



16 August 2016

Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Attention: Pilar Aberasturi - Senior Planning Officer Key Sites Assessments

Dear Pilar

**SECTION 75W MODIFICATION
EDMONDSON PARK SOUTH (MP08_0118 MOD)**

This letter provides a response to the issue raised in Liverpool City Council's submission dated 25 July 2016, in respect of a Section 75W Modification submitted to the Department of Planning and Environment on 6 May 2016. We note that Liverpool City Council, along with Campbelltown City Council have no objection to the proposed modification.

Within the Liverpool City Council submission, however, Council's officer notes that the proposed additional billboard on the southern side of Campbelltown Road may have the potential to cause visual distraction for users of Campbelltown Road due to its proximity to previously approved signs and as such Council has suggested that the modification be referred to the RMS for comment.

The legislative requirements for referral to the RMS are set out in Clauses 17 and 18 of *State Environmental Planning Policy No.64 – Advertising and Signage* (SREP 64). These clauses relevantly state:

17 Advertisements with display area greater than 20 square metres or higher than 8 metres above ground

(1) *This clause applies to an advertisement:*

- (a) *that has a display area greater than 20 square metres, or*
- (b) *that is higher than 8 metres above the ground.*

(2) *The display of an advertisement to which this clause applies is advertised development for the purposes of the Act.*

(3) *The consent authority must not grant consent to an application to display an advertisement to which this clause applies unless:*

- (a) *the applicant has provided the consent authority with an impact statement that addresses the assessment criteria in Schedule 1 and the consent authority is satisfied that the proposal is acceptable in terms of its impacts, and*

APP Corporation Pty Ltd
ABN 29 003 764 770
Level 7, 116 Miller Street
North Sydney NSW 2060

Telephone +61 2 9957 6211
Facsimile +61 2 9954 1951

Elise.crameri@app.com.au
www.app.com.au

- (b) the application has been advertised in accordance with section 79A of the Act, and*
- (c) the consent authority gave a copy of the application to the RTA at the same time as the application was advertised in accordance with section 79A of the Act if the application is an application for the display of an advertisement to which clause 18 applies.*

The two entry billboards proposed are 18m² and will not be more than 8 m above ground. Clause 17 does not apply to these signs. The destination bill board is 32m² (8 m x 4 m). In accordance with Clause 17(3)(a), the applicant is required to provide an impact statement that addresses the assessment criteria in Schedule 1 of SREP 64. The consent authority is to be satisfied that the proposal is acceptable in terms of its impacts. An assessment of the proposed signage against the assessment criteria contained in Schedule 1 of SREP 64 is included at **Attachment A**.

In accordance with Clause 17(3), the consent authority is required to give a copy of the application to the RTA at the same as the application was advertised if the application is an application for the display of an advertisement to which clause 18 applies. Clause 18 does not apply when the Minister for Planning is the consent authority (refer to subclause (6)). There is no statutory requirement for referral to the RMS for comment under either Clause 17 or 18.

18 Advertisements greater than 20 square metres and within 250 metres of, and visible from, a classified road

- (1) This clause applies to the display of an advertisement to which clause 17 applies, that is within 250 metres of a classified road any part of which is visible from the classified road.*
- (2) The consent authority must not grant development consent to the display of an advertisement to which this clause applies without the concurrence of the RTA.*
- (3) In deciding whether or not concurrence should be granted, the RTA must take into consideration:*
 - (a) the impact of the display of the advertisement on traffic safety, and*
 - (b) the Guidelines.*
 - (c) (Repealed)*
- (4) If the RTA has not informed the consent authority within 21 days after the copy of the application is given to it under clause 17 (3) (c) (ii) that it has granted, or has declined to grant, its concurrence, the RTA is taken to have granted its concurrence.*
- (5) Nothing in this clause affects clause 16.*
- (6) This clause does not apply when the Minister for Planning is the consent authority.*

Notwithstanding, we have contacted the RMS to discuss the application. RMS have advised that unless the application is required to be referred to them in accordance with either Clause 17 or 18 of SREP 64, then RMS does not generally provide advice.

The proposed modification is minor and does not give rise to any alteration to the assessment of the potential impacts considered as part of the original or modified concept and / or project approvals.

Figures 1 and 2 are existing views along Campbelltown Road. As shown, the area contains minimal signage. The additional two signs proposed along the southern side of Campbelltown Road are temporary, will be of high quality design and finish, communicating the location of the New Breeze estate. The proposed signs will only be provided through-out the construction and sales period of the New Breeze estate.



Figure 1 – View of Campbelltown Road, looking north-east



Figure 2 – View of Campbelltown Road, looking south-west

The signs are not overly cluttered, are not proposed to be illuminated and do not contain any flashing elements. The signage will be visible to drivers on Campbelltown Road, but given the area within which they are proposed to be located (minimal signage) and the fact that they will be sufficiently set back from Campbelltown Road to avoid potential safety issues, the proposed signage is considered acceptable. The proposed signage will not reduce safety for pedestrians or cyclists or reduce sightlines from public areas.

The proposed signs will have a negligible impact on the environment and are considered appropriate, given the nature and level of construction activity anticipated to take place in the release area over the next 5 years.

We trust this information is sufficient to enable the prompt assessment of the modification. Should you have any queries in relation to this matter, please do not hesitate to contact me on 9956 1295 or elise.crameri@app.com.au.

Yours sincerely

APP CORPORATION PTY LIMITED

A handwritten signature in dark ink, appearing to read 'Elise Crameri', written in a cursive style.

ELISE CRAMERI

Principal Planner

Attachment A

Table 1 – SEPP 64 – Schedule 1 - Assessment

Objectives of SEPP 64	Assessment of Compliance
a. To ensure that signage (including advertising): <ul style="list-style-type: none"> • is compatible with the desired amenity and visual character of an area, and • provides effective communication in suitable locations, and • is of high quality design and finish 	The proposed signs will be of high quality design and finish, communicating the location of the sales office to the public. The signs are not overly cluttered and are not proposed to be illuminated. The proposed signs will be provided through-out the construction and sales period of the overall development. The proposed signs will have a negligible impact on the environment and are considered appropriate, given the nature and level of construction activity anticipated to take place at Edmondson Park over coming years.
b. to regulate signage (but not content) under Part 4 of the Act	Noted
c. to provide time-limited consents for the display of certain advertisements	The proposed signs are not “advertisements” for the purposes of SEPP 64.
SEPP 64 Schedule 1 – Assessment Criteria	Assessment of Compliance
1 Character of the area <ul style="list-style-type: none"> • Is the proposal compatible with the existing or desired future character of the area or locality in which it is proposed to be located? • Is the proposal consistent with a particular theme for outdoor advertising in the area or locality? 	<ul style="list-style-type: none"> • The proposed signage is compatible with the construction, development and sales phase of New Breeze. The proposed directional signage is an essential part of the operation of the sales office to communicate its location to the public from key roads and intersections.
2 Special areas <ul style="list-style-type: none"> • Does the proposal detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas, waterways, rural landscapes or residential areas? 	<ul style="list-style-type: none"> • The proposed signs are located along the southern side of Campbelltown Road and will not detract from the amenity or visual quality of any environmentally sensitive, heritage, open space, natural or other conservation area or established residential area (refer to Figures 1 and 2).
3 Views and vistas <ul style="list-style-type: none"> • Does the proposal obscure or compromise important views? • Does the proposal dominate the skyline and reduce the quality of vistas? • Does the proposal respect the viewing rights of other advertisers? 	<ul style="list-style-type: none"> • The proposed directional signage will not obscure views. • The proposed directional signage will not reduce the quality of vistas. • The proposed directional signage does not obscure the views of any advertisers.
4 Streetscape, setting or landscape <ul style="list-style-type: none"> • Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape? • Does the proposal contribute to the visual interest of the streetscape, setting or landscape? • Does the proposal reduce clutter by rationalising and simplifying existing advertising? • Does the proposal screen unsightliness? • Does the proposal protrude above buildings, structures or tree canopies in the area or locality? • Does the proposal require ongoing vegetation management? 	<ul style="list-style-type: none"> • The proposed signage (scale and proportion) provide a clear visual marker to the public as to the sales office’s location within New Breeze. The proposed signage is of a scale that is appropriate for its purpose. The proposed directional signs are not excessively large, are not visually cluttered and are not proposed to be illuminated. The proposed signage is therefore appropriate for the setting. • The proposed signage will highlight the location of the sales office and illustrate the marketing strategy for New Breeze. The signage will add interest to the sales office development and New Breeze development as a whole.

Attachment A

Objectives of SEPP 64	Assessment of Compliance
	<ul style="list-style-type: none"> The proposed signs do not screen unsightliness. The proposed signs will identify the location of the sales office building. They do not protrude above buildings or trees.
<p>5 Site and building</p> <ul style="list-style-type: none"> Is the proposal compatible with the scale, proportion and other characteristics of the site or building, or both, on which the proposed signage is to be located? Does the proposal respect important features of the site or building, or both? Does the proposal show innovation and imagination in its relationship to the site or building, or both? 	<ul style="list-style-type: none"> The proposed signage is not excessively large. It simply provides a clear visual marker to the public of the location of the sales office. There are no important features on the site. The proposed signage will reflect the overall marketing strategy for the site. The proposed signs are appropriate, in terms of innovation and imagination, for their intended purpose.
<p>6 Associated devices and logos with advertisements and advertising structures</p> <ul style="list-style-type: none"> Have any safety devices, platforms, lighting devices or logos been designed as an integral part of the signage or structure on which it is to be displayed? 	<ul style="list-style-type: none"> No such devices will be integral to the signs.
<p>7 Illumination</p> <ul style="list-style-type: none"> Would illumination result in unacceptable glare? Would illumination affect safety for pedestrians, vehicles or aircraft? Would illumination detract from the amenity of any residence or other form of accommodation? Can the intensity of the illumination be adjusted, if necessary? Is the illumination subject to a curfew? 	<ul style="list-style-type: none"> The signs will not be illuminated.
<p>8 Safety</p> <ul style="list-style-type: none"> Would the proposal reduce the safety for any public road? Would the proposal reduce the safety for pedestrians or bicyclists? Would the proposal reduce the safety for pedestrians, particularly children, by obscuring sightlines from public areas? 	<ul style="list-style-type: none"> The proposed signs will be visible to drivers on Campbelltown Road. The signage will be visible to drivers on both roads but is set back sufficiently to avoid safety issues. The proposed signage will not reduce safety for pedestrians or cyclists. The proposed signage will not reduce sightlines from public areas.