

SSD 7047 – Darling Harbour Integrated Display System – Response to Submissions

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<i>Department of Planning and Environment</i>	
Third Party Advertising Further details are required for the proposed third party advertising, and in particular for 'partner info' and 'precinct partner' advertising including: ▪ mechanisms to control advertising content; and ▪ frequency and duration of third party advertising in comparison to other displays associated with signage including way finding and advertisement of events associated with the site.	In assessing this application, a certain level of planning ambiguity is caused by the requirement to define the intended use of the development through SEPP 64. In our view the Digital Content Management Plan (DCMP) (as updated) can help to address this ambiguity. Elements of the proposed development will be used for a range of uses, including: ▪ Precinct information; ▪ Wayfinding and public transit information; ▪ Promotion of public and cultural events; ▪ Health and safety information; ▪ Emergency communication; ▪ Public art; and ▪ Third party advertising Access to the proposed IDS will only be available to corporate partners of the State Government. No commercial access will be permitted to the IDS outside of this exclusive arrangement. All content on the proposed IDS will be managed in line with the provisions of the DCMP, an outline of which was exhibited with the EIS as EIS Appendix K. The DCMP provides controls for content including: ▪ Dwell time; ▪ Luminance; ▪ Volume (where signs are audible); and ▪ Road safety. The DCMP also requires that all content is approved by a Digital Content Approval Board, which will include a representative from the State government. Overall, the proposal is a form of development not seen before in NSW. The messaging and content will be dynamic and involves technology that supports adaptable and evolving content. The framework put forward to managing the content is considered to be appropriate in this context.
State Environmental Planning Policy 64- Advertising and Signage (SEPP 64) requires a public benefit be derived from advertising in and around a transport corridor. Further details should be provided on the proposed public benefit offer having regard to Council's comments.	Section 3 of the Digital Content Management Plan includes a list of the types of content that would be shown on the IDS. This list includes various elements that would be defined as a 'public benefit'. Although predominantly this content will be provided by the NSW State Government (SHFA, Darling Harbour Live), there is scope for Council to also provide input as required. As stated within the DCMP, all IDS content will be approved by the Digital Content Approval Board, which will include representative from:

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	▪ Venue operators; ▪ Darling Harbour Live / Project Co.; and ▪ The State. Cognisant of the percentage of screen time usually required to be allocated to public purposes (and administered by RMS or Council) when digital advertising screens are approved under SEPP 64, the DCMP has been designed to allocate in excess of 15% of screen time to content that is unambiguously information for public benefit. In reality the content of the IDS will provide a much wider range of public benefits, including: ▪ E-2 is a large outdoor screen which can be used to show live events (e.g. sports fixtures, movie screenings etc.) this will attract people to the area and boost the economy of the Darling Harbour precinct more broadly; ▪ T-1 is a unique destination signifier that is appropriate for the premier live events space in Australia; and ▪ The involvement of the State's corporate partners in the scheme (i.e. the Precinct Partners), allows revenue to be raised by the NSW Government, which assists in making the precinct financially sustainable.
Dynamic LED Blade Signs (P01, P02, P03, P04, P05, P06) Clarification of the exact location of the dynamic LED blade signs is required, noting plans within the EIS are inconsistent.	Updated site plans are provided as Appendix G, these show the proposed locations of the public domain Blade Signs.
The frequency and size of the dynamic LED blade signs along the Boulevard have the potential to result in visual clutter, and potentially dominate and adversely impact on the future character of Darling Harbour at the Boulevard. Provide further consideration and options for: ▪ reducing the number of grouped blade signs, particularly proposed signs P4 and P6; ▪ reducing the height and scale of all blade signs to reflect a human scale; and ▪ locating blade signs to maintain a clear line of sight and walking path along the Boulevard.	The locations for the dynamic LED blade signs have been proposed following an exhaustive design process, which included discussions with the NSW Design Review Panel, which was chaired by the NSW Government Architect. The design has been iteratively developed to respond to the various requirements of the diverse future users of this public domain. Each one of the resulting blade signs is positioned to respond to the requirements of a specific audience. The final design for the location of the proposed Blade Signs has been rigorously assessed. As a result, the number of proposed blade signs is not proposed to be amended. The public domain in the ICC Sydney area is expected to be very busy with pedestrian traffic. The proposed Blade Signs are required to be larger than a human scale to ensure that they can be seen above the anticipated crowds. As the proposed Blade Signs signage will be used for communicating important precinct messaging during large public events maintaining the visibility of the signs at all times is important. Reducing the scale of the proposed signs would therefore result in an inappropriate outcome for this development and the precinct more broadly. The proposed blade signs are situated in locations that ensure a clear line of sight is maintained along the Boulevard. This line of sight can be seen within the updated photomontages provided as Appendix E.
Further details and justification is required for the 10m radius for audibility of the proposed blade signs including plans showing radius of audibility of signs at 2.5m, 5m and 10m.	The proposed blade signs will include the capability to project directional sound up to 10m in front of the unit. As the speakers associated with each blade sign are directional, the acoustic impact of each Blade sign will not be significant when perceived from the side or rear of any one sign. Due to the scale and height of the proposed signs, the optimal viewing distance for each screen is between 5m and 15m away. An acoustic range of 10m is therefore considered to be appropriate to allow for an overlap of the optimal viewing area and the audible

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	area of any one sign. This overlap is illustrated in Appendix G . Also shown in Appendix G is the likely cumulative audibility zone, when the impact of each one of the IDS elements is considered.
Digital Billboard Advertising Sign (T-17) T17 is prohibited as it is greater than 45m ² and a Development Control Plan has not been prepared in accordance with SEPP 64. The sign should be amended to comply with SEPP 64.	The size of Sign T-17 has been reduced to 40m² and as such is not affected by Clause 19 of SEPP 64. Modified architectural drawings have been prepared and are provided as Appendix C. A thorough assessment of the impact of T-17 was included within the EIS as exhibited. As the display area of T-17 has been reduced by over 50%, the anticipated impact is also greatly reduced. No further assessment of impact of the modified T-17 is considered to be required.
A cumulative road safety assessment is required for Sign T17 noting that an electronic advertisement has also been approved also facing Pier Street for the North West plot.	An additional cumulative assessment has been undertaken by ARRB and is provided as Appendix F .
Consideration should be given to increasing dwell times of electronic display signage having regard to Council's comments.	Noted. The proposed dwell times within the Digital Content Management Plan (DCMP) have been updated to address Council comments. A revised DCMP is provided as Appendix D .
Illumination Further consideration should be given to reducing the illumination of all signs during night time hours in accordance with Council comments, to reduce potential impacts to the amenity of nearby existing and future residents.	Council has suggested that the illuminance of the proposed development be reduced to 2 lux. The lighting assessment that was undertaken as part of the EIS and submitted as Appendix E noted that: <i>Within a commercial built environment, AS/NZS4282 recommends that during pre-curfew hours a maximum illuminance level of 25 lux is permitted in the vertical plane at the boundaries of nearby residential properties. Within curfew hours this level is reduced to 4 lux.</i> Council is therefore suggesting a reduction of 50% of the luminance permitted during curfew hours beyond the recommendation within the Australian Standard. Arup's lighting assessment that was submitted with the EIS as Appendix E notes that the following elements of the IDS could exceed 2 lux when viewed from 100m during curfew hours, these are: ▪ E-02 (2.08 lux); and ▪ T -17 (2.03 lux). It is noted that the area of T-17 will be reduced by approximately 50% from that assessed and therefore the illuminance impact of this sign will also be commensurately reduced by approximately 50%. The remaining element of the IDS that would result in an illuminance of greater than 2 lux at 100m is E-02. The nearest residential receiver to E-02 are located over 250m from the source and at this distance the illuminance of this sign has been assessed as being below 0.5 lux. As a result we have no objection to a requirement to comply with a maximum illuminance of 2 lux during curfew hours.
Other Additional photo montages of the proposed signage, especially the LED blade signs are required from Darling Harbour waterways, Pyrmont Bridge and along the Boulevard looking both north and south.	Additional photomontages have been prepared from the required locations and these are provided as Appendix E .

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Clarification of the proposed purpose of building identification sign T09 is required. It is unclear why an LED display is required for building identification purposes.	LED is being used at sign T09 location as an example of 21st century signage technology. This format will allow for creative flexibility in the design of the Naming Rights partner logo. This could include advantages such as the ease of slightly altering the logo to reflect seasonal changes, colour change capabilities and the flexibility for the partner to adjust the logo for specific branding purposes. Additionally, it allows the partner to present different logos within their wider corporate structure e.g. Qantas/Jetstar/Qantas Link/Qantas Freight. LED will be a positive method to: (a) assist in attracting a very important partner to ICC Sydney; (b) maximise the commercial outcome back to The State, and (c) provide an attractive visual feature for the people of Sydney and Australia to be proud of.
Clarification of whether signs E06 and C08 form part of the proposal is required, noting they are shown in some plans but not included in the proposal within the EIS.	C-08 and E-06 are not included in the proposed development. C-08 was included in preliminary designs for the scheme but was deleted following development of the design and in response to preliminary feedback from City of Sydney Council, RMS, and our road safety consultant. No element identified as E-06 has been considered as part of this application.
Clarification of the location and associated sign for Drawing no. CO_AR_D_440010 (Sign Ext 3.2) is required.	Drawing no. CO_AR_D_440010 (Sign Ext 3.2) relates to sign C-05, which is a static building identification sign located at the southern end of the ICC Convention Centre.
<i>Transport for NSW</i>	
Wayfinding The proposed signage should demonstrate consistency with the City of Sydney Council permanent wayfinding strategy in terms of: ▪ Naming conventions; ▪ Hierarchy of places/attractions; and ▪ Look/feel not providing confusion to customers. The CBD Wayfinding Coordination Group (CBD WCG) has been set up to facilitate this sharing of information and collaboration in wayfinding. TfNSW requests that the ongoing management of digital content is discussed as part of the CBD WCG. Shared information may be suitable for the "Public Realm" signs and include information regarding major events across the CBD (Vivid, NYE etc. which may direct to an area across agency boundaries) and disruptions (i.e. Light Rail construction or similar).	The proposed development does not include any signage which is solely 'Wayfinding Signage'. The intention of the proposed public domain Blade Signs is to augment and improve on static wayfinding signage separately provided within the Darling Harbour Precinct, as required by the development consent for SSD 5752. Indicative plans for the pedestrian and vehicular wayfinding signage that will be located within the precinct was included within Appendix B of the EIS. If required, the CBD WCG can be consulted by the Digital Content Approval Board to assist in the provision of appropriate wayfinding throughout the CBD area.
Public Domain "Blade" LED Screens The public domain "Blade" LED screens are proposed to be erected along the centre of the Pedestrian Boulevard in groups of two or more. These screens would attract visitors to congregate around these to seek information.	The Blade signs are proposed to be located at the edge of the main pedestrian transit area of the Boulevard. As demonstrated within the additional photomontages that have been prepared and are provided as Appendix E.

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TfNSW advises that the screens should instead be erected along the edge of the Pedestrian Boulevard. This would ensure that no physical impediments are in the path of the heavy pedestrian traffic flow along the Pedestrian Boulevard, especially during events which are planned for the area.	
Road Safety Audit Some of the signs are located in close proximity to public roads and visible from the public roads. These signs may increase the likelihood of crashes on public roads. TfNSW requests that the applicant be conditioned to undertake the Road Safety Audits during the following stages for the proposed signage scheme, in accordance with <i>Austroads Guide to Road Safety Part 6: Road Safety Audit</i> by an independent TfNSW accredited road safety auditor: • Detailed Design; and • Operation. Based on the results of the road safety audit, the applicant shall review the design and implement safety measures as required.	As noted in the ARRB report as exhibited: <i>The principles of the Austroads road safety auditing guide have been applied to this assessment, and the knowledge and experience of the accredited audit team has been used to prepare this report.</i>
Construction Pedestrian and Traffic Management Plan Several construction projects, including the Sydney Light Rail Project are likely to occur at the same time as this development within the CBD. The cumulative increase in construction vehicle movements from these projects could have the potential to impact on general traffic and bus operations within the CBD, as well as the safety of pedestrians and cyclists particularly during commuter peak periods. TfNSW requests that the applicant be conditioned to the following for the proposed works: ▪ Prepare a Construction Pedestrian and Traffic Management Plan (CPTMP) in consultation with the Light Rail Operator, CBD Coordination Office and Sydney Light Rail team within TfNSW. The CPTMP needs to specify, but not limited to, the following: – Location of the proposed work zone; – Haulage routes; – Construction vehicle access arrangements; – Proposed construction hours; – Estimated number of construction vehicle movements; – Proposed construction hours; – Estimated number of construction vehicle movements;	Noted. A suitable condition can be imposed as required to prepare a Construction Pedestrian and Traffic Management Plan prior to the commencement of any work.

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– Construction program; – Consultation strategy for liaison with surrounding stakeholders; – Any potential impacts to general traffic, cyclists, pedestrians and bus services within the vicinity of the site from construction vehicles during the construction of the proposed works; – Cumulative construction impacts of projects including Sydney Light Rail Project. Existing CPTMPs for developments within or around the development site should be referenced in the CPTMP to ensure that coordination of work activities are managed to minimise impacts on the road network; and – Should any impacts be identified, the duration of the impacts and measures proposed to mitigate any associated general traffic, public transport, pedestrian and cyclist impacts should be clearly identified and included in the CPTMP. ▪ Submit a copy of the final plan to the Coordinator General, CBD Coordination Office for approval, prior to the commencement of any work.	
<i>NSW Roads and Maritime</i>	
In regards to the above subject development application, Road and Maritime held discussions previously regarding the submission and Roads and Maritime requested a photo montage from driver's perspective so an assessment could be carried out from a traffic management and road safety perspective. This information was not provided.	Rendered images of the proposed development from the perspective of a driver were provided and assessed within the Road Safety Assessment that was provided within the EIS as Appendix F.
Roads and Maritime is concerned about the potential road safety risks with the installation of digital signs E01 and C08 which are to be operated with a changeable dwell mode. From the information presented, it fails to satisfy a key criteria regarding road safety and placement of the sign in respect to major decision making point of drivers. The position of the signs forces the drivers head to turn away from the road and the components of the traffic stream in order to view its display and/or message. All drivers should still be able to see the road when viewing the sign, as well as the main components of the traffic stream in peripheral view	C08 does not form part of the proposed development. C08 was included as part of an early design for the development but was removed following advice from our Traffic Safety Consultant. This iteration in the design process, and the reasons to the decision to remove C08 from the development is explained in Section 1.4.2 of the exhibited EIS. Similarly, no part of the proposed development is identified within the EIS as 'E01'. A traffic safety assessment was undertaken as part of the EIS (refer to EIS Appendix G). This assessment found that the proposed development is acceptable on road safety grounds.
<i>NSW Heritage Council</i>	
Heritage Council note that development will not affect the two State listed heritage items that are in the area. Conditions of consent are provided.	Noted. No objection is raised to the proposed conditions of consent.

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<i>Sydney Harbour Foreshore Authority</i>	
No comment at this time.	Noted.
<i>City of Sydney Council</i>	
Council's DCP It is noted that majority of the signage proposed does not comply with the signage provisions of the Sydney DCP 2012, however the City acknowledges that the Sydney International Conference, Exhibition and Entertainment Precinct is a unique precinct of State Significance and that some flexibility in applying the controls may be appropriate. In that regard, it is our view that the nature of the site, and the existing and proposed future uses, are such that large scale dynamic digital displays may be acceptable in certain locations, subject to appropriate conditions to control their use and mitigate their impacts.	In accordance with Part 2 Clause 11 of the <i>State Environmental Planning Policy (State and Regional Development) 2011</i> development control plans do not apply to development that is State Significant Development. As this development is for a State Significant Development, City of Sydney's Development Control Plan does not apply. Further, as noted in Section 1.4 of the Sydney Development Control Plan 2012: <i>This development control plan applies to the land identified in Figure 1.1 Land covered by this DCP where the City of Sydney is the consent authority.</i> As City of Sydney is not the consent authority for this development, Council's DCP does not apply.
Third Party Advertising The City requests the applicant to explicitly define what is meant by the terms 'partner info' and 'precinct partner'. Our strong concern is that the signs will be used for third party advertising for a select group of advertisers (e.g. automobiles, fast food chains, beverages and the like), rather than conference, exhibition, and entertainment organisations holding events in the precinct or the wider area (e.g. event organisers, dance companies, theatre companies and the like).	Section 3.3.3 of the exhibited EIS explicitly defines the elements of the IDS that will be used for 'Precinct Partner Information'. As stated: <i>Precinct partners will be a limited number of third party companies with whom the NSW Government has a commercial arrangement to allow exclusive access to the IDS dynamic LED signage. The chosen precinct partners (who will have long term agreements in place) will align with the vision and character of the SICEEP Precinct. Although this will be classified as third party advertising it is not intended that the predominant use of the IDS be for third party advertising.</i> <i>A DCMP [Digital Content Management Plan] has been developed to limit the content and use of the LED screens within the IDS to that which is permissible under the DHDP. Precinct Partner Information will be limited by the DCMP so that this 'third party' messaging is limited to an extent considered to be incidental or subsidiary to a permissible use, as is permitted under Clause 6(e) of the DHDP.</i> Further, Appendix K of the EIS provides an outline of the Digital Content Management Plan, which provides further clarity as to the type of content that will be shown across the majority of the sites within the IDS. An example of the type of content is also provided within the DCPM: (https://www.dropbox.com/s/azcwfc3qtbwsugh/advertising%20content%20digital%20landscape.m2t?dl=0)
Public Benefit It should be noted that under SEPP 64 a public benefit is required to be provided in connection with advertisements for which, amongst other things, the Minister for Planning is the Consent Authority. It is noted that in "<i>APN Outdoor Pty Ltd v The Council of the City of Sydney [2013] NSWLEC 1002</i>", this requirement was satisfied with an agreement to allow Council to use the sign to display community or emergency messaging for one sixth of the display time at no cost.	Section 3 of the Digital Content Management Plan includes a list of the types of content that would be shown on the IDS. This list includes various elements that would be defined as a 'public benefit'. Although predominantly this content will be provided by the NSW State Government (SHFA, Darling Harbour Live), there is scope for Council to also provide input as required. As stated within the DCMP, all IDS content will be approved by the Digital Content Approval Board, which will include representative from: ▪ Venue operators; ▪ Darling Harbour Live / Project Co.; and ▪ The State.

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Dwell Time The LED signs are proposed to have a dwell time of 10 seconds with a refresh rate of 0.1 seconds. This is contrary to the Court's findings in <i>"APN Outdoor Pty Ltd v The Council of the City of Sydney [2013] NSWLEC 1002"</i> which established appropriate dwell times for LED signs based on RMS advice. That advice, amongst other things, states that advertisements must be displayed statically for a minimum of 30 seconds where the posted speed limit is greater than 80kmph and 45 seconds where the speed limit is less than 80kmph. The City is of the view that while a 10 second refresh rate may be acceptable for signs that face in to the core facilities of the precinct, it is not acceptable for signs facing outward of the precinct or towards sensitive receivers. This includes future dwellings located in Darling Square.	Noted. The proposed dwell times within the Digital Content Management Plan (DCMP) have been updated accordingly. A revised DCMP is provided as Appendix D.
Illuminance To mitigate the potential impact of illuminated signs on residential areas, it is recommended that the brightness of the signs should be limited between dusk and dawn so that the illuminance of existing and proposed neighbouring residential properties from the signs do not exceed 2 lux measured at the window of the windows of habitable rooms. Conditions should require signs and their content do not flash, chase, pulsate or flicker and any animation or moving images are to be slow and smooth.	Council has suggested that the illuminance of the proposed development be reduced to 2 lux. The lighting assessment that was undertaken as part of the EIS and submitted as Appendix E noted that: <i>Within a commercial built environment, AS/NZS4282 recommends that during pre-curfew hours a maximum illuminance level of 25 lux is permitted in the vertical plane at the boundaries of nearby residential properties. Within curfew hours this level is reduced to 4 lux.</i> Council is therefore suggesting a reduction of 50% of the luminance permitted during curfew hours beyond the recommendation within the Australian Standard. Arup's lighting assessment that was submitted with the EIS as Appendix E notes that the following elements of the IDS could exceed 2 lux when viewed from 100m during curfew hours, these are: ▪ E-02 (2.08 lux); and ▪ T -17 (2.03 lux). It is noted that the area of T-17 will be reduced by approximately 50% from that assessed and therefore the illuminance impact of this sign will also be commensurately reduced by approximately 50%. The remaining element of the IDS that would result in an illuminance of greater than 2 lux at 100m is E-02. The nearest residential receiver to E-02 are located over 250m from the source and at this distance the illuminance of this sign has been assessed as being below 0.5 lux. As a result we have no objection to a requirement to comply with a maximum illuminance of 2 lux during curfew hours. Content controls imposed by the DCMP include restrictions on the content of signs visible from the public road, these restrictions include a prohibition of flickering and flashing content. Further restrictions on content can be introduced in response to complaints that are received once the development is operational. As noted within the DCMP, the DCMP will be reviewed and updated six months after commencement of operations and then annually thereafter. The DCMP includes provision for all content to be approved by a Content Approval Committee, which includes a representative from the State.

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Sign T-09 It is recommended that the applicant provide additional information regarding this sign, including the rationale for selecting an LED sign of this size and further information regarding the proposed content. If the purpose of the sign is genuinely for building identification, it is the City's view that a design similar to Building Identification Signs proposed elsewhere in the precinct would be more suitable.	LED is being used at sign T09 location as an example of 21st century signage technology. This format will allow for creative flexibility in the design of the Naming Rights partner logo. This could include advantages such as the ease of slightly altering the logo to reflect seasonal changes, colour change capabilities and the flexibility for the partner to adjust the logo for specific branding purposes. Additionally, it allows the partner to present different logos within their wider corporate structure e.g. Qantas/Jetstar/Qantas Link/Qantas Freight. LED will be a positive method to: (a) assist in attracting a very important partner to ICC Sydney,; (b) maximise the commercial outcome back to The State, and (c) provide an attractive visual feature for the people of Sydney and Australia to be proud of.
Sign T-17 T-17 is a 84m² digital LED screen that is located on the western face of the Theatre that will be used to advertise current and upcoming events at the Theatre, and for third party 'precinct partner' advertising.	The size of Sign T-17 has been reduced to 40m² and as such is no longer affected by Clause 19 of SEPP 64. Modified architectural drawings have been prepared and are provided as Appendix C. A thorough assessment of the impact of T-17 was included within the EIS as exhibited. As the display area of T-17 has been reduced by over 50%, the anticipated impact is also greatly reduced. No further assessment of impact of the modified T-17 is considered to be required.
T01, T11A, T11B, and T12 The City objects to these signs being used for third party advertising, as is currently proposed.	The City's comment is noted. It is reiterated that access to these signs will be provided to the State's corporate partners as a minor component of the total content provision across the IDS and that this content will be provided in line with the provisions of the DCMP. Although this access to the IDS for the State's corporate partners is defined under SEPP 64 as <i>Third Party Advertising</i> the content of the signs will be strictly controlled.
Public Realm Signs The City is very concerned given the cumulative advertising area of these signs is 152m². This will undoubtedly result in visual clutter in the precinct and will compromise the amenity and attractiveness of the public space. The signs also face onto a mixed use residential area, yet are proposed to be illuminated 24 hours per day. In light of this, and all of the above, these signs are not supported as currently proposed and it is recommended that they are deleted from the plans.	The States Design Review Panel has been involved in the Concept Design and Design Development of the Interactive Display System. The process for review included a number of Design Review Panel Presentations where the design evolved significantly, and in particular included the development of the agreed design of the Boulevard Blade Structures and the removal of a number of façade signs (previously named C08 and E01). These comments were made to ensure that the developed design delivered on the key principals of the endorsed precinct masterplan. Signoff by the DRP of the finalised solution occurred on the 4th December 2015 The locations for the dynamic LED blade signs have been proposed following an exhaustive design process, which included discussions with the NSW Design Review Panel, which was chaired by the NSW Government Architect. The design has been iteratively developed to respond to the various requirements of the diverse future users of this public domain. Each one of the resulting blade signs is positioned to respond to the requirements of a specific audience. The final design for the location of the proposed Blade Signs has been rigorously assessed. As a result, the number of proposed blade signs is not proposed to be amended. The public domain in the ICC Sydney area is expected to be very busy with pedestrian traffic. The proposed Blade Signs are required to be larger than a human scale to ensure that they can be seen above the anticipated crowds. As the proposed Blade Signs signage will be used for communicating important precinct messaging during large public events maintaining the visibility of the

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	signs at all times is important. Reducing the scale of the proposed signs would therefore result in an inappropriate outcome for this development and broader precinct. The proposed blade signs are situated in locations that ensure a clear line of sight is maintained along the Boulevard. This line of sight can be seen within the updated photomontages provided as Appendix E. An assessment of the illuminance impact of the proposed blade signs was completed as part of the EIS (refer to Appendix E of the EIS). That assessment noted that the illuminance impact of the blade signs would be 0.18 lux at 100m and would reduce to 0.01 lux at 500m. Although the cumulative area of the blade signs is noted by the City, the location of the blade signs avoids any cumulative impact being experienced by the mixed use residential area from the combined display area of the blade signs. Further consideration of the design of the proposed blade signs is found in Section 3.3. of the Design Report provided as Appendix B within the exhibited EIS.
Sign C-08 The Visual Impact Assessment submitted with the application includes a LED billboard sign proposed at the southern elevation of the Convention Centre to face the Western Distributor overpass. However, there is not reference to the sign in the Development Overview of the SEE (Ref. to Table 3 on page 26). The applicant should clarify if approval for the subject sign is sought as part of the current application.	C-08 is not included in the proposed development. This element was included in preliminary designs for the scheme but was deleted. C-08 was removed from the development application following initial feedback from the project traffic safety consultant, ARRB. This iteration of the project design demonstrates the ongoing commitment to road safety.
Wayfinding It is noted that the application states that all 24 signs 'can' be used for wayfinding, however it makes no commitment to do so. Furthermore, if wayfinding is to be displayed it will only be displayed for 15% of the time. The City is of the view that this is unacceptable in this important precinct, which has exceptionally high foot traffic comprising a high number of intrastate, interstate and overseas visitors who may be unfamiliar with Sydney. It is our recommendation that some signs be allocated for permanent wayfinding. Furthermore, the dwell time for wayfinding on multipurpose signs should increase to at least 50%. The wayfinding signs should include clear information about the various hard-to-find walking links to Ultimo, Pyrmont, Haymarket and beyond, including key sites such as educational establishments and shopping precincts. We also recommend that an additional sign, with permanent wayfinding, be located near the Harris Street lift which links with Fig	Condition of consent G10 of SSD-5752 requires: <i>G 10 The development shall provide wayfinding sign age within the Subject Site in accordance with SICEEP Wayfinding and Signage Guidelines, including signage to other destinations external to the site including transport nodes and tourist destinations.</i> The intention of the proposed public domain Blade Signs is to augment and improve on static wayfinding signage separately provided within the Darling Harbour Precinct, as required by the development consent for SSD 5752. Indicative plans for the pedestrian and vehicular wayfinding signage that will be located within the precinct was included within Appendix B of the EIS. It is noted that consent is not sought for this wayfinding signage within this application.

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Street. It is recommended that the sign be located under the Western Distributor.	

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<i>Noise</i>	
The submission raises concern about the noise levels associated with the proposed development and draws a comparison to existing perceived impacts from a local disco	As illustrated in Appendix F , the audibility of the proposed development will be limited and targeted to that each sign is only audible within its primary viewing area. An assessment of the cumulative acoustic impact of the proposed development was included as part of the EIS.
<i>Luminance</i>	
The submission is concerned about the brightness of the proposed development.	As exhibited the proposed development was limited to a maximum luminance of 4 lux, which would comply with AS/ZS4282. As noted in Appendix A in the response to the Council's comment regarding the brightness of the proposed development, the maximum luminance of the proposed development will be further limited to 2 lux.
<i>Other</i>	
Concerns around Special Events, Compensation, Existing ambient light and noise levels.	This is not relevant to this development application.

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<i>Department of Planning and Environment</i>	
Third Party Advertising and Public Benefit Further information is required to detail: a framework to manage advertising content. At a minimum the framework should justify and outline the frequency and duration for third party advertising for each sign type, giving consideration to way finding and advertisement of events associated with the site. The framework should also outline principals of management for particular modes of operation (i.e. during large events).	The DCMP has been updated to provide more detail on the types of content proposed to be incorporated within the IDS. This update to the DCMP provides a framework to manage the advertising content of the DCMP. The update provides a much finer level of information about the five content categories and about the proportion of time allocated to each content category under a range of operating conditions. This proposed proportional content split is driven by the need to target the content of the IDS to the range of audiences expected through the different operational periods.
the public benefit derived from third party advertising. An appropriate and detailed public benefit is required to justify the proposed third party advertising. The response provided should address the City of Sydney's comments in relation to increasing the dwell time for wayfinding to a minimum of 50%, and clearly address why this is or is not appropriate?	A letter has been provided by Infrastructure NSW on behalf on the NSW State Government, which outlines the public benefit that will be derived from the proposed development. In addition to the monetary value to be generated for the NSW State Government by the precinct partner content, there will be significant public benefits delivered through: ▪ The display of public information, such as way finding information, public transportation information, health and safety information and public interest messages. ▪ The display of entertainment material, such as 'live' sites that will display world events such as the Olympics and World Cup Football and World Cup Rugby. Justification for the proportion of dwell time for precinct partner content, wayfinding etc has been addressed previously and further elaborated within the DCMP.
the content management of sign T09 to ensure the sign is appropriately classified as a 'Business Identification' sign.	The DCMP has been amended to provide greater certainty to the proposed use of T-09.
Dynamic LED Blade Signs (P01, P02, P03, P04, P05, P06) Provide a plan illustrating all of the proposed "Blade Signs", include dimensions to illustrate their location relative to each other and the cumulative areas of impact (both audio and visual) within the public domain.	An updated site plan has been provided that allows the cumulative visual and audio impact of the blade signs along the Boulevard to be understood. The intent of the locations and orientation proposed for the blade signs is to allow for a continuous and synchronised delivery of messaging and information to be provided to the public as they travel through the public domain. As documented within the design report provided with the EIS, the blade signs have been designed to integrate seamlessly with the urban design of the public domain. These elements relate well to the scale, and intended future character of this significant public entertainment and tourist destination space. The number and location of proposed cluster locations was driven by an iterative design review process and is designed to reflect the future variety of uses in this area and the predicted peak visitor density. The plan demonstrates that the blade signs are well spaced, with large gaps between each cluster, and that the area of visual and audio influence is confined. The blade signs will add to the character and vibrancy of this important north-south connection without creating adverse sensory impacts or causing visual clutter.

Government Submissions	Response
Detail the recommendations and/or design objectives from the Infrastructure NSW's Design Review Panel and how these are incorporated into the final design of the signs.	A letter has been provided by INSW on behalf on the NSW State Government to outline the design review process that the proposed development went through before the application was lodged with the Department of Planning and Environment. The design process is also outlined within the Design Report that was exhibited with the EIS. As noted in the Design Report provided with the exhibited EIS: - <i>Section 2.2_Alignment with SICEEP Objectives</i> outlines how the proposed development meets the NSW Government's SICEEP planning objectives. - <i>Section 3.4 Landscape Architects Supporting Statement</i> outlines how the location and operation of the proposed blade signs is appropriate within the approved public domain.
Audio Impact Assessment Clarify how the potential cumulative audio impact on the amenity of the public domain is to be evaluated and possible management mechanisms to minimise audio impacts.	The DCMP has been updated to incorporate more detail about how the audio component of the IDS can be managed within the context of the public domain. A supporting statement has also been provided by Acoustic Logic which comments on the use of the IDS Blade Signs acoustic abilities and the appropriateness of this impact on the public domain.