

24 October 2018

12255

Director – Key Sites Assessment  
Department of Planning and Environment  
320 Pitt Street  
SYDNEY NSW 2000

Attn: David Glasgow – Principal Planning Officer, Key Sites Assessment

Dear David

**RE: Response to Request for Information – SSD7388 (MOD 6)  
31 Wheat Road, Darling Harbour (The Ribbon)**

We refer to the above application, and the Department of Planning and Environment's (DPE's) correspondences dated 29 August and 28 September 2018. Specifically, DPE requested further information regarding:

- provision of any additional information regarding the context of SSD7388, whereby similar signage to that proposed under this application was submitted and then later withdrawn; and
- provision of an assessment determining that the signage is consistent with the *Transport Corridor Outdoor Advertising and Signage Guidelines 2017 (Assessing development applications under SEPP 64)* (the Signage Guidelines 2017).

As part of this response, a Signage Safety Assessment has been provided at **Attachment A**.

**Background to signage**

DPE has sought to confirm whether any additional information could be provided regarding the context of the previously withdrawn signage at the site. To this respect it is noted that Ethos Urban's records only confirm that the signage was submitted following notification of SSD 7388, and was then withdrawn prior to determination for reasons related to notification of the proposal.

In the interests of ensuring clarity as to the additional signs proposed under this application, a schedule of approved and proposed signs has been provided at **Table 1** below.

**Table 1 Schedule of approved and proposed signs**

Sign References	Status
<b>CIN-01, CIN-02, CIN-03, CIN-04, CIN-05, CIN-06, CIN-07, CIN-08, TEN-01, TEN-02</b>	These signs are currently sought for approval, and are subject to assessment at <b>Attachment A</b> . It is noted that signs TEN-01 and TEN-02 have been renamed as CIN-09 and CIN-10 in the Signage Matrix provided for MOD 6.

Sign References	Status
<p><b>GEN-01, HOT-01, HOT-02, HOT-03, RET-01, RET-02, RET-03, RET-04, RET-05, RET-06, RET-07, RET-08, RET-09</b></p>	<p>These signs were previously approved as part of SSD 7388, and have been retained through this design. The only changes to any of these signs have been minor changes to allow for the revised podium design, which is noted at Page 15 of the Environmental Assessment as part of MOD 6.</p> <p>This is supported by DPE’s previous assessment of SSD7388, which states that <i>“the Department has considered the signage zones for the remaining two building identification signs, business identification sign for the hotel, and nine business identification signs for individual retail tenancies. The Department considers they are appropriately sized, positioned and proportioned in relation to the overall height and scale of the proposed building... On this basis the signage zones are considered acceptable subject to a condition of consent requiring signage details be approved prior to any signage installation.”</i> This is reaffirmed by Condition E3 of SSD 7388.</p> <p>Additionally, RET-01 was omitted from the signage list submitted on 19 April 2013, however was included in the Signage Elevations in the same package (see GA Elevations – Sheet 4), and was accordingly approved. This is supported in the above assessment by the DPE, which refers to <i>“nine business identification signs for individual retail tenancies”</i>.</p>

**Supplementary signage assessment**

In addition to the above, a Signage Safety Assessment has been prepared by GTA Consultants, which is provided at **Attachment A**. This assessment undertakes a detailed review of the proposal against the Signage Guidelines 2017, and confirms that the proposed development will not result in any adverse safety impacts on the surrounding roadways. It is also confirmed that historic crash data surrounding the site does not suggest that there is an existing road safety issue at this location.

In addition to the below, a high level assessment against the Signage Guidelines 2017 is provided at **Table 2**.

**Table 2 Supplementary assessment against the Signage Guidelines 2017**

Provision	Comment
<b>Section 2</b>	Section 2 of the Signage Guidelines 2017 confirms the requirements for assessment associated with SEPP 64. A full assessment of the proposed signage against the provisions of <i>State Environmental Planning Policy No. 64 (Advertising and Signage)</i> (SEPP 64) has been provided as part of the originally submitted Environmental Assessment.
<b>Section 3</b>	Section 3 of the Signage Guidelines 2017 details the relevant safety requirements for signage. To this respect, a full signage safety assessment which addresses this section has been provided by GTA Consultants, and is provided at <b>Attachment A</b> . Additional discussion, where relevant, has been provided below.
<b>Section 3.1</b>	Road safety has been assessed at <b>Attachment A</b> .
<b>Section 3.2</b>	The appropriateness of the location of the proposed signage from a road safety perspective has been assessed at <b>Attachment A</b> .
<b>Section 3.3</b>	Conditions regarding the detailed operation of signage, such that it will not be confused with road signage or warnings, as well as any illumination controls can be conditioned as part of any future consent.
<b>Section 4</b>	Section 4 of the Signage Guidelines 2017 outlines manners in which certain advertisements can provide a public benefit. This is considered to be applied to a context of freestanding advertisements, such as billboards, and is not relevant to the subject proposal.  Notwithstanding the above, the revised development (including the signage) continues to be in the public interest, as discussed at Section 5.15 of the submitted Environmental Assessment.
<b>Section 5</b>	Section 5 of the Signage Guidelines 2017 clarifies the responsibility of RMS in assessing signage. RMS has been provided the opportunity to comment on the proposed signage, and has confirmed that it does not object to the proposal.

In light of the above, it is considered that DPE can continue to complete the assessment of SSD7388 (MOD 6). Please do not hesitate to contact me on 9409 4970, or at [tsmith@ethosurban.com](mailto:tsmith@ethosurban.com) should you have any further queries or clarifications.

Yours sincerely,



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