



Suite 6, 501 Glebe Point Rd

Glebe, NSW, 2007



Objection to Glebe Island and White Bay Advertising Signage DA 21/13182

Save Our Bays has strong objections, as outlined here, to the application by Eye Drive Sydney to ‘extend the duration of the use of the Glebe Island Silos signage display for a ten (10) year term with external illumination from dusk to 1am.”

The reasons for our concerns and objection are four-fold and relate to:

- The 10 year timeframe sought and the limitation on future developments
- The unattractive dominating visual impact of the advertising
- The visual impact and night illumination impact on nearby residents
- The lack of public or community benefit
- The wasted opportunity to do something much more attractive and of community benefit – if this extension is granted. The signage has existed on the parapet of the Silos for 29 years.

This submission critiques the flawed analysis in the Visual Impact Assessment and challenges the conclusions of minimal visual day and night-time impact especially for residents in Glebe opposite the silos and huge billboard. The public interest argument is also challenged – a much preferable option is proposed that would provide real public benefit and amenity.

10 YEAR TIMEFRAME

The application for a 10 year extension is excessive and unwarranted.

We fully support the Glebe Society's comment in 2018:

The Silos dominate the Bays Precinct and we see this attempt to lock in an approval mechanism as pre-emptive. We believe the community should be able to comment in a timely way on issues which affect it. To provide such an opportunity once every ten years does not suggest a genuine, consultative and responsive approach to community engagement.

The area around the Bays (both Rozelle and Blackwattle) will undergo major changes which will provide for housing, industry, commerce, leisure and entertainment facilities. This application... would seem to be an attempt to (a) lock in a mechanism in advance of any firm proposals regarding the Bays Precinct and (b) prevent developers, investors and the community in this potentially rapidly changing area from being able to comment in a timely way on issues which affect their environment, given the dominance of the signage and the light emanating from it at night.

VISUAL AMENITY

The VIA concluded that:

'No view points suffer from significant (high) visual impacts as a result of the advertising signage being retained. The sites with the highest visual magnitude are generally closer to the Silos and are from less sensitive view receivers such as public roadways. The following explanations were found to be key factors at a number of sites and consistently effected the magnitude ratings generated:

- Signage is at least partially screened by built form or established vegetation
- Viewpoint character and context is not sensitive to the view of the signage,
- Viewing distances are long and thus signage is difficult to distinguish or is viewed within a much larger overall context. The existing signage has been in place for many years, and it could be determined that this plays a part in further reducing the visual dominance of the signage for surrounding users'. (p. 79)

With respect, these are disingenuous conclusions for several reasons.

First, the selection and discussion of viewpoints :

The applicants base their claims for minimal visual impact on what they say is a '*robust assessment of visual impact*' conducted by GroupGSA .¹ In fact they use the term 7 times throughout their Statement of Environmental Effect. **That claim is inaccurate.**

Their methodology, analysis and presentation of the 'data' and photographs are flawed, misleading and arguably deliberately deceptive as outlined below.

Urban Concepts /GroupGSA state that their Visual Impact Assessment" examined 47 view locations for impact during daylight hours and at night" (p. 18). [lesser number of 15 at night omitted]

Their photography and discussion of these sites is highly selective and misleading.

1. GroupGSA have 'cherrypicked' the sites and there is a concentration of view points further from the silos with less expected impact and little focus or concentration of the sites closest to the silos with direct line of sight on the foreshore and with the highest residential density. Their map of the locations on page 19 make this clear:

- a. Sites 20–29 are quite distant from the silos – 10 sites
- b. Sites 9–13 in more direct line of sight and much closer – only 5 sites and none in the denser residential area due south of the silos
- c. Sites 40–46 face the non-illuminated side where there is no advertising - why include these?

¹ "GroupGSA has undertaken an Visual Impact Assessment (VIA) of the potential visual exposure of the advertising signage, the potential effect of extending the consent duration on the emerging desired future character of the immediate and wider locality having regard to the future land use character identified for the Precinct in the draft Bays West Place Strategy and the potential effects on existing views to the Silos from the public domain (roads, infrastructure and reserves), including the Glebe Foreshore Walkway, Jubilee and Federal Park and residential streets in Annandale." **[Page 100 of the Final SEE which reproduces much of the earlier VIA report.]**

View locations map.

Base imagery sourced from Nearmap.



2. On the basis of their three criteria (visual impact, sensitivity and magnitude),² GroupGSA “assessed” the visual impact rating as not being significant and not requiring any mitigation.

Focussing on the impact on the Glebe foreshore approx. 450 to 500 metres from the silos, view 13 at the end of Glebe Point Road is included and discussed – but not accurately represented.

The VIA visual impact rating for view 13 is ‘moderate’.

- Their “assessment” of visual sensitivity was ‘Moderate – Well-used open space parks and edge to harbour with mix of low, medium and high density residential behind. Overall working waterfront context.’
- Their “assessment” of visual magnitude was ‘Moderate – The signage is at a significant distance from the viewer behind a busy foreshore, with significant activity along the northern end of Rozelle Bay providing visual distraction. The signage views are partially screened from the main walkways by foreshore tree planting.

These “assessments” are strikingly at odds with a reasonable and honest assessment of the impact at one of the closest residential locations and clear views of the silos and the advertising from the Glebe foreshore walkway near View 13 – as the facts and photos shown below indicate.

² The **visual impact ratings** that were used by GroupGSA are explained below:

- **High** – the visual impact on these viewers is significant and would typically require amelioration at the site planning stage.
- **Moderate** – The visual impact on these viewers is at a localised scale **and can be mitigated** or already has some existing screening or an existing setback which minimises visual impact.
- **Low** – the visual impact on these viewers is considered low and no or very little amelioration is required.

Sensitivity was determined by assessing the context or landscape character of the location. “High sensitivity was defined by residential context - Low capacity to absorb change due to potential impacts on day-to-day lives of local residents.”

Magnitude was assessed by determining the overall significance of the Silos within each view. Criteria include existing screening, apparent size (often determined by distance between the viewer and the proposal) and visual context - Presence (or absence) of any items which provide context and scale to the proposal.

There is a substantial residential population in apartments and houses almost directly opposite and in direct line of sight of the massive, dominating and often glaring advertisements. The Glebe foreshore walkway is now very heavily used – by thousands of people walking, with babies and dogs, cyclists, runners, picnickers, especially with the impact of covid lockdown and many people working from home.

The signage at View 13 is *not* at a significant distance – at about 450 m³ and there is little or no visual distraction or screening by foreshore tree planting.

3. The photos presented by GroupGSA do not present an accurate representation of the distance and impact. They clearly minimise the size and visual impact of the advertising.

³ GSA Group state that the viewing distances vary between 450m at view 14 and 770m at view 18. View 13 is closer to the silos than view 14.



View 13: From Glebe foreshore at end of Glebe Point Road, Glebe. **Photography by GroupGSA**

Compare with same view taken from balcony adjacent to this view: **Photography by J Cashmore**



4. The presentation of the visual impact at night is deeply flawed and inadequate.

Group GSA selected only 15 of the 47 sites for night-time impact (an increase from 7 of 46 in 2018) and only two, 11 and 13, from the most affected sites even though they state that the impact at night is generally greater.

They do however conclude that the visual impact at night is high-moderate at Pyrmont and at Glebe at sites 11 and 13 (page 86, .

At View 13, for example: Group GSA stated that: The visual impact is high-moderate:

“In this view, the Silos structure (including signage) is dominant, although given scale and context by the well-lit Anzac Bridge structure. The graphic murals on the Silos are also brightly lit and create a strong visual pattern, with the signage providing a capped lid to the distinct form.

Visual sensitivity

High - Moderate - Well-used open space edge to harbour with low to medium density residential behind. Overall working waterfront context. The foreshore pathway is well lit and well used in the early evening, with lower levels of usage later at night.

The visual sensitivity of residents living on Glebe Point Rd may be higher, with some reporting significant light spill into residences late at night. As this VIA is only able to review the visual impact from the public domain, it is difficult to fully assess these reports.

Visual magnitude

High - Moderate - The Silos appear as a large item within the view, and surrounding lighting and light spill from the Anzac Bridge and industrial areas provides some context and competing light sources. The Silos themselves contribute to the overall lighting component of the structure, increasing the impact of the signage. It is noted that the impact can vary based on the graphic design of the signage installed at any given time, with lighter colours reflecting more light.

How was this conclusion reached?

“The visual sensitivity of residents living on Glebe Point Rd may be higher, with some reporting significant light spill into residences late at night.”

Who did the reports of residents come from, who was spoken to?

The photo below from page 87 of the VIA, however, does not accurately represent the impact.



Compare the VIA photo with the photo below taken 'without tricks' from the balcony of one of the residences at 501 Glebe Point Road: 26 October 2021



A correct assessment at night would be ‘high’.

It is not clear how the report is able to conclude that there is no “reduction in visual amenity to nearby residences or accommodation”. Which, if any, nearby residents did they ask to establish this? If they had asked a number of residents in Pavilions at the end of Glebe Point Road and other apartment blocks, they would find that on many occasions, we need to pull the blinds down to the floor to exclude the light from the advertisement in order to sleep. This was particularly the case when the background of the advertisement is light or white. The lack of complaint is simply the result of not knowing who to complain to and expecting no resolution if a complaint was to be made.

The logic of the conclusions that there are no ‘high’ visual impact overall or at any of the sites – in their terms ‘significant’ impact sites (p. 110) – is flawed.

“No viewpoints were identified to suffer from significant (high) visual impacts as a result of the existing advertising signage to the Glebe Island Silos being retained. It was generally noted that the sites with the highest visual magnitude were generally closer to the Silos and were from less sensitive view receivers such as public roadways.

The following explanations were found to be key factors at a number of sites and consistently affected the magnitude ratings generated:

- Signage at least partially screened by built form or established vegetation
- Viewpoint character and context is not sensitive to the view of the signage
- Viewing distances are long and thus signage is difficult to distinguish or is viewed within a much larger overall context.

The existing signage has been in place for many years, and it could be determined that this plays a part in further reducing the visual dominance of the signage for surrounding users.” (p. 110)

It is not the case that “the sites with the highest visual magnitude were generally closer to the Silos and *were from less sensitive view receivers* such as public roadways.

The most affected are nearby residents, and users of the parks and foreshore walkway directly opposite, not drivers whose presence is transient.

It is not the case that this signage is not partially screened by established vegetation.

The signage is extremely prominent on this very tall building from a number of viewpoints. In particular, there is a dramatic impact on the surrounding harbour and bays, the Glebe Foreshore including the parks and the foreshore walk and residents living on the foreshore and close to the foreshore.

It is not the case that the visual dominance is 'further reduced' because the "existing signage has been in place for many years". The frustration with the lack of change and the dominance of advertising in an area which could be visually appealing with art rather than ugly advertising does not 'go away'.

In summary, the methodology is severely flawed and the analysis and presentation of the visual impact assessment is therefore problematic and misleading. The conclusion that no mitigation is required is unwarranted.

NEED FOR MITIGATION

GroupGSA advise that the visual impact of the advertising signage on both day and night time views does not warrant any mitigation works being undertaken to support a further ten (10) year extension of the consent duration: 'Given that the signage is existing on the site and the day time visual impact is negligible to high moderate, it is not deemed that any specific mitigation works are required to extend the consent duration for a further ten year period. The signage exists only on two sides of the Silos and covers a relatively small portion (approximately 20%) of the overall facade on the relevant southern and western facades. The northern and eastern facades are free of signage and present significant opportunity to view the overall Silos structure, including the lid which is concealed on two sides'.

(p. 105)

Clearly the conclusion that no mitigation is needed, even for the high-moderate rating at two sites on GroupGSA's assessment, and particularly at View 13, is wrong.

It is somewhat perplexing that the lights on the Anzac Bridge are turned off/dimmed at 10pm but there is no curfew for the illumination of the billboard. **At the very least the curfew suggested by the applicants when there is further development should be adopted now – 11pm at the latest.**

Is it just another case in which the revenue stream is sufficient explanation despite the fact that there are few people who are likely to see it at these hours? And also that the unsubstantiated case has simply been accepted that there is no impact and no need for an earlier curfew?

Public interest offer of \$127,000 protection application to be used towards heritage conservation in the Inner West local government area.

Three questions:

- How have those funds been used?
- What proportion of the total cost is that?

Most importantly:

- How does this monetary payment contribute to public benefit or ameliorate the harm for those affected? It is the residents of Sydney City Council– Pyrmont and Glebe – who are affected, not the Inner West Council.

“Without adverse impact” is a very low bar indeed for public interest. We should as a community be expecting much more from such a ‘landmark’ and ‘iconic site’.

In response to the questions about the contribution the advertising makes to the visual interest of the streetscape, setting or landscape, the proponents’ response is evasive and fanciful, referring to the billboard as the **Southern Hemisphere’s most iconic billboard**, which attracts global attention and advertising spend into the Sydney economy from major advertisers and marketers.

In response to the question, **“Does the proposal show innovation and imagination in its relationship to the site or building, or both?”**, the proponents’ response is unimaginative and unresponsive. Arguing that the advertising copy is purpose designed for the Silos given its landmark dimensions does not ensure that the content is of high quality and graphic interest. The advertising that is displayed is generally banal and unimaginative, and never innovative or graphically interesting.

In summary, it is difficult to conclude that there is any public benefit from the continuation of this ad space on the silos. It detracts from the architectural form of the Anzac Bridge and from the value of the industrial heritage of this iconic site – the applicant’s term - to continue to be used as an advertising billboard for a further decade.

The beneficiaries are only two – Sydney Port Authority and Ooh! Media who lease the site. Those benefits are purely commercial and at the expense of the community, residents, park and foreshore users subjected to yet more advertisements and receive no benefit at all. It is also wasteful and polluting in terms of the tonnes of waste of PVC, the plastic material used for the banner itself.

A proper public discussion of the public value of this iconic site, and how it should be refreshed, is warranted and well overdue since the Olympic Grecian columns and advertising banner have outlived their meaning and presence. Visitors ask why Sydney has such an unattractive sight with a huge advertisement in such a prominent site at the Western entry and exit to the CBD area.

It is well past time to open a proper public discussion about the possibilities as an art space to celebrate life and lift the spirits of the community in a covid-19 world. There are a number of options:

- An art space, reflecting Aboriginal culture as a unique innovative feature of the Sydney landscape in an important location
- Welcome to Country – respecting the Aboriginal heritage of the land and recognition of what the local area looked like before it was ‘developed’ post 1788.
- It could be the subject of an art competition, and in a nice touch to restore public faith, the winner could actually win.
- Or, still much better than the current advertisements, it could be returned to its vista of what it is – a bank of silos in the raw and part of a working harbour?

Community information/involvement is the keystone for the development of liveable and interesting cities and the successful transformation of such valuable foreshore land and water. Public cynicism about development projects in Sydney is widespread, and for good reason, particularly in relation to harbourside land.

It would be a very poor choice indeed to allow a huge billboard and an outdated façade to continue to dominate this site. We urge the application to be rejected – and under no circumstances extended for 10 years! Any further extension which we object to should require the 11pm curfew to be introduced now – as offered by the applicants when residents are affected (in future developments).

This will allow more valuable and beneficial opportunities to reflect the history of this location, highlight this heritage site and create an imaginative and innovative part of our urban landscape.

It is time for change, for some vision, and for some real leadership.

Yours sincerely

Dr Judy Cashmore AO

President of SOBS

26 October 2021

TABLE 2.5

VIEW LOCATION DESCRIPTIONS

1. Pirrama Park, Pyrmont	24. Trafalgar Street outside 282 Trafalgar Street, Annandale
2. Pirrama Road Pyrmont	25. Roadway at corner of Rose Street and William Street, Annandale
3. Harbourside walkway at Cadi Wharf, near Refinery Drive, Pyrmont	26. Roadway at corner of Rose Street and Nelson Street, Annandale
4. Harbourside walkway adjacent to 2 Bowman Street Pyrmont and Glebe Island Bridge	27. Bayview Crescent outside 9 Bayview Crescent, Annandale
5. Pedestrian walkway above Bank St Pyrmont (adjacent to 1 Distillery Drive building)	28. Bayview Crescent outside 23 Bayview Crescent, Annandale
6. Waterfront Park, Pyrmont (off Bowman Street)	29. Walkway to side of 2-4 Pritchard Street, Annandale
7. Sydney Fish Market access, near Bridge Road, Blackwattle Bay, Pyrmont	30. Pedestrian & cycle ramp up to Anzac Bridge from Quarry Master Drive, Pyrmont
8. Wentworth Park, Blackwattle Bay, Glebe	31. Anzac Bridge near eastern pedestrian/cycle ramp entry/exit
9. Glebe foreshore walkway near The Boathouse on Blackwattle Bay and footpath continuation from Forsyth Street, Glebe	32. Anzac Bridge mid-point
10. Glebe foreshore walkway near 23 Griffin Place and 33 Cook Street, Glebe	33. Anzac Bridge near western pylon
11. Glebe foreshore walkway near 55-57 Leichhardt Street, Glebe	34. Western approach to Anzac Bridge, Rozelle
12. Corner of balcony at Bellevue historic house at 55-57 Leichhardt Street, Glebe	35. Path at intersection of Victoria Road & Anzac Bridge, Rozelle
13. Glebe foreshore walkway at end of Glebe Point Road, Glebe	36. James Craig Rd, Rozelle
14. Glebe foreshore walkway / Jubilee Park near Federal Road, Glebe	37. Shared path at Anzac Bridge & Victoria Road, Rozelle
15. Bicentennial Park, Glebe near Federal Park picnic shelter and mangrove restoration area	38. Sommerville Rd near entry to Ports Authority Land, Glebe Island
16. Glebe foreshore walkway near Chapman Rd, Glebe	39. Robert Street outside 32 Robert Street, Rozelle
17. Jubilee Park, Glebe near Johnstons Creek crossing	40. Robert Street at corner of Buchanan Street, Rozelle
18. Jubilee Park, Glebe near Hilda Boller Kindergarten	41. Public Park at corner of Mansfeld St and Batty St, Rozelle
19. Jubilee Park, Glebe near feature circular garden bed and Northcote Road	42. Birrung Park, near Donnelly St, Balmain
20. Trafalgar Street outside 264 Trafalgar Street, Annandale	43. Grafton Street at corner of Ewenton Street, Balmain
21. View Street outside 206 View Street, Annandale	44. Tom Uren walkway at end of Johnston Street, Balmain
22. Corner of View Street and Rose Street Annandale	45. Pedestrian stairs at end of Union Street, Balmain

FINAL SEE for issues Extracts

5.2.1. Amenity and the Surrounding Land Uses

The existing character of Glebe Island and White Bay is defined by its industrial and maritime uses. At the current time there is no residential development in the immediate vicinity of the site. Glebe Island under both the Bays Precinct Transformation Plan and the draft Bays West Place Strategy is identified as being retained for port and maritime uses and is to continue as a working port to service the needs of the construction supply chain over the next decade and beyond. (p. 98)

5.2.6.2 CONCLUSIONS

The conclusion reached by Group GSA concerning visual impact is reproduced below.

‘No viewpoints were identified to suffer from significant (high) visual impacts as a result of the existing advertising signage to the Glebe Island Silos being retained. It was generally noted that the sites with the highest visual magnitude were generally closer to the Silos and were from less sensitive receivers such as public roadways. The following explanations were found to be factors at a number of sites and consistently effected the magnitude ratings generated:

- Signage is at least partially screened by built form or established vegetation.
- Viewpoint character and context is not sensitive to the view of the signage.
- Viewing distances are long and thus signage is difficult to distinguish or is viewed within a much larger overall context. The existing signage has been in place for many years, and it could be determined that this plays a part in further reducing the visual dominance of the signage for surrounding users.’

A number of key views were reassessed at night to determine the effects of the lighting of the signage on views from surrounding areas. It should be noted that the lighting is applied to both the signage as well as the overall Silos structure, allowing viewers to appreciate the Silos structure at night. The lighting is only applied to the sides of the structure that feature the signage. There is no lighting to the northern and eastern facades. (p. 104)

In general the visual impact is higher at night than during the day due to the comparative effects of the lit signage against a dark back drop. It should be noted however that recent investigations conducted by Electrolight Australia have confirmed that the lighting complies with all relevant criteria and standards. Should residential development occur within the immediate vicinity of the Silos within the White Bay Power Station Sub Precinct within the ten (10) year consent duration, then the existing

luminance of the signage can remain unchanged but the curfew would need to be brought forward to 11pm at night (from 1am) to ensure compliance with AS4282-2019. (p. 104)

5.2.6.3 MITIGATION

Group GSA advise that the visual impact of the advertising signage on both day and night time views does not warrant any mitigation works being undertaken to support a further ten (10) year extension of the consent duration: 'Given that the signage is existing on the site and the day time visual impact is negligible to high moderate, it is not deemed that any specific mitigation works are required to extend the consent duration for a further ten year period. The signage exists only on two sides of the Silos and covers a relatively small portion (approximately 20%) of the overall facade on the relevant southern and western facades. The northern and eastern facades are free of signage and present significant opportunity to view the overall Silos structure, including the lid which is concealed on two sides'. (p. 105)

Does the proposal contribute to the visual interest of the streetscape, setting or landscape?

The Glebe Island Silos signage is recognised as the Southern Hemisphere's most iconic billboard, and attracts global attention and advertising spend into the Sydney economy from major advertisers and marketers. An advertising display of this scale is referred to by the out of home industry as a 'Landmark' location. The advertising copy that is generated for these companies is purpose designed for the Silos. This ensures that the content is of high quality and graphic interest.

Does the proposal respect important features of the site or building, or both?

The display of advertising on the Silos respects the heritage significance of the Silos and has been undertaken in accordance with the principles for the adaptive reuse of heritage items. The signage display is confined to the roof parapet of the southern and western elevations only.

Does the proposal show innovation and imagination in its relationship to the site or building, or both?

The existing structure is comprised of durable outdoor materials which are suited to the industrial context of Glebe Island as a working port. The advertising copy that is displayed is purpose designed for the Silos given its landmark dimensions. This ensures that the content is of high quality and graphic interest. No change is proposed to the advertising display by this application that would diminish the high graphic quality of the content that will be displayed on the structures over

the next ten (10) year term. The proposal does incorporate a monetary contribution to satisfy the public benefit provisions of SEPP 64. This contribution will be paid to the Inner West Council to facilitate local heritage conservation.

Would illumination detract from the amenity of any residence or other form of accommodation?

"The signage will also not cause any reduction in visual amenity to nearby residences or accommodation."

Photo 1: View 13 from Visual Impact Assessment page 26 of GroupGSA report



Photo 2: View 13 – Actual impact from residence 28/501 Glebe Point Road Glebe (25 March 2018)

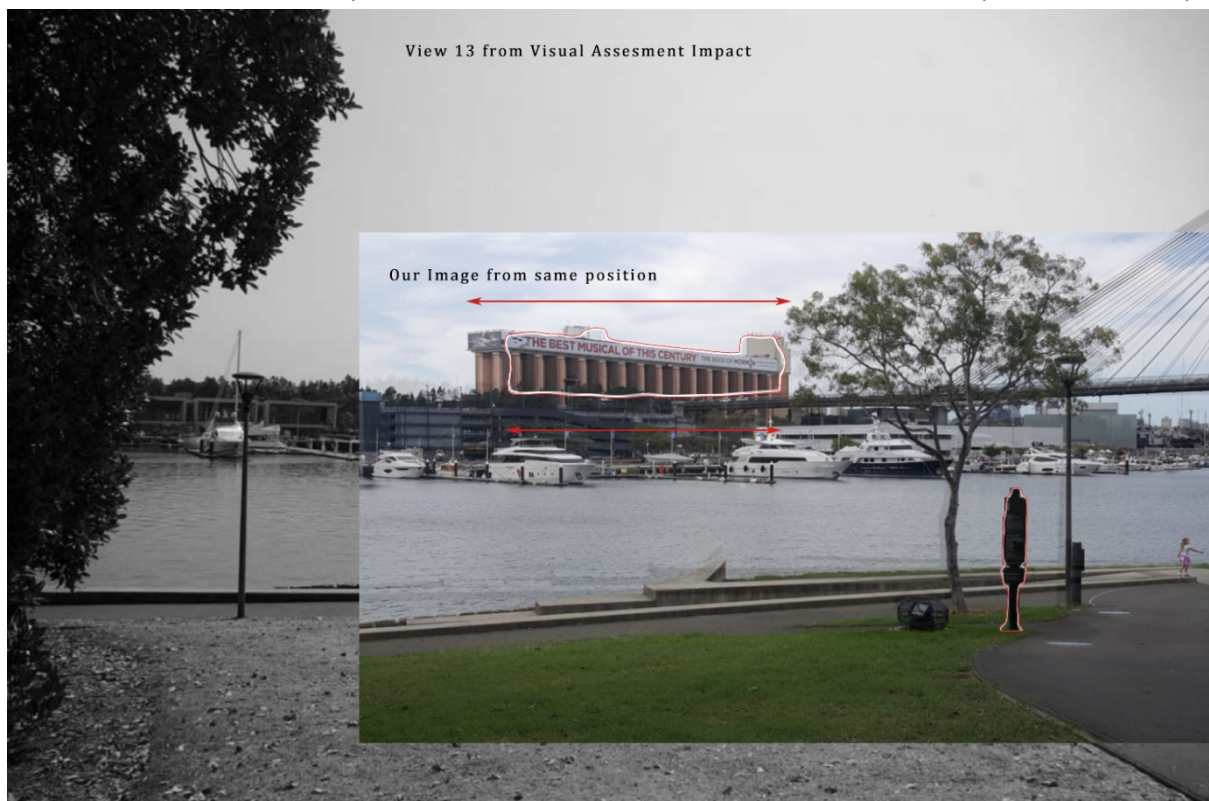




Photo 3: Visual impact - From Glebe foreshore walkway - day - more accurate representation than photos in VIA by GroupGSA



Photo 4:

Very high impact of white or light background photographed from residence at 501 Glebe Point Road – photo taken 25 March 2018