

27 October 2021

Our Ref: 2021/451827

File No: R/2021/8

Cameron Sargent  
Team Leader, Key Sites Assessments  
Department of Planning, Industry and Environment

By Planning Portal

Dear Cameron

**Exhibition of Development Application – Glebe Island Silos Signage - DA 21/13182**

Thank you for your correspondence dated 29 September 2021 inviting the City of Sydney Council ("the City") to make a submission on the abovementioned application. The proposal seeks to extend the duration of the Glebe Island Silos signage display for a period of 10 years with external illumination until 1am.

The City **objects** to the extension of the signage display and fundamentally, to allow the signage to remain for third party advertising. The following comments are made:

**1. Inconsistency with the intent of the original application**

The City has long expressed opposition for the erection and extension of the display of third-party advertising on the Glebe Island Silos. The temporary intent and purpose to which the signage was approved, which was the exceptional circumstance to assist the State Government in achieving a successful outcome in the Sydney's bid for the 2000 Olympics, has its basis completely eroded.

The City assumes that the consent authority was satisfied at that time that the apparent negative impacts to the heritage item was acceptable in the short term. This short term impact was mitigated through the imposition of a time limited consent ending in 2002, and a condition requiring the site to be restored following the lapsing of the consent.

Since that time, the rolling modification consents to extend the signage display, and now with the subject application for a 10-year extension, is perpetuating a permanent blight on the Sydney skyline for third party advertising for 21 years following from the 2000 Olympics. The past approvals have set a highly undesirable precedent and have undermined the application of time limited consents as a useful tool for allowing billboard advertising for short periods to promote important events. This would challenge future applications of similar nature in ensuring certainty that a time limited consent would be a reliable mechanism to confine impacts to the short term.

Allowing the signage display for third party advertising to continue indefinitely through the subject application goes against the original intent of the signage and sets a negative precedent for temporary arrangements. The City considers this is not in the public interest and must come to an end.

## 2. Heritage

The site is identified as a heritage item under the *State Regional Environmental Plan No. 26 – City West* (SREP). As stated above, the short term impacts of the signage to the heritage item by virtue of conditions for a time limited consent in the original approval, has been distorted by previous modification approvals to extend the display of signage for third party advertising.

It is acknowledged that the proposal does not involve any physical works. Nevertheless, the proposal must consider the provisions of *Division 6 – Heritage Conservation* in the SREP that require the consent authority to consider the impacts of the proposed development to the heritage significance of the item and its setting as well as measures to conserve the heritage significance of the item and its setting.

Whilst the advertising structure itself has existed for an extended period of time and would have minimal physical impacts to the heritage item, the continual third-party advertising display is unsightly and visually unappealing and therefore, significantly detracts from heritage significance of the Silos.

The Heritage Impact Statement, prepared by NBRS, makes reference to consultation with Inner West Council who raised concern that the signage may impact on the heritage significance of the Glebe Island Silos. It was recognised that there is no dedicated heritage interpretation of the item and its setting and that some form of interpretation should be considered to allow the general public to better understand the cultural significance of the Silos within its setting.

The City generally concurs with the recommendation and considers that a better outcome would be to incorporate heritage interpretation and public art. This would provide a greater public benefit and much improved visual interest to the site from many public vantage points having regard to the Silo's prominent location. Importantly, the integration of heritage interpretation would promote the conservation of the Silos and would enhance its heritage significance.

## 3. State Environmental Planning Policy 64 – Advertising and Signage (SEPP)

Whilst the City does not support the display of third-party advertising and 10-year extension of the signage, consideration is made to the provisions of the SEPP respectively.

*Clause 21 – Roof or sky advertisements* requires the consent authority to be satisfied that the roof or sky advertisement improves the visual amenity of the locality in which it is displayed and is consistent with the relevant development control plan.

The Glebe Island Silos Advertising DCP 2004 (DCP) is the applicable DCP and is supported by the Glebe Island Master Plan 2000, which stipulates a 3-year consent for the display of advertising on the Silos. The City strongly disagrees with the proponent's assertion that given that DCP predates the SEPP, the proposal can benefit from the maximum 10-year term outlined in the SEPP. The SEPP clearly allows a lesser period to be granted and more importantly, mandates consideration to the relevant DCP. Should the consent authority be minded to recommended consent be granted, this should be restricted to a maximum 3 years as per the DCP.

Moreover, it is the City's view that the Assessment Criteria provided in Schedule 1 of the SEPP should be considered in the context of a much wider area than the

immediate locality of the sign. The City considers that the signage does not satisfy the Assessment Criteria in Schedule 1 when considered in the wider area from which it can be viewed, including the residential areas of Pyrmont and Glebe.

The City also notes that the Assessment Criteria in Schedule 1 requires the consent authority to consider, amongst other things, the desired future character in the area or locality in which it is proposed to be located. The Draft Bays West Place Strategy earmarks the area surrounding the silos to be new development zones 'capable of supporting new development and envisages a mixed-use renewal with vibrant and diverse building outcomes'. Moreover, the Glebe Island Silos are indicated as heritage landmarks in the Draft Strategy that 'act as destination markers and speak directly to the place narrative and history of Bays West'. The continued presence of the signage for third-party advertising, and the ongoing blight to which it contributes, is clearly incompatible with that vision and would compromise future residential amenity of the precinct.

#### **4. Public Benefit**

It is detailed in the Statement of Environmental Effects, prepared by Urban Concepts, that the proponent has met with the relevant Council Officers at Inner West Council and has put forward a public benefit offer of an annual monetary contribution pursuant to Clause 13 of SEPP 64. Whilst the City considers a greater public benefit can be offered by removing the signs as stated above, consideration to the matter and legal vehicle for delivering the offer must be to the satisfaction of Inner West Council and the consent authority.

Should you wish to speak with a Council officer about the above, please contact Reinah Urqueza, Specialist Planner, on [REDACTED] or at [rurqueza@cityofsydney.nsw.gov.au](mailto:rurqueza@cityofsydney.nsw.gov.au)

Yours sincerely,



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