

27th October 2021

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Minister for Planning and Public Spaces / Independent Planning Commission

Dear Minister

Re: DA 21/13182, Glebe Island Silos, Signage

The Glebe Society has over 400 members and is one of Sydney's largest resident groups. The Society is concerned about the impact the lighting of the advertising signage has on Glebe Point.

The advertising on top of the silos is very large, being over 1,170 square metres. It is currently flood lit from dusk to 1am. Glebe Point is a little over 400 metres from the sign. Because parts of Glebe Point are on the direct axis to the principal elevation of the advertising it is the most directly effected of the adjoining neighbourhoods.

The nature of the development, that is illumination which spreads over a large geographical area, means that both the City of Sydney, the LGA for Glebe Point, and Inner West Council, the LGA for Balmain, Lilyfield and Annandale, need to be consulted.

The applicant has only engaged in consultation with the Inner West council despite this LGA being less affected by the development than the City of Sydney.

The supporting documentation for the DA includes an assessment of the Visual Impact of the lighting on Glebe Point (Urban Concepts, [Glebe Island Silos Visual Impact Assessment For: Eye Drive Sydney Pty Ltd](#), p. 86). It finds that the :

**Visual sensitivity is High to moderate,
Visual Magnitude is High to Moderate, and
Visual impact rating is High to Moderate**

The Statement of Environmental Effects, August 2021, notes that High means *the visual impact on these viewers is significant and would typically require amelioration at the site planning stage.*

The report is subject to the caveat that measurements have only been taken on public land. This makes it a tokenistic rather than a systematic analysis. Having determined that the impact is high and significant and requires amelioration further measurements should have been taken from the most affected residences.

The current DA recognises the deleterious impact of the lighting on neighbouring residential areas by requiring that the lights to be turned off at 1am. Why has 1am been selected? What is the rationale? Is it based on the assumption that the residents of Glebe Point go to bed at 1am?

There are other planning regulations which are designed to protect the amenity of residents in their homes during the common hours of repose. A relevant example relates to the use of air conditioners and water pump heaters which must be turned off at 10pm. With the lighting of the advertising on the Glebe Island silos a similar principle should apply which is that after 10pm the lighting should not be intruding into people's home in Glebe Point. Therefore the DA should be subject to the condition that the lights only operate from dusk to 10pm.

State Environmental Planning Policy No. 64 - Advertising and Signage Schedule 1 includes in its assessment criteria that there be analysis as to *whether the proposed signage is compatible with the existing or desired future character of the area or locality in which it is to be located?*

As the Visual impact study established the effect of the signage extends beyond Glebe Island to Glebe Point the applicant should have assessed whether the proposal is compatible with the Glebe Point Heritage Conservation Area. The application fails to do this.

Conclusion

The proposed hours for the lighting of the signs are excessive. The associated light pollution reduces the quality of life in Glebe Point and also wastes energy resources which results in the unnecessary consumption of fossil fuels and contributes to air pollution.

The application recognises that the impact on parts of Glebe Point is High and that this requires mitigation. The previous requirement that the lights be turned off at 1am is unbalanced having more regard to the need of the applicant than the neighbours who are affected by light pollution. The impact of the lights should be mitigated by making it a condition of approval that they be turned off at 10pm each night.

Yours sincerely



Ian Stephenson
President