



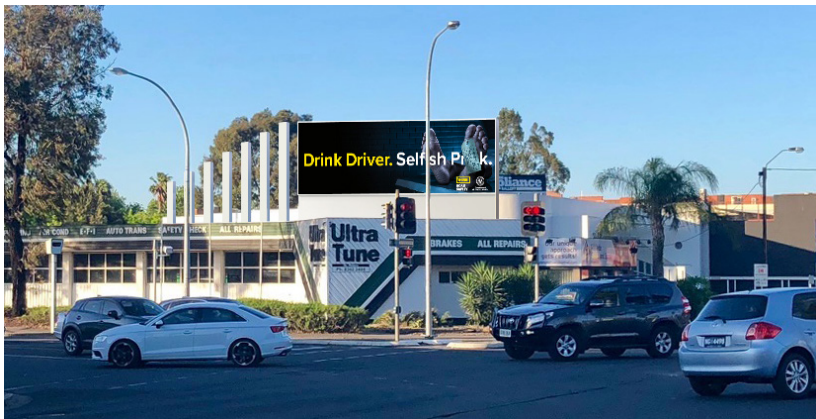
EXISTING OUT BOUND DISTANT VIEW



PROPOSED OUT BOUND DISTANT VIEW



EXISTING OUT BOUND CLOSE VIEW



PROPOSED OUT BOUND CLOSE VIEW



BOUNDARY OF 149 PAYNEHAM ROAD, ST PETERS SA 5069 (LOT 500 OF PLAN 16829)

AERIAL VIEW



NOTE: STRUCTURE INDICATIVE AND SUBJECT TO DETAILED SITE SURVEY AND ALL NECESSARY APPROVALS.

PROPOSED NEW DIGITAL DISPLAY MEASURING WILL BE TO 10.50M X 3.50M
AT 149 PAYNEHAM ROAD, ST PETERS SA 5069 (LOT 500 PLAN 16829)

AERIAL VIEW AND MOCK UP

Date	September, 2022	PLAN & ELEVATION			
Draw by	LF	Drawing No.	Date	Rev	Rev
Scale	NTS	230922-1/5	Sep22	Dec22	Apr23
Drawing No.	230922-1/5	Drawn: LF			
Job No.	SA-PET-0922				



151-157 PAYNEHAM RD, ST PETERS SA 5069

149 PAYNEHAM RD, ST PETERS SA 5069
(LOT 500 OF PLAN 16829)

7 COLUMNS 0.46M X 0.46M
LINING WITH PARAPET

DIGITAL DISPLAY
FACING OUT BOUND TRAFFIC

BOUNDARY OF 149 PAYNEHAM ROAD, ST PETERS SA 5069 (LOT 500 OF PLAN 16829)

NOTE: STRUCTURE INDICATIVE AND SUBJECT
TO DETAILED SITE SURVEY AND ALL NECESSARY APPROVALS.

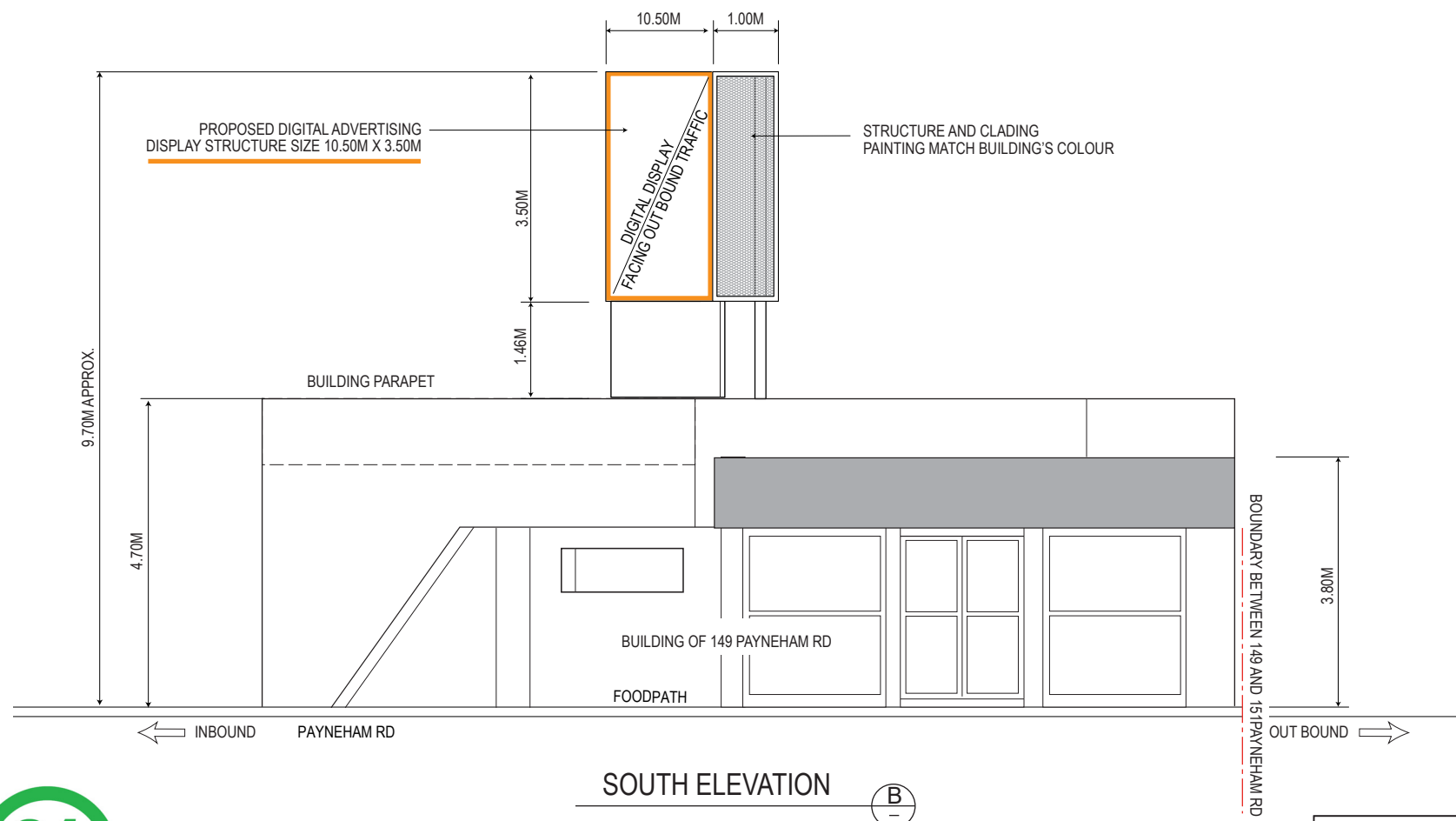
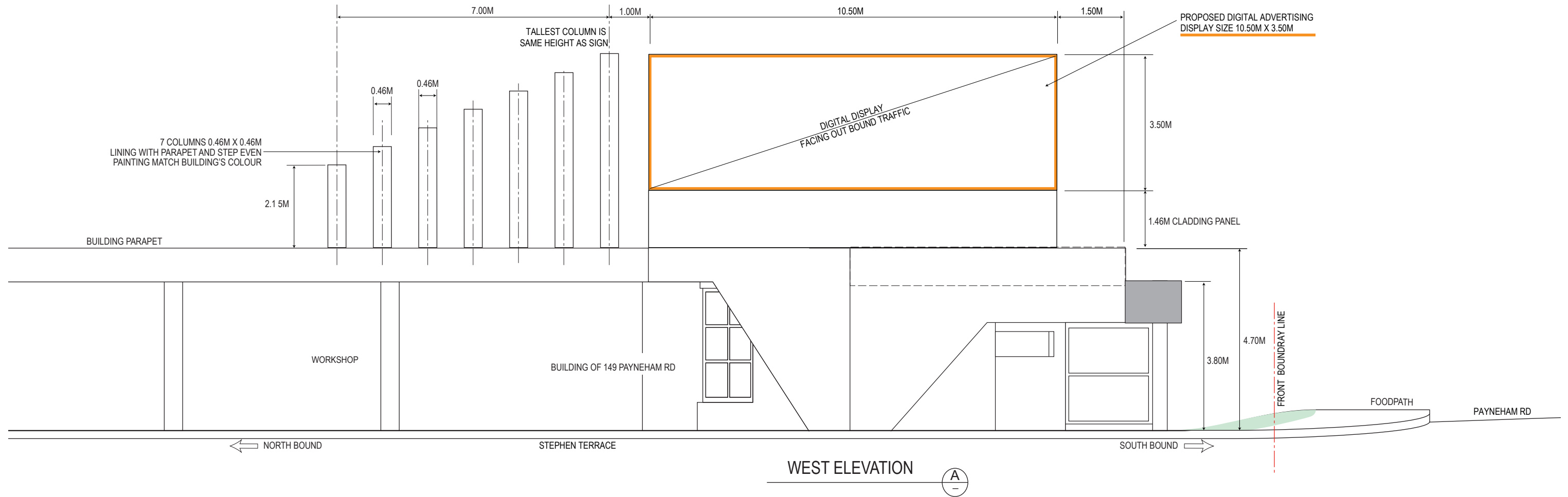


SITE PLAN

PROPOSED NEW DIGITAL DISPLAY MEASURING WILL BE TO 10.50M X 3.50M
AT 149 PAYNEHAM ROAD, ST PETERS SA 5069 (LOT 500 PLAN 16829)

SITE PLAN

Date	September, 2022	PLAN & ELEVATION			
Draw by	LF	Drawing No.	Date	Rev	Rev
Scale	1:200 (print as A3)	230922-2/5	Sep22	Dec22	Apr23
Drawing No.	230922-2/5	Drawn: LF			
Job No.	SA-PET-0922				



NOTE: STRUCTURE INDICATIVE AND SUBJECT TO DETAILED SITE SURVEY AND ALL NECESSARY APPROVALS.

PROPOSED NEW DIGITAL DISPLAY MEASURING WILL BE TO 10.50M X 3.50M
AT 149 PAYNEHAM ROAD, ST PETERS SA 5069 (LOT 500 PLAN 16829)

Date	September, 2022	PLAN & ELEVATION			
Draw by	LF	Drawing No.	Date	Rev	Rev
Scale	1:100 (print as A3)	230922-3/5	Sep22	Dec22	Apr23
Drawing No.	230922-3/5	Drawn: LF			
Job No.	SA-PET-0922				





PROPOSED OUT BOUND DISTANT VIEW



EXISTING OUT BOUND DISTANT VIEW



NOTE: STRUCTURE INDICATIVE AND SUBJECT TO DETAILED SITE SURVEY AND ALL NECESSARY APPROVALS.

PROPOSED NEW DIGITAL DISPLAY MEASURING WILL BE TO 10.50M X 3.50M AT 149 PAYNEHAM ROAD, ST PETERS SA 5069 (LOT 500 PLAN 16829) PHOTO AND PHOTOMONTAGE		Date	September, 2022	PLAN & ELEVATION			
		Draw by	LF	Drawing No.	Date	Rev	Rev
		Scale	NTS	230922-4/5	Sep22	Dec22	Apr23
		Drawing No.	230922-4/5	Drawn: LF			
		Job No.	SA-PET-0922				



PROPOSED OUT BOUND VIEW



EXISTING OUT BOUND VIEW



NOTE: STRUCTURE INDICATIVE AND SUBJECT TO DETAILED SITE SURVEY AND ALL NECESSARY APPROVALS.

PROPOSED NEW DIGITAL DISPLAY MEASURING WILL BE TO 10.50M X 3.50M
AT 149 PAYNEHAM ROAD, ST PETERS SA 5069 (LOT 500 PLAN 16829)

PHOTO AND PHOTOMONTAGE

Date	September, 2022	PLAN & ELEVATION			
Draw by	LF	Drawing No.	Date	Rev	Rev
Scale	NTS	230922-5/5	Sep22	Dec22	Apr23
Drawing No.	230922-5/5	Drawn: LF			
Job No.	SA-PET-0922				

February 16, 2023

Mr Terry Mosel, Presiding Member
Council Assessment Panel for the City of Norwood, Payneham and St Peters
Via PlanSA Portal

Dear Mr Mosel,

PLANNING STATEMENT – LED ADVERTISING SIGN (149 PAYNEHAM ROAD, ST PETERS)

We act for Twenty Four Outdoor Australia Pty Ltd ('client').

Our client seeks planning consent to erect an LED advertising display and architectural columns on the roof of the existing building at 149 Payneham Road, St Peters ('site').

The purpose of this planning statement is to describe the site, its surroundings and the proposal, and to assess the proposal against what we consider to be the most pertinent policies of the Planning and Design Code ('the Code').

Proposal

Our client intends to partially change the use of the land by erecting an LED advertising screen which will display third-party content as well as content related to the existing use of the land. The details of the proposal are described in more detail below:

- Billboard dimensions 12.0m (wide) by 3.0m (tall) by 1.0m (depth)
 - » Advertising area measuring 36m²
 - » Overall height measuring 9.2m (top of sign)
- 7 x architectural columns measuring 1.65m – 4.5m in height with a depth and width of 0.46m.

The proposed LED advertising screen and architectural columns will be attached to the roof of the existing building on the site which is currently occupied by Ultra Tune and used as a motor repair station.

Procedural Matters

At the time of preparing this statement, the relevant version of the Planning and Design Code was gazetted and subsequently consolidated on February 2, 2023 (Version 2023.2).

Due to amendments, the version of the Code used to prepare this letter may not be the relevant version at the time of lodgement of the application. To the extent of any inconsistency, the version of the Code at the time of lodgement will be relevant for the processing and assessment of the application.

The subject site is within the Suburban Activity Centre Zone ('the Zone').

Verification

For the purposes of regulation 31(1)(a), (b) and (c) of the *Planning, Development and Infrastructure (General) Regulations 2017*, the following applies:

Table 1 *Verification snapshot*

Verification matter	Comment
Nature of Development	Partial change in use for third party advertising (LED screen) and architectural columns attached to the roof of the existing building
Elements	<ul style="list-style-type: none"> • Advertisement • Other – partial change in use (third party advertising) • Other – architectural columns
Category of Development	Performance assessed
Relevant Authority	Council Assessment Panel or Assessment Manager

Referrals

Pursuant to Section 122(1) of the Act, the proposal will need to be referred to the Commissioner of Highways in accordance with the Procedural Matters for the Advertising Near Signalised Intersections Overlay, given that:

- the advertisement is within 100m of a signalised intersection; and
- the advertisement will be internally illuminated.

Public Notification

Pursuant to section 107(6) of the Act, the Code may exclude specified classes of development from the requirement to undergo public consultation. Accordingly, Table 5 of the Zone provides the following:

Table 1.1 *Table 5 – Procedural Matters (excerpt)*

Class of Development (Column A)	Exceptions (Column B)
<p><i>Any development involving any of the following (or of any combination of any of the following):</i></p> <p>a) advertisement</p>	<p><i>Except development that does not satisfy any of the following:</i></p> <ol style="list-style-type: none"> 1. Suburban Activity Centre Zone DTS/DPF 3.1 2. Suburban Activity Centre Zone DTS/DPF 3.2

Having considered the above, we confirm that the proposal does not require public notification for the below reasons:

- The proposal does not exceed a height of 2 levels (Zone DTS/DPF 3.1).
- The site is 'adjacent land' to land within the Established Neighbourhood Zone, however:
 - » The proposal satisfies Zone DTS/DPF 3.2

Relevant Authority

Pursuant to Section 93(1)(a) of the Act, the Council Assessment Panel is the relevant authority for the assessment and determination of the application.

Notwithstanding the above, we note that pursuant to Regulation 22(a)(ii) of the *Planning, Development and Infrastructure (General) Regulations 2017*, the Council's Assessment Manager may act as the relevant authority where a development is exempt from the requirements in Section 107(3) of the Act to give notice of the application.

Given that the proposal is exempt from notification, we encourage the Council's Assessment Manager to act as the relevant authority.

Site and Locality

Site

The site is located in the northern quadrant of the intersection between Payneham Road, Stephen Terrace and Nelson Street, is irregular in shape and has a total area of approximately 1,060m².

The site has frontage to Stephen Terrace (48.04 metres), Payneham Road (23.05 metres) and First Land (18.55m), and although the site's postal address references Payneham Road, the existing building on the site is orientated such that Stephen Terrace is considered to be the primary road frontage.

The existing use of the land is comprised of a 'motor repair station' (Ultra-Tune), and a 'consulting room' (Podium Physio). Both uses are contained within the existing building which has a total floor area measuring 335m².

On-site vehicle parking is provided in-front of the existing building along the Stephen Terrace frontage. The perimeter of the site contains landscaping, typically in the form well maintained shrubbery together with three trees including a Eucalyptus which appears to be a significant tree.

Figure 2 Site – looking east from main intersection



Figure 3 Site – view from Stephen Terrace looking east



Locality

The locality is predominately characterised by a variety of commercial activities in an assortment of built forms that are largely discordant, but nonetheless ‘low-rise’ in nature.

Local character is heavily influenced by the intersection between Payneham Road, Stephen Terrace and Nelson Street (all 3 are State Maintained roads), the obvious commercial nature of existing land uses including the Avenues Shopping Centre.

The locality is influenced by existing advertisements in a variety of styles including illuminated and non-illuminated signs, both free-standing and attached to buildings as shown in the below figures.

Figure 4 The Avenues Shopping Centre



Figure 5 *Mr Dishwasher*



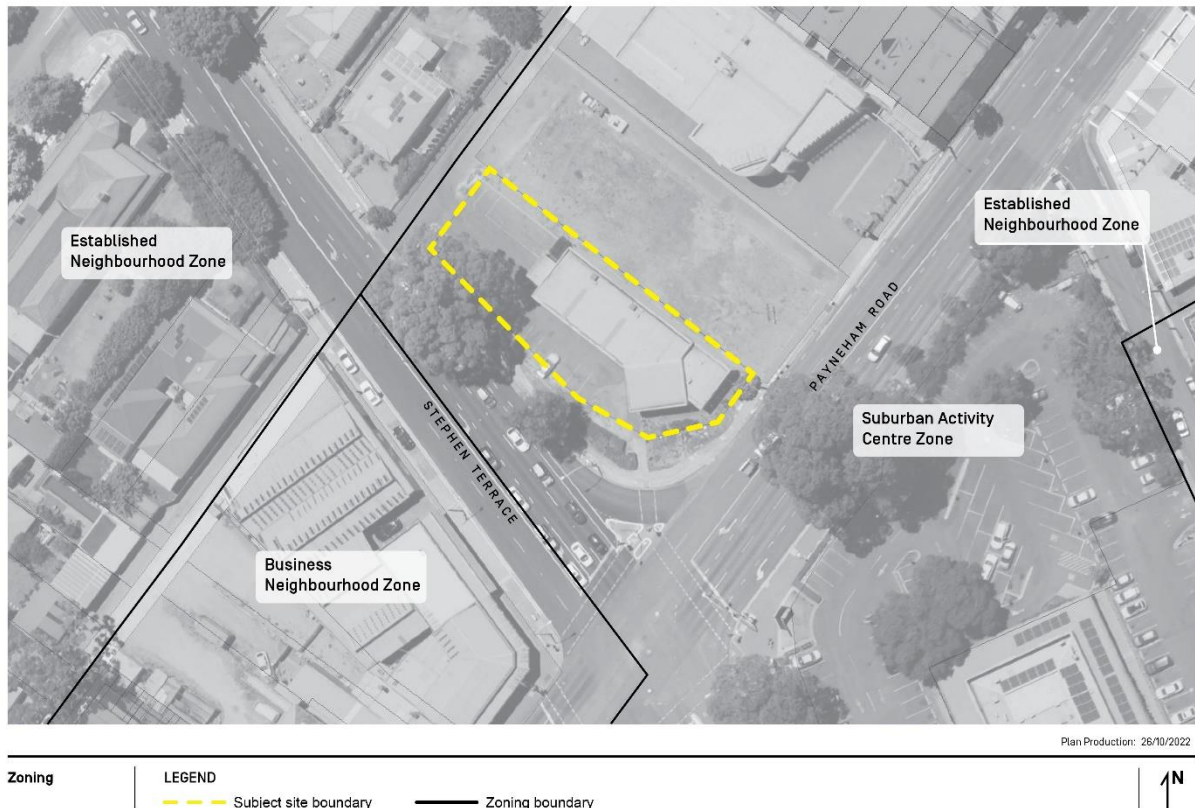
Figure 6 *Luxe Bathware*



Figure 7 *Add Value*



Figure 8 Site and Locality map



Assessment against Planning and Design Code

The subject site is situated within the Suburban Activity Centre Zone.

Table 3 of the Zone lists 'advertisement' as a class of development for which the Code automatically assigns policies for performance assessed development. Accordingly, the following overlays apply to a proposal for an 'advertisement' upon the subject site:

- Advertising Near Signalised Intersections Overlay
- Airport Building Heights (Regulated) Overlay
- Future Road Widening Overlay

The following modules in *Part 4 – General Development Policies*, are identified in Table 3 of the Zone as applying to an 'advertisement' upon the subject site:

- Advertisements
- Clearance from Overhead Powerlines
- Infrastructure and Renewable Energy Facilities

Further to the above, I note that the other elements of the proposal (i.e. partial change of use and architectural columns) are not identified in Table 3 of the Zone. As such, they are properly designated as 'All Other Code Assessed Development' and are to be assessed against all relevant policies in the Code.

Having undertaken an assessment of the proposal against the relevant Code policies, we submit the following comments:

Use of Land

The display of third-party advertising constitutes a partial change in use of the land. As such, it is important to acknowledge the primary desired outcome for the Zone, which is described in DO 1 as follows:

DO 1 *An active commercial precinct supporting neighbourhood-scale shopping, business, entertainment and recreation facilities to provide a focus for business and community life and most daily and weekly shopping needs of the community.*

Accordingly, we contend that the proposed partial change in use of the land for the display of third-party advertising is a reasonable land use outcome for site for the following reasons:

- The primary intent of the Zone is for ‘an active commercial precinct’. We assert that the display of third-party advertising is, in essence, a commercial activity.
- Although the advertising content will change from time to time, it is intended that the sign will display content such as community messaging (e.g. government health and safety campaigns), as well as other third-party goods and services.
- The proposed advertising supports the continuation of the existing use of the land which includes a ‘motor repair station’ (Ultra-Tune), and a ‘consulting room’ (Podium Physio), nor will it prohibit future changes in use of these tenancies.

We further note that in *Keast v City of Marion [1999] SAERDC 74*, Commissioner Hutchings held that:

“in general, the message is not the issue. A message advertising a product or service available on the land on which a hoarding may be erected can be just as offensive in terms of its visual impact as one advertising a generic product or service. What is at issue is the size, height, shape etc of the hoarding”.

In addition to the above, in *A & A Centofanti Pty Ltd v City of Port Adelaide Enfield [2009] SAERDC 8* at 42), Commissioner Hamnet stated:

“...third party advertisements clearly have a place in the urban environment and one looks to Development Plans to provide guidance on where that place might be.”

In a general sense, the Code seeks to guide advertisements away from those parts of urban areas, such as residential areas, parks and recreation areas and precincts of particular visual qualities, to those zones where trade and commerce take place; ie, where goods and services are promoted and sold. As such, we contend that the Zone is ostensibly one in which the Code envisages advertisements, including those with third-party content.

Appearance and Character

In zones where advertising is generally considered appropriate, the Code seeks to ensure that the size, height and shape of advertising hoardings is of a scale that complements the desired outcomes and built form character of the particular commercial locality.

Having previously established that third-party advertising is a commercial use of land that accords with the outcomes sought by DO 1 of the Zone, we take further guidance from the following Code policies:

Part 4 - Advertisements

DO 1 *Advertisements and advertising hoardings are appropriate to context, efficient and effective in communicating with the public, limited in number to avoid clutter, and do not create hazard.*

PO 1.1 *Advertisements are compatible and integrated with the design of the building and/or land they are located on.*

PO 1.2 *Advertising hoardings do not disfigure the appearance of the land upon which they are situated or the character of the locality.*

PO 2.1 *Proliferation of advertisements is minimised to avoid visual clutter and untidiness.*

PO 2.2 *Multiple business or activity advertisements are co-located and coordinated to avoid visual clutter and untidiness.*

PO 2.3 *Proliferation of advertisements attached to buildings is minimised to avoid visual clutter and untidiness.*

PO 3.1 *Advertisements are limited to information relating to the lawful use of land they are located on to assist in the ready identification of the activity or activities on the land and avoid unrelated content that contributes to visual clutter and untidiness.*

Having considered the above policies it important to draw attention to POs 1.2 and 2.3 which use the word 'proliferation'. Notably, POs 1.2 and 2.3 say that 'proliferation' should be 'minimised', not that proliferation should be avoided. It seems apparent to our reading of the Code that there is a degree of acknowledgement that, particularly in urban environs, some proliferation of advertisements will occur, and that it is ultimately unavoidable.

Our reading of the locality surrounding the Payneham Road, Stephen Terrace and Nelson Street intersection is that it is stridently commercial and contains a conglomeration of private business and public infrastructure paraphernalia typical of such locales. Advertisements are a given in such areas including some degree of proliferation.

Accordingly, we consider there to be two primary factors that contribute to the reading of advertisements within the local context, with the first of those factors being the size, shape and location of existing advertisements and the second being views from moving vehicles and pedestrians. To that end, existing advertisements within the locality typically fall within the following three categories:

- **Category 1:** window displays.
- **Category 2:** attached to building facades and within the road reserve (i.e. traffic signs and A-frame hoardings)
- **Category 3:** attached to and above parapets and rooflines, and free-standing pylons on private land.

From a moving vehicle, the array of advertisements within Category 1 is such as to make them almost meaningless. Advertisements in Category 2, with their bold lettering and colours, while more obvious, are subject a degree of obstruction due to building shapes, moving and parked vehicles, fences and

traffic/lighting poles. Advertisements within Category 3, typically have precise, simple shapes with messaging that can be clearly seen with little or no obstruction.

The addition of one advertising screen in the form of that proposed is considered to be acceptable in this context, further noting that:

- The proposed vertical feature blades support the integration of the LED screen with the architectural form of the existing building and will contribute to an overall improved built form presentation to the streetscape (PO 1.2).
- The advertisement will be clearly separated from other advertisements in the locality so that its messages can be read clearly and without confusion, whilst avoiding clutter and untidiness (PO 2.1 and PO 2.3)
- The LED screen creates opportunity for co-location of advertisements including goods and services offered from the site, government messaging, and third-party products and services (PO 2.2).
- My reading of PO 3.1 is such that the policy, whilst it has preference for advertisements that relate to the use of the land, does make provision for third-party advertisements (i.e. unrelated content) provided they do not contribute to visual clutter and untidiness. To that end, I note the following:

» *Macquarie Australian Dictionary Eighteenth Edition*

- *Clutter: 1. to fill (a place) in a disorderly fashion with too many objects 6. Confusion; disorder.*
- *Untidy: 1. Not tidy or neat; slovenly; disordered.*

» The proposed advertisement will not clutter the local environment given that:

- it is integrated with the existing building through the use of architectural features and represents orderly development of the site.
- it is noticeably separate from other signs on the site, and the surrounding locality, such that there will not be too many objects within localised viewing apertures.
- it is visually distinctive and will display high resolution images so as to not introduce elements of confusion or disorder.

» The proposed advertisement will not make the locality appear untidy given that:

- it is a high-quality LED screen that will display high resolution imaging that will be clear to read and interpret
- it will be neatly integrated with the existing building and proposed architectural blades, and generally improve the visual appearance of the site.
- it will not disorder the site in any way.

Further to the above, when considering the relevant Code policies, we suggest that the distillation of their main thrust and intent can be summarised in the below key points – Advertising should:

- be consistent with the envisaged character of the zone;
- be appropriate to the character of the locality and urban landscape;
- not disfigure the urban environment;
- not detrimentally affect the character of any area;
- not detrimentally affect the amenity of the zone, the area or the locality; and
- not have an adverse impact on the amenity of adjacent land uses.

In consideration of these main themes, we opine as follows:

- The proposal is consistent with the character of the locality which is heavily influenced by the following:
 - » the Avenues Shopping Centre which includes various forms of advertising including a number of illuminated fascia signs and a free-standing pylon sign.
 - » the cluster of commercial tenancies located at the road junctions, noting that these commercial premises contain a variety of advertising displays.
 - » the 'strip' of commercial tenancies along Payneham Road, and to a lesser extend Nelson Street, which includes a variety of advertisements including illuminated advertisements above roof lines (Mr Dishwasher at 155 Payneham Road) and free-standing illuminated signs (OTR at 90-104 Payneham Road).
- Existing advertisements within the vicinity of the site individually and collectively contribute to an urban environment that is overtly commercial in nature, and as such, the proposal is appropriate within this local context, further expressing its commercial nature.
- The proposal is considered to be sufficiently compatible with the surrounding built form and would not disfigure the land upon which it is proposed or the locality, and is of a scale and size that is appropriate.
- The size, shape and general appearance of the proposed sign is not inconsistent with the urban form within the locality, which includes two State Maintained roads in Torrens Road and Hanson Road, and will not proliferate, visually clutter or cause the respective streetscapes to become untidy.

Assessment policies:

Zone DO 1 and PO 1.1.

Part 4 – Advertisements DO 1, PO 1.1, PO 1.2, PO 2.1 PO 2.2, PO 2.3 and PO 3.1.

Safety

Our client engaged expert traffic engineering firm, Cirqa to assist with the design and siting of the proposal and to prepare a Traffic Impact Assessment ('TIA') to demonstrate compliance with the safety requirements of the Commissioner of Highways, and relevant Code policies.

Whilst we largely defer to the technical assessment provided in the TIA prepared by Cirqa, we submit that the proposed advertisement will contribute to a safe environment for drivers and pedestrians on account of the following:

- The placement of the proposed sign (in an elevated position) will not impede, nor restrict any vehicle, pedestrian or cyclist movements within the subject site nor on the adjacent roads.
- The sign will be clear of aligning with any signal lanterns or traffic control devices (relevant to approach movements from the southern side of Payneham Road and from Nelson Street) for 10 of the 11 assessment locations identified in the TIA.
 - » Cirqa advise that the 1 alignment with a signal array is acceptable (40m south of the Payneham Road stop bar 'southern approach') and will have a minimal impact on the conveyance of traffic control information.
- Although a driver's concentration is always on demand, the local traffic conditions are not considered to demand 'high' levels of concentration, noting that the Payneham Road, Stephen Terrace and Nelson Road speed limits are less than 80km/h.

The brightness of the LED Screen is measured in nits or candela per square metre. A nit is a unit of measurement of luminance, or the intensity of visible light, where one nit is equal to one candela per square meter (Cd/m²). Nits are used to describe the brightness of computer displays, such as LCD and CRT monitors.

Whilst the LED sign has the capability to display 7,000 nits (cd/sqm) the software used in the display allows the supplier to set maximum and minimum brightness levels based on the weather conditions – typically a sunny day, cloudy day, dawn & dusk, and night-time brightness levels.

The sign automatically adjusts to climatic conditions and time of day through an auto brightness controller. Two brightness controllers are installed to ensure that if one fails, the other can take over ensuring that the brightness control functionality is not compromised. In the unlikely event that both controllers fail, the software has a time-based failsafe meaning the brightness will revert to pre-set parameters based on time of day (for example, if it is 10pm the screen cannot go above 2% brightness irrespective of the brightness sensor readings). And, finally if all of the above fails, the system is set to automatically dim to 2 percent brightness, so as to minimise any likely or perceived hazard to passing motorists/pedestrians.

Every development approval for a digital advertising board typically contains maximum brightness levels as part of the conditions. Speaking broadly, these would include a maximum daytime brightness of, typically, 6000-6300 nits (cd/m²) and a night-time brightness of, typically 200-300 nits (cd/m²). The supplier of the screen then sets these as the maximum brightness levels *based on a 100% white image*. This means that the screen would only read at that maximum brightness if a 100% white image was displayed - so, a-blue background, for example, would read significantly less than that maximum.

A professional graphics team will generate and control sign content to ensure the screen and advertising content will always appear to be of high graphic standard to give the impression of a poster rather than a pixelated, low-quality screen. The screen will promote static advertising with no motion or video content. Maintaining this high quality is in the best interests of the advertising agencies and advertisers, and will ensure no deleterious impacts on drivers.

Assessment policies:

Advertising Near Signalised Intersections Overlay DO 1 and PO 1.

Part 4 – Advertisements DO 1, PO 5.2, PO 5.3, PO 5.4, PO 5.5 and PO 5.6.

Conclusion

From the assessment undertaken, it is considered the proposed partial change in the use of the land, the LED advertisement and architectural blades, represents an appropriate for of development for the site, and will not create any unreasonable impact upon the character or amenity of the local area.

The proposal is worthy of consent for the following reasons:

- is orderly and economic;
- is well designed and sited in respect to its setting;
- will make a positive contribution to the streetscape and local character;
- is in general accord with the overall intent and purposes of the Suburban Business Zone and the Code as a whole.

Should you have any questions, please do not hesitate to connect our office.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Jason Cattonar", with a long, horizontal, sweeping stroke extending to the right.

Jason Cattonar
Associate Director

Appendix 1 *Plans and elevations*
Appendix 2 *Traffic Impact Assessment*

Ref: 22525|BNW

17 January 2023

Mr Jason Cattonar
Future Urban Pty Ltd
Level 1, 74 Pirie Street
ADELAIDE SA 5000

Dear Jason,

LED ADVERTISING SIGNAGE 149 PAYNEHAM ROAD, ST PETERS

I refer to the proposal to install a LED advertising sign at 149 Payneham Road, St Peters. As requested, I have undertaken an assessment of the proposal in respect to traffic safety considerations. This letter summarises the assessment undertaken.

1. BACKGROUND

1.1 SUBJECT SITE

The subject site is located at 149 Payneham Road, St Peters. The site currently accommodates single storey commercial building. The Planning and Design Code identifies that the site is located within a Suburban Activity Centre Zone.

1.2 ADJACENT ROADS

The site is located adjacent the northern corner of the intersection of Payneham Road/Stephen Terrace/Nelson Street. All of these roads are arterial roads under the care and control of the Department for Infrastructure and Transport (DIT). Adjacent the site, each of the roads generally comprise two through bound lanes with additional turn lanes provided at their signalised intersection. A 60 km/hr speed limit applies on these adjacent roads. Traffic data recorded by DIT indicates the following daily traffic volumes on the adjacent roads:

- Payneham Road (north of intersection) – 34,500 vehicles per day (vpd);
- Payneham Road (south of the intersection) – 31,500 vpd;
- Stephen Terrace – 21,100 vpd; and
- Nelson Street – 19,600 vpd.

The three roads form a four-way intersection adjacent the site. The intersection is controlled with traffic signals and includes signalised pedestrian crossings on each leg.

2. THE PROPOSAL

The proposal comprises the installation of an electronic LED advertising sign (approximately 3.0 m high by 12.0 m wide) on top of the existing building within the site. The bottom of the sign will be 1.46 m above the top of the existing building (this height has been identified to avoid alignment of the signal with one of the primary signal lanterns facing northbound traffic on Payneham Road).

The sign will be approximately 45 m from the centre of the adjacent signalised intersection. The sign will face south-east (i.e. visible to northbound drivers on Payneham Road and westbound drivers on Nelson Street) and will not display images/advertising to drivers travelling east on Stephens Terrace or south on Payneham Road.

3. ASSESSMENT

The proposed sign has generally been assessed against the requirements of (the then) DPTI's *"Advertising Signs Assessment Guidelines for Road Safety"* (2014). However, during other recent signage applications, DIT has advised that the location/siting requirements identified in the DPTI guidelines do not need to be adhered to. Notably, DIT has generally requested a review be undertaken of the position of such signage in relation to any traffic control devices (such as traffic signal lanterns) from driver view points measured at 40 m and 80 m from the adjacent (relevant) approaches' Stop lines. The assessment for the views at these locations are discussed in Section 3.3 below. The other aspects of the assessment are as per the requirements of the guidelines and also detailed below.

3.1 CRASH RISK

Crash data has been obtained from DIT for the adjacent roads for the most recent available 5-year data set (between 2017 and 2021 inclusive). The data indicates that, in the vicinity of the site, there have been 28 crashes at the intersection of Payneham Road/Stephens Terrace/Nelson Street. Additional mid-block crashes have also been reported on the Payneham Road approaches and the Stephen Terrace approach (with no midblock crashes reported on Nelson Street in the vicinity of the intersection).

In respect to the crashes reported at/within the intersection, the predominant crash types were 'right turn' (43%) and 'rear end' (25%). The majority of crashes resulted in 'property damage only' (66%) with 31% of crashes resulting in injury and one crash (3%) resulting in a serious injury. No fatalities have occurred at the intersection within the noted timeframe.

In respect to the crash statistics for the mid-block approaches, data has been reviewed for the southern leg of Payneham Road (given drivers on this section would be able to view the proposed advertising sign). The other legs have not been considered as the sign

will either not 'present' to drivers on the western and northern approaches and, in the case of Nelson Street, no crashes have been identified in proximity to the intersection.

Within 80 m of the site (the approximate distance for which the sign would be visible to approach drivers on the southern approach of Payneham Road), there have been 11 crashes of which 9 resulted in 'property damage only' and 2 resulted in injury. Six of the crashes were 'rear end' crashes and 4 were 'side swipe' crashes.

3.2 LOCATION, PLACEMENT AND CLEARANCE

As noted above, it is proposed that the advertising sign be installed on the roof of the existing building at 149 Payneham Road (as illustrated on plans provided by the applicant). The new advertising sign is proposed to be 3.0 m high by 12.0 m wide.

In respect to vertical clearance requirements, pedestrians (or vehicles) will not travel directly underneath the sign (as it will be on the building). No vertical clearance requirements are therefore applicable.

3.3 ROAD TRANSPORT INFRASTRUCTURE

The placement of the proposed sign (in an elevated position) will not impede, nor restrict any vehicle, pedestrian or cyclist movements within the subject site nor on the adjacent roads.

As above, DIT typically requests review of a sign's impact against a drivers' view/sight line at specific locations within the approach lanes to the sign. Specifically, DIT requests review of the impacts at points measured 40 m and 80 m from the Stop bar for each approach lane (for which the sign would be visible). Montage images have therefore been prepared for these locations for the southern Payneham Road approach and the Nelson Street approach (refer attached images).

Based on the images for the various assessment locations, the following comments are noted in reference to the DIT criteria:

- **Payneham Road (southern approach)**
 - 40 metres south of the Stop bar – western lane – sign is clear of all signal lanterns or other traffic control devices (and largely blocked by existing buildings);
 - 40 metres south of the Stop bar – central lane – sign is clear of all signal lanterns or other traffic control devices (and largely blocked by existing buildings);
 - 40 metres south of the Stop bar – eastern (right turn) lane – sign aligns with a signal lantern array (refer below for further discussion);
 - 80 metres south of the Stop bar – western lane – sign is clear of all signal lanterns or other traffic control devices (and largely blocked by existing buildings);

- 80 metres south of the Stop bar – eastern lane – sign is clear of all signal lanterns or other traffic control devices (and largely blocked by existing buildings);
- **Nelson Street (eastern approach)**
 - 40 metres east of the Stop bar – southern lane – sign is clear of all signal lanterns or other traffic control devices (facing drivers on this approach);
 - 40 metres east of the Stop bar – central lane – sign is clear of all signal lanterns or other traffic control devices (facing drivers on this approach);
 - 40 metres east of the Stop bar – northern (right turn) lane – sign is clear of all signal lanterns or other traffic control devices (facing drivers on this approach);
 - 80 metres east of the Stop bar – southern lane – sign is clear of all signal lanterns or other traffic control devices (facing drivers on this approach);
 - 80 metres east of the Stop bar – central lane – sign is clear of all signal lanterns or other traffic control devices (facing drivers on this approach);
 - 80 metres east of the Stop bar – northern (right turn) lane – sign is clear of all signal lanterns or other traffic control devices (facing drivers on this approach);

The sign will therefore be clear of aligning with any signal lanterns or traffic control devices (relevant to approach movements from the southern side of Payneham Road and from Nelson Street) for 10 of the 11 assessment locations. Of the assessed locations, there will only be alignment of the proposed sign with a signal lantern array at the 40 m distance in the right turn lane on the southern Payneham Road approach. However, the impact of this 'alignment' is considered minimal as:

- from this point, the sign will be outside of the 10° to 12° primary driver viewing angle (5° to 6° angle from the 'centre line' of the driver's view);
- similarly, the 'aligning' signal array will also be 9.7° from the centre line of a driver's view in this position on Brighton Road. Again, this would be outside the primary field of view for a driver in this position. Therefore, it is much more likely that a driver within the right turn lane (on the southern Payneham Road approach) would focus attention on the other three signal lanterns which have 'tighter' observation angles at this point;
- the 'conflicting' signal lantern does not include lanterns for the right turn movement and therefore drivers in the right turn lane are unlikely to rely on this array. The other lanterns on the north-eastern corner (including the mast arm array) provide the right turn arrow lanterns and these do not conflict with the proposed advertising sign;
- the proposed sign will be approximately 99 m at its closest point to the subject driver position whereas the 'aligning' signal lantern is 45 m from the driver position (and in front of the sign). Assuming adoption of the relevant luminance provisions (and other relevant operating characteristics detailed below), the signal lantern array would be much more conspicuous to drivers than the sign at this point;

- there is a “target board” surrounding the subject signal lanterns. “Target boards” provide black surrounds around the perimeter of signal lanterns enhancing the prominence of the lanterns for road users. I note that expert witness advice has previously been provided by Mr Damien Bitzios (traffic engineer) to the Environment, Resources and Development (ERD) Court including a similar conclusion in respect to the possible provision of a target board on a signal array to minimise the impact of a proposed LED billboard [*Ooh! Media Pty Ltd v Corporation of the City of Adelaide, 2017*].

I therefore consider that the impact of the proposed sign on the conveyance of traffic control information on approach to the intersection would be minimal.

3.4 PHYSICAL CHARACTERISTICS

The DPTI Guide details physical characteristics of the sign related to its size, shape, colour and message type. As noted above, the sign is proposed to be 3 m wide and 12 m high which is within a typical range of sizes associated with such advertising signs.

In relation to content, specific details are not available at this time (and will change over time with individual advertisements). However, to ensure conformance with DPTI’s guide, the following provisions are considered appropriate:

- advertisements shall not contain shapes or primary colours of red, amber (yellow) or green which, in combination, could potentially be mistaken for traffic control devices;
- advertisements displayed shall be highly legible to ensure interpretation as quickly and concisely as possible. This shall be achieved by advertisements being contained within a single, self-contained message that is not spread across multiple images/ photographs; and
- advertisements shall comply with the requirements of all current industry standards and codes of content and shall not contain salacious, illegal or controversial messages.

3.5 ILLUMINATION, REFLECTIVITY AND MOVEMENT

The proposed advertising sign shall be equipped with the following features:

- adaptive dimming to suit changes in ambient light levels (this will prevent the sign from ‘dazzling’ motorists on the adjacent roads);
- error detection system to detect when a system malfunction occurs (this will trigger the display to turn off or display a blank black screen if malfunction occurs); and
- appropriate software security (preventing against hacking or unauthorised modification of messages on the display).

The proposed advertising sign shall be configured to automatically adjust luminance levels in accordance with Table 4 of DPTI's Guide. Similarly, the proposed sign shall not exceed the maximum veiling luminance levels illustrated in Table 5 of DPTI's Guide. Copies of Tables 4 and 5 from DPTI's "Advertising Signs Assessment Guidelines for Road Safety" are attached to this letter.

In regard to movement, the proposed advertising sign is proposed to display static messages/advertisements (i.e. no videos or animations) with dwell times in the order of 45 seconds (as per DPTI's Guide).

The messages shall not contain flashing, revolving, pulsating or intermittent lights/images). Advertisements shall transition instantaneously (within 0.1 seconds of one another) and shall not contain transition effects (i.e. fade, zoom, fly-in etc.). Individual advertisements shall not contain moving, flashing, scrolling or rotating messages, nor shall they be sequential (i.e. an individual message spread across several static images).

4. PLANNING AND DESIGN CODE

The Planning and Design Code identifies that the 'Advertising Near Signalised Intersections' Overlay applies to the subject site. The Deemed-to-Satisfy (DTS) Criteria/Designated Performance Feature seek that:

"Advertising:

(a) is not illuminated

(b) does not incorporate a moving or changing display or message

(c) does not incorporate a flashing light(s)."

The proposal will not wholly meet the DTS/DPF criteria in that it will be illuminated and the display/message will change (albeit it will not be a moving display/message nor will it incorporate a flashing light). In respect to the illumination, this is an important aspect of any advertising sign (regardless of whether it is externally or internally illuminated) to ensure that messages can be quickly viewed and interpreted by road users in low light conditions (to do otherwise could present a greater safety risk). In respect to the changing display or message, adherence to the above recommended provisions (particularly the dwell times) will effectively result in the sign presenting as a static image to passing road users.

Of particular relevance, the associated Performance Outcome seeks that:

"Advertising near signalised intersections does not cause unreasonable distraction to road users through illumination, flashing lights, or moving or changing displays or messages."

Given the assessment detailed above and assuming adherence to the recommended provisions, the above Performance Outcome of the Code would be met by the proposal.

5. SUMMARY

The proposal is to install an LED advertising sign on the existing building at 149 Payneham Road, St Peters.

The proposed advertising sign has been generally assessed against the DPTI *"Advertising Signs Assessment Guidelines for Road Safety"* in order to determine the suitability of the proposal in regard to road safety. The proposed LED technology (i.e. luminance) and the way in which advertisements change, will satisfy the requirements stated in the guideline. Based on the review, it is considered that the operation of the proposed sign should ensure that all advertisements displayed do not feature predominant colours or shapes which could be mistaken for traffic control devices. Furthermore, all advertisements must contain constant static images (which are legible and concise), have dwell times of at least 45 seconds and must change instantaneously (within 0.1 seconds) without transition effects.

As required by DIT, the proposed location of the sign has been assessed based on an assessment of a driver's view from various points on approach to the adjacent signalised intersection and the sign itself. The sign is entirely clear of aligning with adjacent signal lanterns (and other traffic control devices) for 10 of the 11 locations. While the proposed sign will align with one set of signal lanterns at the remaining assessment position (with the right turn lane on Payneham Road's southern approach), this would occur outside a driver's primary field of vision. Importantly, the lanterns which would align with the proposed sign do not include right turn arrow lanterns and therefore have little relevance to right turning drivers (noting that there is no conflict for straight through movements in the other lanes).

Assuming adherence to the relevant provisions detailed above, it is considered that the proposal should not have a significant or unacceptable risk of distraction to road users (particularly, given the existing presence of advertising signage in this location) and that it aligns with the relevant Performance Outcome of the Planning and Design Code.

Please feel free to contact me on (08) 7078 1801 should you require any additional information.

Yours sincerely,



BEN WILSON

Director | CIRQA Pty Ltd

ATTACHMENT 1

PHOTO MONTAGES FROM DRIVER POSITION/EYE HEIGHT

Payneham Road (southern approach)

- 40 metres south of the stop bar – western lane



- 40 metres south of the stop bar – central lane



- 40 metres south of the stop bar – eastern (right turn) lane



- 80 metres south of the stop bar – western lane



- 80 metres south of the stop bar – eastern lane



Nelson Street (eastern approach)

- 40 metres east of the stop bar – southern lane



- 40 metres east of the stop bar – central lane



- 40 metres east of the stop bar – northern (right turn) lane



- 80 metres east of the stop bar – southern lane



- 80 metres east of the stop bar – central lane



- 80 metres east of the stop bar – northern (right turn) lane



ATTACHMENT 2

Extracts from DPTI's "Advertising Signs Assessment Guidelines for Road Safety" (August 2014):

Table 4 – Luminance levels for internally illuminated signs

Ambient Conditions	Sign Illuminance Vertical Component (Lux)	All Colours	
		Sign Luminance (Cd/m ²) Max	Sign Luminance (Cd/m ²) Min
Sunny Day	40000	6300	2800
Cloudy Day	4000	1100	500
Twilight	400	300	200
Dusk	40	200	100
Night	<4	Site Specific Veiling Luminance or 200, whichever is the lower (refer veiling luminance calculation)	60

Table 5 – Maximum Veiling Luminance

Ambient Road Lighting Environment (refer AS 1158)	Average Carriageway Luminance (Cd/m ²)	Maximum Veiling Luminance (Cd/m ²)
V1	1.5	0.40
V3	0.75	0.25
V5	0.35	0.13
Unlit	0.25	0.10