

17 July 2018

Director, Codes and Approval Pathways
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Sir/Madam,

RE: Submission to proposed Housekeeping amendment to the Codes SEPP

Thank you for the opportunity to provide a submission in relation to the proposed amendments to the *State Environmental Planning Policy (Exempt and Complying Development) 2008* (Codes SEPP).

We commend the Department in seeking to instigate amendments, especially as they are based on feedback from stakeholders that aim to further support the NSW Government's efforts to streamline exempt and complying developing in NSW.

This letter relates to one aspect of the proposed amendments to the Codes SEPP, specifically the new provision to allow signage on cranes to be exempt development. The introduction of a new provision is supported in principle; however, we believe further consideration and review is required to the development standards proposed to apply for the signage to be able to be carried out as exempt development.

Signage on Cranes

It is noted that the reason for the proposed amendment to the Codes SEPP is in order to provide greater control to signage on cranes – we understand the pretext being that there is a lack of controls applying at present.

Providing greater consistency and control of crane signage across NSW is supported, however there should be the right balance between supporting signage, whilst reducing red tape (a key objective of the Codes SEPP).

A review of the typical signs installed on cranes across Mirvac projects and the broader industry reveals that the proposed amendments to the Codes SEPP will only allow quite restrictive signage to be installed on a crane as exempt development. The two key aspects of the proposed new provisions that will limit crane signs are the restrictions on size - 600mm high / 2m wide, and illumination - not allowed. These two aspects effectively mean that any signage erected that meets the proposed exempt development criteria will be marginal, effectively negating the very purpose for erecting the signage.

In order to obtain signage that is more commensurate with current industry practice i.e. signage that is larger and illuminated, the net effect of the proposed new provisions will be an outcome where the industry will need to prepare Development Applications (DA's), to seek to secure development consent for each and every crane sign. This is considered to be an unnecessary burden on the planning system, especially for an item that is an expected feature on a crane and which has marginal if any, and only temporary environmental impacts.

We respectfully request the expansion of the scope of what could reasonably be able to be installed on a crane to be allowed to be undertaken as exempt development.

Recommendation

It is recommended that the Department of Planning and Environment consider amending the provisions for crane signage to reflect industry common practice and requirements for installing crane signs.

Cranes tend to have typical sizes, in terms of jib heights and lengths. Accordingly, it is suggested that determining the appropriate size for signage should be based on an appropriate proportion and relationship of the sign to the crane.

The table below outlines recommended amendments for crane signage to ensure the right balance between controlling and supporting crane signage.

<i>Proposed Provision</i>	<i>Recommended Provision</i>
<i>The size of the sign is no greater than 600mm in height and 2m in width</i>	The size of sign is no greater than 1.4m in height and 9m in width
<i>It is not illuminated</i>	If the sign is illuminated: (i) Be only permitted to be illuminated from dusk until dawn, and (ii) have its means of illumination, including any associated cables, concealed or integrated with the sign, and (iii) not be animated, flashing or moving, and (iv) comply with AS 4282—1997, Control of the obtrusive effects of outdoor lighting

To provide an indication of the above recommended signage provisions on a working crane, we would welcome the opportunity of meeting with to provide images and plans for further information.

Signage on Jump-form

Similar to signage on cranes, there is considered to be merit in broadening exempt development to also permit signage erected on jump-form (the climbing formwork system used to construct the core).

This is another form of signage which is common industry wide practice.

Providing an additional provision to enable jump-form signage to be erected would again prevent unnecessary DAs needing to be submitted and assessed, freeing up resources on both sides to concentrate on more meaningful, essential and critical items.

Jump-form signs also have the added benefit of providing screening which results in a cleaner and neater view of the construction of the building core.

Recommendation

It is recommended that the Department of Planning and Environment consider broadening the proposed amendments to the Codes SEPP to permit jump-form signage to installed as exempt development.

The table below outlines the proposed amendments recommended be adopted for introducing jump-form signage.

Recommended New Provision	Proposed Development Standards
Signage on jump-form	The size of any jump-form signage is no greater than 8m in height and able to be installed on all aspects to the width of the construction core
	It is not illuminated
	It does not contain reflective materials, colours or finishes
	Third Party advertising is not permitted

As above, we would welcome the opportunity of meeting with you to provide images and plans for further information.

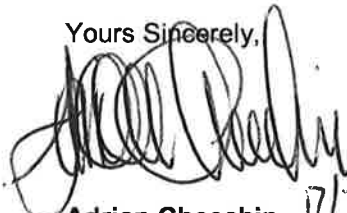
Conclusion

Thank you for the opportunity to provide a submission on the proposed amendments to the Codes SEPP.

We welcome the Department's approach in seeking to streamline the development process.

Should you require any additional information, please contact the undersigned on 9080 8000.

Yours Sincerely,



17/7/18
Adrian Checchin
Development Director