



18th July 2018

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

To whom it may concern,

**Re: Feedback on ‘Signage on Cranes’ Exempt and Complying Development Proposal**

To whom it may concern,

With regards to the proposed amendments to the State Environmental Planning Policy (Exempt and Complying Development) 2008 Built Pty Ltd would like to make comment on the ‘Signage on Cranes’ policy. In the interest of streamlining policies relating to signage on cranes and more broadly to signage on construction sites across New South Wales, Built has assessed the proposed amendments and compiled the following feedback for review.

**Conditions that are acceptable:**

- The signage does not obstruct line of sight to traffic control signals, driveways or other critical road infrastructure;
- It does not contain reflective materials, colours and finishes;
- It does not incorporate sound, vibration, odour and other emissions;
- It does not contain or use flashing lights, electronically changeable messages, animated display, moving parts, simulated movements, complex displays that hold a drivers attention beyond ‘glance appreciation’, or displays resembling traffic signs or signals by use of colour, shape or words that can be construed as giving instruction to traffic; and
- Third party advertising is not permitted.

**Conditions that would require minor adjustment:**

- The signage shall contain only the name or logo of the Construction Company, builder, or developer, project name or crane operator and contact details.

**Conditions that would require amendment:**

Current condition	Issue	Proposed amendment
The size of the sign is no greater than 600mm in height and 2m in width	<p>Visibility of signage affected by height of construction and height of lettering. Adopted simplified model under AS1319.</p> <p>Note that based on proposed 600mm restriction, only buildings under 50m in height would have compliant crane signage (refer Appendix B).</p> <p>Painted signage on cranes to be unrestricted as cranes have minimal solid body areas for painted signage.</p>	<p>For construction signage (excluding painted crane signage) – the height of the letter/logo is to be no more than 12mm for every metre in building height (e.g. 100m high building = 1200mm high signage).</p> <p>No restriction on length as this will be proportional to height.</p> <p>No restriction on size of painted crane signage.</p>

It is not illuminated	Luminance is a complicated measured affected by area, proximity to neighbours, ambient lighting and time of day.  To simplify this an adaptation of existing signage luminance policies may be most practical.	Luminance to be in accordance with a given table range and controlled by time of day (see Appendix C Campbelltown DCP 2015 Table 16.2 for example).  Where outside of the table range, signage will be classified non-exempt development and DA submission will be required.
Policy title (Signage on Cranes)	To cover any type of signage on construction equipment (e.g. jumpform and formwork screen signage) not just crane signage.	Change to 'Signage on Construction Equipment'

Table 1: Proposed condition amendments

A summary of this process has been illustrated below in Figure 1:

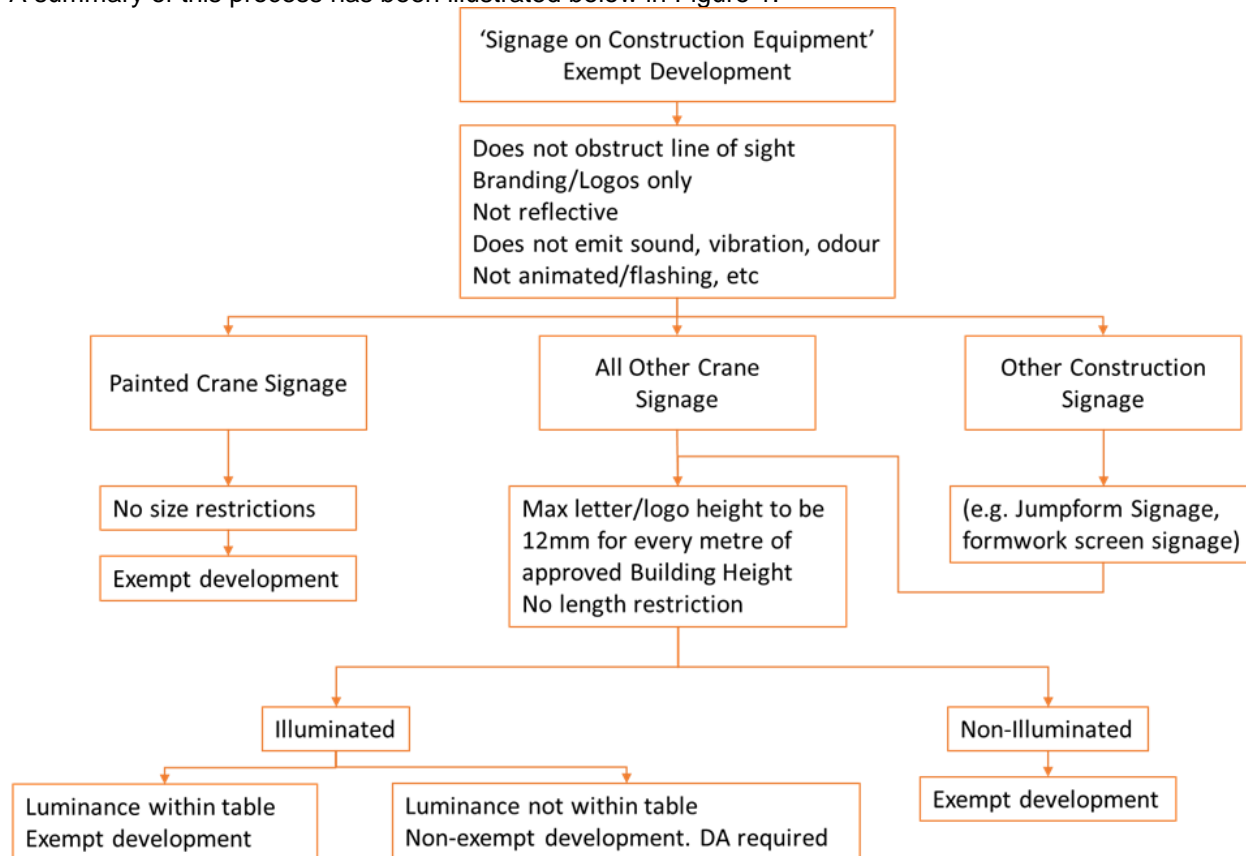


Figure 1: Flowchart of proposed amendments to Signage on Cranes Exempt Development



### Proposed Amendment 1: Signage Letter Size

The relationship between signage letter heights and building is a function of visibility from ground level, and has been adapted and simplified from AS1319-1994.

Based on the current 600mm restriction on signage height – only cranes on building sites under 50m in height would be visible from the ground. Based on the above proposal, construction companies, developers and / or crane companies would easily determine the maximum permissible signage size based on the height of the building being developed.

A summary of sign letter sizes and building heights is provided in the table below:

Building Height (m)	Letter Height (mm)
50	600
75	900
100	1200
125	1500
135	1620
150	1800
175	2100
200	2400
225	2700
250	3000
275	3300

Table 2: Summary of proposed sign letter size for various building heights

Given that by nature cranes have minimal solid body areas for painted signage, Built propose to remove restrictions on size of painted signage on cranes.

A scale example of how these conditions would appear under the original and proposed scenarios would on a 135m high building (e.g. 4 Parramatta Square) is illustrated in Appendix B.

### Proposed Amendment 2: Luminance of signage

Luminance of crane signage is a complicated issue that is difficult to govern using an all-encompassing set of compliance conditions. Given a growing trend to provide illuminated crane signage, we propose that exempt developments would need to comply with a prescriptive luminance table that addresses:

- Illuminated Area;
- Proximity to Neighbours;
- Ambient Light Conditions; and
- Time of Day (including restrictions on hours of illuminations).

Any illuminated signs outside of this range would be non-exempt developments and a DA would be required. Appendix C shows an extract of an existing table from the Campbelltown (Sustainable City) Development Control Plan 2015 that deals with luminance of signage in a local government area.

### Proposed Amendment 3: Policy title change to ‘Signage on Construction Equipment’

This amendment would streamline the exempt development condition so that it is less conditional and applies to all types of construction equipment, not just cranes.



In summary, whilst Built believe the overall changes to the State Environmental Planning Policy (Exempt and Complying Development) 2008 are beneficial, the following amendments would help streamline the existing policies for Signage on Cranes (and Construction Equipment generally):

- Proposed Amendment 1: Signage Letter Size
- Proposed Amendment 2: Luminance of signage
- Proposed Amendment 3: Policy title change to 'Signage on Construction Equipment.

Regards,

Daniel Graham  
Design Director



**Appendix A – Table of Building Heights and Recommended Signage Size for Proposed Sydney buildings and Under Construction**

<b>Under Construction</b>	Floors	Approx Height	Signage Height (+25m crane clearance)	Vd = Viewing Distance (m)	Required Letter Size (mm) as per AS1319	Recommended Text Size DA height x 12 = (mm)
Crown Sydney Hotel and Resort	75	262.5	287.5	407	2440	3150
Sydney Greenland Centre	68	238	263	372	2232	2856
Rhodes Central Tower 1A	39	136.5	161.5	228	1370	1638
York and George	40	140	165	233	1400	1680
Darling Square Northeast	41	143.5	168.5	238	1430	1722
Wynyard Place	34	119	144	204	1222	1428
Boomerang Tower	39	136.5	161.5	228	1370	1638
One30 Hyde Park	38	133	158	223	1341	1596
Castle Residences	35	122.5	147.5	209	1252	1470
Wanda Vista Sydney	28	98	123	174	1044	1176
230 Sussex Street	31	108.5	133.5	189	1133	1302
Darling Square Southeast Plot	28	98	123	174	1044	1176
Rhodes Central Tower 1B	29	101.5	126.5	179	1073	1218
Adina Grand Apartment Hotel Sydney	24	84	109	154	925	1008
Arc by Crown Group	25	87.5	112.5	159	955	1050
Barrack Place	21	73.5	98.5	139	836	882
Western Plot (North Tower) Student Accommodation	21	73.5	98.5	139	836	882
The Ribbon	20	70	95	134	806	840
Infinity By Crown	20	70	95	134	806	840
Opera Residences	19	66.5	91.5	129	776	798
<b>Median</b>	<b>30</b>	<b>105</b>	<b>130</b>	<b>184</b>	<b>1103</b>	
<b>Proposed</b>	Floors	Approx Height	Signage Height (+25m crane clearance)	Viewing Distance (m)	Required Letter Size (mm) as per AS1319	Recommended Text Size DA height x 8 = (mm)
505 George Street	78	273	298	421	2529	3276
182 George Street	54	189	214	303	1816	2268
One Sydney Harbour Tower I	70	245	270	382	2291	2940
338 Pitt Street	69	241.5	266.5	377	2261	2898
Darling Park Tower 4	46	161	186	263	1578	1932
Ritz Carlton @ the Star	65	227.5	252.5	357	2143	2730
Quay Quarter	53	185.5	210.5	298	1786	2226
One Sydney Harbour Tower II	60	210	235	332	1994	2520
Wanda One Sydney	58	203	228	322	1935	2436
Sydney Metro Martin Place North Tower	39	136.5	161.5	228	1370	1638
First Tower	60	210	235	332	1994	2520
33 Bligh Street	30	105	130	184	1103	1260
Harbourside	45	157.5	182.5	258	1549	1890
City One	30	105	130	184	1103	1260
59 Goulburn Street	40	140	165	233	1400	1680
Sydney Metro Martin Place South Tower	30	105	130	184	1103	1260
81 Goulburn Street	40	140	165	233	1400	1680
9-25 Commonwealth Street	34	119	144	204	1222	1428
77 Market Street	30	105	130	184	1103	1260
410 Pitt Street	33	115.5	140.5	199	1192	1386
19-31 Pitt Street	32	112	137	194	1162	1344
One Sydney Harbour Tower III	30	105	130	184	1103	1260
173-175 Phillip Street	27	94.5	119.5	169	1014	1134
<b>Median</b>	<b>39.5</b>	<b>138.3</b>	<b>163.3</b>	<b>230.9</b>	<b>1385.2</b>	

Table 3: Building Heights and Recommended Signage Size for Proposed Sydney buildings and Under Construction

## Appendix B – Scale representation of crane signage size for 135m tall building (4 Parramatta Square)

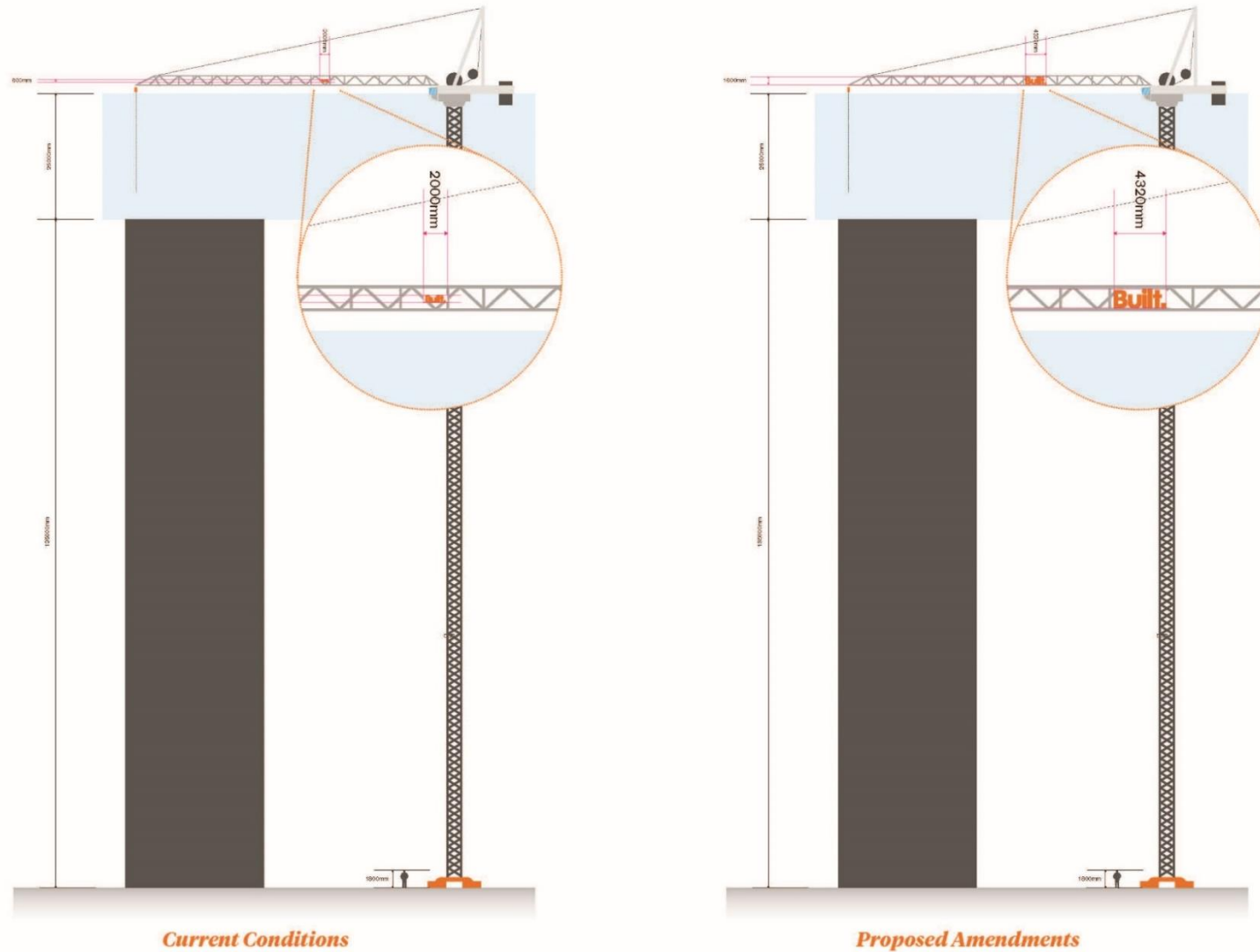


Figure 2: Scale representation of crane signage size for 135m tall building (4 Parramatta Square) under Current Conditions (left) and Proposed Amendments (right)





Figure 3: Images of actual crane signage at 4 Parramatta Square designed in accordance with Proposed Amendments (1600mm high)

## Appendix C – Extract of Table 16.2 Maximum Allowable Daytime Luminance of Illuminated Signs from Campbelltown DCP 2015

Table 16.2 Maximum Allowable Daytime Luminance of Illuminated Signs ( Not Digital Signs)

Illuminated Area (sqm)	Areas 1	Area 2	Area 3
less or equal to 0.5	2900 cd/sqm	2000	1000 cd/sqm
Greater than 0.5 and less than or equal 2.0	2300cd/sqm	1600	800 cd/sqm
Greater than 2.0 and less than or equal 5.0	2000cd/sqm	1200	600
Greater than 5.0 and less than or equal 10	1500	1000	600
Greater than 10.0	1200	800	400

Source: Based on the information provided under the Draft Transport Corridor Outdoor Advertising and Signage Guidelines - November 2015

### Areas 1, 2 and 3 under Tables 16.1 and 16.2 above

Area 1 covers areas with generally high off-street ambient lighting e.g. some major shopping/commercial centres with a significant number of off-street illuminated advertising devices and lights.(eg Blaxland Road)

Area 2 covers areas with generally medium off-street ambient lighting e.g. small to medium shopping/ commercial centres (eg Queen Street) .

Area 3 covers areas with generally low levels of off- street ambient lighting e.g. rural and residential areas.

Figure 4: Table 16.2 extract from Campbelltown (Sustainable City) Development Control Plan 2015





## References

Campbelltown City Council (2018), Campbelltown (Sustainable City) Development Control Plan 2015 Amendment No. 5;  
<<https://www.campbelltown.nsw.gov.au/BuildAndDevelop/PlanningPoliciesandControls/DevelopmentControlPlans/CampbelltownSustainableCityDevelopmentControlPlan2015>>

Council of Standards Australia (1994), Australian Standards AS1319-1994 Safety signs for the occupational environment;  
<<https://www.saiglobal.com/PDFTemp/Previews/OSH/as/as1000/1300/1319.pdf>>

Department of Planning and Environment (2018), Housekeeping amendment to the Codes State Environmental Planning Policy (Exempt and Complying Development Codes) 2008: Explanation of Intended Effect; <<http://www.planning.nsw.gov.au/Policy-and-Legislation/State-Environmental-Planning-Policies-Review/Housekeeping-amendment-to-the-Codes-SEPP>>