

## The St Peters Residents Association makes this submission in relation to the following Development Application.

Applicant:	Twenty Four Outdoor Pty Ltd C/- Future Urban Pty Ltd
Application ID:	23004466
Notified Elements:	Advertisement, Change of use & Other - Commercial/Industrial
Address:	149 PAYNEHAM RD ST PETERS SA 5069

#### Assessment against the Planning and Development Code (PDC).

The site lies within the Suburban Activity Centre Zone and abuts the Established Neighbourhood Zone (Historic Area Overlay NPSP20). The site is also almost adjacent to the "Jam Factory" Local Heritage Place.

Table 3 lists 'Advertisement' as a class of development to which various policies apply for a Code Assessed - Performance Assessed Development. These policies are discussed below.

#### Suburban Activity Centre Zone.

#### DO 1

An active commercial precinct supporting <u>neighbourhood-scale</u> 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. Buildings and pedestrian areas create <u>a high quality activated public realm</u> that is integrated with pedestrian and cycle networks and establish well-defined connections to available public transport services."

The development will not be consistent with <u>neighbourhood-scale</u> activities. This large, illuminated advertising hoarding will ride roughshod over the "suburban" and "neighbourhood" focus of the Suburban Activity Centre Zone, as it targets its advertisements at large flows of vehicular commuter traffic passing through this intersection.

It will not contribute positively to a <u>high quality activated public realm</u> as outlined by DO 1, as it will demean the public realm, adding a tawdry over-arching commercial, visually dominating billboard to this intersection. Large obtrusive billboards, with impersonal changing displays, detract from a high-quality public realm and detract from the quality of pedestrian networks within that public realm. Pedestrians are made to feel like ants next to large obtrusive billboards which direct their advertising to mass flows of oncoming motor vehicles.

#### Land Use and Intensity

PO 1.1

## Shops, office, - - - - and other businesses that provide a range of goods and services to the surrounding neighbourhood and district.

The advertisements displayed will predominantly be of a third-party nature aimed at the broader community and not <u>the surrounding neighbourhood and district.</u> Advertising of the businesses on which the hoarding will be erected will be minimal as the focus will be on third-party advertising directed at passing motorists.

#### Built Form & Character

#### PO 2.1

## Development <u>complements adjacent development</u> within the zone, and mitigates interface <u>impacts on adjoining residential uses</u> in neighbourhood type zones through appropriate building siting, scale and design.

This development fails to <u>complement adjacent development</u>, adding to the visual clutter of the intersection and will certainly have <u>impacts upon adjoining residential uses</u>. The site of the development abuts the Established Residential Zone (which also has an Historic Overlay) on Stephen Terrace and First Lane.

It should also be noted that approval has been recently given by SCAP for a residential development at 151-157 Payneham Road on the adjoining vacant land and the existing "Mr Appliance" showroom, which is to be demolished.

While the illuminated face of the hoarding will not face the side windows of this new development, the backside will certainly be seen and obstruct possible views from the apartments.

#### **Building Heights and Setbacks.**

#### PO 3.1

#### <u>Building height is consistent with</u> the form expressed in any relevant Maximum Building Height (Levels) Technical and Numeric Variation layer and Maximum Building Height (Metres) Technical and Numeric Variation layers or is <u>generally low</u> <u>rise to complement the established streetscape and local character</u>.

The height to the top of the hoarding will be 9.7 metres above ground level. While this PO does not specify a height in metres it appears to require a <u>maximum building height of 2</u> <u>levels</u>. If a level is assumed to be 3.5 metres, then the height of the sign is 2.2 metres more than the desired maximum.

The <u>local character and streetscape</u> of the locality is <u>generally low-rise</u> and single story. The proposed hoarding presents as two-story or greater.

#### PO 3.2

## Buildings mitigate visual impacts of buildings on residential development within a neighbourhood zone.

From the applicant's documents it is not clear if the development will need to comply given the proximity to the abutting Established Neighbourhood Zone. We ask that the Council Planning staff check and advise on this.

#### Advertisements.

#### PO 4.1

### Advertisements are sited and designed to achieve an <u>overall consistency of</u> <u>appearance</u> along individual street frontages.

This advertising hoarding does not achieve <u>overall consistency of appearance</u> along any of the Stephen Tce, Payneham Road or Nelson Street frontages.

Most other signage in the vicinity is placed on shop fronts, verandas or parapets. There is a free-standing sign opposite for the Avenues Shopping Centre, however this is about 6-7 metres in height, and the current "Mr Appliances" pylon sign will shortly be removed when the site is redeveloped.

There is no other advertising signage of the proposed size or height in the vicinity.

#### Advertising near Signalised Intersections Overlay.

#### DO 1

Provision of a safe road environment by reducing <u>driver distraction</u> at key points of conflict on the road

#### PO 1.1

## Advertising near signalised intersections does not cause <u>unreasonable distraction</u> to road users through illumination, flashing lights, or moving or changing displays or messages.

The proposed advertising hoarding will present an additional <u>distraction to road users</u>, especially those waiting for the traffic lights to change when this intersection is congested. This is a major intersection which is often heavily congested at peak am and pm times on working weekdays. Motorists already face distractions at busy intersections, and an additional one is undesirable, particularly the distraction of a large internally illuminated billboard with changing advertisements. Even if the timing of changing advertisements is adjusted to minimize impacts on motorists, they will still be looking at it and waiting for the advertisement to change. How could they do otherwise? Billboards at intersections facing vehicular traffic are designed to attract the eyes of drivers.

There are no green right-hand turn arrows on Payneham Road for vehicles leaving the City and seeking to turn right into Nelson Street during the morning peak. The proposed advertising hoarding may distract drivers seeking to turn right from Payneham Road into Nelson Street and so turning motorists must be even more vigilant. We submit that at peak traffic periods this intersection is a key point of conflict on the road, and the proposed elevated advertising sign will be a significant distraction for motorists.

#### Advertisements.

DO 1

# Advertisements and advertising hoardings are <u>appropriate to context</u>, efficient and effective in communicating with the public, limited in number to avoid clutter and do not create a hazard.

We submit that this large internally illuminated billboard with changing advertisements directed at motorists will not be <u>appropriate to context</u> in which it will be situated and will appear as a visual blight on the landscape.

It will be situated on land which is adjacent to an Established Neighbourhood Zone (Historic Overlay Area), and one site removed from the Local Heritage Jam Factory on Payneham Road.

It will be adjacent to a site on Payneham Road recently approved for residential apartments and ground floor commercial tenancies, with the existing "Mr. Appliances" building at 155-157 Payneham Road to be demolished.

#### PO 1.1

## Advertisements are <u>compatible with and integrated with</u> the design of the building and/or land they are located on.

This billboard is not <u>compatible with</u>, nor integrated with, the design of the existing building, being erected on top of a motor repair shop.

A few "architectural columns" as proposed will not disguise the motor repair shop's very basic design, nor the sign itself. They are obviously proposed to mitigate the large, illuminated hoarding. They are akin to "lipstick on a pig!"

We submit that the proposed billboard is also not <u>compatible nor integrated</u> with the land on which it is to be located, situated as it is at a busy traffic intersection in a zone which is meant to cater for suburban shopping and other suburban "neighbourhood scale" facilities. This land also nestles between an Established Neighbourhood Zone (Historic Overlay Area) and a medium-rise apartment building. The proposed billboard will be grossly incongruent in this location.

### PO 1.5

## Advertisements and/or advertising hoardings are of a <u>scale and size appropriate to</u> <u>the character of the locality.</u>

It is ironic that Future Urban, acting for the applicant, describes this major intersection as "stridently commercial and contains a conglomeration of private business and public infrastructure paraphernalia typical of such locales".

It would seem that Twenty Four Outdoor Australia Pty Ltd, the applicant, desires to make this intersection even more stridently commercial by erecting a huge billboard to tower over it. While major traffic intersections are not generally known for their aesthetic qualities, authorities should strive to ensure that they do not become even more ugly, garish and dangerous than they need be.

We submit that this billboard is likely to have negative interface impacts on the adjoining apartments recently approved by the State Commission Assessment.

It is useful to compare the proposed LED hoarding with other similar ones in the City of Norwood Payneham & St Peters.

Near the Glynde Corner, about 2km further north-east on Payneham Road, is a prominent LED sign which measures about 5.0m by 1.5m.



The proposed sign measures12.0m by 3.0m according to Future Planning's letter (6/2/2023, page 1), however this is inconsistent with the 24 Outdoor plans which show it to be 10.5m by 3.5m.

Whatever the true size , it remains a massive hoarding which is out of character with the locality. The following photo shows the proposed sign's approximate size, outlined in red, compared to that at Glynde.



Most people will be aware of the very large LED sign that sits above the Britannia Hotel. There have been advertising signs above this hotel in various forms for over 80 years, with the current one being the latest iteration. Council planning staff have advised that the Britannia hoarding is about 9m by 3m, meaning that the proposed sign is even <u>larger than</u> <u>that on the Britannia Hotel.</u>

If approved, this development will create an unacceptable precedent for similar hoardings at our other intersections.

Will the Maid & Magpie Hotel be next, despite past refusals by the former St Peters Council?

#### PO 3.1

#### Advertisements are limited to <u>information relating to the lawful use of land they are</u> <u>located on</u> to assist in the ready identification of the activity or activities on the land and avoid unrelated content that contributes to <u>visual clutter</u> and untidiness.

This advertising hoarding will display predominantly third party and government advertising. Most of the content will be <u>unrelated to the lawful use of the land by the existing businesses</u> on the site.

<u>Visual clutter</u> and untidiness will be increased by the proposed large advertising hoarding at this important intersection.

Cluttering is a multi-step process and each advertising sign or hoarding, particularly those showing third party advertisements, adds, step by step, to the end result, which is clutter.

We submit that this large advertising sign, which is larger than others in the locality, and which will be erected to sit well above the building, will dominate the intersection, and add to visual clutter, contrary to PO3.1.

The St Peters Residents Association submits that approval for the proposed Advertising Hoarding should be <u>refused</u> by the Council Assessment Panel (CAP) as it fails to satisfy the important criteria in the Planning & Design Code.

The Association wishes to be heard by the CAP in relation to this application.

David Cree President St Peters Residents Association Inc 27 June 2023