

2 May 2024

Mary Garland  
Team Leader, Transport and Water Assessments  
NSW Department of Planning and Environment  
Locked Bag 5022  
Parramatta NSW 2124

Dear Mary,

**Response to Request for Information (DA23/14504)  
Digital Advertising Sign – Sydney Park Road, Erskineville**

This letter has been prepared by *Keylan Consulting Pty Ltd* (Keylan) on behalf of Sydney Trains (the Applicant) to address the Department of Planning, Industry and Housing's (DPHI) Request for Additional Information (RFI) dated 5 February 2024, 22 February 2024 and 14 March 2024 in relation to Development Application (DA23/14504).

A response to the issues raised in DPHI's letters are detailed in the table at **Attachment A, B and C**. This response should be read in conjunction with the following attachments:

- **Attachment D:** Amended Lighting Impact Assessment
- **Attachment E:** Amended Structural Feasibility Statement
- **Attachment F:** Management Plan
- **Attachment G:** Traffic Control Plan
- **Attachment H:** Utilities Plan
- **Attachment I:** Test of Significance Assessment

The response reinforces the findings of the SEE and supporting information, that the proposed digital advertising sign:

- will not adversely impact on the visual amenity of nearby residential properties or users of Sydney Park
- will not adversely impact items of heritage significance
- will result in acceptable lighting and road safety (including future TfNSW upgrades)
- will provide a public benefit to the community.

Notwithstanding, the proposal has been amended from 24-hour operation to provide an extended curfew from 10pm to 6am daily. This amendment follows a detailed review of the submissions received during the public submission.

We trust that this response provides sufficient information required for DPE to finalise its assessment and approve the application.

Please do not hesitate to contact Lauren Donohoe via email [lauren@keylan.com.au](mailto:lauren@keylan.com.au) should you wish to discuss any aspect of this project.

Yours sincerely

*Padraig Scollard*

Padraig Scollard BA MURP  
Associate

Attachments:

Attachment A: Response to DPHI RFI dated 5 February 2024  
Attachment B: Response to DPHI RFI dated 22 February 2024  
Attachment C: Response to DPHI RFI dated 14 March 2024  
Attachment D: Amended Lighting Impact Assessment  
Attachment E: Amended Structural Feasibility Statement  
Attachment F: Management Plan  
Attachment G: Traffic Control Plan  
Attachment H: Utilities Plan  
Attachment I: Test of Significance Assessment

## Attachment A

### Response to issues raised by DPHI dated 5 February 2024

Ref.	Issues raised	Response
<b>1</b>	<b>Visual Impact</b>	
1.1	<i>During exhibition, the Department received public submissions on potential signage impacts arising from the proposed Sydney Park Junction project by Transport for NSW (TfNSW). The Sydney Park Junction project includes changes to management of motorised, bicycle and pedestrian traffic in Sydney Park Road and Princes Highway/King Street, along with pedestrian connectivity improvements to Sydney Park.</i>	<p>As noted above, TfNSW's Sydney Park Junction project (the Project) involves changes to the configuration of Sydney Park Road. The proposal seeks to reduce the number of lanes adjacent to the sign on Sydney Park Road from four lanes to two lanes. The speed limit will remain at 40km/hr. A permanent cycle lane will also be implemented (noting a temporary is currently in place, and assessments were undertaken to reflect this).</p>
1.2	<p>(a) Pursuant to Section 3.1(1)(a) and Schedule 5 of the State Environmental Planning Policy (Industry and Employment) 2021 (Industry and Employment SEPP) please provide an assessment of:</p> <ul style="list-style-type: none"> <li>i. <i>the visual impact of the proposed development in terms of the desired future character of the Sydney Park Road area;</i></li> <li>ii. <i>impacts by the project on amenity and visual quality of local vistas and views as viewed from Sydney Park Road, Sydney Park users and adjacent residents; and</i></li> <li>iii. <i>the impacts by the project on the amenity, visual quality and character of nearby heritage items and the heritage conservation areas in Newtown / St Peters.</i></li> </ul>	<p>Although the proposed changes and future character as a result of the Project are notably positive, the changes will not substantially alter the physical built form and environment in which the proposed sign is located in, other than the road alignment and foot pavement. If anything, the proposed sign is considered to positively contribute to the future amenity and desired character of the area, by encouraging a dynamic community space, promotion of community event messaging and overall activation of the area.</p> <p>In relation to items 1.2(ii) and (iii), the visual impacts of the proposed sign from these locations are not anticipated to substantially change as a result of the Project. A detailed visual and amenity impact assessment against the locations identified has been provided as part of the VIA, LIA and HIA submitted with the DA. For the purposes of not repeating the assessment in full, the following conclusions are relevant:</p> <ul style="list-style-type: none"> <li>• <i>...the visual impact of nearby residentials will be low-medium given the nature and orientation of units, presence of retaining wall and orientation and siting of the sign</i></li> <li>• <i>the proposed illumination is acceptable as it is well below with the AS4282 standards. In complying with the above requirements, the proposed signage should not result in unacceptable glare, nor should it adversely impact the safety of nearby residents</i></li> </ul>

Ref.	Issues raised	Response
		<ul style="list-style-type: none"> <li>the proposed sign is located in a mixed, urban environment, characterised by tall, contemporary buildings, industrial and heritage.</li> <li>Views towards the sign from the heritage conservation areas, hotel, and former theatre will be towards the back of the sign and will be far enough away to not make an impact</li> <li>No fabric of significance will be impacted by the sign...</li> </ul> <p>Given this, the proposed sign is considered consistent with the desired future character of the area in accordance with the aims of the Industry and Employment SEPP, as set out in Section 3.1(a)(i).</p> <p>Lastly, it is noted, the intention of the Sydney Park Junction Project is to prioritise safety, improve pedestrian links and cyclist connectivity. These changes as a result of the Project will have further positive implications on any road safety concerns associated with the sign and is anticipated to have an improved outcome.</p>
1.3	(b) Pursuant to Schedule 5 Part 4 of the Industry and Employment SEPP, an assessment of how the project's scale and proportion are appropriate for its streetscape and setting.	<p>An assessment against Part 4, Schedule 5 of the Industry and Employment SEPP has been undertaken and forms part of the SEE submitted with the DA.</p> <p>Regardless of TfNSW's proposed upgrades, the proposed sign will remain consistent with the objectives outlined in Part 4. In summary, our assessment concluded that:</p> <ul style="list-style-type: none"> <li>the proposal is appropriate for the streetscape and will not detract from the existing road corridor and will complement the surrounding area</li> <li>the proposal contributes to the visual interest and activation along Sydney Park Road through the display of high quality advertisements</li> <li>the scale, proportion and form are appropriate as the proposal is located wholly within the railway corridor and does not protrude into the road reserve</li> <li>the proposal will not contribute to visual clutter</li> <li>the proposal does not screen unsightliness</li> <li>the proposal does not protrude above buildings or tree canopies</li> </ul>

Ref.	Issues raised	Response
1.4	<p>(c) <i>In accordance with the Transport Corridor Outdoor Advertising and Signage Guidelines 2017 Sections 2.3 and 2.4, an assessment of visual signage clutter for motorists, pedestrians, cyclists, residents and Sydney Park users, given the existing bus shelter digital sign and static sign on the wall of 672 King Street which is visible behind the proposal. The assessment should address:</i></p> <p>i. <i>the potential for visual clutter to create a distraction for drivers and impact traffic safety, taking into consideration existing directional and road safety signs;</i></p> <p><i>the potential for visual clutter to reduce landscape amenity; and</i></p> <p><i>measures to mitigate the impacts of visual clutter</i></p>	<ul style="list-style-type: none"> <li>the proposal does not require ongoing vegetation management</li> </ul> <p>A detailed assessment against the visual clutter controls has been undertaken as part of the SEPP assessment, submitted with the DA. Notwithstanding, further assessment has been provided below:</p> <p>There are some existing advertisements in proximity to the proposal along Sydney Park Road:</p> <ul style="list-style-type: none"> <li>existing digital bus shelter advertisement on Sydney Park Road</li> <li>existing static sign on the southern façade of 672 King Street.</li> </ul> <p>Section 2.3 and 2.4 of the Signage Guidelines relate to <i>sign placement in transport corridors in urban areas</i> and <i>sign clutter</i>. An assessment against these controls, with regard to visual impacts is provided below.</p> <p>The signage guidelines (Chapter 2.3.2(a)) states, as a guideline,</p> <p><i>...advertising in urban areas should be restricted to rail corridors, freeways, tollways or classified roads within or adjacent to strategic transport corridors passing through enterprise zones, business development zones, commercial core zones, mixed use zones or industrial zones. .</i></p> <p>The proposed location of the sign is consistent with the above guideline, being within a rail corridor, adjoining mixed use zoned land, thereby, the proposal is suitable for this location.</p> <p>Notwithstanding, further consideration has been given to the compatibility of the surrounding area and impacts on potential sensitive land uses. The amended DA proposes an extended curfew from 10pm – 6am daily. This is amended from a 24-hour operation as proposed in the original DA. During the curfew, the proposed sign will be turned off. This results in no adverse lighting impacts on adjoining residents or park visitors during nighttime hours.</p> <p>Furthermore, Section 2.4 of the signage guidelines states:</p>

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		<p><i>...in urban enterprise corridors and within entertainment districts, it is not uncommon to have multiple signs visible along a given sightline. When strategically placed, these signs can contribute to the urban fabric and promote city life in key areas....</i></p> <p>Importantly (as noted within the SEE), the proposed sign is situated within an established, busy, urban environment and the installation of signage will positively contribute to the urban fabric of the area. In addition to this, the current urban environment is anticipated to become further activated with TfNSW's proposed road upgrades.</p> <p>It is also noted, the proposed sign is the only form of advertisement located within this portion of the rail corridor.</p> <p>The nearby existing signs, located at 672 King Street and the bus shelter are within the road corridor.</p> <p>Notably, 672 King Street is oriented towards vehicles travelling along the Princes Highway and it is not likely that this sign and the proposed sign will be visible/viewed at the same time.</p> <p>In regard to the bus shelter advertisement, it is noted both of these signs will be visible to westbound motorists on Sydney Park Road and are generally within the same view corridor. Given this, an assessment from a road safety perspective was undertaken as part of the DA and concluded the signs will not require drivers' to turn their head away from the road in order to view the digital sign.</p> <p>In light of this, it is concluded the proposed sign is not located in an area where there is advertising clutter, nor will the installation of the proposed sign contribute to unacceptable clutter or visual impacts for motorists, pedestrians and park visitors.</p>

Ref.	Issues raised	Response
<b>2</b>	<b>Lighting Impact</b>	
2.1	<p><i>The Department requests the following information on digital lighting manufacture to as part of its consideration of lighting impacts.</i></p> <p><i>(a) Page 4 of the Lighting Impact Assessment indicates sign manufacture includes use of baffles to control light direction. Page 14 states the viewing angle is 70 degrees either side of both horizontal and vertical axes. To assist in the assessment of lighting impacts of the proposed sign when viewed from the sides and above, provide details on how luminance and illuminance changes as a proportion of the maximum for various angles away from each axis.</i></p>	<p>An amended LIA (Attachment D) has been prepared by Electrolight in response to the matters raised by DPHI.</p> <p>Details of the luminance changes as a proportion of the maximum for various angles away from each axis have been incorporated into the LIA and supplementary documents.</p>
2.2	<p><i>(b) Calculate and describe the light spill emitted to the left and right of the sign face vertical plane in a manner similar to Upward Light Ratio (ULR) defined on page 3 of the Lighting Impact Assessment.</i></p>	<p>The amended LIA provides supplementary documents that demonstrate the distribution of light spill from the sign both horizontally and vertically. The LIA confirms the signage includes baffles which mitigate upward waste light, resulting in an Upward Light Ratio (ULR) of not more than 50%.</p>
2.3	<p><i>(c) Lighting assessments have been provided for No. 645-655, and 655-667 Sydney Park Rd. Please advise why there has been no assessment of the residential property at 117-219 Sydney Park Rd which is likely to be more affected by the proposed development. Unless sufficient justification can be provided, an assessment of the impacts to 177-219 Sydney Park Rd must be provided.</i></p>	<p>In response to DPHI's concerns, Electrolight have advised</p> <p><i>...an assessment wasn't provided for 117-219 Sydney Park Rd because it is considered to be a significant distance away from the sign, and two developments (241-245 Sydney Park Rd and 121 Sydney Park Rd) are in closer proximity and therefore represent worst case...</i></p> <p>Notwithstanding, the amended LIA includes an assessment against the properties at 117-219 Sydney Park Rd. The results show that 0 lux is received by these properties.</p>
2.4	<p><i>(d) An assessment of residential properties in King Street, as well as Lord and Concord Street (due to illuminance controls from the sign upon objects in its surrounding environment), given that they have lines of sight to the project.</i></p>	<p>The amended LIA provides an assessment of residential properties from Concord Street to Lord Street North of Signage, based on this, Electrolight have confirmed:</p> <p><i>...No light is emitted from behind the sign. This is evident when reviewing the photometry, however we have updated the LIA and included a calculation grid</i></p>



Ref.	Issues raised	Response
		<i>that runs along Lord St and Concord St north of the rail line. The results show that 0 lux is received by all properties.</i>
2.5	<i>(e) Clarification of whether the Section 6 Threshold Increment Assessment is assessed in the pre-curfew or post-curfew period, and whether it can apply to any other Sydney Park Rd user, such as a cyclist, pedestrian or recreational park user with clarification of impacts to them.</i>	<p>In response to this, Electrolight have confirmed:</p> <p><i>...The Threshold Increment is assessed based on a night time brightness of 120cd/m2, which is the post-curfew luminance. Threshold Increment within AS4282 is about road users (motorists and cyclists). It is not relevant to pedestrians or recreation park users. It should be noted that the low result of TI is a function of the relatively small size of the sign, it's low luminance and its location with respect to oncoming traffic....</i></p>
<b>3</b>	<b>Signage Construction, Public Benefit</b>	
3.1	<i>(a) Please provide details of the likely date for the commencement of construction (e.g. 'x' weeks after approval, should the development be approved) and the duration of the construction period.</i>	<p>The construction will commence after DA approval is received (should the DA be approved). Construction is undertaken in 2 phases:</p> <ul style="list-style-type: none"> <li>• Offsite fabrication: 4 – 6 weeks</li> <li>• On site: 6 – 8 weeks</li> </ul> <p>The screen box installation will be undertaken within this timeframe over 1 night.</p>
3.2	<i>(b) Details of any outcomes (which are not subject to confidentiality) held with City of Sydney, Inner West Council, or any health, community or emergency authority for delivery of public benefit, for the proportion of sign display time dedicated to community and emergency announcements. In addition, clarification of whether community or emergency message display time is a fixed amount each hour, day etc and whether it can be measured and audited.</i>	<p>No consultation was undertaken with Council in the preparation of the public benefit statement.</p> <p>As detailed within the Public Benefit Statement submitted with the DA, five minutes per hour will be available for the display of customer promotion and event messages by arrangement with TfNSW and Sydney Trains at no cost to either Sydney Trains or TfNSW. Additionally, the sign shall be made available for use, at no cost, to allow emergency messaging to override the commercial advertising.</p> <p>The Applicant is willing to accept this as a condition of consent.</p>
<b>4</b>	<b>Structural Feasibility</b>	



Ref.	Issues raised	Response
4.1	<p>(a) <i>The Digital Sign Safety Assessments (Appendixes 3 and 9 of Statement of Environmental Effects) states that the existing sign has been approved and designed in accordance with Australian Standards AS 1170.1 and AS 1170.2 to meet requirements for wind loading.</i></p> <p><i>Please clarify all load standards required to prepare structural design, each AS1170 sub-part used to provide a design load and clarify each AS version year used.</i></p>	<p>A Structural Feasibility Statement has been prepared by Dennis Bunt Consulting Engineers (Attachment E) The statement identifies the signage will be design in accordance with the following loading standards:</p> <ul style="list-style-type: none"> <li>AS/NZS 1170.0:2002 <i>Structural design actions Part 0 : General Principles</i></li> <li>AS/NZS 1170.1:2002 <i>Structural design actions Part 1: Permanent, imposed, and other actions</i></li> <li>AS/NZS 1170.2:2021 <i>Structural design actions Part 2 : Wind actions</i></li> <li>AS/NZS 1170.4:2007 <i>Structural design actions Part 4 : Earthquake actions in Australia</i></li> </ul>
<b>5</b>	<b>Statutory Planning Framework</b>	
5.1	<p>(a) <i>Table 5, Page 19 of the SEE – Section 4.15 of the Act assessment subclause (1)(a)(iv) states that the application is consistent with the relevant matters of the EP&amp;A Regulations. Please describe what the relevant matters are and how the application is consistent.</i></p>	<p>The proposal is compliant with the relevant matters of the <i>Environmental Planning and Assessment Regulation 2021</i> as outlined below:</p> <p><b>Part 3, Division 1:</b></p> <ul style="list-style-type: none"> <li><i>Clause 23 Persons who may make development applications</i> <ul style="list-style-type: none"> <li>the DA accompanies written consent from the owner of the land</li> </ul> </li> <li><i>Clause 24 Content of development application</i> <ul style="list-style-type: none"> <li>the proposal is in the approved form, contains the relevant information and paid the relevant fees</li> <li>it is presumed DPE, as the consent authority have given Council a copy of the DA</li> </ul> </li> <li><i>Clause 25 information about concurrence or approvals</i> <ul style="list-style-type: none"> <li>concurrence is not explicitly required as part of the DA</li> </ul> </li> <li><i>Clause 36 Consent authority may request additional information from the application</i> <ul style="list-style-type: none"> <li>the applicant has/will appropriately respond to all RFI requests</li> </ul> </li> <li><i>Clause 294 Crown development</i> <ul style="list-style-type: none"> <li>the proposal is on behalf of a public authority and therefore clause 294(a) applies</li> </ul> </li> </ul>

Ref.	Issues raised	Response
5.2	<i>(b) Table 6, Page 31 of the SEE – Item 6. Please describe the proposed safety devices, gates, platforms, lighting devices and logos including items proposed in architectural plans.</i>	The proposal does not include any safety devices, platforms or lighting devices as the sign will be serviced from the front and will use an elevated work platform and external light for repairs and maintenance.
<b>6</b>	<b>Maintenance</b>	
6.1	<i>(a) Please provide details on the proposed maintenance regime for the sign, including reasonably foreseeable maintenance tasks, landscaping management, and the interval that maintenance tasks would likely be performed.</i>  <i>Clarify if any maintenance tasks requires traffic management of any carriageway, footpath verge, or use of mobile cranes.</i>	No vegetation management is required.
6.2	<i>(b) Include a brief discussion on how removal or demolition of the project would be undertaken.</i>	<p>JCDecaux have advised that the removal and demolition of the structure is undertaken as follows:</p> <p><i>...Initial step would be to terminate all electrical cables. The removal would involve partial and temp full closure of the Sydney Park Road and the use of a crane for one night. Then an excavator would be required to break and remove pile cap to below the surface (if requested)...</i></p>

## Attachment B

### Response to issues raised by DPHI dated 22 February 2024

Ref.	Issues raised	Response
<b>1</b>	<b>Construction Impacts</b>	
1.1	<i>Describe night-time hours sought for rail track accessible and Sydney Park Road accessible construction work, staging, and the number of days required to complete each stage.</i>	<p>The hours of construction are typically subject to terms set out by TfNSW in the Road Occupancy License (ROL).</p> <p>Typical work hours are set out below and would be subject to the ROL:</p> <ul style="list-style-type: none"> <li>• Daytime– 10am-2pm, Mon – Friday</li> <li>• Nighttime – 8pm-5am, Mon – Friday</li> <li>• Rail possession weekend – 2am, Sat – 4am, Monday.</li> </ul> <p>It is anticipated the proposed works are anticipated to take place over 6 – 8 weeks.</p> <p>A detailed staging plan has been prepared by Hanlon Industries (Attachment F).</p>
1.2	<i>Clarify which components of works would be facilitated from the Sydney Park Road side of the rail boundary fence and the rail track side. In particular, the proposed drill rig required to bore a foundation pier hole 20 m deep (depending on geotechnical conditions). Confirm if the drill rig is proposed to stand in the rail track cut or the Sydney Park Rd footpath area, describe a suitable make and model, mass, and capacity to raise auger bits to necessary working heights. Similarly, as boring generates spoil from the pier location, outline the proposed hydrema's and the spoil tipper truck's operating areas needed for bore spoil collection and disposal.</i>	<p>Details of required road and/or foot path closures are included in the Management Plan prepared by Hanlon Industries (Attachment G).</p> <p>Furthermore, details of the proposed location of the drilling/proposed works are included within the Management Plan.</p>

Ref.	Issues raised	Response
1.3	<i>Advise any likely conditions provided with the TfNSW Road Occupancy License such as restriction of work in peak AM or PM traffic hours, weekends and public holidays, provisions for work in proximity to signalised intersections, overall time limits, or restricted traffic speeds or movements as required to cater for vehicular traffic, bus bay operation, pedestrian traverses, or other traffic matter.</i>	As above, the hours of construction are typically subject to terms set out by TfNSW in the Road Occupancy License (ROL).
1.4	<i>Wherever construction or maintenance operations are proposed on or over the bus bay, merge lane or footpath verge areas, please describe traffic control plans for the following scenarios in accordance with requirements of relevant chapters of TfNSW Traffic Control at Work Sites Technical Manual:</i> <i>i. Traffic control plans (TCPs) to cater for all vehicle and pedestrian management for all plant standing areas,</i> <i>ii. how bus and passenger access to the bus stop would be provided,</i> <i>iii. how pedestrians would traverse footpath verges to access footpath beyond TCP managed areas,</i> <i>iv. If traffic controls direct pedestrians around the work site or bus stop, describe pedestrian and bus passenger management solutions to cater for safe, convenient pedestrian traverse and bus stop access.</i>	Details of required road and/or foot path closures and management measures are included in the Management Plan prepared by Borger Traffic Industries (Attachment F and G).
1.5	<i>Provide a noise and vibration impact assessment (NVIA) for proposed night works in accordance with the relevant Environment Protection Authority guidelines including the Interim and Draft Construction Noise Guidelines (Department of Environment and Climate Change 2009) and the following:</i> <i>i. Include assessment of all noise sources such as plant, loaders, trucks, generators and power tools as required for various stages and tasks described above</i> <i>ii. Provide a description and appraisal of noise and vibration mitigation and validation monitoring measures.</i>	A noise and vibration management plan has been prepared by Hanlon for the proposed works (Attachment F). The plan details noise management measures in accordance with <i>Interim Construction Noise Guideline - NSW and Department of Environment and Climate Change NSW</i> .
1.6	<i>Provide a Lighting Impact Assessment due to proposed night work given the need for safe outdoor workplace lighting and also control of its obtrusive effects on nearby residents particularly those in Sydney</i>	A Construction Management Plan will be prepared and submitted prior to the commencement of works, which will provide further details in external lighting. The Applicant is willing to accept this as a condition of consent.

Ref.	Issues raised	Response
	<i>Park Road and Concord Street. Describe light mitigation techniques to reduce light disturbances and their validation monitoring measures.</i>	Notwithstanding, Hanlon Industries have confirmed the site is situated on embankment and the task lighting will be facing onto the embankment and will be positioned inside the hoarded area in order to eliminate any obtrusive effects to the nearby residents.
<b>2</b>	<b>Connection to Utilities</b>	
2.1	<i>Please provide detailed plans for connecting the project to the local energy supply and telecommunications, their cabling, and a description of any additional infrastructure such as transformers, locations for these, and how access for these will be provided to the relevant network service operator.</i>	A detailed plan outlining the connection to utilities and services has been prepared (Attachment G).

## Attachment C

### Response to issues raised by DPHI dated 14 March 2024

Ref.	Issues raised	Response
<b>1</b>	<b>Vegetation Management</b>	
1.1	<i>In accordance with section 1.7 of the Environmental Planning and Assessment Act 1979, Part 7 of the Biodiversity Conservation Act 2016 (BC Act) applies to the assessment of development applications. Section 7.7 of the BC Act requires an application for development consent to be accompanied by a biodiversity development assessment report (BDAR) if the proposed development is likely to significantly affect threatened species. Section 7.3 of the BC Act sets out the test for determining whether a proposed development is likely to significantly affect threatened species or ecological communities, or their habitats.</i>	<p>A Test of Significance has been prepared by Environmental Services &amp; Education Australia (ESEA) and écologique in response to the matters raised by DPHI (Attachment H).</p> <p>The Test of Significance found:</p> <p><i>...The site assessment found the development area is highly modified and consists only of weedy groundcover species – including Cortaderia selloana (pampas grass), Cenchrus setaceus (fountain grass) and Lantana camara (lantana. No trees occur in the development area. Two specimens of Melaleuca linariifolia (flax-leaved paperbark) are present within the pedestrian footpath of Sydney Park Road...</i></p> <p>The test of significance considered the above and species/communities likely to use that type of habitat. The assessment concluded that:</p> <p><i>...The subject site does not contain any remnant native vegetation or habitat for any threatened species, populations or communities either directly or indirectly. Two highly mobile threatened species, the powerful owl and grey-headed flying fox, are likely to fly over / transit through the vicinity of the subject site but are considered highly unlikely to stop at or use the subject site. The test of significance supports that a significant effect on these threatened species or their habitat is unlikely, and further consideration is not warranted...</i></p>

Ref.	Issues raised	Response
1.2	<i>It is understood that vegetation removal is likely to be required to install the sign. It is not clear if vegetation management may be required once the sign is operational due to conflicting information on page 23 of the Statement of Environmental Effects. After further consideration, the Department requests that you assess whether construction and any ongoing vegetation management is likely (or unlikely) to impact threatened species or ecological communities, or their habitats in accordance with section 7.3 of the BC Act. Any test of significance undertaken must be supported by adequate biodiversity site investigations and field data.</i>	No trees are present within the area, and as such, no trees are required to be removed as part of the proposed development.