

Department of Planning and Environment

Our ref: DOC22/367124

Your ref: DA 22/5186

Alexander Richard
Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

8 June 2022

Subject: Notice of Exhibition - Digital Advertising Signage – Princes Highway, Loftus (DA 22/5186)

Dear Mr Richard

I refer to your email received on 10 May 2022 requesting comments from the Environment and Heritage Group (EHG) in regard to a development application (DA) for digital advertising signage located on the Princes Highway at Loftus (DA 22/5186).

EHG has reviewed the DA and provides the following comments regarding NSW National Parks and Wildlife Service (NPWS) reserves.

No access to or works on park are to occur as part of this proposal unless authorisation is granted by NPWS under the *National Parks and Wildlife Act 1974* (NPW Act) or the *National Parks and Wildlife Regulation 2019*. In particular, the park is not to be used to gain access to the development site or for the storage of materials, equipment, workers' vehicles or machinery at any time.

The Developments adjacent to National Parks and Wildlife Service lands (NPWS 2020) resource provides general guidance on the priority environmental considerations for impact assessments adjacent park. In assessing applications adjoining or adjacent park, EHG recommends that consent authorities use the guideline when assessing environmental impacts and assigning mitigation measures relevant to the scope of works proposed. It is anticipated the Minister for Planning (as the consent authority) would apply the guidelines in assessing this application.

Section 4 of the Lighting Impact Assessment (LIA) states the assessment will review the proposed digital signage against State Environmental Planning Policy (SEPP) (Industry and Employment) 2021.

One assessment criteria contained in Schedule 5 of SEPP (Industry and Employment) 2021 is consideration 2, whether the proposal would detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas, waterways, rural landscapes or residential areas. The LIA does not identify that the signage would be sited adjacent Royal National Park and as a result does not assess whether the proposal would detract from the amenity or visual quality of this environmentally sensitive area reserved for natural conservation.

For instance, the potential for glare to impact vistas south and south west across the national park from the highway has not been considered in the assessment. The Statement of Environmental Effects does undertake a brief assessment (Section 4.2.1) against the assessment criteria but that assessment is limited to the colour of the sign structure. Consequently, potential amenity impacts on vistas, or to users of Royal National Park or on wildlife are not considered.

The Department is advised that a separate submission may be made by the Heritage Branch.

If you have any queries, please contact Marnie Stewart via marnie.stewart@environment.nsw.gov.au or 02 9995 6868.

Yours sincerely,

A handwritten signature in black ink that reads "S. Harrison".

Susan Harrison
Senior Team Leader Planning
Greater Sydney, Biodiversity and Conservation