

From: [REDACTED]
To: [Tahlia Sexton](#), [REDACTED]
Cc: [Michelle Niles](#), [REDACTED]
Subject: HPE CM: RE: DA22/5186 Loftus Digital Sign DN22/0013
Date: Thursday, 27 April 2023 8:04:59 PM
Attachments: [image002.png](#)
[image003.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)
[image012.png](#)
[image001.png](#)

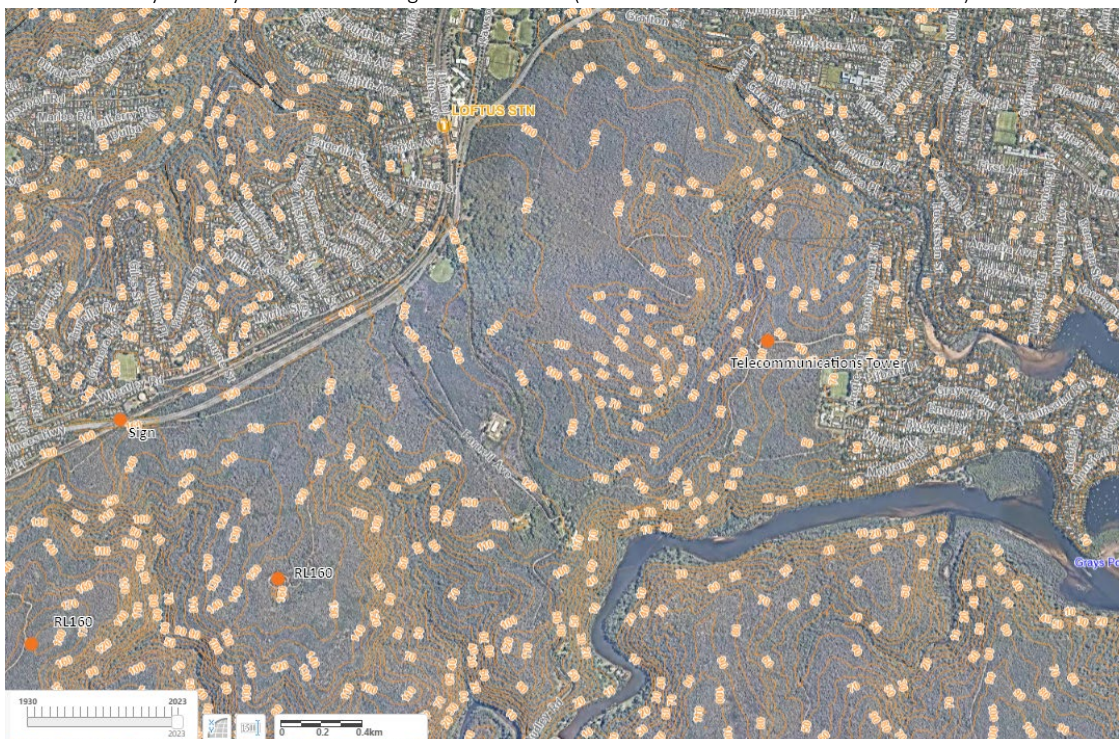
Hi Tahlia

As discussed today, we are hoping to get a more detailed response on the digital sign back to you next week.

I am concerned that the '221103 KEYLAN RFI and RTS Princes Hwy Loftus' response does not adequately address our concerns.

In brief:

- Heritage NSW comments focus on the Loftus Junction Signal Box which is a far distance from this site. Perhaps Heritage NSW were not aware of the potential impacts to the Royal National Park? The park is on Australia's National Heritage List: [National Heritage Places - Royal National Park and Garawarra State Conservation Area - DCCFEW](#). The sign will be visible to people in the park. The proposal has not consulted properly on the heritage impact. I am not familiar with Federal legislation and what this may mean for this assessment. I note that the DPIE (Environment) response dated 8 June also considered that the impacts to the Royal National Park had not been properly assessed. These visual and heritage impact issues were raised with Alexander Richard (DPIE) on 15 July (email), but I note such was not included in your RFI to Sydney Trains dated 10 August 2022? The subsequent visual analysis response largely addresses the impacts to residential properties in Tilba PI and disregards the visual impacts to the park. The statement in Attachment B 'the 5 – 6m drop in elevation from the road to the Road National Park will minimise view lines from the Park to the sign' is contrary – the drop exacerbates the visibility of the sign to other parts of the Park. The site of the sign is a high point in the Shire – the land is approximately RL 160 (plus the 9m sign). While a lot of the park is lower, there are high points (RL160) in the Park, immediately south east and southwest, accessible by tracks and motorists where it is possible that the sign will be seen. Furthermore it has not been established that the sign will not be visible on the horizon from other parts of the Shire. For example the Telecommunications tower (approximately RL125?) is visible to residents in Grays Point, Kirrawee and GyMEA Bay. Hence will the sign also be visible (it has more mass than the slender tower)?



The photos on the bottom of page 6 of the Biodiversity Impact Assessment (prepared by ecoligique dated 8 August

2022) show the views to the National Park. It is not clear what elevation these shots were taken (9m?). This partially shows the extent of National Park that will be able to see the sign.

While it is agreed that the sign is located adjacent to an urban area, it is a 14.4m x 3.75m illuminated sign (on a 5m pole) directly facing the Park. The 'eucalypt' pole and boarder will do little to disguise the sign.

- When viewed heading south on the highway, the sign relies heavily on one tree (see Figure 7, page 12 – SEE dated March 2022) – without this tree the sign will protrude above the dominant skyline and is contrary to Cl3.21 of the SEPP. Heading North the view of (the rear of) the sign will also protrude above the skyline given the high point it is located on.
- The site is mapped as Environmentally Sensitive land in SSLEP2015 - terrestrial biodiversity, riparian land and watercourses. Does this make it a prohibited development (Cl.3.8 of SEPP Industry and Employment) 2021?
- The public benefit is revenue – this argument could be made for any development along the train corridor and may lead to a proliferation of unneeded development in rail corridors. It is not clear how the revenue from this specific development will benefit residents in this locality or in the Shire.

We are seeking further comments from our Environmental Science Unit regarding the potential for biodiversity impacts.

Thanks

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Development Assessment & Certification Manager

Development Services

Planning & Growth

T: ■

sutherlandshire.nsw.gov.au

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We acknowledge the Dharawal people as the Traditional Custodians of the land within Sutherland Shire. We pay respect to the Elders and their families, past, present and emerging, and through them, to all Aboriginal and Torres Strait Islander peoples.



From: [REDACTED]
To: [Tahlia Sexton](#)
Cc: [REDACTED]
Subject: HPE CM: RE: DA22/5186 Loftus Digital Sign DN22/0013
Date: Friday, 5 May 2023 5:41:40 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
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[image012.png](#)

Hi Tahlia

Further to our comments below, in summary, I am concerned that the proposed sign will have adverse aesthetic and visual impacts on the Royal National Park, inadequate consultation has been undertaken with Heritage NSW, and the impacts on the heritage listed Park have not been fully considered. Furthermore, the sign will protrude above the skyline and the site is mapped as Environmentally Sensitive land – and this may preclude such advertising in this location pursuant to the provisions of the SEPP. It is also considered that the proposal has not demonstrated particular public benefit to local residents.

Council's Environmental Scientist has reviewed the assessment of the ecological impact of the proposed sign at Loftus. Overall, it is considered that the assessment is adequate and the proposal will have minimal ecological impact. The proposed sign should not increase the night-time lighting in the National Park above current ambient levels, if complying with AS 4282-2019 Control of the Obtrusive Effects of Outdoor Lighting. The extent of light spill from the sign into the adjoining RNP appears minimal. If possible, consideration should be given to additional controls to reduce or filter blue, violet and ultra-violet wavelengths, in accordance with the National Light Pollution Guidelines Including Marine Turtles, Seabirds and Migratory Shorebirds. The habitat in this area was affected by bushfire in 2002, and is deemed "unlikely" by Ecologique, to contain hollow-bearing trees suitable for nesting forest owls or the Glossy Black-Cockatoo. There is no suitable koala habitat or GHFF roosting habitat in the area of the RNP likely to be affected by light spill. Based on these assessments, the sign is unlikely to result in a significant impact to biodiversity in the RNP.

If you require further information – please contact me

Regards

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