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# Lane Cove Bushland & Conservation Society Inc

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8 November, 2022.

The NSW Department of Planning and Environment,

## **SUBMISSION by Lane Cove Bushland & Conservation Society**

### **Redevelopment of Greenwich Hospital (Concept) Modification 1- amendments to envelopes and GFA (SSD-8699-Mod-1)**

The Lane Cove Bushland & Conservation Society forwards further details to supplement the earlier brief Submission outlining our response to **SSD-8699-Mod-1**. As with the previous Submissions forwarded by the Society we remain opposed to Seniors Living as we believe the site should continue to be preserved for use and possible expansion as a Hospital.

#### **The Two Key Areas of Concern on the Site are:**

- **The South-West Corner of the site has bushland remnant on the upper section of a bushland slope.**
- **C2 zoned protected bushland is part of Gore Creek Reserve and is below the south-west corner.**

#### **Assessment needed of trees and biodiversity assessment of existing vegetation on site and of adjacent bushland**

##### **The Bushland of the South-West Corner**

The potential biodiversity impacts of development on the existing vegetation requires improvement in the Site Assessment and Planning. A lack of identification of this part of the site including the failure to map and name trees, by **the Redgum Arborist Report (2018) and the Mark Bury Consulting Tree Impact Assessment Report** (Appendix R) is a major flaw of the Arborist Reports. The flora survey track shown in **Travers Biodiversity Assessment Report (BDAR)** demonstrates that this area can be assessed by the arborists.

The trees must be clearly identified before any work begins in order to be and retained, and so that they can be protected and monitored during development.

Bushland on the development site is integral to the adjoining off-site bushland as building works can easily impact upon it. The potential for development and post-development damaging impacts on the

bushland reserve from the location of the Seniors Living South block above it requires upmost caution and is addressed here.

**The Ecological Assessment** of the site should include the adjacent bushland. The precedent for this was set by requirements for similar large development in Lane Cove at 266 Longueville Road, by the Sydney North Planning Panel.

**Biodiversity Assessment of the adjacent bushland** is lacking and is needed

**The Environmental Impact Statement** fails to include assessment of possible potential impacts on bushland, despite its presence both on the eastern and western areas of the site and adjacent.

### **Protection of Bushland on Slope (including Erosion, Sediment Control Plans and Containment).**

#### **Slope Protection:**

Erosion and Sediment Control Plans must be very clearly specified in DA documents, and most importantly, the Society stresses the importance of these Plans for the development above bushland situated on steep slopes. Double fencing should be mandatory on these steeper areas and critically, must be in place on such sites before work begins. Other development sites have shown that unless this requirement upgrade the controls is mandated, today's intense weather conditions result in environmental damage. Plans must upgrade the controls to two high steel fences (a minimum requirement), and set about two metres apart, and lined with silt fabric for up to one metre high.

**The Stormwater Management Plan** includes a perimeter sediment control fence for **Erosion and Sediment Control for Stage 3** (p18) however, this is inadequate to hold the sediment flows or protect down slope bushland from for the intense weather systems (as experienced by sediment damage from development at 266 Longueville Rd).

#### **Regeneration of native vegetation.**

The regeneration of all the sites remnant bushland to high quality bushland must be a condition stipulated in any Approval. This weeding and regeneration work must be clearly detailed.

#### **Light Spill into Bushland from the Seniors Living South Block**

The private use of lighting at night, as well as that of the development itself, could negatively affect habitat for wildlife, including reduction in the possible range available as habitat, if light-spill from the development encroaches into bushland, on and off-site. [National Light Pollution Guidelines for Wildlife Including Marine Turtles, Seabirds and Migratory Shorebirds \(Department of the Environment and Energy, 2020\);](#)

#### ***Impacts of light 'spill' on urban bushland***

In January 2020, the Australian Government released its National Light Pollution Guidelines for Wildlife. Their opening sentence states:

*“Natural darkness has a conservation value in the same way that clean water, air and soil has intrinsic value. Artificial light at night is increasing globally by about two per cent per year. Animals perceive light differently from humans and artificial light can disrupt critical behaviour and cause physiological changes in wildlife.”*

Three quotes from the research paper *Light pollution at the urban forest edge negatively impacts insectivorous bats* by Haddock et al Biological Conservation Vol. 236 August 2019 (listed below) state:

- 1) *“Connectivity and quality of vegetation in cities, including urban forests, can promote urban biodiversity. However the impact of anthropogenic pressures at the forest-matrix edge, particularly artificial light at night (ALAN), on connectivity has received little attention”;*
- 2) *“Artificial light sources on the edges of urban forest have diverse effects on bats and insects, and should be considered an anthropogenic edge effect that can reduce available habitat and decrease connectivity for light-sensitive species”;* and
- 3) *“Only relatively recently has ALAN been widely discussed as a global threat to biodiversity.”*

Light Spill impacts have also been noted in Council’s *Bushland Fauna Survey* (June 2020) Chapter 9, at page 236. We therefore believe that this issue of light ‘spill’ on urban bushland needs to be addressed as a matter of urgency.

#### *Current planning instruments*

There is a chapter dedicated to the protection of bushland in Council’s Development Control Plan (DCP), Section H, which endeavours to preserve and protect our bushland when development applications adjacent to bushland are considered.

Yours sincerely,  
Shauna Forrest, President,  
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