



Lane Cove Bushland & Conservation Society Inc

P.O Box 989, Lane Cove NSW 1595

ABN 50 518 833 556

lanecove_bushland@yahoo.com

15 October 2020

The General Manager,
Cc all Lane Cove Councillors,
Lane Cove Council, Lane Cove 2066

LCB&CS Submission: 4 Northwood Rd. Lane Cove - DA113/2020.

Dear Mr Wrightson,
Cc all Councillors,

The Lane Cove Bushland and Conservation Society welcomes the opportunity to forward our Submission on the 'Pathways' Development Proposal, 4 Northwood Rd., as the development adjoins a valuable wildlife corridor of mature trees and bushland. The LCBCS has been advocating for the environment for over 49 years, working to preserve the natural bush and wetlands of the Lane Cove area and to advance ecologically sustainable development for the urban and natural environment.

The LCBCS is an independent, respected community group in our local Council area, having representatives on Council Advisory Committees, and provide our recommendations, having carefully considered the documents provided and visited the adjoining sites.

Recommendations:

Setbacks.

1. The 10 metre eastern setback must be strongly enforced and not reduced using exemptions. The large development's hard surfaces, run-off, light-spill and soil erosion etc. can impact directly on the health of adjacent healthy bushland so the 10 metre setback must be strictly enforced.

Light spill at night, shadowing and solar access for the offsite adjacent E2 bushland on the eastern side from the 5 storeys of development are issues that must be addressed and will only increase with any reduction in the 10 metre eastern setback.

Council's adjacent sloping land and bushland contains many valuable mature tree species which are part of a 'Wildlife Corridor' that extends down to the Greenwich coastline, so must be protected by the full 10 metre eastern setback.

Reducing the 10 metre eastern setback to bushland would set a dangerous precedent that could see Lane Cove further denuded of mature trees and shrubs necessary for climate mitigation, for passive recreation and to provide food resources and habitat for native fauna.

The loss of species due to negative impacts on adjacent bushland through the reduction of a 10 metre setback is at odds with Council's declaration of a 'Climate Emergency' and commitments to reduce the impacts.

2. All setbacks should be landscaped with native species specified in the landscape plan (SEE 2020). This includes replanting of *Syncarpia glomulifera* (Turpentine) which is marked for removal in the development footprint.

3. The western setback along the road is not consistent with the DCP (SEE 2020) and should be made consistent.

4. An '**Ecological Impact Assessment**' is needed as the adjoining bushland is zoned E2, and is part of contiguous vegetation that forms a linkage with remnant bushland in Lane Cove Bushland Park to the east.

The adjoining bushland is SEPP 19 Bushland. The State Environmental Planning Policy No 19 - Bushland in Urban Areas (SEPP 19) applies to land in the Lane Cove Local Government Area with the aim of protection of bushland within urban areas identified in the SEPP. It is important that the development application also assesses the adjoining bushland, because of effect of the proposed development on bushland as per Clause 9.

Specific aims of the policy are: protection of habitats for rare or native flora and fauna, protection of wildlife corridors and vegetation links with other bushland as well as the recreational potential of bushland.

- An assessment must provide information about the potential direct and indirect impacts of the development on flora and fauna and their habitats, **including consideration of the adjacent land zoned E2**, and threatened species, populations and endangered ecological communities;
-

Clause 9 of the SEPP applies to land which adjoins bushland zoned or reserved for public open space purposes. This clause states that a public authority shall not carry out development or grant development consent unless it has taken into account the following:

- (c) the need to retain any bushland on the land,
- (d) the effect of the proposed development on bushland zoned or reserved for public open space purposes and, in particular, on the erosion of soils, the siltation of streams and waterways and the spread of weeds and exotic plants within the bushland, and
- (e) any other matters which, in the opinion of the approving or consent authority, are relevant to the protection and preservation of bushland zoned or reserved for public open space purposes.

Recommendations: The Statement of Environmental Effects, Landscape Plan, Vegetation Management Plan and general comments.

5. The Landscape Plan should, but does not provide planting specifications for the 200 sqm area proposed for revegetation. This should be detailed in a Vegetation Management Plan (VMP). The VMP should be submitted to Council and approved prior to the commencement of any works on site. The area should be revegetated to Coastal Enriched Sandstone Moist Forest (OEH 2016) to create continuity with the vegetation along Gore Creek.

6. The Draft Northwood DCP specifies that trees must be planted at a 2:1 ratio and must be native. The Statement of Environmental Effects (SEE) does not specify the planting ratio. This

should be detailed in the SEE and the Landscape Plan to ensure that replanting of native species is consistent with the DCP.

7. Mature native trees should be retained where possible. The canopy species planted should be *Syncarpia glomulifera* (Turpentine) as these are the trees being removed. Turpentine is also listed as a dominant canopy species in Coastal Enriched Sandstone Moist Forest

8. The Landscape plan includes planting of native species, however, some do not form part of Coastal Enriched Sandstone Moist Forest. We suggest that some **'positive diagnostic' species** are planted instead of some species that do not occur in the community.

9. We suggest that the path is constructed from sandstone rather than concrete to be more sympathetic with the area (& depending on what the bushfire specifications are).

We are pleased to see that the proponent is planning to replant the 11 trees that are proposed for removal (SEE 2020). We welcome any questions or feedback in relation to our Submission.

Regards,
Shauna Forrest (President)
on behalf of the Lane Cove Bushland and Conservation Society.
0410 041279