

**Lane Cove Bushland & Conservation oral Submission (by President, SF)
to the Sydney North Planning Panel online meeting, 28 July 2023
Subject: DA 117/2017 266 Longueville Rd. S 4.55 Modification Application**

Dear Chair and Panel Members

The Lane Cove Bushland & Conservation Society object to the approval of the above S 4.55 application to modify DA 117/2017 on several grounds. I am the current President and speak on behalf of the Society, who has put in a Submission from the very start of this process. We primarily address the impact of the development on the adjacent Conservation Zone.

However, we also do not agree the Modification Application should be allowed as it does not satisfy the criteria that it is substantially the same development under s4.55(2) primarily due to the change from providing 70 aged-care beds, to 0 aged care beds, and the increase in apartments.

This development adjoins Conservation Zone/ C2 bushland, and **Under Lane Cove Council's DCP- Part H-5.2.1**, this development should be set back 10 metres from its bushland boundary, BUT it isn't, so, the Society objects because the reduced set-backs put the natural environment at risk of degradation into the future. The LCBCS has consistently objected to the use of a 'ground truthing line' that lay within the C2 zone, in deciding the building set-back distance from bushland, when a 10m set-back from the C2 boundary is the REAL TRUTH of Council's DCP.

On the eastern boundary, the minimum setback of the building line is **3.8m at its narrowest point and only 2.8m at the balcony in the north-east.**

This lack of setback from the Conservation Zone means the limbs of trees will most likely be growing right up to balconies into the future. Residents will call for the removal of trees and clearing of shrubs in the very close C2 zone as the perception or fear of fire in today's climate is not unexpected, even if unlikely. As Europe and North America are showing us now, Climate change must be planned for now.

Retaining trees in urban Conservation Zones is essential for cooling local climate and temperatures as well as being essential for healthy wildlife habitat and corridors.

The South-west also faces bushland and is **7.8m to the building line, with the balcony only 7.1m** off the site survey line/ the C2 line.

(In the north east, the set-back expands out to 8.1m at the building line & balcony where it bulges out.)

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The 6 stories will undoubtedly have floor to ceiling glass doors onto their balconies and 7th story of roof terrace, lighted as well. Light pollution is the fastest growing pollutant in the world, and the potential negative harmful effects of artificial light at night must be

mitigated (International *Dark Sky Alliance*).

While balcony lighting can be conditioned to not shine directly into native nocturnal habitat in the adjoining bushland reserve, the 6 floors of rooms and loungerooms with floor to ceiling glass doors opening onto balconies cannot be conditioned, so will be a new, huge source of light and noise disrupting and reducing nocturnal habitat, some relying on dark sky, and particularly as open doors & windows are desired in summer. This is why the LCC's DCP's 10m setback must be maintained.

Changing these apartments from nursing home style aged care to apartments amounts to an intensification of use that will impact more intensely on wildlife, including threatened species that use this bushland corridor.

The increase in balconies and the proximity to the C2 zone may have an impact not only on habitat viability, including for threatened species, but also for neighbouring residences.

The Australian Government Department of Climate Change, Energy, the Environment and Water says: Preserving naturally dark roosting and feeding sites, connected by dark corridors, is vital for all bats" and recommends the "use of low-intensity red or amber lighting, installed **at least 50m** from bat habitats."

Artificial light exposes bats to predators when leaving rest sites and causes them to abandon roosts altogether. Lighting near bats' travel routes can cut them off from food and water sources impacting their flight time and energy use.

The revised Arboricultural Impact Report (Bluegum) submitted with the **Dec 2022 modification application** is not as comprehensive as the one that accompanied the original Aust Unity DA submission (Craig and Rhodes survey, amendments dated, **2017**) and does not cover the surrounding reserve and adjoining properties as adequately as did the former report/s .

Reducing environmental conditions by relying on new reports containing lesser information, is surely not the intent of this process.

Finally, the vegetation behind and downslope from 266 Longueville Rd is part of a wildlife corridor to Gore Creek and may suffer from changes to subterranean water flow with the very substantial addition of car spaces "a new level for underground car park and reconfiguration of all other 7 levels."

"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."