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27 September 2019

Re: Support for National Light Pollution Guidelines for Wildlife

To Whom It May Concern,

The Sydney Coastal Councils Group (SCCG) is a regional organisation of Councils (ROC) that advances sustainable management of Sydney's urban coastal and estuarine environment. We currently comprise nine member Councils who represent 1.3 million Sydneysiders.

I am writing to you to express SCCG's support for the *Draft National Light Pollution Guidelines for Wildlife*. Our organisation is very pleased that the Federal Government is undertaking to prepare these guidelines, as light pollution is emerging as an increasingly important issue in our region.

Some of our members have also expressed its relevance to several sensitive areas within their local government areas, and believe that these guidelines would afford additional protection where previous attempts have been unsuccessful.

Our support is based on the following reasons:

1. Strong support for developing technical guidance to improve development and park management standards, but target audience needs to be identified and supported

SCCG recognises the importance of technical guidance to assist Councils assess the design and placement of lights in sensitive habitats. In our Councils' experience, light pollution and its impact on wildlife is often poorly considered by ecologists and developers as part of their development application. Often, the lighting plan for developments is not usually submitted with development applications.

In addition, there has been a lack of consideration when designing lighting within parks and reserves and its impact upon biodiversity. The focus is often on public safety at the potential detriment of wildlife.

Recommendation:

It is recommended that the guidelines:

1. Are amended to clarify who the likely end-users are for these guidelines. SCCG believes that the targeted audience is developers, land managers, planners, ecologists and consent authorities.



2. Are promoted broadly to developers, ecologists and consent authorities. It is suggested that on-line training be considered to upskill personnel on the application of the guideline's recommendations.

2. Evidence-base to develop the guidelines strongly supported but additional species and data gaps need to be included

SCCG supports the development of these guidelines and the evidence-base supporting its recommendations. In particular, SCCG congratulates the Commonwealth including the latest research regarding impacts of lighting on specific species including turtles, the effect of blue light on the wildlife physiology and setting best-practice standards based on the latest research.

Recommendation:

3. SCCG supports the guidelines identifying certain lighting for different species rather than a one-size fits all approach. However, it suggests that other species also be included, particularly urban-adapted threatened nocturnal species (such as the Eastern Pygmy Possums and threatened microbat species) and fish and marine invertebrates. Additional case studies are therefore recommended.

4. Data gaps in research are highlighted in the guidelines and there is a commitment to fill these knowledge gaps and update the guidelines accordingly. Marine light pollution requires more thorough investigation to determine the extent to which marine life is both drawn and deterred by light and how it can be appropriately managed in an urban centre such as Sydney which contains several marine protected areas.

If you have any queries, please contact me on 02 9976 1502 or by email at executiveofficer@sydneycoastalcouncils.com.au

Yours sincerely,



Sarah Penny Joyce
Executive Officer



Sutherland Shire
COUNCIL

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