

Feedback to Draft Plan of Management for Bicentennial Reserve

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Issue	Ref	Objection/ Comment
Categorisation of Land	<p>Watercourse: “Land that is categorised as a natural area should be further categorised as a watercourse under section 36(5) of the Act if the land includes-- (a) any stream of water, whether perennial or intermittent, flowing in a natural channel, or in a natural channel that has been artificially improved, or in an artificial channel that has changed the course of the stream of water, and any other stream of water into or from which the stream of water flows, and (b) associated riparian land or vegetation, including land that is protected land for the purposes of the Rivers and Foreshores Improvement Act 1948 or State protected land identified in an order under section 7 of the Native Vegetation Conservation Act 1997 . “</p> <p>Cultural Significance Land should be categorised as an area of cultural significance under section 36(4) of the Act if the land is-- (a) an area of Aboriginal significance, because the land-- (i) has been declared an Aboriginal place under section 84 of the National Parks and Wildlife Act 1974 , or (ii) whether or not in an undisturbed state, is significant to Aboriginal people in terms of their traditional or contemporary cultures, or (iii) is of significance or interest because of Aboriginal associations, or (iv) displays physical evidence of Aboriginal occupation (for example, items or artifacts such as stone tools, weapons, engraving sites, sacred trees, sharpening grooves or other deposits, and objects or materials that relate to the settlement of the land or place), or (v) is associated with Aboriginal stories, or</p>	<p>Watercourse Category (Sub-Category?):</p> <p>Whilst Flat Rock Creek runs predominantly underground it is a significant Watercourse that needs to be noted and protected. This should be added as another category.</p> <p>Cultural Significance: Aboriginal</p> <p>There are numerous stories about aboriginal people having lived and hunted in the area and sightings at the waterfall which is now buried under Bicentennial. My understanding was that there were many specific sites also however only one is noted in the Bushland Management POM? The indigenous history of the area should be noted and followed up.</p> <p>https://www.visitsydneyaustralia.com.au/WalkingTrackFlatRock.pdf</p> <p>Given the last Aboriginal Settlement was to the West of Willoughby Rd and we know that Flat Rock Gully was a food source it seems apparent that the area is significant regardless of being in a highly “disturbed state”.</p> <p>http://www.aboriginalheritage.org/wp-content/uploads/Galuwa-Inyun-Bulga1.pdf</p>

	<p>(vi) contains heritage items dating after European settlement that help to explain the relationship between Aboriginal people and later settlers, or</p> <p>Cultural Significance: Other</p> <p>(b) an area of aesthetic significance, by virtue of-- (i) having strong visual or sensory appeal or cohesion, or (ii) including a significant landmark, or (iii) having creative or technical qualities, such as architectural excellence, or (c) an area of archaeological significance, because the area contains-- (i) evidence of past human activity (for example, below-ground features such as building foundations, occupation deposits, features or artifacts or above-ground features such as buildings, works, industrial structures, and relics, whether intact or ruined), or (ii) any other deposit, object or material that relates to the settlement of the land, or http://www5.austlii.edu.au/au/legis/nsw/consol_reg/lgr2005328/</p>	<p>Cultural Significance: Aesthetic and Archeological Significance</p> <p>https://dictionaryofsydney.org/entry/naremburn</p> <p>Under these definitions both Henry Lawsons Cave (landmark) and the Flat Rock Bridge (1886) (120 year old structure) should be categorised as areas of cultural significance</p>
<p>Contamination</p>	<p>Managing Land Contamination Planning Guidelines SEPP 55–Remediation of Land 1998 EPA https://www.environment.nsw.gov.au/resources/clm/gu_contam.pdf</p> <p>“Reliable information is also important in providing accurate advice to the community. It is recognised that land contamination may cause concern, in particular regarding any potential risk that may be associated with such contamination. It is understandable, therefore, that the community seeks access to information held by government and councils</p>	<p>Objection: There is insufficient information in the Plan of Management to adequately identify the boundaries of contaminated land, the history, and the plan for management ie) ground cover erosion, contamination events, flooding, sink holes etc The council has notified the Bicentennial Reserve Committee that they are looking for more information on the Site Closure – this is an essential element of the plan of management. The EPA requires clear and accessible records to be maintained.</p> <p>It would be appropriate to include guidance to users of the land that any works require EPA approval under the Contaminated Lands Act? It is unlikely that people will do their own thing but being aware that there is a process is helpful.</p> <p>It would also be useful to understand how often methane vents are tested and their location so users know what to expect as well as any water or ground testing, capping inspection or notification requirements. I was told a</p>

	<p>on the issue of contamination and the remediation of land. “</p> <p>https://www.legislation.nsw.gov.au/view/html/inforce/current/epi-1998-0520#sec.19</p>	<p>tree fell down at one point and the roots were wrapped around a drum of what may have been toxic material. Noting who should be contacted and what should be done in the event of something coming to surface, capping becoming eroded or ground infiltration events would be an appropriate esp. if it is outside council hours? This could be a health and safety issue so the council should at least make people aware of the correct procedures to follow.</p>
<p>Rescoping of POM</p>		<p>The Western side of Flat Rock Gully bushland has been removed from the scope of the current plan. This should be made clear and the reason explained. The current bushland POM does not adequately cover all of the challenges and the uniqueness of Flat Rock Gully. Consider whether Flat Rock needs its own POM (as per North Sydney Council who have the generic plan and then specific plans for areas of significance) or expand what is there and be more specific, bringing over the relevant issues in the 1995 POM.</p> <p>It should be noted that the reserve runs into an area zoned E2 Environmental Conservation. A formal Fauna study is needed for the whole area as it is not specified in either POM and the 1995 plan had identified that as being necessary. It is hard to know how to manage our areas if we do not know which animals are using them.</p>
<p>Northern Beaches Tunnel</p>		<p>The EIS documents make it clear that traffic, noise and air quality will be significant issues for the Reserve. Netballers competing with 70 diesel trucks an hour is going to be a challenge. North Sydney have installed their own air quality monitor to start to gather background information and monitor both construction and operational impacts. I would strongly recommend Willoughby Council arrange the same to ensure children playing sport are safe and that real time reporting is available so parents can check for information if they have concerns. Whilst the project proponents will be required to monitor it is sometimes difficult to obtain information. It will also not necessarily be placed in the Gully but up</p>

		<p>around stacks. The EIS specifically shows impacts settling into the gully from stacks but also the number of diesel trucks is a huge concern in the community given diesel is a class 1 Carcinogen and the spoil being trucked out is likely contaminated. St Peters site has experienced gaseous leachate across a wide span of the suburb leaking out when their tip was opened – this is very difficult to control and likely to occur. I would suggest an air quality monitor with an alarm system if there is an intention that sport is to continue while the digging occurs.</p>
The context of the Reserve	<p>Page 18 Tunks Park Plan of Management Previous POM 1995</p> <p>https://www.northsydney.nsw.gov.au/Council_Meetings/Policies_Plans/Plans_of_Management/Parks_Reserves_Management</p>	<p>The context of the land should be provided as it is interconnected with residential areas, bushland, storm water, waterways, sewers and roads. The Tunks plan shows an excellent context map to show the interconnection of urban, parklands and waterways. This is relevant as the activities of one area affect the other. The POM does not currently put bicentennial reserve in context and show the zoning of land or what may impact on it or what it may impact.</p> <p>It would be appropriate to include underground facilities on this map which may impact on Bicentennial Reserve given the extent of works around the area.</p> <p>The previous POM has Willoughby Leisure Centre and the Incinerator Area on opposite sides? Is there an area under current development that should be noted as of historical significance in some way?</p>
Users	Previous POM	<p>Included a percentage breakdown for each licensee and the percentage of local vs our of area membership/ use. This data would be useful for planning purposes and helpful for the local community to see.</p>
Historical Context	<p>Page 23 Tunks Park POM</p> <p>https://abc17603.wordpress.com/history/suburbs/naremburn/</p>	<p>Comment: A timeline is included which shows a brief history of the area going back to the Cammeraygal Peoples. Aboriginal and other history of the area could be improved. The 1995 plan included a significant history which would be a shame to lose track of. Historical context is important to</p>

		<p>the community and for planning purposes. I would like to see more historical displays and interaction with local schools learning about the area and it's history. A goal may be to create more educational opportunities in the Gully?</p>
<p>Goals and Timelines</p>	<p>https://yoursay.northsydney.nsw.gov.au/st-leonards-park-pom</p>	<p>Comment: The draft St Leonards Plan of Management currently on consultation contains two tables. One prioritises the objectives and one displays the timelines for work. Including this level of detail would assist the community in understanding how the reserve will be managed over coming years:</p> <p>This might include but not be limited to the following. I would imagine that Bicentennial would have similar goals to Tunks.</p> <ul style="list-style-type: none"> Weed management Lawn care Rubbish management Recycling – water and materials Usage Noise Management Sports Times <p>Use of Park ie) organised activities such as bike repair days, bush walks, sustainability groups, walking groups, aboriginal talks etc What are WC's goals in creating a sense of community beyond the Leisure centre and Sports Fields?</p> <p>I would like to see firmer goals around sustainability ie) a plastic straw ban in the reserve, a commitment to use sustainable weed management practices, and a ban of synthetic grass. Given the toxins and water quality issues already present adding more plastic and toxic fill is not at all ideal. I would like to see council make a commitment to banning the use of synthetic grass in Bicentennial Reserve.</p>

<p>Balance between Structured and Unstructured Use</p>	<p>Previous Plan of Management 1995 Strategies Include Water, Open Space and Planning/ Management, Landscape Character and Visual Appreciation, Recreation and Access, Vegetation Mgt.</p> <p>Tunks Park Plan of Management</p> <p>Both of the above set targets for a balance between organised and recreational use.</p>	<p>Points that could be clarified:</p> <p>What is Willoughby Councils Goal with regard to balancing Recreational use and organised activities</p> <p>Are the ovals for organised sports use only or also community use</p> <p>How will the bushland be improved over the period of the plan – what is the goal?</p> <p>How will encroachment and development impacts be minimised</p> <p>Lighting times</p> <p>Noise suppression</p> <p>Where are dogs allowed and where are they not</p> <p>Goals around the creation and maintenance of beauty</p> <p>Active transport: the current track was insufficient during the pandemic to allow for effective social distancing and with more riders using the path it is becoming crowded at times. Is there opportunity for another bike track – perhaps a two-way system that goes around the baseball diamond or an elevated connection (skyway cycleway).</p>
<p>Sewage Overflow</p>	<p>Storage Tunnel Issues: https://www.tunneltalk.com/TunnelTalk-Australia-Mar1999-Northside-alliance-for-cleaner-Sydney-harbor.php</p>	<p>Given the recent events it would be appropriate to note the alignment of the Northern Storage Tunnel in the area and what to do or who to contact in the event of an emergency</p>
<p>Stormwater Management and Water Quality</p>	<p>1995 POM 2.5.42 Stormwater Management</p> <p>2.4 Water Management Section</p>	<p>The WC stormwater diagram showing where stormwater enters the Gully from would be useful to include to grow awareness about impacts to the gully and issues if they arise. The Flood Assessment recently completed noted an area of flooding that occurs in Bicentennial and it would be helpful to include this on a diagram or comment.</p> <p>Water Quality goals such as establishing a water quality program, testing etc were listed in the POM previously but it is not clear if that is continued, when, by whom and where water quality is reported. It would be helpful to have water quality results communicated to the Bicentennial</p>

	2.4.8 Stormwater Transmission	<p>Committee and posted to the website or perhaps notified to the community to raise awareness and create strategies for improvement.</p> <p>The previous plan stated that it's water quality aim was "To recognise the importance of Flat Rock Gully as a natural waterway and to identify and enhance the value of the creek downstream of Flat Rock Drive as a natural bushland stream" How can we promote the natural environment to users and leasees – participating in a clean-up day as part of lease arrangement perhaps? Invitation to Bushcare events. Set an expectation that users need to be part of the environment and community they are in not just use the fields would be a sustainable and community building practice.</p> <p>Given the current issues it may be appropriate to note that it is a sewage overflow point downstream as not many people have realised this– section 2.4.3 lists the challenges to water quality and mentions this.</p> <p>The previous plan spoke about the stormwater system being under capacity causing flooding on Bicentennial. Has this been rectified or is this something to still look into as a goal as I often notice flooding?</p>
Flora and Fauna	Previous POM 1995	<p>The previous plan included specific information to the reserve re: the flora and fauna in the area. The Tunks POM notes that several species are dependent on the sports fields for grazing at night and birds are dependent on the fields for bugs etc An awareness of this raised awareness of good waste management practices and the need to minimise chemical usage. It is also important to ensure that lighting does not run late into the night and that it is angled away from bushland to minimise impacts on Fauna.</p>
Committee Representation	Resident and Sporting Group	<p>Resident and Sporting Group make up the bulk of the advisory group. Given the nature of the Reserve and it's location additional members from Wildlife or Ecology Groups would be helpful ie Willoughby Environmental</p>

		Protection Association (several members of which were involved in the original plan).
Planning context	Previous POM	1.3 The Planning context States that a Dev Control Instrument for all developments that joins or occur in public open space is required – has this been put in place? If so it should be mentioned, if not it should be specified. I am very concerned about the encroachment of development into the bushland and leisure spaces and further contamination of the area.
Cross Border Issues	With North Sydney	It is not always clear who owns which part of the area and whether North Sydney Council and Willoughby Council are working together. Whilst this may be applicable further down for walkers and cyclists the connectivity is important. Regarding water quality, weed management and fauna management some coordination is also necessary. The previous plan noted this as something to be worked on and I would like to see this as a goal of this plan also. Connectivity between Willoughby and North Sydney for active transporters is a real issue.
Traffic and Parking	POM 1995	The previous plan included a very extensive review of capacity both with regard to users and parking/ traffic. This is a significant issue for the community and should be included in some detail. How will parking be managed during construction and to accommodate more people after construction. Goals around managing traffic with trucks for all the development. Encourage active and public transport use – how? Bike racks, promotion, communication with Transport for NSW?
Sportsfields	New POM	Objection: I believe that the plan should specify clearly the times of use by leasees For example, 9-5pm Mon to Friday. The lighting times and any noise or traffic controls. In this way the community can know when they are able to plan for unstructured time. I was also unaware that the Baseball diamond has been named after the sporting body – is the ground now only for Baseball club use? Whilst I agree with keeping dogs off the field it's not clear if sports fields can be used by residents. Given the

		population growth in the area expected it would be appropriate to be clear about that and provide signage. Ideally I would like a period of time to be set aside for community use of the reserve ie Sun am until 12pm or a similar block of time to allow for family and community use. This has been very important during Covid and it is a principle that would allow for greater flexibility at other times.
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My overall sense from reading the plan is that it is heavily pointing towards the formal use of the reserve – I would like to see a greater balance with informal use, development of informal areas and activities and the recognition of the value of retaining undeveloped/ bushland areas. Given there is also a sports field management plan this plan should really represent the overall community use of the reserve and care for it into the future. I would like Flat Rock Gully better recognised overall as an area of historic, social and natural importance – esp it’s connection with the environs downstream. Regarding goals the plan references many other plans – it is not clear if these are already in existence or to be consulted on. I would prefer all the aspects of bicentennial reserve management (to the extent possible) to be included in the one document. In this way each user of the area can see what the totality of issues and plans are - this will lead to a more cohesive and inclusive management of the reserve.