

NAREMBURN PROGRESS ASSOCIATION

Founded 1901; Incorporated 2004

PO Box 393 St Leonards NSW 1590

www.nareburnprogress.org.au – secretary@nareburnprogress.org.au



Larissa Penn
President
president@nareburnprogress.org.au

Roger Promnitz
Vice President
0419 227 986

Helene Kemp
Vice President / Treasurer
0403 015 004

Ralph Youie
Secretary

7th March, 2022

Dear Willoughby Council,

Thank you for the opportunity to give feedback regarding the Draft Bushland Plan of Management 2021, Policy and Resource Inventory.

Whilst the plan appears extensive, it is very generalised and fails to provide specific targets around some key issues which are impacting Willoughby's remaining bushland corridors. It is important to us and our members that the remaining bushland in Willoughby is carefully protected from the impacts of housing and major developments, weeds, recreational encroachment, run off and more. It is also important that our natural and Aboriginal heritage is retained for future generations. We look forward to discussing these points further leading to a refinement of the plan.

Vol.1 - Policy

6.1.5 Threats to Plant Communities

The plan does not set specific targets with regard to replacing native species which are lost due to die back ie) a 2:1 replacement value funded by council and/or developers who create a loss of trees due to pollution and building leachate.

The plan does not recognise that areas of historic contamination ie) Flat Rock Gully/ Bicentennial Reserve and other filled spaces can pose a significant risk to the tree canopy if leachate is brought to the surface, if capping is disturbed or if roots reach contaminants which has happened in the past.

Flooding is not recognised as a threat to plant communities - given the WCC Flood Management plan recognises several areas of flooding in Willoughby bushland this should be identified.

Downwash (from major developments, industrial area etc) is not recognised as a risk to plant communities in terms of volume or contaminants

8.1.3 Active Recreation Facilities and Structures

"Recreational use of bushland is based on the conservation of natural ecosystems balanced with recreational needs of the community."

"8.1b Recreation facilities and structures will not be constructed in bushland areas if the direct and indirect adverse impact of those structures is deemed by Council's Bushland Manager to endanger the natural ecosystem of the bushland reserve"

The wording about protection of bushland is very non-specific and does not assure the protection of bushland ie) all bushland removal should be seen as endangering a natural ecosystem,

We do not agree that bushland should necessarily provide the source of recreational space into the future. Better utilising existing space and reserving space for facilities when considering development approvals should be councils' priority. There should be a stronger goal expressed to protect Willoughby's remaining bushland.

More specific protection of areas should be made clear in the plan to prevent encroachment of recreational facilities or development ie maps which specify areas to be protected. Clearing of bushland should be subject to community consultation and that is not adequately noted in the plan.

8.1d Aim: To ensure that recreation structures and facilities in bushland are maintained to the highest possible standard.

"Construction of recreation facilities in bushland areas will be of a high standard." It is not clear what this standard is?

For example, given the evidence around synthetic grass contributing to microplastics to waterways and bushland areas it would be appropriate to set a standard of no synthetic grass in bushland areas and in catchments or next to waterways ie Flat Rock Gully/ Clive Park etc We do not see the use of synthetic grass as being of "high standard" in these areas. Where synthetic grass has been used specific standards around adequate bunding, shoe cleaning facilities, signage and pollution traps should be installed and maintained. As previously noted, specific targets are required to adequately manage bushland health in the area – the targets in the document are not sufficiently specific.

10.2c Aim: Reduce Council financial liability for restoring degradation to natural areas arising from leases, licences and bonded activities.

The progress association supports these objectives in principle however the action and measure is very vague. The council should set a target that a certain % of funds from leases and licences go into bushland management for example; High Risk might be 30%, Medium Risk 20% and Low Risk 10%. All development has an impact on the degradation of bushland due to increased use and should contribute to upkeep ie) replacement of trees impacted by run off and better weed control etc

This risk-based principle should also apply to development funding to ensure bushland is adequately invested in in the Willoughby area.

Additionally, it is not clear as to how bushland compulsorily acquired for State Projects of any description will be returned to council. A set of targets for the return of bushland should be set.

10.4b Aim: To ensure that the Aims, Objectives, Targets, Actions and Measures remain achievable and relevant.

"Council supports the regular review and updating of this Urban Bushland Plan of Management by staff or consultants experienced and qualified in Bushland Management, in conjunction with Council's Natural Heritage and Bushland Advisory Committee, to ensure that the Plan remains consistent with the aims and objectives of SEPP19 and the Willoughby City Strategy and the ability of Council to resource and implement the plan."

The federation has previously written in support of all consultative committees continuing to ensure community feedback incorporated into planning, the Bicentennial Reserve and Flat Rock Gully Committee and others such as the Heritage Committee should also be consulted. Likewise, the NPA have given feedback to the Mayor and our local Councillors regarding the need to continue committees.

12. Cultural Heritage Management in Bushland

12.1.1 12.1.1 Legislation and Policy

“The National Parks and Wildlife Service is responsible for the protection of Aboriginal objects and Aboriginal places in New South Wales under the National Parks and Wildlife Act 1974 (NPW Act). An Aboriginal place is —a place that, in the opinion of the Minister, is or was of special cultural significance with respect to Aboriginal culture and is published in the Government Gazette. No Aboriginal places have been recorded in Willoughby.”

The recent Talus Land Grant indicates that there is now an Aboriginal Place in Willoughby – should this be included? In addition, research conducted in the Willoughby Area indicates that there are Aboriginal places of importance to the Cammeraygal that require further investigation and advocacy by the council to Government as per the MLALC submission regarding the Beaches Link Project.

12.1.4 Natural Heritage Sites

Natural Heritage Areas

<https://www.willoughby.nsw.gov.au/Environment/Bushland-and-Wildlife/Natural-Heritage-Register>

The POM refers to Natural Heritage Areas. The councils Website lists Natural Heritage across many suburbs however there is no Natural Heritage Register for Naremburn and the area around and in Flat Rock Gully appear to be excluded. Naremburn is the oldest Willoughby suburb and has many important areas of Natural Heritage remaining despite several road projects. A survey of Natural heritage in this area needs to be included before the plan is approved.

Vol.2 – Resource Inventory

2. Wildlife

A detailed fauna study completed in 2001 by Dr Arthur White of Biosphere Consultancy which is over 20 years ago. The previous plan recommended that a new study be done to update Willoughby’s knowledge of fauna in the area and the specific strategies needed to manage various habitats. Currently the fauna list is generalised across Willoughby despite there being a wide variety of different habitats. The plan currently states that there are: *“7 species of frog, 18 species of mammals; 28 species of reptiles; 139 species of bird”*; And a large but as yet unknown number of invertebrates. Understanding specific habitats is essential to the survival of our endangered and native species ie) rock wallabies at Flat Rock, Powerful Owls, various endangered frog species etc. The Fauna review in the POM is inadequate and outdated.

5.4.4 Heritage Listed Items

The Open Air Theatre in Castlecrag is listed as a heritage item however Henry Lawson's Cave is not - this needs to be rectified by council given the rich history of the cave which has a National significance and should be included in this and other relevant plans.

Reserve	Item	Heritage Listing	Address
Castlehaven Reserve	Open Air Theatre	Local Environmental Plan	The Barricade, Castlecrag

Flat Rock Bushland Reserve

The documents do not recognise that Flat Rock Creek is a designated Critical Fish Breeding Habitat.

General

The document does not set a standard for water or soil testing to check the health of the water source in the area. There should be a cross reference to the testing regime which incorporates both biological and chemical testing on a regular basis. The quality of ground and surface water in the area is critical to the health of the bushland. The results of recent testing should be noted to provide for continuity in this regard.

The documents do not recognise the sewage overflow points in Willoughby or the risk of sewage overflow/ works impacting bushland in the area. There should be a note of where these points are and where lines travel. Currently bushland is under threat due to a need to replace old sewage lines which are under pressure due to overdevelopment. Recognising this will be an important step in the future management of bushland in the area as the POM should be provided to any contractors working at the site. We would suggest a map be included where sewage lines intersect with key bushland reserves and signage where the overflow points are to alert the public and bush care personnel.

The documents do not adequately discuss the heat island reducing benefits of bushland and the value of bush preservation in terms of addressing climate change. The focus is on mitigation/ resilience rather than recognition of benefit and both are important.

The documents do not adequately discuss the light and noise pollution impacts of encroaching development and extended sporting club use. These issues have a significant impact on native nocturnal fauna.

The Bicentennial Reserve and Flat Rock Gully (FRG) have been treated under one Plan of Management since 1995 however this plan and the previous Bicentennial Plan separate the two for reasons that are not specified. The area is a single landform ie Gully, a common catchment for Flat Rock Creek and contains a continuous area of bushland which runs from beyond Willoughby Rd down to the remnant forest and to Tunks Park. Demarking this area at Flat Rock Drive fails to recognise the importance of the wildlife corridor. We would ask that the bushland area adjacent to "Bicentennial Reserve sporting fields", Flat Rock Reserve and Flat Rock Gully be considered as one reserve under this plan for this reason.

The Naremburn Progress Association believes that the document should be withdrawn and reissued following a 'major' review including:

- professional edit

- **identification of Statement of Purpose (not limited to legislative requirement) and target audience**
- **clarity regarding the status of the UBPoM relative to other WCC operational guidelines and policies**
- **Addressing the above specific points**
- **Specific and measurable targets across the document**
- **An updated and area specific Fauna Study**

Yours Faithfully,

A handwritten signature in black ink, appearing to read "Larissa Penn", is positioned above a rectangular grey box that serves as a placeholder for a stamp or seal.

Larissa Penn
President Naremburn Progress Association