



20th December 2021

ask@centralcoast.nsw.gov.au

Dear Chief Executive Officer,
Mr David Farmer
Central Coast Council

Peat Island Planning Proposal

The aim of Friends of Berowra Valley is to protect the natural landscape, heritage and biodiversity of Berowra Valley while making the valley more accessible to the community.

We strongly object to this proposal due to three major concerns:

1. Impact to the water dependent vegetation communities. We recommend a bio-filtration system and water sensitive urban design.
2. Impact on Brooklyn's community services, infrastructure and traffic.
3. Brooklyn Sewerage Treatment Plant's capacity to protect the water quality of the iconic Hawkesbury River.

Impact on the Environment

This development is concerning for the following reasons:

- The potential to result in increased sedimentation and contaminated runoff into the Hawkesbury. This contaminated runoff has the potential to impact water dependent communities including the Freshwater Wetland, Swamp Oak Floodplain Forest and Mangroves. The contaminated runoff will also have the potential to impact foraging habitat for wading birds which forage on the mudflats and mangrove areas.
- During the extensive development and construction phase, subsequent stormwater runoff and potential flooding events there must be strict controls on sediment and runoff. We agree with the recommendation that the implementation of a bio-filtration system should be installed but recommend water sensitive urban design principles also be considered.
- The long term risk to the health of the mangroves. The environmental capital and ecosystem services that mangroves deliver have positive outcomes for the broader community and must be protected to allow migration of mangroves due to sea level rise. The current plan does not allow for this important mitigation of climate change effects on the local mangroves.

- Protection of the environment needs to be more strongly considered for any planning in this area. Loss of air quality, limitation of access to green and public spaces, pollution of waterways and loss of biodiversity resulting from increased residential and visitor populations, and increased development will have a quantifiable impact on the broader community.
- The proposal that nest boxes should be installed to replace hollows and buildings removed/refurbished at a minimum ratio of 1:1 (i.e. 1 nest box installed for each hollow removed) is a good idea, but unfortunately it does not take into consideration that only some bats will utilise nest boxes, and many species will be profoundly affected by the subsequent loss of breeding habitat.
- A Koala Assessment Report is missing and is required under the Koala Habitat SEPP 2019.

Impacts on Brooklyn and Hornsby Shire

The Brooklyn Community and Hornsby Shire Council have been advocating for more than a decade to be included within the consultation and the project scope.

Key issues affecting Brooklyn are:

The Community Facility Needs Analysis states that there is capacity for Brooklyn to provide the services for this increased population in Central Coast Council without any additional funding being provided to the Hornsby Shire Council and affected State agencies.

- The consultants engaged failed to consult with individual service stakeholders to establish the extent of extra capacity (if any) available for services such as those offered by NSW Health, Brooklyn Primary School and day care, and sporting associations.
- Brooklyn rate payers are concerned that they will suffer from overstretched services and increased rate stress to provide services for Central Coast residents.

It is negligent that the impact on Brooklyn was not included in the Scope of the Project or any of the analysis and reports, such as the Social Impact Assessment. The Proposal mentions Brooklyn many times and while it lists the community concern regarding the strain of resources and amenity, particularly in Brooklyn, it did not mention this as a key issue and did not include any mitigation measures to address this major concern.

Impact on Traffic

Brooklyn roads, particularly Brooklyn Road itself and Dangar Road are currently overloaded and dangerous. Brooklyn's landforms prevent widening or improving access. Trucks, including those from State Rail, and cars and boat trailers accessing Parsley Bay, make resident access to Brooklyn Road often dangerous. Weekend traffic around the Brooklyn CBD is always outstripping safe availability.

The addition of considerable traffic from the proposed Peat Island development will exacerbate an already overloaded traffic system.

Demands on Parking

Each of these additional traffic demands will result in additional demands on Brooklyn parking facilities, which already exceed capacity, and have been the subject of numerous studies since the early 1990's. Contention between on-shore and off-shore parking demands, and supply of visitor parking, are currently being analysed and assessed by Hornsby Council and the community, to try to identify potential long term solutions.

Parking facilities in Brooklyn for commuters and service users from the Peat Island development must be provided and funded by the NSW Government and the development proponents before construction begins.

Impact on Sewerage

The Brooklyn Sewerage Treatment Plant (STP) currently services Brooklyn, Dangar Island, Mooney Mooney and Cheero Point. It is owned / operated by Sydney Water Corp (SWC) and we understand it has ample capacity to meet future projected growth until 2045 *of the existing settlements*.

- The proposed Peat Island development will use up much of this excess capacity. Developers should be required to ensure STP upgrades are fully paid for at SWC rates, not Gosford rates.
- The proposal does not examine stormwater or sewerage effluent re-use in the development. NSW Metro Water Strategy requires integrated and sustainable solutions
- Water modelling is needed to confirm impact of “doubling” the discharge to the river and assurances that oyster farming and existing fishing activities will not be impacted.
- The water cycle report ignores importance of Rainwater harvesting; stormwater harvesting and water recycling. Tapped fresh drinking water supplies could be used to hose down car parking areas and recreational spaces. Instead there should be irrigation management to ensure more productive use of water and increase reuse of waste water, effective management of sediment and litter, rather than going down drains, plantings to maximise retention of nutrients, prevent run off to the river.
- The development should follow NSW Integrated Water Cycle Planning Guidelines. NSW Government Greener Place Design Guide should also be adhered to.

Alternative Vision for Peat Island

There is an alternative vision for Peat Island that was discussed at a number of meetings and has been voiced many times. This vision includes:

- The Western side of the M1 stays in public hands for public access.
- Incorporates ideas such as an indigenous cultural centre with native garden, cooking classes and tours, a river discovery centre, history centre, boat tours of the ‘best natural art gallery; and could even be a ‘Cockatoo Island in the North part of Greater Sydney’ with eco accommodation, music art and more.

In summary, there are many reasons that this Peat Island Zoning Proposal should not be approved.

Yours sincerely
Friends of Berowra Valley.