



17<sup>th</sup> April 2023

## Westleigh Park Draft Plan of Management

Reference F2023/00077

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.

In this draft Plan of Management we have three major concerns:

1. Council is violating the Local Government Act requirements for natural area (bushland). The science shows that mountain biking is inconsistent with every one of the requirements imposed to protect bushland.
2. Council has failed to release the results of the recent fauna surveys making fauna management comment more difficult.
3. The use of synthetic turf is contrary to Council's stated goal of being environmentally sustainable.

## Violation of the Local Government Act

Council states that the Local Government Act requires that the management of community land categorised as a natural area (bushland) is:

- (a) to ensure the ongoing ecological viability of the land by protecting the ecological biodiversity and habitat values of the land, the flora and fauna (including invertebrates, fungi and micro-organisms) of the land and other ecological values of the land, and*
- (b) to protect the aesthetic, heritage, recreational, educational and scientific values of the land, and*
- (c) to promote the management of the land in a manner that protects and enhances the values and quality of the land and facilitates public enjoyment of the land, and to implement measures directed to minimising or mitigating any disturbance caused by human intrusion, and*
- (d) to restore degraded bushland, and*
- (e) to protect existing landforms such as natural drainage lines, watercourses and foreshores, and*
- (f) to retain bushland in parcels of a size and configuration that will enable the existing plant and animal communities to survive in the long term, and*
- (g) to protect bushland as a natural stabiliser of the soil surface.*

The science supports our position that mountain biking trails are inconsistent with each of these requirements.

*(a) to ensure the ongoing ecological viability of the land by protecting the ecological biodiversity and habitat values of the land, the flora and fauna (including invertebrates, fungi and micro-organisms) of the land and other ecological values of the land, and*

All tracks through natural areas cause some form of damage to the environment (Havlick et al, 2016; Pickering et al 2010a;b). Track impacts in general include soil erosion, compaction, changed hydrology, track widening/deepening, dislodgement of rocks, and exposure of roots and bedrock. There can be damage to plants including reduction in vegetation height, width and biomass, changes in species composition, and the spread of weeds and plant pathogens (Pickering et al 2010a). All components of habitat within a functioning ecological community are at risk of disturbance from track creation. A permanent trail, whether for walking, riding or vehicular access may become a boundary or barrier for ground-dwelling species, a conduit for water erosion and weeds (Weiss et al, 2016), an access point for predators and noise and light pollution (Steven et al, 2011). Tracks increase the level of ecological fragmentation within natural areas (Ballantyne et al, 2014a,b). There is a long history of informal track creation around permanent tracks, especially in muddy areas or where impediments such as fallen branches exist (Davies & Newsome 2009; Pickering et al 2010b; Ballantyne et al, 2014a,b).

(Extracted from the Canobolas Conservation Network's Cycling Strategy Submission.)

*(b) to protect the aesthetic, heritage, recreational, educational and scientific values of the land, and*

Mountain bikers destroy the aesthetic and scientific values of the land in search of recreation.







*(c) to promote the management of the land in a manner that protects and enhances the values and quality of the land and facilitates public enjoyment of the land, and to implement measures directed to minimising or mitigating any disturbance caused by human intrusion, and*

The mountain biking community are a very small subset of the whole community. They have overshadowed those who have an interest in enjoying the bushland for the purpose of connecting and enjoying their natural environment. There is a philosophy in bushwalking to tread lightly. You don't destroy trees and shrubs, crush ground covers, smash insects or the few reptiles remaining in the area. You don't bring in external materials for jumps. You share the area with everyone so that all can enjoy it.

*(d) to restore degraded bushland, and  
(e) to protect existing landforms such as natural drainage lines, watercourses and foreshores, and*

Mountain biking is a high impact sport. It is not a passive form of recreation like walking as it uses equipment and extra power to transmit a person along a track. Speeds can be up to approx. 15-20km/hr on downhill single track, but speeds up to 52km/hr have been quoted in mountain biking literature (Refs available). Extra lateral energy into the soil surface is expended on corners and over terrain features. This and hard braking (skidding) promotes the removal of the track surface by treaded tyres which are optimised to penetrate and grip the soil surface. Mountain bikers describe the sport as "shredding". While a single use of a track may not seem to cause much damage,

multiple use over time leads to track degradation via widening (Evju et al 2021) and deepening (Salesa and Cerda, 2020).

(Extracted from the Canobolas Conservation Network's Cycling Strategy Submission.)

*f) to retain bushland in parcels of a size and configuration that will enable the existing plant and animal communities to survive in the long term, and  
(g) to protect bushland as a natural stabiliser of the soil surface*

Compaction of track surfaces, especially when wet, promotes poor water infiltration and ultimately exacerbates water flow along the tracks. If tracks are not well designed and maintained this leads to erosion (Salesa and Cerda, 2020). All tracks cause erosion and greater damage is caused by mountain biking than hiking (Salesa and Cerda, 2020; Evju et al, 2021). In their comprehensive review of global track erosion literature Salesa and Cerda (2020) state "reported world soil losses from tracks ranged from 6.1 Mg ha<sup>-1</sup>y<sup>-1</sup> to 2090 Mg ha<sup>-1</sup>y<sup>-1</sup>, all of which are not sustainable".

(Extracted from the Canobolas Conservation Network's Cycling Strategy Submission.)

## **Fauna Management**

The failure to allow access to the fauna surveys completed since the co-design workshops is deeply concerning. To claim that they will only be extracted from the GIS system when preparing for the BDAR as part of the DA process means that we do not have access to very important information.

We know from searches on the Atlas of Living Australia that the local area contains at least 15 mammal species including ringtail possums, brushtail possums, swamp wallaby, short-beaked echidna, feathertail gliders, Goulds Wattled bats, Grey-headed Flying Foxes, sugar gliders, eastern grey kangaroo, large bent-winged bat, brown rat, eastern horse-shoe bat, little forest bat.

There should also be 14 reptile species including the red-bellied black snake, blue-tongue lizards, eastern water dragon, green tree snake, snake-necked turtle, bearded dragon and more.

There should be 8 amphibian species including the common eastern froglet, leaf green tree frog, striped marsh frog, perons tree frog, the vulnerable red-crowned toadlet and the eastern dwarf tree frog.

Over 133 bird species have also been documented including the sulphur-crested cockatoo, noisy miner, kookaburra, grey butcher bird, Australian magpie, king parrot, eastern whip-bird, pied currawong, crested pigeon, Australian raven, crimson rossella, brush turkey, galah, eastern koel, eastern spinebill, grey fantail, eastern wattlebird, red wattlebird, glossy black cockatoo and many many more.

There are also 4 molluscs listed such as the chocolate-streaked pinwheel snail, the endangered dural land snail, hydrobiid snail and leopard slug.

Your observation in the master plan that there were “a few reptile species and indications of mammals” is very vague and concerning. The pounding that the site has endured from mountain bikers for over 10 years has most likely contributed to a reduction in the fauna species that should be found in the area.

Squaretailed Kites, listed as vulnerable, were observed plus Powerful Owls were heard. This site should be an important hunting ground for the Powerful Owl.

Powerful Owls are listed as a vulnerable species. They have been assigned to the ‘[Landscape species](#) management stream’ under the Saving our Species (SoS) program. This SoS strategy aims to ensure that the species is secure in the wild in NSW and that its NSW geographic range is extended or maintained and maintain its conservation status under the [Biodiversity](#) Conservation Act.

Council claims that it wants to avoid, minimise and mitigate impacts on biodiversity at every stage, the removal of MTBing from the bushland is an obvious first step. Calculating offsets does not bring back your fauna that have had their habitat destroyed.

## **Zoning**

Westleigh Park sports fields must be appropriately zoned as RE1 Public Recreation, instead of R2 Residential zone. The high conservation areas must be zoned as C2 Environmental Conservation.

## **Sportsfields**

### **Synthetic turf**

Council states that they want to support environmental sustainability and reduce carbon emissions. Synthetic turf does not align with this stated intention. Synthetic turf is basically a product of the fossil fuel industry and is hence not sustainable, particularly as it cannot be recycled. Cleaning chemicals and micro plastics can be shed into the environment and it deprives fauna of feeding sites.

This site is particularly unsuitable for synthetic turf given its proximity to sensitive bushland. The site is exposed to the full sun and bushfires. Synthetic turf can get extremely hot and be unsafe for players. Synthetic turf can also burn in a bushfire and produce toxic fumes. Synthetic fields cannot sequester carbon.

### **Lighting**

Lighting has a serious impact on native fauna and to minimise the impact on nocturnal animals:

- Playing field lighting must be consistent with the Australian Standards including Control of Obtrusive Lighting Effects.
- The closure of playing fields by 9pm to minimise disruption to resident amenity and wildlife.

Yours sincerely

Karen Benhar

President

Friends of Berowra Valley