



10 November 2021

Central Coast Council  
PO Box 20  
WYONG NSW 2259  
Via online submission form: <https://www.yourvoiceourcoast.com/pipp>  
Via email: [ask@centralcoast.nsw.gov.au](mailto:ask@centralcoast.nsw.gov.au)

Attention: Mr David Farmer – Chief Executive Officer

Dear Mr Farmer,

#### **Peat Island and Mooney Mooney Planning Proposal – Public Exhibition**

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Thank you for the opportunity to review and provide comment on the Planning Proposal for Mooney Mooney and Peat Island (the proposal) as outlined in the Addendum Report, the associated technical studies and plans provided. The purpose of this letter is to present Council's submission on the Peat Island Planning Proposal.

At its meeting on 10 November 2021, Council considered Group Manager's No. PC17/21 (copy attached) and resolved as follows:

1. *A submission regarding the Peat Island Planning Proposal attached to Director's Report No. PC17/21 be forwarded to Central Coast Council to advocate for amendments to the Planning Proposal and further detailed analysis of issues including potential impacts on Brooklyn.*

As you may be aware, Hornsby Shire Council has made officer level submissions raising a number of concerns on the Peat Island Planning Proposal as part of pre-exhibition stakeholder consultation following the Gateway Determination in 2017. Copies of these submissions are attached and include:

- A submission (dated 7 November 2017) on the 2016 Planning Proposal;
- A submission (dated 15 February 2019) on an amended Planning Proposal (2018); and
- A submission (dated 15 February 2019) on a further amended Planning Proposal (2021).

Each submission has raised concerns regarding implications for Brooklyn and issues with respect to water and land-based commuter berthing and parking, accessibility to Hawkesbury River and Berowra Railway stations, economic impact of commercial zoned land on Brooklyn, the intensity of the development and biodiversity impacts.

Several aspects of the Peat Island Planning Proposal are supported, including the potential to become a tourism attractor for the Hawkesbury River area, improvement to public access to the Hawkesbury River foreshore, public access to Peat Island and retention of historical buildings and interpretation of the history of the site. There have also been some positive improvements to the proposal since 2016, including the removal of residential development from Peat Island and a reduction in density and building height, retention of additional historical buildings and proposed heritage listing of Peat Island.

However, based on a review of the currently exhibited Planning Proposal, Council maintains a number of concerns raised in previous submissions and has identified additional issues which still need to be addressed by the proponent as summarised below.

## **1. Marina**

The exclusion of the marina from the current Planning Proposal and the indication that it be progressed as part of a separate future planning proposal is not supported.

Currently, demand for commuter berthing and parking for all Hawkesbury River residents within the vicinity of the Planning Proposal site are accommodated by facilities within the Hornsby Shire, specifically at Brooklyn and Berowra Waters. Moreover, a recently adopted Car Parking Management Study for the Hornsby Shire outlines that boat mooring and car parking at Brooklyn is currently at capacity and recommends that Council 'de-prioritise' the provision of car parking in Brooklyn for Central Coast residents. This would indicate that it is essential that the provision for a marina as part of this Planning Proposal be included to appropriately address the current parking/berthing needs of Central Coast "river access only" residents, as well as any additional demand generated by the proposed development.

Further, consideration of the marina as part a separate future planning proposal would not allow a wholistic and integrated approach to the overall development in Peat Island and Mooney Mooney. Concerns are raised that the indicative location of the marina on the concept plan, the proposed carpark within the RE2 zone and the increase in population that would result from the Peat Island Planning Proposal, would be used to justify progression of a separate planning proposal for the marina at the expense of detailed consideration of the environmental impacts, or the evaluation of alternative locations within the area that could result in a better environmental outcome.

The marina is tied to commuter berthing and parking concerns, as well as traffic and environmental impacts, and is an integral part of the proposal that needs to be considered upfront to determine the impacts and benefits for all river settlements. It should be considered as part of the current Peat Island Planning Proposal to ensure integrated consideration of transport movement options between the road, waterway and the railway and allow the complex estuarine impacts of this type of development to be appropriately addressed upfront.

## **2. Terrestrial and Estuarine Biodiversity Impacts**

Concern is raised with the proposal to rezone an area, also proposed as the concept land-based marina location, in the south-west portion of the subject site to RE2 Private Recreation. This proposed location presents the highest marine impact risk from an ecological perspective as it is likely to impact upon mangroves as well as the estuarine environment. Further, the majority of the proposed RE2 area is currently tidal mud plains and would therefore require ongoing maintenance dredging.

Concern is also raised with regards to 'sediment contamination' referred to in the Detailed Site Investigation prepared by JBS&G Australia Pty Ltd, dated 5 August 2021, which concludes that "the site can be readily made suitable for the proposed land use, subject to removal and validation of underground storage tanks (USTs) and remediation and/or management of the surficial asbestos containing materials (ACM), buried asbestos and heavy metals identified above the ecological criteria".

Council undertook sediment sampling in 2013, which identified that elevated levels of Copper and Mercury were identified approximately 1km downstream from Peat Island, (within ANZECC & ARM CANZ (2000) guidelines). Further, the presence of Polycyclic Aromatic Hydrocarbons (PAH) were identified adjacent to Peat Island above the ANZECC & ARM CANZ (2000) guideline levels. These results highlight the potential constraints in spoil management and disposal which are associated with the proposed development.

Both the Riparian Constraints Assessment and Detailed Site Investigation briefly identify that Acid Sulphate Soils and Potential Acid Sulphate Soils are likely to be present at and adjoining the site. Further, the Riparian Constraints Assessment states that “an acid sulphate soil management plan would need to be prepared for those developments located within at-risk areas to ensure that any impacts of exposing acid sulphate soils on the nearby aquatic fauna are mitigated”. It is recommended that an Environmental Impact Statement (EIS) be prepared at Planning Proposal stage to properly determine the full impacts of any exposed acid sulphate soils associated with the proposed development on estuarine and aquatic ecology.

### **3. Transport Analysis – Train and Bus Service**

Concern is raised with the reliance of the Traffic and Transport Review on the use of outdated data to analyse existing train and bus services. Figure 3.8 on Page 17 of the Review uses RailCorp ‘Barrier Counts of Rail Passengers’ data to provide an understanding of the function and service capacity of the Hawkesbury River Station, which is outdated as it was collected in 2012 and commuter volumes may have changed over time. It is also noted that the reference to non-compliance with DDA standards at Hawkesbury River Station on page 18 of the Review is incorrect, as works to upgrade the station were completed in early 2021.

The Traffic Review does not appropriately consider the effect that any increase in bus service frequency may have on the Brooklyn Town Centre, or on the accessible areas around the Hawkesbury River Station. The following issues should be addressed prior to finalisation of any proposal:

- Bus circulation and the turning circle on Dangar Road outside of the Hawkesbury River Station.
- The integration of appropriate drop off and pick up point as well as bus waiting zones at Hawkesbury River Station for shuttle services.
- The integration of the bus and train timetables and more frequent trains to avoid prolonged waiting periods.

### **4. Commuter Car Parking at Brooklyn**

Community and commuter parking surrounding the Hawkesbury River Station, and within Brooklyn more generally, has been a significant ongoing issue for both the Brooklyn and Hawkesbury River communities. A Constraints Analysis Report prepared by McGregor Coxall for the 2016 Brooklyn Improvement Master Plan notes that all day parking provision within the Brooklyn Town Centre, and east of the railway station, is limited due to the demand from the river communities and recreation activity users.

Further, car parking studies undertaken by Hornsby Shire Council in 2019 indicate that the average and peak car occupancy rate (on and off-street) in areas around Brooklyn, east of the railway bridge, is 88% and 98% respectively. Car parking utilisation data collected during the 2021 COVID-19 lockdown shows that these occupancy rates have been further compounded. In addition, Berowra Railway Station commuter parking is consistently over capacity, with overflow parking occurring on local roads in the vicinity. These findings indicate that there is insufficient capacity within the region to accommodate an increase in demand for commuter parking generated by the Peat Island Planning Proposal.

The proposal does not provide assessment of the additional pressure residents or visitors to the development would have on the car parking within Brooklyn, Berowra and Hornsby Shire more broadly. Further, the suggestion for local Councils to provide additional commuter parking requirements through Section 7.11 Contributions at development application stage is inadequate. Certainty should be provided at the planning proposal stage concerning where additional parking will be provided with an associated funding strategy and implementation plan.

As noted during pre-exhibition consultation, Hornsby Council officers have consistently raised this matter as a concern, and they are yet to be sufficiently addressed.

## **5. Active Transport Infrastructure**

The inclusion of active transport options within the original and revised Planning Proposal is supported. However, any proposed active transport infrastructure should be appropriately integrated with proposed public transport updates, including previously identified bus service and railway improvements.

The recommendation to formalise a dedicated cycle lane from Mooney Mooney to Hawkesbury River Station is also supported. However, the cost of construction of the Hornsby Shire component should be contributed through a Voluntary Planning Agreement (VPA) as part of the Planning Proposal. The works would comprise linking Kangaroo Point to Hawkesbury River Station by completing the following:

- Upgrading of the single existing walkway on the western side of the Hawkesbury River Bridge to a compliant shared pedestrian/cycle deck on the bridge connecting the subject site.
- Construction of a bicycle compliant refuge island south of the pedestrian and cyclist access to Kangaroo Point.
- A 50 km/h speed zone on the Pacific Highway between Brooklyn Road and the Hawkesbury River Station to provide a safe road environment for pedestrian and cyclists.

It is recommended that Transport for NSW be consulted in planning for any active transport options.

## **6. Traffic Analysis**

The Review does not assess the implications of an increase in population and density on the Brooklyn township and Hornsby Shire more broadly. Due to the reliance of the Planning Proposal on the Brooklyn township, and the Hawkesbury River Station particularly, the analysis of traffic and transport should be expanded to consider the impacts on the intersection of Brooklyn Road and Pacific Highway, as well as the Brooklyn township.

## **7. Economic Impact on Brooklyn**

The removal of the highway service centre and associated neighbourhood centre as outlined in the Cover Letter Update to the Economic Statement prepared by URBIS, dated 9 August 2021 is supported, as it reduces the quantum of retail space by 83% and the potential for the service centre to compete with local businesses and services in Brooklyn, addressing concerns previously raised by Hornsby Shire Council officers.

However, the economic impacts to Brooklyn resulting from the amended proposal has not been specifically addressed in the Cover Letter Update or the original Economic Statement. It is requested that the Economic Statement be widened in scope to capture the impacts on retail and business services in Brooklyn, as well as Hornsby Shire more generally.

## **8. Community Services**

Concern is raised with the recommendations of the 2016 Community Facilities Needs Assessment, as well as the 2021 Addendum Update, as the proposal continues to defer the responsibility of education/childcare and healthcare facility provisions to Brooklyn and Hornsby Shire more broadly. Further, the amended 2021 proposal, although recommended by the Needs Assessment, does not provide the opportunity for the establishment of community health care facilities within the community facility centre.

Brooklyn is a geographically constrained township that has limited space to provide educational and healthcare services for a sharp increase in population, and as a result, would have significant implications on the current capacity of services available to the Brooklyn and Hornsby Shire communities.

Brooklyn is a geographically constrained township that has limited space to provide educational and healthcare services for a sizable increase in population. As a result, the proposal would have significant implications on the current capacity of services available to the Brooklyn and Hornsby Shire communities. Further clarification is requested to elaborate on how an increase in demand for Hornsby Shire's community services or facilities will be appropriately addressed by the Proposal and what provisions may be provided to Hornsby Council to cater for ongoing use. Greater consideration should be given to providing additional community services within the Mooney Mooney and Pear Island area.

## **9. Dwelling Type and Yield**

The R1 General Residential zone permits a range of residential accommodation forms, including "residential flat buildings" and "attached dwellings" (i.e. townhouses). It is acknowledged that the R1 zone has been proposed as the application of other residential zonings may limit housing choice. However, these types of housing and densities cannot be prescribed in particular locations when grouped together under an R1 zoning. Concern is raised that the estimated yields from the development could be significantly higher than indicated in the proposal and could further exacerbate traffic, utility and environment pressures within the subject site and in the surrounding areas. It is recommended that further analysis be completed to quantify the yield for the proposal and to allow for appropriate zonings (i.e. R2 Low Density Residential or R3 Medium Density) to be applied across the subject site.

Further, the proposal does not provide an affordable housing component as part of the Peat Island and Mooney Mooney precinct. Given that this is a State Government initiated proposal, it is recommended that the proposal include a component of affordable housing in line with other State Government priorities to provide a range of safe, affordable and well-designed housing options for communities.

## **10. Provision of Open Space**

The Draft Greener Place Design Guide published by the Government Architects Office (Issue N0.04), dated 2020, states:

- In low density areas local parks should be provide within 400m walk of residents.
- Developed open space such as a local park/playground a minimum 1,950m<sup>2</sup> (based on the recommendation of a 5,000m<sup>2</sup> local park for 1,500 residents) should be included.
- The quality of the open space provided needs to be considered and is as important as the amount.

The Planning Proposal includes approximately 9.65ha of open space, as well as proposed foreshore paths to facilitate recreation opportunities. Concern is raised that much of the open space proposed is undeveloped, natural areas which would not provide recreational opportunities for new residents and would not achieve the requirements of the Draft Greener Place Design Guide.

There is a 700m<sup>2</sup> playground at Peter D'Emden Reserve in Mooney Mooney provided by Central Coast Council which includes limited play equipment. The other local play spaces are Brooklyn Park and McKell Park, both located in Brooklyn, and provided by Hornsby Shire Council. None of these facilities are within the required 400m walk for local parks that should be provided to cater for the new population in line with the requirements of the Draft Greener Place Design Guide.

Concern is raised with the proposed reliance on open spaces and sports facilities in Brooklyn and Hornsby Shire more broadly, and the increase in demand generated by the Proposal for these types of facilities. The anticipated increase in demand for parks and sports ground facilities in Brooklyn will place undue pressure on Hornsby Shire Council to fund and create greater capacity to cater for this additional demand. It is recommended that Council request that contributions be included in the proposal to address ongoing maintenance costs related to an increase of demand for Hornsby Shire sporting facilities and open space.

It is also recommended that the Planning Proposal should be amended to include a quality, functional local open space of a minimum 1,500m<sup>2</sup> with opportunities for informal recreation within 400m walk of the new dwellings. This open space should include play space facilities, general exercise equipment for a broad mix of users, and be provided in association the community facilities proposed for the central Chapel Residential Precinct.

## **11. Provision of Infrastructure**

A Letter of Offer – Voluntary Planning Agreement prepared by Property & Development NSW “*confirms a willingness to enter into a voluntary planning agreement (VPA)*”, however it is requested that a breakdown of the funding mechanism and costs of proposed infrastructure and details of any VPA should be provided as part of the exhibition of the proposal. It is also requested that Hornsby Council be part of discussions on in the preparation of, and a party to, any VPA given the reliance on Hornsby Council to support infrastructure such as community facilities, commuter berthing and parking and active transport infrastructure. Demonstration of the economic viability of the project is essential to ensure that the identified public benefits associated with the rezoning will be delivered as part of the project.

## **12. Bushfire Prone Land**

Although the Strategic Bushfire Study prepared by Peterson Bushfire, dated 4 August 2021, addresses the strategic planning requirements of PFB 2019, concerns remain regarding the suitability of the subject site for more intensive development with regard to bushfire risk and potential issues for bushfire emergency evacuation. The Planning Proposal does not adequately assess the impacts of traffic on the Pacific Motorway (M1) and the Pacific Highway in the event of a bushfire emergency, as Evacuation Risk Modelling has not been prepared as part of the proposal.

It is recommended that appropriate investigations, in consultation with the NSW Rural Fire Service, be undertaken to address evacuation risks and access considerations. Greater transparency with regards to the NSW RFS response to the Planning Proposal is also requested, so Council can better understand the ongoing concerns with the site.

## **13. Sewage Disposal**

Regardless of the findings of the system capacity assessment, concern is raised regarding the capacity of Brooklyn’s WWTP to accommodate the discharge requirements of proposed future development associated with the Planning Proposal. As noted in the Utilities Report prepared by Mott MacDonald, dated August 2021, the recommendation for further design investigations highlights concerns over the ability of the Brooklyn WWTP to adequately treat peak flow volumes, along with the subsequent probable bypass/discharge into the Hawkesbury River system. Further, increased demand generated by the proposed development may consume a significant portion of the capacity at the WWTP, further reducing flexibility of accommodating future growth in Brooklyn.

Given the sensitive receiving environment of the Hawkesbury River, and associated economic value of oyster aquaculture and fisheries adjacent to the site, it is recommended that secondary pump stations be proposed and constructed to avoid bypass during pump station failure. It is also requested that any details of these upgrades to existing water and sewer infrastructure be completed prior to finalisation of the Planning Proposal and provided to Hornsby Shire Council for further assessment and comment.

#### **14. Water Cycle Management**

Concern is raised with the limited detail provided in the Water Cycle Management Review prepared by Mott MacDonald, dated 6 August 2021. Council encourages a total water cycle management approach whereby water is central to the subject site. It is recommended that the proposed development should consider the NSW Government Architects Greener Places rationale to integrate the urban green infrastructure design framework as identified within the Draft Greener Place Design Guide.

It is requested that, at a minimum, the proposed development implement water sensitive measures at a lot and community scale, including:

- Efficient water use to minimise demand on the water resource.
- Irrigation management tools to ensure more productive and efficient use of water.
- Increased reuse of waste water to minimise the demand of the business on the water resource.
- Effective management of sediment and litter.
- Maximising the retention of nutrients to improve efficiency of production and maintain water quality.
- Environmentally responsible use of plantings that embrace the benefits of appropriately selected species.

#### **15. Heritage Impacts**

It is recommended that further measures be considered to acknowledge the former residents and patients of the Peat Island facilities and their families. It is requested that further consideration is given to recognising the impacts that these former facilities have had on certain community members and appropriately address the sensitive nature of Peat Island's extensive history.

The heritage studies and identified recommendations to conserve cultural values are consistent with previous officer-level submissions on the Planning Proposal. The Planning Proposal and associated Final Concept Plan prepared by Urbis, dated 9 August 2021, have responded to reflect these recommendations, which is supported.

However, further measures should be considered to acknowledge the former residents and patients of the Peat Island facilities and their families. Of particular note, a finalised interpretation strategy for the previous use of Peat Island should include reference to Brooklyn Cemetery, with over 350 patients/residents of the Island having been identified as buried in unmarked graves there by Hornsby Council staff. Further consideration should be given to recognising the impacts that these former facilities have had and appropriately address the sensitive nature of Peat Island's extensive history.

#### **16. General Issues**

Some of the technical documents supporting the Planning Proposal date back to 2016 and include a cover letter to update them to align with the current concept masterplan. In particular, the Traffic and Transport Review dated 9 August 2021 relies on outdated data which has not been revised to address available data

since 2016. As a result, this has implications as outlined in the discussion above under Transport Analysis - Train and Bus Service and Commuter Car Parking at Brooklyn.

Since the former proposal (2016 version) was considered by Central Coast Council at its meeting in 2017, an Administrator has been appointed to make decisions for the Council. To be effective, councillors need to understand the views of the people they represent. Communication needs to flow both ways to be effective. Councillors provide information to the community about the policies and decisions of council, and the community relays its desires, concerns, and opinions to the council through the councillors. Care should be taken to ensure that the issues raised by the community during the public exhibition of the Planning Proposal receive the same level of analysis that would be received from an elected Council.

Once again, thank you for the opportunity to provide comment on the amended Planning Proposal for Mooney Mooney and Peat Island. Should you require clarification in relation to any comments provided, please do not hesitate to contact Katherine Vickery, Manager Strategic Land Use Planning, on 9847 6744 during business hours.

Yours faithfully

Philip Ruddock AO  
Mayor

TRIM Reference: F2021/00030

Attachments:

1. Director's Report No. PC17/21
2. Hornsby Shire Council Meeting Minutes – 10 November 2021
3. Submission to Central Coast Council – Peat Island and Mooney Mooney Planning Proposal – 2 February 2021
4. Submission to Central Coast Council – Peat Island and Mooney Mooney Planning Proposal – 7 November 2017
5. Submission to Central Coast Council – Peat Island and Mooney Mooney Planning Proposal – Pre-exhibition Consultation – 15 February 2019





12 February 2021

Central Coast Council  
PO Box 20  
WYONG NSW 2259  
Via email: Dean.Fisher@centralcoast.nsw.gov.au

Attention: Mr Dean Fisher – Senior Strategic Planner

Dear Mr Fisher,

### **Peat Island and Mooney Mooney Planning Proposal**

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Thank you for the opportunity to review and provide comment on the amended Planning Proposal for Mooney Mooney and Peat Island (the proposal) as outlined in the Addendum Report, the associated technical studies and plans provided.

As you are aware, Hornsby Shire Council made a submission to the original Planning Proposal (2016), dated 7 November 2017 and the amended Planning Proposal (2018) dated 15 February 2019 (copies attached) which outlined a number of concerns and matters requiring further evaluation. Based on a review of the amended proposal, Council maintains a number of concerns raised in previous submissions and details additional issues which need to be addressed by the proponent.

Please note that the comments contained within this letter are technical officer-level comments only as the matter has not been reported to the elected Council.

#### **1. Commuter Car Parking at Hawkesbury River Station**

The updated Traffic and Transport Review prepared by Mott MacDonald dated 26 October 2020 indicated that existing rail services operating via Hawkesbury River station operate with some spare capacity and should easily accommodate any additional demand generated by the proposal. Residents of the proposal site would likely rely on vehicles to travel to Hawkesbury River Station which will increase commuter parking demand at the station. The proposal does not provide any assessment of the additional pressure that new residents would have on car parking within the Brooklyn.

There is insufficient capacity to accommodate the increase in demand for commuter parking arising from the proposal. Car parking studies undertaken by Hornsby Shire Council in 2019 indicate that the average and peak car occupancy rate (on and off-street) in areas around Brooklyn, east of the railway bridge, is 88% and 98% respectively.

The Traffic and Transport review states: *“This increase to commuter parking requirements would need to be addressed by Hornsby Shire Council / Central Coast Council and TfNSW. An allowance for these works could be included in a Section 7.11 Contribution”*. The Addendum Report identifies that the Section 7.11 Contributions could *“be applied at development application stage”*.

The provision of additional railway commuter parking is a responsibility of the State Government and not local Council. The additional commuter parking at Hawkesbury River Station must be addressed by the proponent

and TfNSW as part of the planning proposal and not be addressed via Section 7.11 contributions at development application stage. Further, it is requested that additional parking at Hawkesbury River Station is physically constructed before any development proceeds on the proposal site.

## **2. Transport - Trains and Busses**

Figure 3.8 on page 18 of the Traffic and Transport Review prepared by Mott MacDonald, dated 26 October 2020, provides information on the daily patronage numbers of trains which is likely to be outdated as it was collected in 2012. Hawkesbury River Station was recently upgraded to comply with the Disability Discrimination Act (DDA) standards and the volume of commuters who use the Hawkesbury River Station instead of Cowan, Berowra or Hornsby Stations may have changed over time.

Although the amended proposal identifies that buses are not a common form of transportation within the area, any increase in bus services will have an effect in Brooklyn Town Centre and needs to be addressed in the proposal. The following issues need to be addressed by both the proponent and TfNSW:

- Bus circulation and the turning circle on Dangar Road outside of the Hawkesbury River Station;
- The integration of appropriate drop off and pick up point as well as bus waiting zones at Hawkesbury River Station for shuttle services; and
- The integration of the bus and train timetables and more frequent trains to avoid the prolonged waiting periods.

## **3. Active Transport Infrastructure**

Currently, there is a lack of safe pedestrian and cyclist path of travel for Mooney Mooney residents to Brooklyn along Brooklyn Road. The updated Traffic and Transport Review prepared by Mott MacDonald dated 26 October 2020 includes a recommendation to improve the connectivity between the Hawkesbury River Station and Mooney Mooney by improving the cycling lanes and extending these to link to the planning proposal site.

The inclusion of active transport options within the proposal is supported, however these need to be integrated with the recommended public transport updates outlined above. Council maintains its request for the proposal to contribute to the cost of constructing a shared pedestrian cycleway in Hornsby Shire through a Voluntary Planning Agreement, linking Kangaroo Point to the Brooklyn Town Centre and Hawkesbury River Station. This should comprise the following works:

- Upgrading of the existing single walkway on the western side of the Hawkesbury River Bridge to a compliant shared pedestrian/cycle deck on the bridge with connections to the planning proposal site;
- A bicycle compliant refuge island south of the bridge to facilitate pedestrians and cyclist access to Kangaroo Point;
- A 50 km/h speed zone on the Pacific Highway between Brooklyn Road and the Hawkesbury River Station to provide a safe road environment for pedestrians and cyclists; and

It is recommended that TfNSW are consulted in planning for active transport options and rectifying commuter carparking and railway bridge access to the Hawkesbury River Station.

## **4. Traffic analysis**

The Traffic and Transport Review is contained to the Peat Island and Mooney Mooney area and does not assess traffic and parking impacts further south of the Hawkesbury River Bridge. Given the reliance of the proposal on Brooklyn and Hornsby Shire generally, the analysis should be extended to consider the impacts on the intersection of Brooklyn Road and the Pacific Highway, as well as the Brooklyn Township.

## **5. Economic Impact on Brooklyn**

The Economic Statement prepared by Urbis (Appendix S) states that the highway service centre and associated retail space has been removed from the proposal, reducing the quantum of retail space by 83%. Although this amendment addresses matters raised in Council's previous submission concerning the potential for the service centre to compete with local businesses and services in Brooklyn, the impacts to Brooklyn resulting from the amended proposal has not been specifically addressed in the Economic Statement. It is requested that the Economic Statement be widened in scope to capture the impacts on retail and business services in Brooklyn in addition to Hornsby Shire more generally.

## **6. Community Services**

Concern is raised that the proposal would defer the responsibility of providing community services, such as health and child care, to Brooklyn and the Hornsby Shire more broadly. Brooklyn is geographically constrained and has limited space to provide these services. The increased population in Mooney Mooney and Peat Island would have significant implications effect on the services available in the Hornsby Shire.

## **7. Provision of Open Space**

The Peat Island and Mooney Mooney Planning Proposal includes 268 new dwellings and would allow for an incoming population of 536 people. The *Community Facilities Needs Assessment* prepared by Urbis dated 2016 indicates that this would generate a requirement for 1.5Ha of open space. The report notes the site has access to a number of regional open space facilities in proximity to the Peat Island site. It also states: '*It is anticipated that any community demand for open space and recreation will be met by the existing assets.*'

The *Draft Greener Place Design Guide* published by Government Architects Office Issue N0.04 dated 2020 states:

- In low density areas, residences should be within 400 metres walk of a local park;
- Local park open space be a of minimum 1500m<sup>2</sup> (based on the recommendation of a 5,000m<sup>2</sup> local park for 1,500 residents); and
- The quality of the open space is just as important as the area or amount provided.

The open space for the proposal comprises mainly natural areas that are undeveloped. The proposal also includes foreshore walks that facilities recreation and are supported. However, there is no developed local open space proposed that would cater for the new population to satisfy the requirements of the *Draft Greener Place Design Guide*. This matter should be addressed as part of the Planning Proposal, as concern is raised that the demand and burden for provision of local open space and facilities will be placed upon Hornsby Shire Council at Brooklyn.

There is one small playground at Peter D'Emden Reserve in Mooney Mooney provided by Central Coast Council of approximately 700m<sup>2</sup> that includes minimal play equipment. The other local play spaces are Brooklyn Park and McKell Park located within Brooklyn and provided by Hornsby Shire Council. These facilities are not within the required 400m walk for local parks that should be provided to cater for the new population.

It is therefore recommended that a quality, functional local open space of 1,500m<sup>2</sup> with opportunities for informal recreation within 400m walk of new population should be included in the planning proposal. This would include play space facilities and general exercise equipment for a broad mix of users. It is suggested that any developed local open space be provided in association the community facilities proposed for the Chapel Residential Precinct. The provision of additional open space should be integrated into the proposal and not impact on environmentally sensitive areas.

## **8. Bushfire Prone Land and Associated Risk**

Council maintains concerns regarding the suitability of the site for more intensive development having regard to bushfire risk and potential issues for bushfire emergency evacuation.

The proposal has not adequately assessed the impacts of traffic on the M1 Motorway and the Pacific Highway in the event of a bushfire emergency. It appears that Evacuation Risk Modelling has not been undertaken for this proposal. It is requested that appropriate investigations are undertaken in consultation with the NSW Rural Fire Service (RFS) to address this matter.

It is recognised that a Strategic Bushfire Study prepared by Peterson Bushfire dated 12 October 2020 (Appendix N) has been submitted to address the strategic planning requirements outlined within *Planning for Bush Fire Protection 2019*. Council would like to review the RFS response to this recent Study given Council's ongoing concerns regarding the bushfire risk, evacuation and suitability of the site for more intensive development.

## **9. Marina**

Concern is raised regarding the exclusion of the marina from the amended proposal. There remains a need to provide mooring services for Central Coast Council river residents to take the pressure off boat mooring and car parking at Brooklyn which is currently at capacity.

It is recommended that a marina is considered concurrently in the progression of the proposal to ensure integrated consideration of transport movement options between the road, waterway and the railway. It will also allow the complex estuarine impacts to be addressed upfront as outlined below.

## **10. Terrestrial and Estuarine Biodiversity Impacts**

The RE2 Private Recreation zone, which is proposed to be applied over the concept marina facilities, presents the highest marine impact risk from an ecological perspective as it is likely to impact upon mangroves as well as the estuarine environment. The majority of the area proposed for the marina development is currently tidal mud plains. Therefore, concern is raised regarding ongoing requirements for maintenance dredging. Of particular concern is sediment contamination referred to in the Targeted Site Investigation Cover Letter prepared by JBS&G Australia Pty Ltd dated 22 October 2020 (Appendix M). This concluded that, *"the site can be readily made suitable for the proposed land use, subject to removal and validation of underground storage tanks (USTs) and remediation and/or management of the surficial asbestos containing materials (ACM), buried asbestos and heavy metals identified above the ecological criteria"*.

Hornsby Council undertook sediment sampling in 2013 and results are available through <https://mhlfit.net/users/HornsbyShireCouncil-SedimentMonitoring>. The sampling identified that elevated levels of Copper and Mercury were identified approximately 1km downstream from Peat Island, (within ANZECC & ARMCANZ (2000) guidelines). However, the presence of Polycyclic Aromatic Hydrocarbons (PAH) were identified adjacent to Peat Island above the ANZECC & ARMCANZ (2000) guideline levels. These results highlight the potential constraints in spoil management and disposal which are associated with the proposed development.

Council acknowledges that the Traffic and Transport Review prepared by Mott Macdonald dated 26 October (Appendix H) conducted a preliminary assessment of the proposed Marina Facilities and ancillary works associated with the Planning Proposal in October 2018. This assessment identified the locations and depths of Potential Acid Sulphate Soils likely to be present and provides sufficient detail on its management at the Planning Proposal stage. However, Council maintains its request that an Environmental Impact Statement (EIS) is required to be prepared to properly determine the full impacts on estuarine and aquatic ecology.

## **11. Sewerage Disposal**

As outlined in Council's previous submissions, concerns are raised regarding the capacity of Brooklyn's Wastewater Treatment Plant (WWTP) to accommodate the discharge requirements associated with the proposed development.

The details outlined within the Utilities Report prepared by Urbis (Appendix F) states that future development associated with the Planning Proposal will connect to the Lower Hawkesbury Sewerage Scheme for treatment via the Brooklyn WWTP. Sydney Water have imposed peak flow restrictions for wastewater generated within Mooney Mooney which discharges to the Brooklyn WWTP. To satisfy the licence agreement, a flow control valve restricts flows from Mooney Mooney to 15 L/s before discharging to the WWTP.

Further, the information presented states that '*expected flow rates are marginally higher than the permissible discharge rate*'. This highlights concerns over the inability of the WWTP to adequately treat the peak flow volumes, along with the subsequent probably bypass/discharge into the Hawkesbury River system.

Given the sensitive receiving environment of the Hawkesbury River, and associated economic value of oyster aquaculture fisheries adjacent to the proposed development, it is recommended that secondary pumping stations be constructed to avoid bypass during pump station failure and any details of these upgrades to existing water and sewer infrastructure be submitted for further assessment.

## **12. Water Cycle Management**

The Water Cycle Management Review prepared by Mott MacDonald dated 15 October 2020 (Appendix G) provides broad consideration of how best to manage water during construction and for on-going site management, however the information provided is limited in detail.

Council encourages a total water cycle management approach whereby water is central to the site. The development should consider the NSW Government Architects Greener Places rational to integrate the urban green infrastructure design framework as identified within the *Draft Greener Place Design Guide*.

As a minimum, the proposed development must implement water sensitive measures at the lot and community scale, including:

- Efficient water use to minimise demand on the water resource;
- Irrigation management tools to ensure more productive and efficient use of water;
- Increased reuse of waste water to minimise the demand of the business on the water resource;
- Effective management of sediment and litter;
- Maximising the retention of nutrients to improve efficiency of production and maintain water quality;
- Environmentally responsible use of plantings that embrace the benefits of appropriately selected species.

## **13. Development Intensity**

Council notes that the amended proposal seeks to reduce the number of dwellings from 294 to 268, similar to the number proposed under the original proposal. However, Council maintains concerns that the actual development intensity may be higher than the yields indicated in the proposal.

## **14. Heritage**

The amended proposal has addressed the previous heritage concerns raised in Council's submissions. The additional technical reports have been prepared and identify suitable recommendations to conserve the significant Aboriginal and European cultural values of the site and guide the future use and management. It is acknowledged that the Revised Planning Proposal and Indicative Concept Plan have responded to reflect the

recommendations of the Aboriginal Cultural Heritage Assessment (prepared by Extent) and Conservation Management Plan (prepared by URBIS).

## **15. Consultation**

It is understood that further opportunity will be provided to Council and our community to comment on the planning proposal when it is formally exhibited.

However, given that the proposal would have direct implications for Hornsby Shire Council and considerable time has passed since the original engagement on the proposal, we would appreciate the opportunity for additional stakeholder consultation events, such as a workshop or presentation to our Council.

Again, thank you for the opportunity to provide comment on the amended Planning Proposal for Mooney Mooney and Peat Island. Should you require clarification in relation to any comments provided, please do not hesitate to contact me on 9847 6744 during business hours.

Yours faithfully

A handwritten signature in black ink, appearing to read 'K Vickery', with a stylized, cursive script.

Katherine Vickery  
Manager, Strategic Planning

TRIM Reference: F2021/00030

### **Attachments:**

1. Submission to Central Coast Council – Peat Island and Mooney Mooney Planning Proposal – 7 November 2017
2. Submission to Central Coast Council – Peat Island and Mooney Mooney Planning Proposal – Pre-exhibition Consultation – 15 February 2019



7 November 2017

Central Coast Council  
PO Box 21  
GOSFORD NSW 2250

Attention: Mr Robert Drew – Strategic Planner

Dear Mr Drew,

**Peat Island and Mooney Mooney Planning Proposal (RZ/58/2014)**

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I refer to your letter dated 21 September 2017 providing the opportunity for Hornsby Shire Council to comment on the Peat Island and Mooney Mooney Planning Proposal pursuant to the requirements of the Gateway Determination issued by the Department of Planning and Environment (DP&E).

The following comments are offered by Council officers to assist Central Coast Council in progressing the evaluation and further evolution of the planning proposal. It is understood that Hornsby Shire Council will again be provided the opportunity to comment on the planning proposal as part of its public exhibition. The key issues for Hornsby Shire are:

**1) Accessibility to Hawkesbury River and Berowra Railway Stations**

The Planning Proposal identifies that the closest railway station is situated at Brooklyn, approximately 5km to the south east. Berowra Railway Station is situated approximately 12km to the south. However, the planning proposal does not discuss the adequacy of all day parking at Hawkesbury River and Berowra Railway Stations. It is not adequate to simply state that the “A public bus service, route 592 operates between 7.00am and 3.30pm providing access between Mooney Mooney and Brooklyn, to Hawkesbury River Railway Station and Berowra/Cowan Stations.” Residents of new dwellings will have cars and the desire to access local railway stations to service their daily commuter needs.

The constraints analysis report prepared for the *Brooklyn Improvement Masterplan (2016)* by McGregor Coxall has identified that parking and pedestrian access at the Hawkesbury River Railway Station is a significant issue. Brooklyn Town Centre has limited all day parking due to demand from river communities and recreation. Berowra commuter car parks are full with overflow parking occurring on local roads. Additional development within the region has the potential to exacerbate the existing situation if infrastructure improvements to the Hawkesbury River Railway Station are not provided in conjunction with the Planning Proposal.

Secondly, a shared pedestrian and cyclist path is required linking the development with Brooklyn for commuting and recreation purposes, comprising the following works:

- upgrading of the existing single walkway on the western side of the Hawkesbury River Bridge to a compliant shared pedestrian/cycle deck on the Bridge with connections to the planning proposal site;
- a bicycle compliant refuge island south of the Bridge to facilitate pedestrians and cyclist access to Kangaroo Point; and
- a 50 km/h speed zone on the Pacific Highway between Brooklyn Road and the Hawkesbury River to provide a safe road environment for pedestrians and cyclists.

In addition, the proposed development should contribute to the cost of constructing a shared pedestrian cycleway in Hornsby Shire linking Kangaroo Point to Brooklyn Town Centre and Railway Station. Contributions to these works should be considered as part of a Voluntary Planning Agreement (VPA).

## **2) Commuter Berthing and Parking**

Peat Island and Mooney Mooney form part of the Lower River Settlements of the Hawkesbury River. Within this context, Brooklyn is a transport hub for many Lower Hawkesbury River settlements.

The constraints analysis report prepared for the *Brooklyn Improvement Masterplan (2016)* by McGregor Coxall has identified that access and movement within Brooklyn is consistently raised as a critical issue. This includes boat mooring/commuter berthing and car parking for river residents. Furthermore, it is evident from the Brooklyn Improvement Masterplan constraints analysis that many Central Coast river residents are currently utilising the limited parking available in the Brooklyn Town Centre.

The issue of needing to address the impact of Central Coast river residents on Brooklyn was previously raised with the then Gosford City Council when Hornsby Shire Council sought feedback concerning the level of support that would be provided for the provision of a regional commuter berthing and parking solution as part of the preparation of the Kangaroo Point Community Masterplan. More specifically, in 1999 and 2004, Hornsby Shire Council sought advice concerning the potential and permanent demand from river residents for commuter berthing and parking within Gosford City and whether it would support Hornsby Shire Council in providing a regional solution to same. Gosford City Council acknowledged that although there is recognised demand for commuter berthing and parking from its river residents', it had no intention of promoting a regional commuter berthing and parking option in the Gosford City Local Government Area (LGA) or financially supporting a similar facility in the Hornsby Shire to accommodate the identified need.

At the time, Hornsby Shire Council undertook a review of the dwelling entitlements and full time river residents of Hornsby Shire to quantify the potential and permanent demand for commuter berthing spaces and the number of associated car parking spaces which would be required to satisfy the demand. It was established that there would be a potential demand from 95 and a permanent demand from 25 river settlement dwellings in Hornsby Shire for commuter berthing spaces. Based on Council's Car Parking requirements for larger dwellings, it was identified there was an associated potential demand for 190 parking spaces and a permanent demand for 50 parking spaces. Despite investigating a number of solutions for the provision of commuter berthing and parking within Hornsby Shire LGA, to date no viable alternative has been found.

It is understood that the planning proposal seeks to promote a marina with between 110-130 berths and dry stack storage with 60 berths. It is also understood that associated land based marina uses and marina



parking will also be developed along the waterfront, it being noted that the planning proposal does not specify the number of parking spaces to be provided.

The Peat Island and Mooney Mooney Planning Proposal therefore provides a possible regional solution to the long identified commuter berthing and parking problem for Lower Hawkesbury River residents. Accordingly, the Planning Proposal should address the need for commuter berthing and associated car parking for river residents by dedicating to Gosford City Council in a VPA the number of commuter berthing and parking spaces required to support the potential (but at a minimum permanent) demand generated by river residents in both the Hornsby Shire and Central Coast LGAs.

### **3) *Economic Impact of Commercial Zoned Land on Brooklyn***

The Planning Proposal identifies that 1.1 hectares of land should be zoned for business purposes with a B2 Local Centre zone.

While the development concept identifies that the land is primarily intended to provide for a service station and associated uses (which may include a small supermarket and restaurant/café) to take advantage of existing passing trade on the M1 Motorway and providing local convenience retail to services the local community, the proposed extent of land to be rezoned for business purposes and application of the B2 zoning does not reflect this function. If a service centre is supported by Central Coast Council and the DP&E, then an alternate zoning should be considered to reflect the limited role of the centre. This position is consistent with the Gateway Determination dated 10 August 2017 that requires the Central Coast Council to update the Planning Proposal to consider the suitability of alternative zoning approaches for achieving the proposal's intent.

The proposed B2 zoned land at Mooney Mooney would facilitate the development of a car oriented local shopping centre that may directly compete with the Brooklyn Town Centre. The Planning Proposal has not undertaken an economic impact assessment of the application of the B2 zone to determine the impact on retail and business services available within Brooklyn that in turn may impact on the vitality of the Brooklyn Town Centre. An economic impact assessment should be undertaken to support progression of any alternate zoning of the land promoting business uses.

### **4) *Bushfire Prone Land and Associated Risk***

The Planning Proposal seeks to promote the development of land for residential housing, including apartment buildings and townhouses, in a Bushfire Prone locality. This strategy appears to be inconsistent with advice previously provided to Hornsby Shire Council on its Housing Strategy.

As you may be aware, residential development precincts north of Yirra Road, Mount Colah in the suburbs of Mount Colah and Berowra were deferred from Council's Housing Strategy by the DP&E in response to concerns expressed by the NSW Rural Fire Service (RFS) on evacuation risks. These lands were located adjacent to the Pacific Highway and whilst some contained bushfire prone land, a number of the precincts were only in the vicinity of bush fire prone land. Hornsby Shire Council has been recently advised by the NSW RFS that any rezoning of land north of Yirra Road should be subject to satisfactory Evacuation Risk Modelling Management Planning but that while it has undertaken preliminary work on Evacuation Risk Modelling for residential apartment buildings, the development of an Evacuation Risk Modelling Tool may take a few years to complete.

It appears that Bushfire Evacuation Risk Modelling has not been undertaken for this Planning Proposal. Accordingly, this modelling should be undertaken and the NSW RFS again be consulted prior to progression of public exhibition of the Planning Proposal.

#### **5) Clarification of Development Intensity**

The *Urban Design Report* recommends various residential building types throughout the precinct, including low density housing, townhouses and apartment buildings. However, the Indicative Development Outcomes and development yields identified in Table 4.2.1 of the *Mooney Money and Peat Island Revised Planning Proposal (September 2016)* prepared by Urbis are not reflected in draft LEP controls. For example, areas identified for low density residential housing are proposed to be zoned R1 General Residential that permits a range of range of residential accommodation forms, including “residential flat buildings” and “attached dwellings” (i.e. townhouses). I note that the R1 zone is proposed to be matched with building heights of either 8.5m, 9m and 12m, dependent upon the location of the land but floor space ratios (FSRs) are yet to be determined and identified on a FSR Map.

It is understood that the R1 Zone is proposed to be applied to 5.86 hectares (excluding existing community uses) of land and has a proposed yield of 218 dwellings. This equates to 37 dwellings per hectare. Traditional townhouses achieve a yield of 50-60 dwellings per hectare. Contemporary townhouses with basements can achieve 100 dwellings per hectare and 3 and 4 storey residential flat buildings are greater again. Therefore, the actual development potential achieved by the rezoning may be many times the yield suggested.

The intensity of development has implications for the Hornsby Shire in relation to the impacts on Brooklyn. It is understood the R1 zone is being used because the R2 zone only provides for detached dwelling houses. However, because of the range of residential accommodation forms available in the R1 zone, the extent of the R1 zone and proposed building heights should be reviewed to reflect the dwelling yields promoted by the development concept. Any FSRs applied should also reflect the development concept.

#### **6) Sewerage Disposal**

It is understood that sewer services are not currently available to the entire site but the proposal suggests there is potential for future development to connect to the Lower Hawkesbury Sewerage Scheme to provide for suitable storage and treatment of waste water loads that would be generated by future land uses.

The current Sydney Water treatment facility located in Brooklyn lacks sufficient capacity to meet discharge requirements. Water and sewer management needs to be addressed in consultation with Sydney Water prior to public exhibition of the Planning Proposal. Additional studies are required to determine the most appropriate form of water delivery and sewer disposal and should include details of any augmentation / upgrades required to be made to existing water and sewer infrastructure.

#### **7) Terrestrial and Estuarine Biodiversity Impacts**

The RE2 Private Recreation zone, which is proposed to be applied over the concept marina facilities, presents the highest marine impact risk from an ecological perspective as it is likely to impact upon mangroves as well as the estuarine environment. The majority of the area proposed for the marina development is currently tidal mud plains. Therefore, concern is raised regarding ongoing requirements for maintenance dredging. Further, as Acid Sulphate Soils are also likely to be present, additional investigation and reporting on the impacts of Acid Sulphate Soils is required.

An Environmental Impact Statement (EIS) is required to be prepared to properly determine the full impacts on estuarine and aquatic ecology. The EIS should include seasonal surveys of the mudflat areas and adjacent coastal mangrove areas to be removed to better determine the true effect on mudflat species.

#### **8) Heritage Impacts**

The Aboriginal Heritage Assessment provides a good preliminary assessment. In accordance with Office of the Environment and Heritage due diligence guidelines, further archaeological investigation and assessment is required. The European Heritage Assessment also provides a good preliminary assessment. The Assessment identifies that further investigation is required to determine whether there is opportunity to conserve more than the four principal buildings at Peat Island.

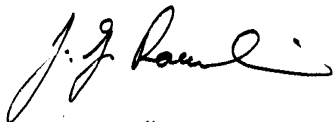
A Conservation Management Plan for Peat Island and an Aboriginal Heritage Plan should be prepared prior to the formalisation of detailed planning controls for the locality to allow the results and recommendations to be taken into consideration in the detailed concept plans and future management of the place.

#### **9) Construction Management and Restoration**

I note that a Detailed Environmental Site Assessment is recommended for the planning proposal, which is supported. However, should the planning proposal be progressed, a Construction Traffic Management Plan should be required to be submitted (as detailed in Hornsby Council's DA Submission Guide) for review by Hornsby Shire Council prior to approval of any development works to ensure truck movements through the Hornsby Shire are appropriate in terms of routes, number of movements, consideration of weight restricted roads and pedestrian safety. A Dilapidation Report for the truck movements throughout Hornsby Shire should also be submitted for review by Hornsby Shire Council at an appropriate stage of any development works.

Should you require clarification in relation to any comments provided, please do not hesitate to contact me on 9847 6744 during business hours.

Yours faithfully



Jason Rawlin  
Acting Manager  
Strategic Planning Branch

TRIM Reference: F2014/00264-02

15 February 2019

Central Coast Council  
PO Box 21  
GOSFORD NSW 2250

Attention: Mr Michael Bowman– Strategic Planner

Dear Mr Bowman,

### **Peat Island and Mooney Mooney Planning Proposal - Pre-Exhibition Consultation**

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Thank you for the opportunity to review and provide comment on the amended planning proposal for Mooney Mooney and Peat Island as outlined in the Addendum Report, the associated technical studies and plans provided.

As you are aware, Hornsby Council made a submission to the original proposal, dated 7 November 2017 (copy attached) which outlined a number of concerns and matters requiring further evaluation. Based on a review of the amended planning proposal, it does not appear that the concerns raised by Hornsby Council's original submission have been adequately addressed.

Council's key concerns relate to the impacts of the planning proposal on the Brooklyn township, particularly in relation to car parking issues and impacts on the economic viability of Brooklyn. It is requested that a detailed analysis addressing the implications for Brooklyn be conducted and further consultation is had with Council before further progression of the planning proposal.

The concerns raised are summarised below:

- **Accessibility to Hawkesbury River and Berowra Railway Stations** - The Traffic and Transport review submitted as part of the amended has not addressed, or proposed any solution to, the parking issue in Brooklyn. Given that the review report notes that the bus timetable of route 592 is infrequent and out of sync with the train timetables, new residents are likely to rely on vehicles to travel to train stations and utilise all day parking. Further, the amended proposal seeks to increase the number of dwellings from 268 to 294 dwellings, which would place additional pressure on parking and exacerbate current issues. Further, Council maintains its request for the proposal contributes to the cost of constructing a cycleway from Mooney Mooney to Hawkesbury River station through a VPA.
- **Commuter Berthing and Parking** - The Planning Proposal should address the need for commuter berthing and associated car parking for river residents through a VPA.
- **Economic Impact of Commercial Zoned Land on Brooklyn** –Council maintains its request for an economic impact assessment to be undertaken of the application to determine the impact on retail and business services available within Brooklyn.
- **Bushfire Prone Land and Associated Risk** –Bushfire Evacuation Risk Modelling does not appear to have been undertaken in consultation NSW RFS.

- **Development Intensity** – The amended proposal seeks to increase the number of dwellings from 268 to 294 which may exacerbate impacts. Council maintains concerns regarding the potential yields based on the zoning, FSR and building heights.
- **Sewerage Disposal** –Details of any upgrades to existing water and sewer infrastructure is required.
- **Terrestrial and Estuarine Biodiversity Impacts** - An Environmental Impact Statement (EIS) is required to be prepared to properly determine the full impacts on estuarine and aquatic ecology.
- **Heritage Impacts** - The amended proposal would retain nine buildings (in comparison to the 4 buildings retained in the previous concept plan) which is supported. A Conservation Management Plan for Peat Island and an Aboriginal Heritage Plan should be prepared.
- **Construction Management and Restoration** – A Construction Management Plan should be required to be submitted prior to any development works to ensure truck movements through the Hornsby Shire are appropriate.

It is understood that further opportunity for Council and our community to comment on the planning proposal will be provided as part of its public exhibition. However, Council staff would be happy to further discuss or clarify any of the above issues and would welcome additional consultation prior to further progression of the planning proposal. Council will conduct further review and prepare a further submission during the exhibition period.

Should you require clarification in relation to any comments provided, please do not hesitate to contact me on 9847 6744 during business hours.

Yours faithfully



Katherine Vickery  
Manager, Strategic Planning

TRIM Reference: F2014/00264-02