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To: Council Northernbeaches Mailbox
Subject: Submission on Northern Beaches Council DA2021/1338

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Submission on Northern Beaches Council DA2021/1338 -

Thank you for the opportunity to comment on the Bayview Golf Course Development Application for Water Harvesting and Sub Surface Drainage of Golf Course Fairways.

I object to this DA because it runs counter to the provisions of the State Environmental Planning Policy (Coastal Management) 2018, namely by creating the potential for acid sulphate pollution running into Pittwater and by causing further damage to the natural wetland habitat.

This Coastal Management SEPP notes that:

"Development consent must not be granted to development on land that is within the coastal environment area unless the consent authority has considered whether the proposed development is likely to cause an adverse impact on the following:

- (a) the integrity and resilience of the biophysical, hydrological (surface and groundwater) and ecological environment,
- (b) coastal environmental values and natural coastal processes,
- (c) the water quality of the marine estate (within the meaning of the Marine Estate Management Act 2014), in particular, the cumulative impacts of the proposed development on any of the sensitive coastal lakes identified in Schedule 1,
- (d) marine vegetation, native vegetation and fauna and their habitats, undeveloped headlands and rock platforms ..."

However, construction on this project at Bayview Golf Club is likely to have **adverse impacts in line with points (a), (b), (c) and (d) - causing disturbance to acid sulphate soils and potential acid sulphate soils, leading to toxic chemicals and metals flowing into Pittwater during storms or floods.**

The NSW Department of Industry, Planning and Environment describes the environmental problems caused by acid sulphate soils as follows:

"Left undisturbed, acid sulfate soils do not present any risk. But when they are exposed to air, the iron sulfides they contain react with oxygen to create sulfuric acid. The acid makes metals in the soil, such as iron and aluminium, more soluble. These metals can be released in toxic amounts."

The acid and released heavy metals can:

- Damage waterways and kill aquatic life – Rainfall can wash acid and toxic metals into waterways, killing organisms that are immobile (such as oysters) or that live in shallow water.
- Kill plants – Very acidic soil can kill all plants growing in it

See: <https://www.environment.nsw.gov.au/topics/land-and-soil/soil-degradation/acid-sulfate-soils>

Furthermore, the Martens Consulting Engineers Report, "Acid Sulfate Soil Management Plan: Stormwater Harvesting and Irrigation Works Bayview Golf Course", confirms that acid sulphate soil and potential acid sulphate soils are present at the site.

The plan underlines the risk - calling for the use of lime to neutralise potential acid sulphate soil where it is disturbed, and for extensive monitoring.

I believe we must protect Pittwater from any potential new source of pollutants such as those created from acid-sulphate soils - which could be released during construction or at times of flooding from water retention ponds.

The department also notes the **economic impact of acid-sulphate soils** as disturbing most NSW coastal industries, including **recreational fishing and oyster growing** - which are both present in Pittwater and the Hawkesbury River system.

Wetland and wildlife corridor

I also note that the area proposed for this development is part of a wildlife corridor and wetland, for which the natural processes have already been disturbed. The Horton Coastal Engineering report says that tidal gates downstream of the golf course already mitigate flooding there during extreme high tides. Without them, the whole course would be frequently inundated during storm surges, "which demonstrates the importance of the tidal gates in allowing the golf course to function", the Horton report says.

However, wetlands provide habitat for migratory birds - of which 70 per cent have disappeared from Australia over the last 30 years. The plan to upgrade drainage is designed to further diminish the characteristics of the wetland that supports birdlife - and in this way is also counter to the SEPP's requirement to prevent an adverse impact on **"coastal environmental values and natural coastal processes"**.

Miranda Korzy