

10 July 2021

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Illawarra Escarpment Alliance  
*Ours to Protect*



## **Wollongong City Council's draft Plan of Management for Community Land**

Submission by the Illawarra Escarpment Alliance

*The Illawarra Escarpment Alliance (EscA) is an alliance of like-minded community based organisations and private landholders of E2-zoned (Environmental Conservation) land, established to focus collaborative efforts to protect the Illawarra Escarpment's cultural and environmental heritage. EscA was established in 2019 in response to the release of a draft Illawarra Escarpment Mountain Bike Strategy that proposed 82km of mountain bike trails in the Illawarra Escarpment State Conservation Area. We seek to continue the tradition of citizens and communities protecting the Illawarra Escarpment from inappropriate or unsustainable development. We are committed to the philosophy of caring for country and support culturally appropriate and ecologically sustainable tourism and community engagement on the Escarpment.*

One of EscA's objectives is to ensure adherence to the planning framework for the Illawarra Escarpment and contribute to improving the framework. The Illawarra Escarpment Strategic Management Plan 2015 (IESMP) is the major policy document covering all escarpment lands under Council jurisdiction. The escarpment needs to be managed as a unity, as various reports following the 1999 Royal Commission have noted. The ecosystems, vegetation and wildlife movements do not observe changes in land tenure. Nor does much informal human use. Fragmented land ownership in the foothills is a major challenge addressed by the IESPM, which calls for a community-wide response. We think that all Council policies should lead by setting the example of good management.

The escarpment is a major asset for Wollongong and there has been a lot of community concern and controversy over uses of it over many years. These have ranged from overdevelopment to deer damage to unauthorised bike trails. In the past Council has devoted resources to it, including various committees with community representation leading to the production and review of the IESPM. We think that the ongoing issues warrant greater Council oversight and leadership.

Most of Wollongong's community land is not on the escarpment, but is one of the Natural Areas subcategories which is used. The POM signals in its Escarpment Action Plan (Table 12) the goal to implement the IESPM. Hence the way the relevant land is categorised and governed should be in harmony between the POM and the IESPM. We are pleased to see the following vision in this table, which is very much in line with EscA's goals:

The escarpment will be a place where the natural environment is celebrated and explored with respect rather than used as an illegal dumping ground to abandon cars and asbestos or used as a place to make illegal bike trails. Instead bike riders will use designated bike trails that cross a variety of land tenures when in the Escarpment in future.

However, along with the National Parks Association Illawarra Branch (NPA), we are concerned about the way the category Natural Areas (Escarpment) is used in this POM. We think that some land parcels are wrongly categorised as Natural Areas (Bushland) when they should be Natural Areas (Escarpment). Surely for consistency any community land within the Escarpment zone used in the IESPM (following the LEP 2009) should also be designated Natural Areas (Escarpment). The IESPM maps cover a number of suburbs so are not at the scale required to see precise boundaries, but some examples are clear.

The POM uses the category Natural Areas (Escarpment) only for a small number of land parcels at high elevation and not for lower, more accessible sites that are more likely to be subject to the acknowledged threats, from dumping to illegal trails. These are the foothills sites that EscA is concerned about. They need to be managed in an exemplary way so that Council's wider escarpment policies have credibility and authority.

NPA raises the example of Lot 106 on the Bulli map, Slacky Flat Park, which is zoned E2 and includes a rainforest gully in good condition. It is classified as Natural Areas (Bushland). We note that on the Woonona map Lots 122 Woonona Heights Park and Lot 123 Carole Reserve are also included within the Escarpment zone on the IESPM map and similarly zoned E2, but shown on the POM as Natural Areas (Bushland). There are parcels in other areas such as Balgownie, Tarrawanna and Mt Kembla that we think are included in the Escarpment zone but are classified here as Natural Areas (Bushland) rather than Natural Areas (Escarpment).

We recommend that Council review the classification of all community land parcels that are within the Escarpment zone according to the IESPM, with a view to categorising them as Natural Areas (Escarpment) in the POM. In addition we consider that the Permissible Uses and Developments for Natural Areas as listed in Table 14 need reviewing in light of the declared aims of managing the escarpment. Further we suggest that Council consider using the category Area of Natural Significance for at least some escarpment sites along with other natural areas.

Thank you for the opportunity to comment.

Felix Bronneberg

for Illawarra Escarpment Alliance