

Illawarra Escarpment Alliance  
Ours to Protect



Mr Greg Doyle  
The General Manager  
Wollongong City Council  
Wollongong NSW 2500

Dear Mr Doyle,

**Objection to revised DA2020/4 14 Cosgrove Avenue, Keiraville, Land and Environment Court Proceedings 21/48598**

Submission by the Illawarra Escarpment Alliance  
12 April 2021

*The Illawarra Escarpment Alliance (EscA) is an alliance of community-based organisations and likeminded individuals, established in 2019 to focus collaborative efforts to protect the cultural and environmental values of the Illawarra Escarpment in its entirety.*

EscA is writing to strongly oppose this Development Application (DA), which proposes to extend a suburban cluster development (somewhat detached) into the Escarpment foothills. The Illawarra Escarpment and foothills should not be seen as an area appropriate for meeting demands for urban growth. Planning proposals on the Escarpment need to focus on achieving conservation, recognising cultural values and environmental enhancement of the Illawarra Escarpment.

The Escarpment foothills performs an essential role as a buffer between urban development and the highly valued land of the Illawarra Escarpment State Conservation Area (IESCA) as well as providing some stability in the geologically fragile escarpment environment,

EscA also supports the concerns raised by nearby residents, which include traffic congestion, encroachment on the escarpment, biodiversity loss, land slip, bushfire risk and increased stormwater runoff.

In addition to the above the following specific concerns are noted:

1. The proposed large scale removal of important vegetation will have adverse effects on biodiversity and result in future slip and landslide issues.
2. This highly visible proposal in the Mt Keira foothills will despoil the scenic Escarpment setting of Mt Keira which holds significant cultural heritage to the Wodi Wodi people of the Dharawal nation.
3. The stability of the property with steep slopes on the sides of the proposed development needs to have an independent geotechnical assessment to determine the risk of landslides into adjacent properties.
4. The proposal will overwhelm the antiquated inadequate Keiraville stormwater easements running through private properties due to increased urban runoff.
5. The site and surrounding forested areas are classified as high bushfire risk by the RFS. The removal of a considerable number of native trees and the establishment of asset protection zones is proposed to reduce the bushfire risk, further reducing native vegetation. The further clearing of tracts of native forest in the escarpment foothills for urban development must not be permitted
6. The objective of increasing housing supply generally in the Wollongong LGA needs to be

- assessed on a broader scale by Council, not at a site specific level driven by developers.
7. Wollongong City Council (WCC) must take a leadership role in preserving and enhancing the values of the Illawarra Escarpment. This proposal will have a negative impact on the visual quality of the escarpment and degrade its scenic value.
  8. The amended application does not demonstrate that the reasons for refusal by the Southern Regional Planning Panel (SRPP) have been addressed, namely the DA conflicts or does not comply with several provisions of the Environmental Planning and Assessment Act 1979 in significant areas such as:
    - Section 1.7 – impact on biodiversity values;
    - Section 4.15 (1)(b) - built form, scale and visual impact;
    - Section 4.15 (1)(c) - suitability for the development;
    - Section 4.46 – bushfire safety;
    - Section 4.15 (1)(a)(i) - permissibility and LEP objectives consistency;
    - Section 4.15 (1)(a)(i) – inconsistency with the objectives of the zone;
    - Section 4.15 (1)(a)(i) – inconsistency with the provisions of the LEP;
    - Section 4.15(1)(a)(iii) – inconsistency with DCP provisions for Bushfire and Traffic Management;
    - Sections 4.15 (1) (d) and (e) – setting an undesirable precedent not in the public interest.

In conclusion, EscA urges rejection of the amended DA and concurs with the SRPP's comment that “approval of the development proposal would set an undesirable precedent for similar inappropriate development and is therefore not in the public interest”. WCC is urged to oppose the DA to the fullest extent in the Land and Environment Court proceedings.

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