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Illawarra Escarpment Alliance
Ours to Protect



To whom it may concern,

Illawarra Escarpment Alliance (EscA) submission on DA 2020/1245 Farmborough Road and Draft Planning Agreement 344 Farmborough Heights

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 objects to Development Application (DA) 2020/1245 in its current form. The DA appears to be yet another attempt to extend development into the Escarpment foothills buffer zone, in an area that clearly is part of the Illawarra Escarpment and very close to a portion of the Illawarra Escarpment State Conservation Area (IESCA). EscA's objection also extends to the Draft Planning Agreement DPA covering the site. The DA is however the document that provides more detailed evidence of the environmental significance of the site and of the impact that the DPA and DA taken together will have on that environment. The two documents need to be considered together, although the deadline for comment on the DA is 15 January and the deadline for the DPA is 5 February.

EscA's primary concerns relate to the negative impact that the DA and DPA will have on the environmental values of the Illawarra escarpment. One way to benchmark these impacts is against WCC's Illawarra Escarpment Strategic Management Plan 2015, which establishes guiding principles for escarpment management (p.17). These principles include: application of the principles of ecologically sustainable development; ensuring that any development has an overall conservation improvement to the escarpment; and ensuring that the escarpment must be considered as a whole to avoid multiple small decisions leading to negative cumulative impacts.

EscA believes that the DA and DPA do not uphold these principles, in a number of respects.

Inadequate protection for threatened ecological communities on the site: the site is home to patches of a threatened ecological community (TEC), *Coastal Grassy Red Gum Forest*. This is part of the *Illawarra and South Coast Lowland Forest and Woodland Ecological Community*, listed as critically endangered under the federal government's *Environment Protection and Biodiversity Conservation Act 1999*. It is quite unusual to see patches of this TEC located so high up the slopes of the escarpment, which gives it additional rarity value.

The DA and DPA apply E2 zoning protection only to areas currently directly occupied by this TEC and surrounds them with relatively high-intensity E4 blocks. No buffer zone is provided; this is inconsistent with the Commonwealth conservation advice for this TEC, which recommends a buffer area of 20-50m around remnant patches as a minimum to protect them from the degradation

associated with 'edge effects' (such as weed incursion, wind and sun damage, ingress by invasive fauna). Relatedly, WCC's Illawarra Escarpment Strategic Management Plan would suggest that areas of E2 land be 'buffered' by zones of E3 land, rather than E4. Use of E3 zoning would also assist in buffering the IESCA itself, not just the areas of Coastal Grassy Red Gum Forest on the site.

Negative impact on wildlife and vegetation corridors: EscA believes that subdivision of the site as is proposed undermines connectivity between the IESCA, the escarpment foothills and coastal plains. Connectivity is important for the preservation of TECs in the area, many of which occur in many small patches, as well as for local fauna, including many threatened species. Areas in the escarpment foothills are of particular importance in terms of WCC responsibility, because so little of these areas are within the IESCA, and it thus falls to WCC to ensure maintenance or restoration of connectivity. While maintaining connectivity in sometimes degraded landscapes is a challenge, this site is large enough that it retains substantial connectivity value, and EscA believes that the DA will seriously fragment that connectivity.

The sheer number of lots and lack of buffering for E2-zoned lands is the main driver of fragmentation and EscA believes that the area of E2-zoned land should be increased, E3 buffer lots added and connectivity among the E2 lands improved. The Landscape Plan also represents a missed opportunity to maintain or potentially even restore some connectivity, at least for avian species (birds and bats); if the Landscape Plan were designed to use species listed in the Vegetation Management Plan for the E2 areas, this would have helped mitigate the negative impact of the subdivision on native vegetation and fauna. It can still be designed in at this stage.

Uncertainty around the management of E2-zoned lands: EscA noted some uncertainty in the DA around the purpose and management of E2-zoned lands. Are they 'conservation zones' or 'public reserves'? Adequate protection of the areas as conservation zones would likely preclude their use for most kinds of recreation, and fencing as stipulated in the VMP would restrict public access. There will inevitably be pressure on them from nearby residences, even if fencing is in place, as is experienced in other natural areas around the LGA; pressures will include dumping of household waste, including potentially weedy green waste, inappropriate recreation activities such as bike riding and dog walking, and casual vandalism. These pressures will increase if there is community expectation of access to these areas as public reserves, as some of the wording in the DA suggests. Greater clarity is required as to the purpose and management of the E2-zoned lands, and ideally a clear statement that these will be managed for environmental outcomes in accordance with the VMP.

A further question arises as to what happens to the E2-zoned lands after the cessation of the current VMP, which covers a period of only three years. In experience of our members, vegetation management is a long-term endeavour and involves decades-long commitment and funding. Additionally, the smaller the patch size, the higher the ongoing management cost is likely to be, because the patch is more vulnerable to edge effects. There are likely to be substantial *and increasing* ongoing costs associated with vegetation management. These costs will only increase if the E2-zoned lands are available for any sort of public recreation. We are uncertain of the basis on which the funds proposed to be dedicated to WCC for ongoing management were calculated, but question whether management costs will decrease over time. Even the cost of developing regular vegetation management plans is substantial; most WCC nature reserves do not have such plans.

Bushfire risk management: the DA and DPA recognise the bushfire risk associated with the development. Unfortunately many the measures proposed to manage bushfire risk - establishment

and maintenance of asset protection zones, and use of large mown grassy areas – are almost certain to reduce conservation value of the site. This speaks to the challenge of development on the Illawarra escarpment: it more or less requires environmentally damaging actions associated with bushfire risk mitigation. EscA questions whether these actions are consistent with the principle of ensuring that any development has an overall conservation improvement to the escarpment.

We respectfully ask WCC to review the DA and DPA extremely carefully, with expert input by environmentally qualified staff in the Planning and Environment Division, with an eye to ensuring that the DA and DPA adhere to the Illawarra Escarpment Strategic Management Plan and have an overall conservation improvement to the escarpment.

Thank you for the opportunity to comment.

Submitted on behalf of EscA by Emma Rooksby