

Submission to the NSW Independent Planning Commission **The Russell Vale Underground Expansion Project (MP09 0013)**

I am the co-founder of *The Seacliff Coasters*, a trail running community based in the North Illawarra consisting of 350 Members. As the founder and an organiser of this community I have an interest in ensuring public access to a *continuous Illawarra Escarpment Conservation Area and Trail Network* as is described in the National Parks and Wildlife Service *Illawarra Escarpment Management Plan (2018)*.

This existing continuous trail includes the areas of the *Lower and Upper Escarpment Trails* between Bulli and Balgownie including Rixon's Pass and Broker's Nose; this area is currently controlled by *Wollongong Coal*. This small section of trail (a length of approximately 6km) is blocked by the extension westward of the Russell Vale Colliery lease well beyond its field of actual operation (see figure 1.2).

This blocked section of trail prevents the opportunity to complete a continuous conservation area and walking trail network that would otherwise extend from Bundeena, in the North, to (potentially) Berry, in the Shoalhaven. This is a remarkable opportunity for the area - socially, economically and environmentally (see figure 2 - illustrating discontinuity of reserve due to Russell Vale Colliery).

The further expansion of these operations (with which this hearing is concerned) over an initial period of 5 years and a stated mine-life of 37 years (according to Wollongong Coal's Annual Reporting) will postpone realisation of this continuous reserve and trail network and all of the social, economic, and environmental benefits that such a network would afford.

A continuous trail network is the principle stated goal of the National Parks and Wildlife Service's Illawarra Escarpment Plan of Management of 2018 - with plans dating to 2008 as part of a commissioned study of walking tracks;

"In order to identify a continuous and integrated network of tracks, Illawarra Escarpment State Conservation Area Master Plan for Walking Tracks and Associated Facilities (Epacris Environmental Consultants 2006) was prepared with community input. It provides for a walking route along the length of the escarpment between Royal National Park and Mount Kembla, and a range of short and medium length loop walks. Most of the proposed tracks follow existing informal routes. Upgrading priority tracks is progressively being undertaken and new tracks will be developed as resources become available" (page 24).

The NPWS plan of management (2018) acknowledges the economic, social, and environmental benefits of a continuous reserve and trail network. The plan of management also highlights the way small sections of *discontinuity* threaten the potential for new ecotourism businesses and services, public access, witness and custodianship, and survival of threatened species that rely on a continuous corridor for survival;

'Further, the distribution of the park along the escarpment is discontinuous, which could affect the long-term viability of the park to maintain its full range of values.' (page 8)

Wollongong Coal loosely prohibits public access to these areas - although until the recent expansion proposal no sign of Wollongong Coal or their representatives had been seen in the area extending West from the *Lower Escarpment Firetrail*. Trail Motorcycle Riders ride roughshod through the area, feral species- particular Rusa Deer are uncontrolled and Lantana grows rampant. The company demonstrates no active custodianship over a band of wilderness that is nonetheless bracketed by Illawarra Special Conservation Areas.

The blocked section of trail imposes a virtual wall between the suburb of Russell Vale and the Colliery Complex in the east extending to the special water catchment area to the west. There is no way to connect the Illawarra Conservation Areas situated to the north and south of this section. To go around the area you would have to descend into the suburbs at Bulli and in all likelihood not return to the trail until reaching Mt Pleasant and the Mt Keira Ring Track. There is no passage westward due to the restrictions on entry to the Special Area of the water catchment. **This is a completely unnecessary impost on the public amenity of this green corridor.**

Due to the absence of any allowance for public amenity and the existence of continuous fire trails through these areas, many people have simply ignored the increase of signage that has prohibited access to the route since the application to expand operations was filed. The prohibition of public access and the disregard for public witness and amenity is universally acknowledged by local users as unreasonable and ignored.

The extent of public usage and the use-value of a sanctioned continuous Illawarra Escarpment Trail is highlighted by 'Heat Maps' that are generated by the fitness activity logging app Strava. The extant public use of both the Lower and Upper Escarpment trails and the question of public amenity was ignored in the survey of residents made by WCL in their *Project Information Sheet No2* of May 2019.

In September of 2020 members of *The Seacliff Coasters* ran a change.org petition (<https://www.change.org/ourescarpment>) highlighting the issue of public access and amenity raised by this expansion plan. We received over 1000 signatures in 48Hours supporting public thoroughfare and recreational use within this site.

Conclusion and Recommendation:

It is absurd that such a small and popular section of the Illawarra Escarpment State Conservation Area remains inaccessible and largely unmanaged. The potential social, economic and environmental value of a continuous Illawarra Escarpment reserve and trail network will be indefinitely undermined if this approval is given without a condition of public access, witness and amenity.

As the included figures show these trails already exist and are well and passionately adopted by the local population - policing this access would be more difficult and expensive than providing for public access and amenity along existing continuous trails.

It is clear that given the fiscal state of Wollongong Coal and their apparent inability to meet even the current costs of remediation, (Wollongong Coal Annual Report 2019-2020), the geological and hydrological dangers of mining under the Special Areas of the Catchment (areas in which I'm not even allowed to run), that this proposal should be denied.

Should the expansion be approved regardless of these concerns it should be with the condition of public access to *The Lower Escarpment Trail* and the area directly west of it to *The Upper Escarpment Trail* and with regard to the public amenity provided by a continuous Illawarra Escarpment Reserve and Trail network.

Sincerely,

Mat Wall-Smith
(Co-founder: The Seacliff Coasters Trail Running Community).

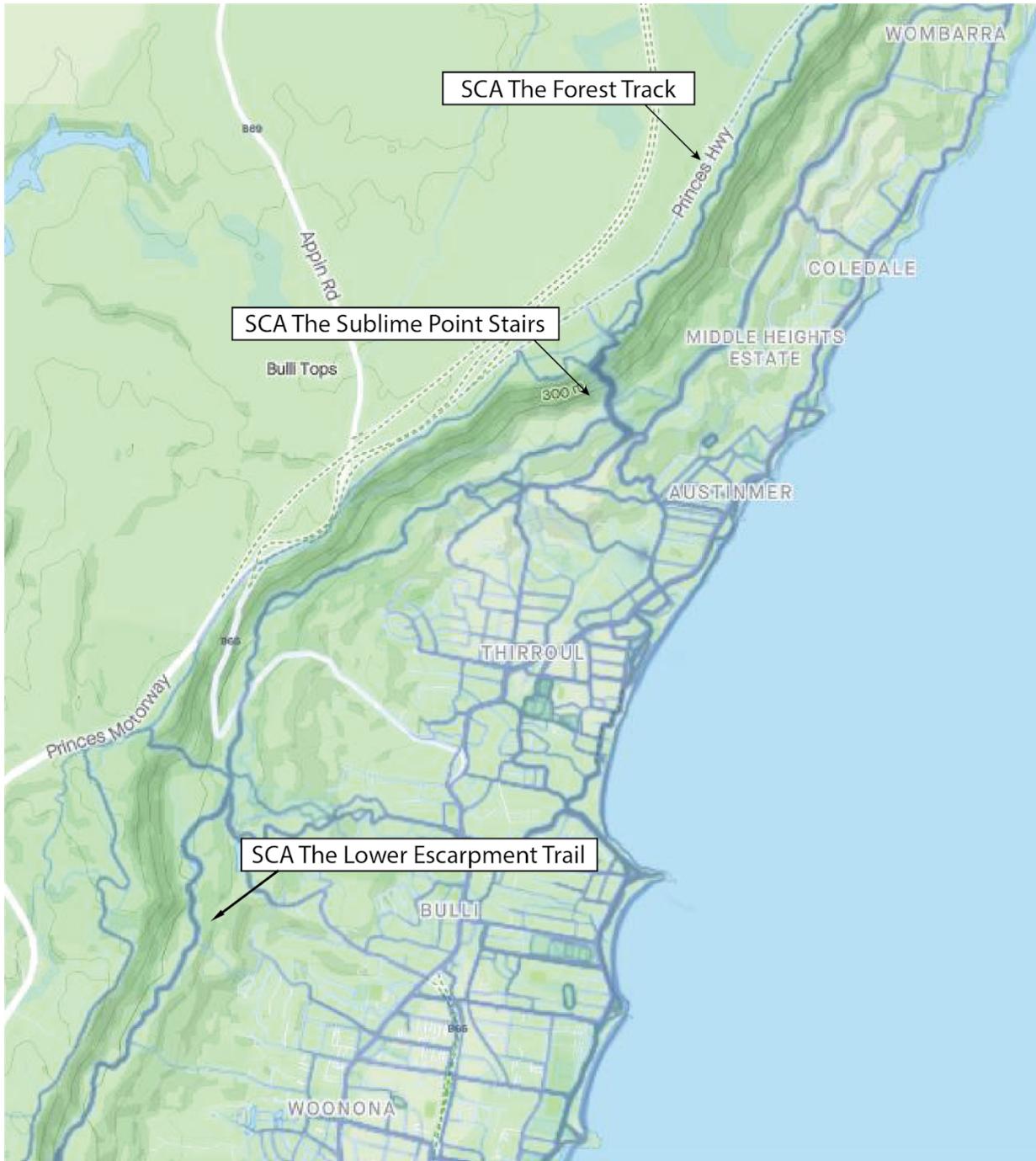


Figure 1.1 Strava Heat Map demonstrating extant public use a continuous Illawarra Escarpment Trail Network from Coledale to Sublime Point along the The Forest Track and through to the Lower and Upper Escarpment firetrails of the Illawarra Escarpment State Conservation Area.

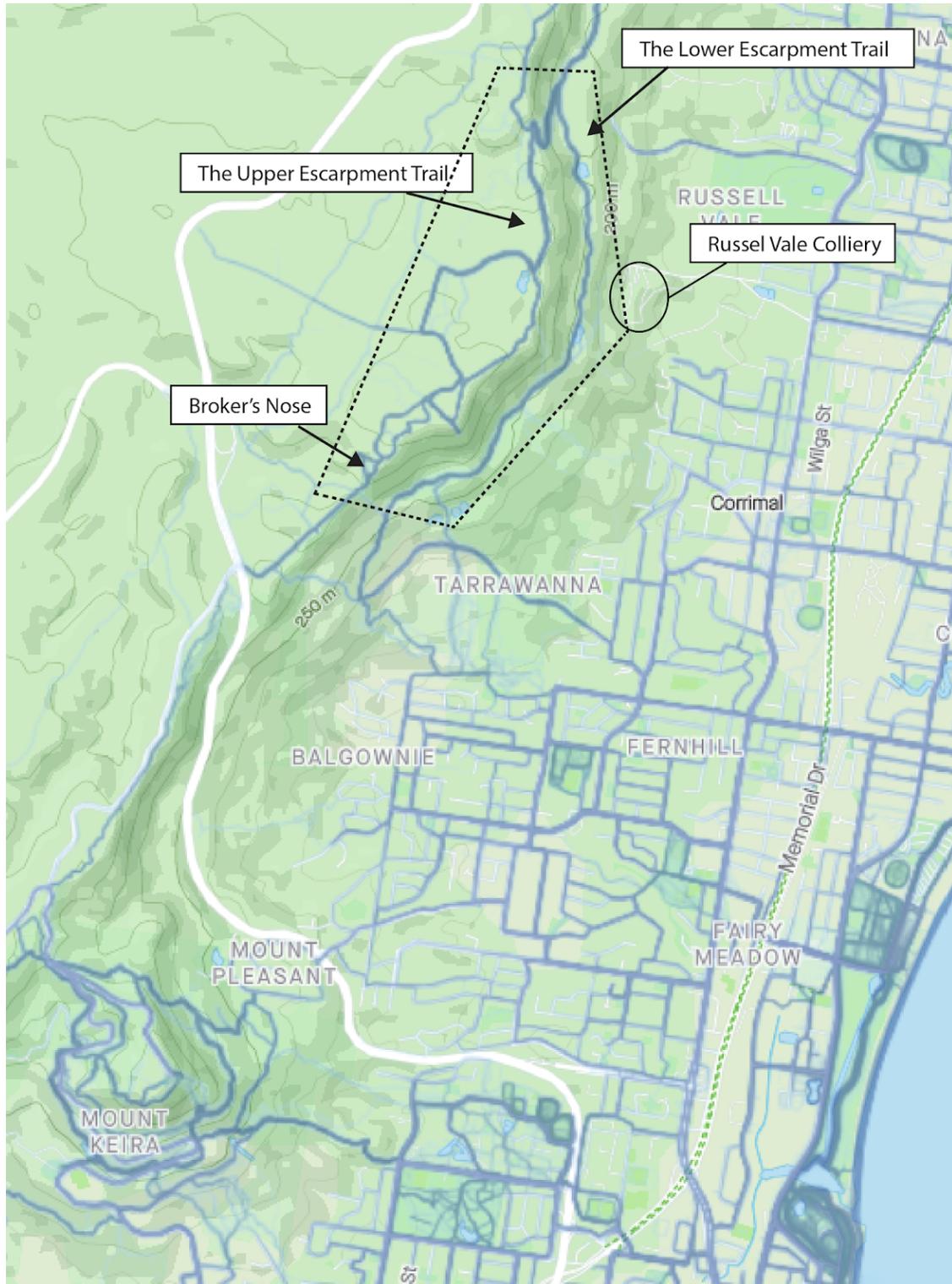


Figure 1.2 Strava Heatmap showing public use of continuous Illawarra Escarpment Trail and the extent of Wollongong Coal's blockade of public access to a continuous Illawarra Escarpment Trail (dotted boundary).

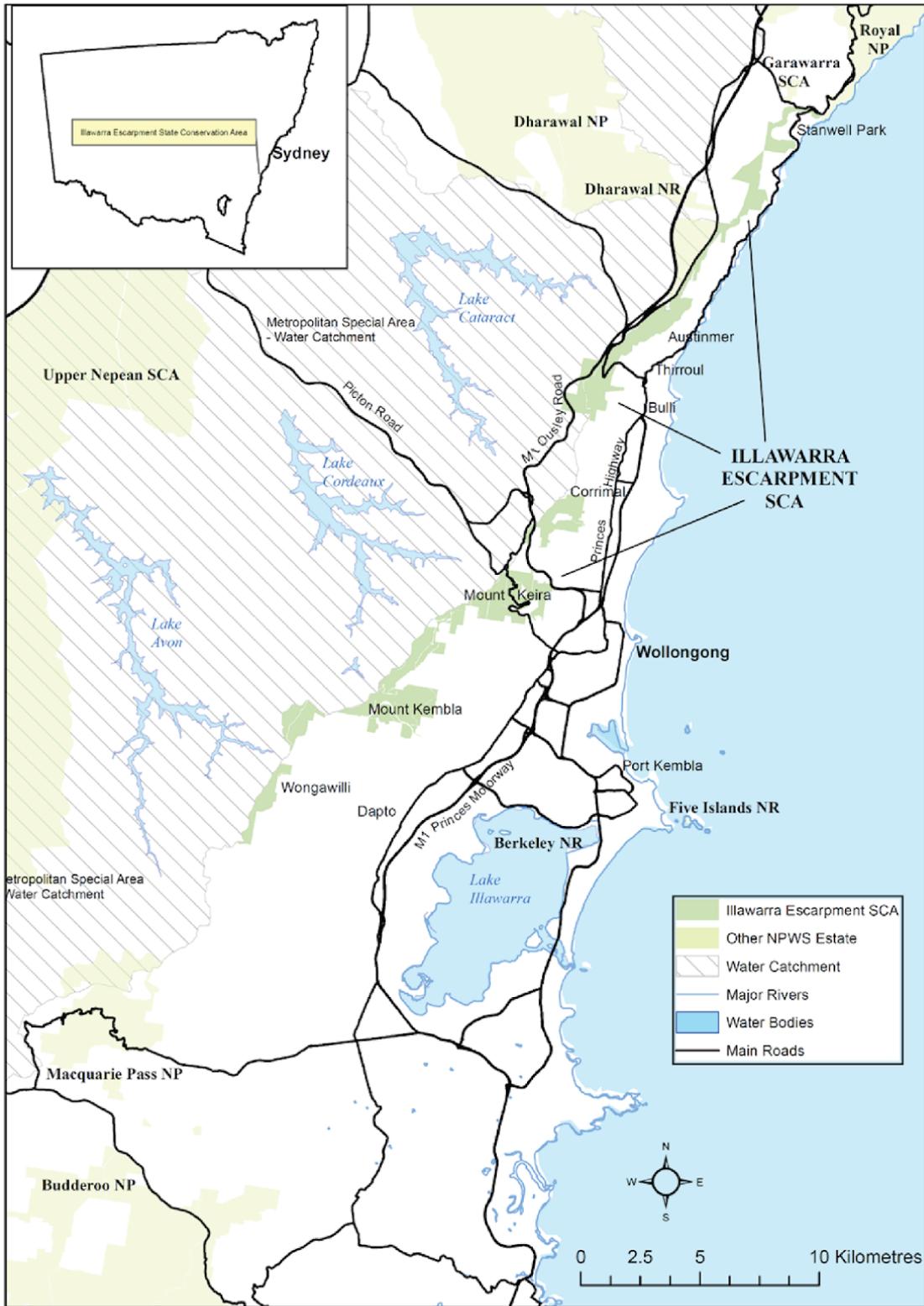


Figure 2. The Illawarra Escarpment Special Conservation Area illustrating discontinuity at the site of the Russell Vale Colliery site preventing a continuous reserve and trail network.