



TRISH DOYLE MP

STATE MEMBER FOR THE BLUE MOUNTAINS

Submission

Opposition to State Significant Development Proposal – Narrow Neck Road, Katoomba SSD-86456706

I write to formally record my opposition to the proposed State Significant Development (SSD) at 142-150 Narrow Neck Road, Katoomba.

I have previously conveyed both my own views and those of my constituents directly to the Minister for Planning. I take this opportunity to reiterate that the proposal, in its current form, is inappropriate and should not be approved.

Community feedback regarding the proposal has been circulated widely and is overwhelmingly negative. I have heard serious concerns raised by Blue Mountains City Council (BMCC) and the Blue Mountains Conservation Society (ConSoc). I share their apprehension about the proposed development, particularly those concerns voiced in relation to bush fire risk and environmental degradation.

Having reviewed the Environmental Impact Statement (EIS) submitted by the proponent, I am not satisfied that it meets the standard of rigour required for a development of this scale and sensitivity. In several respects the document is inadequate and potentially misleading.

Provision of Affordable Housing

I acknowledge and applaud the NSW Government's objective to accelerate housing delivery across New South Wales. However, this proposal does not meaningfully contribute to that objective in the context of the Blue Mountains, nor does it address the housing needs of our community.

This development proposal provides only the minimum allocation of affordable housing, while proposing a substantially higher number of serviced apartments (52). I can only assume that the serviced apartments will be used predominantly for short-term rental accommodation.

This is of particular concern in the Blue Mountains, where the significant number of short-term rentals has already had a detrimental impact on the availability of longer-term, stable, social/community/public and affordable housing options for residents.

Sound planning principles require that residential development (particularly affordable housing) be located within safe and practical access to schools, services, and transport. This proposal does not meet those principles. The proposed site is 3km by road to Katoomba town centre. The site is not located centrally to the Katoomba township, nor is it close to the shops, the hospital, schools or employment.

The lack of pedestrian infrastructure, combined with increased traffic volumes, presents a clear safety risk, particularly for children and older residents. The EIS does not appear to provide adequate mitigation strategies to address this concern.



Incompatibility with Local Context

The blue Mountains is not a conventional metropolitan growth area, it is a unique environment – a string of villages built along a narrow ridgeline, situated within a World Heritage- listed landscape. The Blue Mountains is one of only two such areas worldwide.

The reliance within the EIS on metropolitan planning frameworks, including the Greater Sydney Strategy, is misplaced. These frameworks do not adequately reflect the environmental sensitivity, the topography and its constraints, or the established character of our unique environment.

Applying standard metropolitan planning and growth assumptions to this context is not appropriate and undermines the environmental values and distinctive character that define the region.

Furthermore, I have previously written to the Minister and made my views very clear that to ignore our Blue Mountains Local Environment Plan (LEP) is both disrespectful and dangerous.

I firmly believe the proposed development to be of inappropriate scale, density and height for our region – and an area surrounded by bushland.

It must be remembered that the Blue Mountains was ultimately excluded, by the Minister, from the 2024 Low and Mid-Rise Housing Policy. I strongly believe that the same consideration should apply in this instance. A development proposal of such density has never been seen or considered in the Blue Mountains, previously.

It is relevant to note that the EIS has not assessed impacts of the proposed development under the current local planning controls, It has been developed presuming approval of the concurrent rezoning proposal which sees the height for buildings in this area almost doubled from 8m to 15.6m!

Additionally, the inclusion of a pumped sewer system suggests that the site is not suited to the magnitude of the development. Neighbouring residents report that they must regularly contact Sydney Water to address considerable and ongoing issues with sewage from their single storey homes.

Bushfire Risk and Emergency Management

I acknowledge that the site chosen by the proponent is not currently zoned as a bush fire 'risk', but it must be recognised that all the adjacent bushland is indeed bush fire prone. It is absurd to suggest that the adjacent bushland poses no threat particularly given that this area has experienced significant bushfires in recent years. We have seen fires as close as 500 metres away from the proposed site.

The threat of fire is real, ever increasing, and frightening.

I have recently forwarded correspondence to the Minister, from Mayor Mark Greenhill, dated 15 April 2026, which highlights the risks associated with introducing a significant population increase in close proximity to bushland, particularly in an area with constrained evacuation capacity. I concur with his analysis.

There is no evidence of a strategic bushfire assessment having been conducted by the proponent. Effective evacuation routes have not been considered. In the event of a major bushfire, evacuation is effectively limited to the Great Western Highway (GWH). Main routes directly out of Katoomba such as Yeomans Bridge onto the GWH are already crippled at peak times and over weekends and holidays. Additional traffic in an emergency would only exacerbate existing issues. This presents an unacceptable level of risk.

Further concerns have been raised with me by local emergency management representatives. My understanding is that the Blue Mountains Bush Fire Committee (BMBMC) convened an urgent meeting due to the seriousness of their concerns and will submit their views directly to the Minister for his consideration as the Planning Panel review and summarise submissions. In conversations with the Local Emergency office Commander (LEOCOM), he also expressed concern about the proposed development being inappropriate to the surrounding environment.

I have also been alerted to limitations in firefighting capacity for building of the proposed height. It is my understanding that Fire and Rescue NSW (FRNSW) currently do not have a fire appliance that could adequately reach 4-6 stories high. It is ludicrous to consider approving a proposal for such a heavily populated development which cannot be effectively protected in an emergency – by our combined emergency services.

Environmental Impact

The proposal raises substantial environmental concerns that have not been satisfactorily addressed.

The EIS does not adequately demonstrate that the proposed development will avoid significant and irreversible environmental harm. There is insufficient analysis of storm water runoff, erosion, and downstream impacts including those affecting Katoomba Creek Catchment (Kedumba). The cumulative effect cannot be reasonably measured. Please see the submission from the Blue Mountains Conservation Society (ConSoc) for more detailed analysis on this matter.

The reliance on mitigation measures and general construction compliance standards does not provide a sufficient degree of certainty for a development in such a sensitive location.

There is also a clear risk of adverse impacts on adjacent National Park land and ecologically sensitive swamp systems, which has not been convincingly addressed.

Infrastructure Constraints

The proposal fails to account for existing infrastructure limitations.

There is an absence of safe and continuous pedestrian infrastructure connecting the site to key destinations, including schools, the town Centre, and essential services. This significantly limit accessibility and increases dependence on private vehicles.

Public transport services in the area are limited in both frequency and coverage. The EIS does not demonstrate how future residents and visitors, particularly those without access to a vehicle, will safely and reliably access services and the township.

In addition, the proposal is likely to generate increased traffic volumes on Narrow Neck Road and surrounding routes, which are not designed to accommodate such demand. This raises legitimate concerns regarding road safety.

Community Opposition and Lack of Consultation

There is significant and sustained community opposition to this proposal, I have attended several public meetings all of which have attracted high numbers in attendance from residents, community groups and other stakeholders. Community feedback has been consistently negative about the proposal. With many people finding the planning portal difficult to navigate, my office has received numerous 'submissions' against the proposal.

The EIS does not engage with these concerns, nor does it demonstrate that community input has meaningfully informed the proposal. My understanding is that apart from a sant letterbox drop to neighbouring residents there has been absolutely no effort made to consult with residents, members of local Indigenous Communities, Local Government, community groups such as ConSoc, or with me as the local State Representative.

Consultation, as presented, appears limited and does not meet the standard of genuine, ongoing engagement expected for a development of this scale.

Setting a Precedent

Approval of this proposal would set a undesirable and dangerous precedent for any further development within environmentally sensitive areas such as the Blue Mountains.

The EIS does not provide the level of certainty, caution or strategic alignment required to justify such a precedent.

Conclusion

The pertinent factors outlined above in opposition to this proposal should be taken into serious consideration.

On behalf of my community, I strongly urge the Department of Planning and the Minister to reject this proposal.

Yours sincerely



Trish Doyle

Member for Blue Mountains

Parliamentary Secretary for Environment, Climate Change, Energy, and Heritage
30 April 2026