



GSA Planning

Via email: george@gsaplanning.com.au

142-150 Narrow Neck Road Katoomba – State Significant Development proposal via the Housing Delivery Authority pathway.

Dear George, Tanya and team,

Thank you for your time in the meeting on 21st January 2026, with Kim Barrett (Manager City Planning) and Gemma Bennett (Acting Manager Development & Building) as well as other senior staff on behalf of Blue Mountains City Council. We appreciate you subsequently sending through the package of information related to the proposal at 142-150 Narrow Neck Road Katoomba. To formulate the response within this letter, we have reviewed the following material as received:

- Preliminary documentation – January 2026 – Architectural Drawings Part 1 (as attached DA5.12 Rev B)
- Preliminary documentation – January 2026 – Architectural Drawings Part 2
- Preliminary documentation – January 2026 – Traffic and Parking Impact Report
- Preliminary documentation – January 2026 – Bushfire Statement cleaned
- Preliminary documentation – January 2026 – Urban Design report
- Preliminary documentation – January 2026 – Landscape Plan cleaned
- Preliminary documentation – January 2026 – Community Engagement – 86456706 Meliora Projects cleaned
- Email - 6 February 2026 – clarification on community engagement – GSA Planning

Significantly, Council has not received a full consultation report, planning report, planning proposal report, strategic bush fire assessment, nor any environmental or biodiversity assessment. These are substantial gaps and fundamental to an understanding of the proposed development.

As referenced at the 21st of January meeting, the proposal presents as an overt attempt to achieve the yield in the SSD EOI proposal, with little to no site responsiveness or consideration of the context within which the development would occur. It is not clear whether options have been explored that respond to the site and are of a lesser yield. However, this proposal, for reasons of feasibility or otherwise, does not demonstrate this. The fundamental principles of good urban planning have been abandoned. For the reasons outlined in this response, Council must reiterate that this density and scale of development is not suitable for this site and not appropriate in the Blue Mountains context.

At the outset it is important to confirm Council's view that this site can support quality, locally appropriate, medium density housing. This is reflected in the zoning of the site and the associated controls. A modest uplift in these controls may also be appropriate to achieve such an outcome, and

as demonstrated in the Blue Mountains Local Housing Strategy 2020 and subsequent Blue Mountains Affordable Housing Policy, Council is committed to continuing to meet its housing target and the delivery of housing for the local community.

This proposal is beyond all levels of reasonableness and will actually set back the aim of measured density in the Blue Mountains. Based on the documentation we have received and the conversation at our meeting of 21st January, the legacy development on the adjoining allotment appears to have been used as justification for a doubling of the provisions within Blue Mountains LEP 2015, suggesting that there is strategic basis for such a proposal. Factually, the existing development is the result of a 'zombie-DA' from the 1990s. Council's current controls confirm a reasonable building envelope for the site considering the context, to achieve a medium density outcome.

The scale proposed in your development, has a building height and density greater than any town centre in the Blue Mountains LGA, yet the site is located adjacent to the escarpment on the edge of Katoomba. The yield proposed represents half of the Blue Mountains 5-year housing target as prescribed by the state government, placed on a single site with no infrastructure investment. It is incomprehensible that this is considered to be a positive planning outcome.

The Blue Mountains housing target responds to multiple environmental and natural hazard determinants, many of which result from the location of the Blue Mountains inside a World Heritage National Park. The LGA was therefore excluded from the TOD scheme and the Low and Mid Rise reforms in the Housing SEPP. Despite the site itself having been excluded from the recently updated bushfire map by the RFS, all surrounding land is bush fire prone. Therefore, all evacuation routes around the site, are over bushfire prone land. To place what is likely to be more than 500 people in harm's way, within a new development, is reckless at best.

We have provided feedback below, on each of the documents provided, as well as providing comment on core matters of stormwater and environmental impact, which are not addressed in the documentation we received.

1. CONTEXT AND LEGISLATIVE BACKGROUND

The HDA Criteria

The Department has adopted the *Housing Delivery Authority SSD criteria (Criteria)*. Within the Criteria, the Department has identified four objectives for the HDA. Each of the objectives is considered in greater detail with specific criteria to be addressed through a number of elements.

Objective 2 of the Criteria is to '*Identify housing projects that can be assessed and constructed quickly by focusing on more compliant, major housing proposals that can commence construction quickly*'

The Council notes in particular the first criteria associated with objective 2, is to be 'Largely consistent with development standards'. To satisfy these criteria a proposal must '.... not exceed applicable development standards by more than 20%'.

As detailed in sections 3 and 6 below, the proposed development exceeds both the FSR and height controls by approximately 100%, grossly exceeding the 20% limit established by the Criteria.

Existing Development Consent DA X98/095

The site is the subject of a partially complete total development of the land (formerly comprising the Katoomba Golf Course) approved under DA X98/095 (as modified) (**DA 95**). That partially completed development is located within Lots 1, 2, 3 and 4 DP 1026915. The development of Lot 4 (clubhouse) is complete while the development of each of Lot 3 and Lot 2 (medium density development) is largely completed. The subject Lot 1 was approved as a hotel development forming part of the total development.

Complex legal issues could well arise in relation to the conduct of DA 95 and any attempt to surrender part of that development consent to facilitate development of the site as proposed. There are restrictions on the title associated with this development consent, and these do not appear to have been considered or addressed as part of the current SSD proposal. The documentation provided to Council does not reference these restrictions.

Housing SEPP

The scheme relies on a height limit of 10.4m under the Housing SEPP to justify the proposed building height. It is our reading of the SEPP that these provisions have been incorrectly applied to the proposal. This is addressed in section 7 below, in response to the architectural drawings.

2. BUSH FIRE AND EVACUATION

As you would be aware, the Blue Mountains is identified as one of the most bush fire prone areas of Australia. That reality has significantly constrained the development potential of the City, and recently informed the Department's application of planning policies, with the Blue Mountains being excluded from the Low and Mid Rise reforms in the Housing SEPP and TOD reforms.

The entire perimeter of the City, and its interface with Blue Mountains National Park, the World Heritage Area and large parcels of Crown land, is susceptible to bush fire. The site is in close proximity to the mapped canopy of the Black Summer Fire that occurred in the Blue Mountains and other parts of NSW in 2019/2020.

Regardless of the removal of the bush fire prone land status of the site itself, the reality on the ground remains. Each of the evacuation routes from the site, and from any development that occurs on this land, passes through land that is Bush Fire Prone. Moreover, the assertion in the Bushfire Hazard Solutions memo that the site was actively declassified by Council as bushfire prone land is incorrect. During the update process of the bushfire prone lands map, all versions of the map prepared by the NSW RFS and reviewed by Council retained the bushfire prone land status of the site. When Council received the final certified map (the day after the SSD declaration had been made by the Minister) the bushfire prone status had been removed.

The memo from Bushfire Hazard Solutions (dated 11 December 2025) only references the requirements of Section 20 of the SEARs for the SSD application, not the Guidance for Concurrent Rezoning Report that were also issued by the Department. Consequently, the memo only addresses the access to and from the site and only identified an attempt to consult with NSW Fire and Rescue, not the NSW RFS. This is not adequate for a full assessment of the proposed development.

The Guidance for Concurrent Rezoning Report issued by the Department identifies bushfire under Section 4 Relevant Issues. Notwithstanding this, Planning Direction 4.3 and Planning for Bush Fire

Protection (PBP) 2019 also set requirements for the strategic consideration of bush fire risk for any LEP amendment.

Planning Direction 4.3 applies to any planning proposal that would ‘...affect, or is in proximity to, land mapped as bushfire prone land.’ The site adjoins land to the northwest, southwest, and east that is bush fire prone land, and is within 200m of bushland, well with the distance that could be subject to ember attack in the event of a bush fire. Planning for Bushfire Protection (section 4.4) calls up the Planning Direction and sets additional objectives and requirements, including consultation with the RFS, during the preparation of an LEP amendment where the Planning Direction applies.

As part of consultation with the RFS, a bush fire assessment is required, and critically, where that proposal is of a strategic nature, a strategic bush fire study is required. Given the extent of uplift proposed in a highly bush fire prone area it is the view of Council that this proposal is of a strategic nature, and that a strategic bushfire assessment is therefore required. The requirements for this are set out in section 4.2 of PBP and are significantly broader in scope than the memo prepared by Bushfire Hazard Solutions.

For comparison, the strategic bushfire study that Council was required to commission for the Planetary Health Precinct and Parkland Precinct Plan over the land directly adjoining the site can be found here <https://www.bmcc.nsw.gov.au/documents/2023-10-31-council-meeting-enclosures-5-item-13>. This study found that:

- *Modelling outcomes from the broader study indicate higher fire intensities are most likely to occur under FFDI 106. These conditions are most likely to be experienced under westerly influenced winds, and in steeper forested areas, exposed to uphill fire runs under SW-N winds. In these conditions fire transfer in an easterly direction is very likely.*
- *The site has small setbacks from bushfire hazard to the north and west and a larger setback from hazard to the south east. These setbacks may lessen the likelihood of direct fire transfer from the landscape fire catchment to the site in moderate conditions, however during extreme or catastrophic conditions, direct fire transfer is possible.*
- *In addition to direct fire transfer, given the potential fire severity within proximal hazards (forest on steep slopes) significant ember attack is expected and provides a vector for fire transfer to the site.*

This is of particular relevance for the subject site given that it is located to the west of the Planetary Health Precinct and Parkland site, closer to the hazard under extreme fire danger (likely being westerly winds), and with the same likelihood of direct fire transfer across the subject site.

The Strategic consideration of bushfire, or the apparent lack of it to date, is a key concern of Council given the potential risk to life posed by failing to adequately address it. Council would expect and would require of any applicant lodging a rezoning application with Council, that the requirements of Planning Direction 4.3 and PBP are met, and that the NSW RFS be consulted.

Consequently, we would expect that these requirements, including the preparation of a strategic bush fire study and consultation with the NSW RFS, would be undertaken as part of the preparation of a concurrent rezoning request for this SSD application, to satisfy the requirements of the Guidance for Concurrent Rezoning Report issued by the Department.

3. EXISTING PLANNING CONTROLS UNDER BLUE MOUNTAINS LEP 2015

The following sections details key provisions under Blue Mountains LEP 2015. It is not a clause-by-clause review but rather highlights fundamental controls which must be addressed as part of the development proposal.

Height of Buildings

The site is identified on the LEP 2015 Height of Buildings Map Sheet HOB_002G as being subject to a height restriction of 8 metres. The proposal nominates that the whole site (based on drawing DA6.50 Rev B) would be to a height of 15.6m. **The discrepancy between the current control and the proposed development is in the order of 100% across the site**, well beyond the 20% variation nominated in the HDA criteria.

While the submitted document seems to confirm that the variation sought through a concurrent rezoning would be from 10.4m to 15.6m, capturing the bonus available under the Housing SEPP, this is not applicable across the whole site (refer to section 7).

Floor Space Ratio

The site is identified on the LEP 2015 Floor Space Ratio (FSR) Map Sheet FSR_002G as having a maximum FSR of 0.6. The development proposed will have an FSR in the order of 1.2:1, constituting a variation of 100% from the current development control. The proposed variation grossly exceeds the criteria that should have been applied by the HDA when assessing application, and the documentation provided to Council provides no strategic basis for the proposed uplift as part of concurrent rezoning process.

Key Site under LEP 2015

The Council accepts that the site is identified on the LEP 2015 Key Sites Map Sheet KYS_002G, which cross-references with clause 6.22 of the LEP. However, that clause deals with incentives for providing affordable housing for very low, low and moderate income earning households. Clause 6.22 provides appropriate controls for the provision of affordable housing within the City and does so in a location earmarked for medium density development, not for high rise development as proposed. The difference between the Council's controls recorded in clause 6.22 and the development proposed is enormous. The variations are beyond reasonableness for consideration under Clause 4.6 for example, and well beyond what is contemplated in the HDA criteria, which nominates an exceedance of a development standard of not more than 20%.

Protected Area Escarpment Blue Mountains LEP 2015

The site is within a Protected Area Escarpment under the Council's LEP 2015. This planning control was adopted and implemented by the Council, with the continued support of the Department, in the late 1980s. The control is fundamental to the Blue Mountains and was incorporated in each of the Council's LEP 4, 1982 (as amended), LEP 1991, LEP 2005 and LEP 2015. The proposed development is antithetical to the Protected Area Escarpment control, as referenced in the meeting of 21st January. The Protected Area Escarpment control was adopted to minimise the intrusion of built elements when the Katoomba Escarpment is viewed from within the Blue Mountains National Park and the World Heritage Area. The application of the control to the site is shown on Sheet SLV_0026 to LEP 2015.

The site is located at the top of the ridge of the western side of Katoomba. Due to its elevated location, the site is readily visible across Katoomba. Any high-rise development undertaken on the site will also

be visible from within the Blue Mountains National Park and the Blue Mountains World Heritage Area. The National Park and World Heritage Area boundaries are a matter of a few hundred metres to the west of the site.

The proposal and material provided does not reference this Protected Area, and when raised by Council at the meeting of 21st January 2026, there was no response on how this has been considered. It is clear that it has not.

The urban design material provided to Council appears to suggest that this area is somehow related to the town centre of Katoomba and that similar heights and visual impact are acceptable. This is not the case. There is nothing in the Council's planning scheme which suggests a strategic direction or expected built outcome on this site, close to the scale or density suggested in the proposal. This is further detailed below.

Protected Area Slope Constraint

The site is partly subject to the Protected Area Slope Constraint, which in all development scenarios, would affect site layout and yield. Yet, in this case it has not. The proposal appears to ignore this provision, with buildings proposed over the slope constrained parts of the site, and significant excavation and benching to occur in these areas. This is not an acceptable outcome and does not demonstrate that any site responsive design thinking has occurred. Slope constrained areas should be avoided and any design amended and contained to parts of the site unaffected by this constraint.

Environmental Context

The site is located in the headwaters of the Katoomba Creek Falls, with the Falls being the location of the critically endangered *Pherosphaera Fitzgeraldii*, commonly known as the Blue Mountains pine or dwarf mountain pine. It is found only in the spray zone of waterfalls within the Upper Blue Mountains. The quality of water, and the minimisation of urban run-off within the catchment of Katoomba Creek Falls, is a vital element in the Council's planning regime for the western area of Katoomba.

The adjoining land, Council's Planetary Health Precinct and Parklands, contains the Scheduled Vegetation Community – Blue Mountains Swamp – listed in Schedule 6 of Blue Mountains LEP 2015. The significance is that the proposal nominates that stormwater runoff will be directed towards this Council owned site, into existing waterbodies on the land. These waterbodies lead directly to the area of Blue Mountains Swamp, zoned C2 Environmental Conservation. This is not an environmentally appropriate outcome and will not be accepted by the Council. This is referenced in section 5 below.

4. BIODIVERSITY

The northern end of the site is currently heavily vegetated. The proposal includes retention of 2 existing, exotic pine trees in the centre of the site, and a limited number of trees within the road reserve of Narrow Neck and Glencoe Roads. The proposed tree removal will result in the loss of over 5000m² of native, bushland vegetation.

Under Section 7.4 of the Biodiversity Conservation Act 2016, as the Minimum Lot Size associated with the property is less than 1 hectare, the threshold for vegetation clearing applicable to this site is 2500m². The Biodiversity Offsets Scheme applies to the proposal. The Biodiversity Development Assessment Report prepared under Section 7.7 must demonstrate how, as a first step, the proposed development has avoided impact on vegetation in accordance with the avoid, minimise and offset hierarchy specified in Section 6.3A.

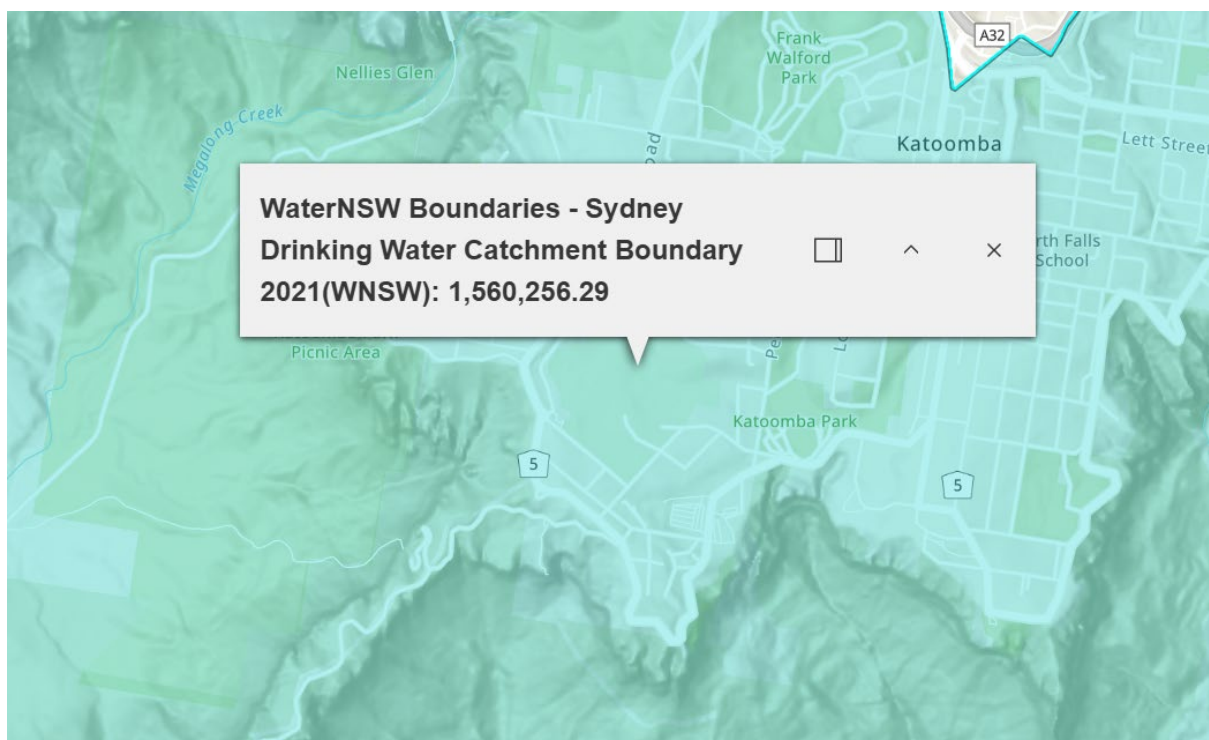
It is also noted that Section 7.9 requires that a State Significant Development must be accompanied by a BDAR unless the Agency Heads determine that there is no significant impact on biodiversity values.

It appears that no measures have been taken by the proponent to avoid the impacts of the development on biodiversity values. The removal of a substantially sized, healthy patch of bushland that supports natural ecosystem functioning with no attempt at limiting vegetation loss and no retention of any significant area of vegetation is inconsistent with maintenance of biodiversity values and is at odds with the purpose of the Biodiversity Conservation Act.

Additionally, a Koala Plan of Management is required under the State Environmental Planning Policy (Biodiversity and Conservation)2021. This does not appear to have been considered in the documentation provided.

5. SYDNEY DRINKING WATER CATCHMENT AND STORMWATER MANAGEMENT

The site is located in the Sydney Drinking Water Catchment. This has not been acknowledged in the documentation.



It appears that the stormwater management proposal includes a small OSD tank and nominal rain gardens, but that stormwater runoff will leave the site and be directed towards the adjoining Council land, and into existing water bodies. This is not an acceptable proposal.

Stormwater must be managed within the site, and being located within the Sydney Drinking Water Catchment, must achieve a neutral or beneficial outcome on stormwater quality. This has not been demonstrated in the documentation we have received.

We have also been advised by Water NSW that Narrow Neck Road has a short flow path into Warragamba Dam and therefore, careful consideration of the management of stormwater quality is essential and must be demonstrated. The inclusion of a small OSD device and limited rain gardens within the site, on face value, could not adequately cater for stormwater volumes from what will now be, a largely impervious site. It is not acceptable to direct stormwater into the Council's property, as part of the stormwater management for the development.

6. URBAN DESIGN

The vision in the Urban Design Report states that the intent is to create a precinct which responds to the escarpment landscape, heritage character and community context. There is no evidence in the documentation that this has been achieved. The following points are identified and significant concerns raised:

- The mix of development types is proposed to respond to housing supply and housing affordability challenges. The provision of more than 50 serviced apartments for short term accommodation does not address this intent, nor does the commercial proposals on the site.
- Further, it has been confirmed by the state government that the Blue Mountains is not the location to provide housing for Sydney's growth, but rather for the housing needs of its own community. The provision of half of the five-year housing target on a single site with limited accessibility, is a grossly disproportionate response to the issue of housing.
- Wider Content – this part of the report states that the site is well located close to the town centre and train station. This is simply not true. The distance to the train station is 1.5km as noted elsewhere in the report. This distance is the reason given for the locating of other services on the site, like restaurants etc, presumably because of the distance to the town centre and the limited transport opportunities, makes it less than convenient.
- The document notes that the site is located at the top catchment of Sydney's Drinking Water, yet the proposal does not address this in any design response, nor is it captured in any documentation.
- The statement that medium density zoned land in Katoomba is located on hilltops is misleading. The map included in the report identifies the town centre location as representative of this. To suggest that the subject site should be redeveloped to a height of 15.6m, as a referential response to the hilltop character of Katoomba town centre, is an unfounded parallel.
- The site was the subject of a single, 1990s, court approved development consent. The precedent set by this consent has not been reinforced in current planning controls, where the height and FSR for the site at 8m and 0.6:1 respectively.
- With the exception of the Hydro Majestic, all precedent images shown on page 10 of the Urban Design report are located in, or near the town centre, and most are heritage listed buildings for either a commercial or educative purpose. It is unclear why these have been chosen as a viable comparison for high density residential development in a medium density zone near the edge of the urban area.
- There is a statement in the urban design report that the proposed development "sits within a strategic growth and landscape interface area identified for integrated planning under the Southern Escarpment Masterplan." It is not clear where this statement is from. There is no strategic growth area in this location.

- The built form development section of the report nominates a site setback of 12m. This is not shown on the architectural plans and there is no space for such a setback. There is a restriction of title of the subject land, requiring that the existing vegetation and a bushland canopy be maintained on the site. This is not shown.
- Sloping Terrain – the report states that the design will be stepped to reduce cut and fill. This simply does not show on the plans, where it is clear that the site will be benched and heavily excavated, even in the slope constrained areas.
- Improve amenity – there is a statement that because the site is located 1.5km from Katoomba, that hospitality and visitor facilities on site will improve amenity for residents. This contradicts an earlier statement which argues for the proximal nature of the site to public transport and services.
- Retain existing trees – this section is misleading. The report refers to two large pine trees to be retained. All other trees are proposed to be cleared. There is extensive bushland on the subject land, all of which is proposed to be removed. There is no ecological value to the retention of two pine trees in the centre of the site.
- Public Benefit – multiple parts of the proposal rely on coordination with, or access to, Council's Planetary Health Precinct and Parkland. There have been no discussions with Council in this regard, and no access points are available between the two sites. It is not reasonable to rely on these elements as central to the proposal. Council as the property owner, was not even notified of the proposal or included in the public consultation process claimed to have been undertaken. This is addressed in section 8 below.
- The proposal will overwhelm the Blue Mountains Planetary Health Precinct and Parkland, with a wall of development overlooking the parkland and casting deep shadows into the site for large parts of the day. Further, with the scale and density of development, to state that the proposal will be managed to limit light spill, when more than 200 dwellings are proposed in an area with extremely limited artificial light on the edge of the escarpment, is not realistic.
- The site is not within walking distance of the town centre. Parts of Katoomba are extremely steep and walking from the site to Katoomba railway station is neither easy nor quick. Despite the inclusion of a bus stop on Narrow Neck Road as part of the proposal, this does not constitute realistically accessible access for large parts of the community. Your documentation confirms this, giving the 1.5km distance to Katoomba as justification for the inclusion of additional services and facilities on the site, such as restaurants etc. This dispersal of commercial development outside of centres, and on the edge of the escarpment is not a sound planning approach.

7. ARCHITECTURAL PLANS AND LANDSCAPING

As captured within the introduction to this response, the overall scheme is not site responsive and represents significant over-development on what is a highly sensitive site. The following comments capture responses to both the architectural plans and the landscape documentation provided. A detailed analysis of the calculations included on the plans has not been undertaken, given the timeframe available for a response.

- **GFA for Affordable Housing** – The total GFA nominated across the site for all land uses is 19621m². Of this, 4196m² is non-residential, and only 2314m² is provided for affordable housing.

The affordable component therefore represents approximately 11% of the overall GFA. It is therefore unclear why all plans reference an application of the 30% height bonus under

the Housing SEPP, when this only applies where a minimum of 15% affordable housing GFA is provided. It appears that the calculation may have been completed, conveniently excluding proposed commercial floor space. This is not a correct application of the SEPP provisions.

The representation of the variation sought to building height and FSR and part of any concurrent rezoning is therefore misrepresented in the documentation. **It should be revised to show the accurate variation of 95% from the Council's maximum building height of 8m.**

- **Application of Height bonuses to Non-RFBs** – The architectural drawings show that the bonus height under the SEPP has been applied across the site as a whole. This is not an appropriate application of the provision, which only applies to RFBs. The proposed restaurant building for example, would not be afforded the building height bonus.
- **Solar Access** - Based on the calculation provided, only 62% of the units receive the minimum amount of sunlight required under the Apartment Design Guide. For a new development, not located in a dense, metropolitan area, this is unacceptable and confirms that the proposal represents an overdevelopment.
- **Cross ventilation** – Only 61% of the units are naturally cross ventilated. This is also unacceptable for a new development in this location, particularly on a site such as this, with one of the highest heat island ratings in Katoomba.
- **Overshadowing** – The drawings demonstrate the significant overshadowing that will occur within the site, impacting on the private open space of apartments within a number of the proposed buildings, as well as the adjoining development (The Escarpments), to the west of the subject site. The impacts on the dwellings immediately adjoining the subject property, will be severe.

The following comments relate specifically to landscaping and open space, as identified on both the architectural drawings and the landscape plans:

- **Vegetation on Narrow Neck Road** - The urban design statements confirms that retention of a 12m wide strip of vegetation on Narrow Neck Road is required.

On the landscape plan, this is shown as a narrow, planted line of trees on the landscape details. On the architectural plans, it is not identified at all. Rather, buildings are shown within approximately 5m of the property boundary, and pedestrian pathways within approximately 2m.

Council's road reserve will not be used to accommodate this vegetation. It must be located within the site.

- **The scheme identifies "soft roads"** constructed of permeable paving to be used within the site, but also to double as access for emergency vehicles including fire trucks. This is not appropriate and would not meet the required standard for either permeability (if these are to be relied upon for water sensitive urban design purposes) or for emergency vehicles.
- **Deep Soil Areas** – the architectural plans show a deep soil area of 4625sqm and an almost identical area of communal open space. These calculations cannot be correct.

- Areas in front of and around Building H are proposed for OSD tanks and the like. They would therefore not have the soil volume to sustain trees and large planting and would not meet the definition for deep soil zones in the ADG, being ‘...areas of soil not covered by buildings or structures within a development. They exclude basement car parks, services, swimming pools, tennis courts and impervious surfaces including car parks, driveways and roof areas.’
- **Communal Open Space** – similar to the concern raised with areas suggested for deep soil zones, the areas nominated for communal open space cannot be described as such, with many locations nominated being narrow strips of land in front of buildings, containing shrubs or other plantings and dominated by pathways and car park entries. They can neither be described as deep soil zones or communal open space.

8. COMMUNITY CONSULTATION

As stated in the material provided to Council, community consultation occurred at the end of 2025. It appears that this consultation included a broad survey and other information about the proposal, conducted by Meliora Projects.

The consultation information states that a letterbox drop occurred around the site, suggesting that this was within an approximate radius of 1km from the site. However, the information provided to Council is only the appendices to what we presume is the consultant’s report. We understand that there were two rounds of letterbox drops proposed to occur, however there is no evidence of this.

The pages we have received from the consultant report state that 6 survey responses were received, and that the sentiments within these were largely negative, with concern over impacts, bushfire and a range of other issues.

Based on information from the community, and the lack of awareness around the project, we can only conclude that the second and broader letterbox drop did not occur. Further, it is unclear why Council, as an adjoining landowner, was not notified. Council’s property, being the Planetary Health Precinct and Parkland will receive some of the most significant impacts as a result of this proposal, yet no contact was made with Council as a property owner. Council in this capacity, will correspond with you and the Department on this separately.

Finally, none of the consultation material shows plans or a single image or concept sketch of the proposal. This makes the potential impact on adjoining land completely opaque, and the consultation can therefore only be described as tokenistic. Meaningful consultation requires the provision of a reasonable understanding of a project. The information provided to the community does not enable this and cannot be considered genuine engagement.

SUMMARY AND NEXT STEPS

In summary, as stated at our meeting on 21st January 2026, the proposed development is clearly an exercise in achieving and attempting to justify a desired yield with no response to the site or its context. The proposed scale of development far exceeds anything that exists or is permitted in the Blue Mountains and represents nearly half of our 5 year housing target located on a site over 1.5km from the town centre, near the edge of the escarpment and World Heritage National Park, in a highly bush fire prone area.

Council remains extremely concerned about the proposed development and will be making strong representations to the Department opposing the proposal.

Additionally, given the lack of community consultation undertaken as outlined in section 8 above, we propose that Council prepares its own information for the public, including one of the elevations prepared to date (DA5.12 Rev B or similar from this drawing set – shown in Attachment 1), such that our community is adequately informed of the proposal. If there are other images that you would prefer to be included in this information, please provide this to us.

We would be happy to discuss the issues raised in this letter further and would be open to genuine consultation on the project, particularly once the planning and rezoning reports are completed. Notwithstanding, we appreciate this letter being included with your documentation to the Department as an accurate record of concerns raised by Council during the consultation you were required to undertake.

Please contact Kim Barrett, City Planning Manager, should further information or clarification be required.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'WILL LANGEVAD', with a stylized, cursive script.

WILL LANGEVAD

Director – Environment and Planning Services

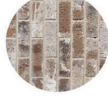
MATERIAL BOARD



LOUVER SCREEN/FENCE/AWNING
DULUX DARK BRONZE



BRICK - AUSTRAL BRICKS
SAN SELMO SMOKED WILD STORM



BRICK - AUSTRAL BRICKS
SAN SELMO SMOKED OPAQUE SLATE



BRICK - AUSTRAL BRICKS
DULUX MEDIUM BRONZE A5
VARIANT (BLD H ENTRY)



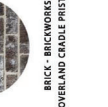
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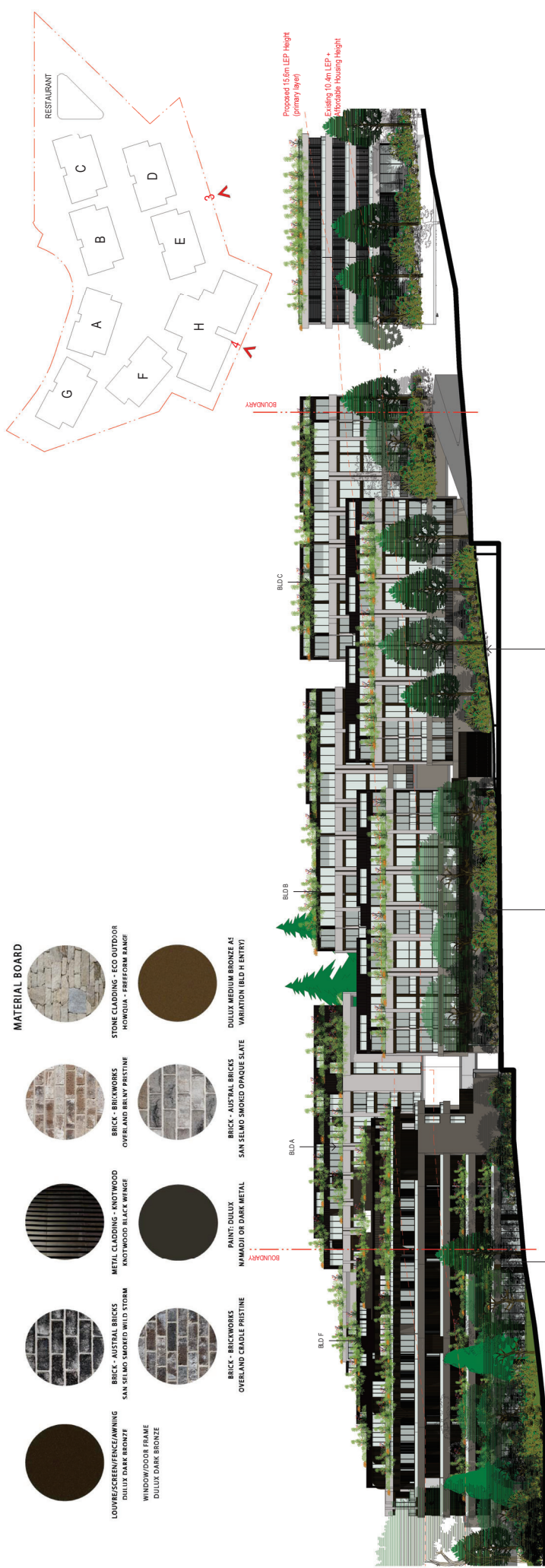
BRICKWORKS
OVERLAND CRADLE PRISTINE



BRICKWORKS
OVERLAND CRADLE PRISTINE



STONE CLADDING - ECO OUTDOOR
HONGOLIA - FREEFORM RANGE



Elevation
SITE EAST ELEVATION DWG 2
1:200

Elevation
SITE EAST ELEVATION DWG 2
1:200



Elevation
SITE EAST ELEVATION DWG 1
1:200

NOTE:
REFER TO DRAWING DAY 01 FOR MATERIALS AND FINISHES
AREAS BEYOND THE HEIGHT LINE ARE COMPLIANT WITH PROPOSED 15.8M HEIGHT. REFER TO DRAWING DAY 51
NOT FOR CONSTRUCTION

NOTES

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- Changes to the design or construction of the project must be approved by Antoniaddes Architects in writing.
- Refer to the specifications and drawings for the project for further details.
- All materials and finishes must be approved by Antoniaddes Architects prior to construction.

REVISION

REVISION	DATE	BY	DESCRIPTION
B	31.10.2020	DP	Issue for Submission
AA	16.12.2020	DP	Issue for Submission

PROJECT NO

24012

PROJECT

Kakomira
142-150 Narmee Neck Road,
Kakomira
VOM Prime Pty Ltd

DRAWING SERIES

DA5 Elevations

DRAWING TITLE

Elevations East & South East_Trees

DRAWING NO

DA5.12

SCALE

As Indicated

SCALE

1:200

DESIGNED BY

SX

CHECKED BY

AA

From: Tanya Wallis tanya@gsaplanning.com.au 
Subject: Re: EXTERNAL: Re: 142-150 Narrow Neck Road Katoomba - SSD - Meeting with GSA Planning
Date: 2 February 2026 at 2:16 pm
To: Kim Barrett kbarrett@bmcc.nsw.gov.au
Cc: George Karavanas George@gsaplanning.com.au

TW

Thank you Kim.

Kind regards,

Tanya Wallis
Senior Planner
(02) 9362 3364 | tanya@gsaplanning.com.au
467 Oxford Street, Paddington
gsaplanning.com.au

GSA Planning

From: Kim Barrett <kbarrett@bmcc.nsw.gov.au>
Sent: Monday, 2 February 2026 2:14 PM
To: Tanya Wallis <tanya@gsaplanning.com.au>
Cc: George Karavanas <George@gsaplanning.com.au>
Subject: RE: EXTERNAL: Re: 142-150 Narrow Neck Road Katoomba - SSD - Meeting with GSA Planning

Hi Tanya
We should be able to have a response to you within this week.
Kind Regards

Kim Barrett | City Planning Manager | t 4780 5591 / 0414 195 591 | e council@bmcc.nsw.gov.au

Blue Mountains City Council • council@bmcc.nsw.gov.au • www.bmcc.nsw.gov.au • Locked Bag 1005 Katoomba NSW 2780

Working on Gundungurra and Dharug Ngurra (Country), I recognise the deep and ongoing spiritual connection to, and custodianship of, Ngurra.

From: Tanya Wallis <tanya@gsaplanning.com.au>
Sent: Monday, 2 February 2026 2:07 PM
To: Kim Barrett <kbarrett@bmcc.nsw.gov.au>
Cc: George Karavanas <George@gsaplanning.com.au>
Subject: Re: EXTERNAL: Re: 142-150 Narrow Neck Road Katoomba - SSD - Meeting with GSA Planning

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Hi Kim,

Hope you had a good weekend.

We wanted to follow-up to gauge anticipated timing to receive Council's written comments - if you are able to provide an indication on this, it would be greatly appreciated.

Thank you.

Kind regards,

Tanya Wallis

Senior Planner

(02) 9362 3364 | tanya@gsaplanning.com.au

467 Oxford Street, Paddington

gsaplanning.com.au

From: Tanya Wallis <tanya@gsaplanning.com.au>

Sent: Wednesday, 28 January 2026 4:26 PM

To: Kim Barrett <kbarrett@bmcc.nsw.gov.au>

Cc: George Karavanas <George@gsaplanning.com.au>

Subject: Re: EXTERNAL: Re: 142-150 Narrow Neck Road Katoomba - SSD - Meeting with GSA Planning

Hi Kim

Just FYI - I have received the community engagement info from the consultant which is now in the link. Let me know if any issues accessing it.

Thanks.

Kind regards,

Tanya Wallis

Senior Planner

(02) 9362 3364 | tanya@gsaplanning.com.au

467 Oxford Street, Paddington

gsaplanning.com.au

From: Tanya Wallis <tanya@gsaplanning.com.au>

Sent: Wednesday, January 28, 2026 10:37 AM

To: Kim Barrett <kbarrett@bmcc.nsw.gov.au> William I andevad

<WLangevad@bmcc.nsw.gov.au>; Simon Porter <sporter@bmcc.nsw.gov.au>;
Gemma Bennett <gbennett@bmcc.nsw.gov.au>
Cc: Andreas Antoniadis <andreas@antarch.com.au>; Paul Walter
<paul@atlasurban.com>; Joseph Fok <Joseph@antarch.com.au>; Geoff Olson
<geoff@xeriscapes.com.au>; George Karavanas
<George@gsaplanning.com.au>
Subject: Re: EXTERNAL: Re: 142-150 Narrow Neck Road Katoomba - SSD -
Meeting with GSA Planning

Hi Kim,

Hope you're well.

Following discussions with the Proponent, please find **linked below** the current architectural plans, landscape plans, urban design report, traffic report and bushfire statement. This information is provided on a without prejudice basis for the purpose of Council's internal review and comments only:

https://www.dropbox.com/scl/fo/7mgwngjzzwd6rko1j3jy3/AKMFIJ5Lfx6S_t04ENLlbQ4?rlkey=skjmhuib51o1kpqtnqgeqsru&st=1fs7fgjm&dl=0

We trust this documentation assists in the provision of your feedback - could you kindly confirm anticipated timing for us to receive Council's written comments?

Thank you and we look forward to your response.

Kind regards,

Tanya Wallis
Senior Planner
(02) 9362 3364 | tanya@gsaplanning.com.au
467 Oxford Street, Paddington
gsaplanning.com.au

From: Kim Barrett <kbarrett@bmcc.nsw.gov.au>
Sent: Tuesday, 27 January 2026 3:53 PM
To: Tanya Wallis <tanya@gsaplanning.com.au>; William Langevad
<WLangevad@bmcc.nsw.gov.au>; Simon Porter <sporter@bmcc.nsw.gov.au>;
Gemma Bennett <gbennett@bmcc.nsw.gov.au>; George Karavanas
<George@gsaplanning.com.au>
Cc: Andreas Antoniadis <andreas@antarch.com.au>; Paul Walter
<paul@atlasurban.com>; Joseph Fok <Joseph@antarch.com.au>; Geoff Olson
<geoff@xeriscapes.com.au>
Subject: RE: EXTERNAL: Re: 142-150 Narrow Neck Road Katoomba - SSD -
Meeting with GSA Planning

Thanks Tanya,

We look forward to receiving the information and updated plans, as shown in the meeting. Also, regarding the community consultation and letter box drops referenced in the meeting, are you able to please provide further detail on this. We were unable

consultation and letter box drops referenced in the meeting, are you able to please provide further detail on this. We were unable to find anything online or via community networks, which identified the details or plans associated with the proposal.

We look forward to hearing from you.

Kind Regards

Kim Barrett | City Planning Manager | t 4780 5591 / 0414 195 591 | e council@bmcc.nsw.gov.au

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Working on Gundungurra and Dharug Ngurra (Country), I recognise the deep and ongoing spiritual connection to, and custodianship of, Ngurra.

From: Tanya Wallis <tanya@gsaplanning.com.au>
Sent: Tuesday, 27 January 2026 10:17 AM
To: Kim Barrett <kbarrett@bmcc.nsw.gov.au>; William Langevad <WLangevad@bmcc.nsw.gov.au>; Simon Porter <sporter@bmcc.nsw.gov.au>; Gemma Bennett <gbennett@bmcc.nsw.gov.au>; George Karavanas <George@gsaplanning.com.au>
Cc: Andreas Antoniadis <andreas@antarch.com.au>; Paul Walter <paul@atlasurban.com>; Joseph Fok <Joseph@antarch.com.au>; Geoff Olson <geoff@xeriscapes.com.au>
Subject: EXTERNAL: Re: 142-150 Narrow Neck Road Katoomba - SSD - Meeting with GSA Planning

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Hi Kim,

Thanks for your time last week and email below.

We will discuss with the Proponent, and come back to you shortly with some further information to assist with your feedback.

Kind regards,

Tanya Wallis
Senior Planner
(02) 9362 3364 | tanya@gsaplanning.com.au
467 Oxford Street, Paddington
gsaplanning.com.au

From: Kim Barrett <kbarrett@bmcc.nsw.gov.au>
Sent: Thursday, 22 January 2026 3:29 PM
To: William Langevad <WLangevad@bmcc.nsw.gov.au>; Simon Porter

<porter@bmcc.nsw.gov.au>; Gemma Bennett <gbennett@bmcc.nsw.gov.au>;
George Karavanas <George@gsaplanning.com.au>; Tanya Wallis
<tanya@gsaplanning.com.au>
Cc: Andreas Antoniadis <Andreas@antarch.com.au>; Paul Walter
<paul@atlasurban.com>; Joseph Fok <Joseph@antarch.com.au>; Geoff Olson
<geoff@xeriscapes.com.au>

Subject: RE: 142-150 Narrow Neck Road Katoomba - SSD - Meeting with GSA
Planning

Dear George and team,

Thank you for the presentation yesterday. To enable us to respond to you in detail and in an informed way, could you please send through the updated version of the plans and other material you presented at the meeting. The content sent through in advance of the meeting now appears superseded. As requested, we would also greatly appreciate any studies you have undertaken, particularly in relation traffic and bush fire. These will assist in formulating our response.

We look forward to hearing from you.

Kind Regards

Kim Barrett | City Planning Manager | t 4780 5591 / 0414 195 591 | e council@bmcc.nsw.gov.au

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1005 Katoomba NSW 2780

Working on Gundungurra and Dharug Ngurra (Country), I recognise the deep and ongoing spiritual connection to, and custodianship of, Ngurra.

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From: Kim Barrett kbarrett@bmcc.nsw.gov.au
Subject: RE: EXTERNAL: MEETING REQUEST - 142-150 Narrow Neck Road, Katoomba (SSDA)
Date: 16 January 2026 at 9:08 am
To: George Karavanas George@gsaplanning.com.au
Cc: Tanya Wallis tanya@gsaplanning.com.au

KB

Sorry George,

Calendars have shifted in the meantime. Would 330-430 on Wed work? I will update the appointment and hope this can be accommodated.

Kind Regards

Kim Barrett | City Planning Manager | t 4780 5591 / 0414 195 591 | e council@bmcc.nsw.gov.au

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Working on Gundungurra and Dharug Ngurra (Country), I recognise the deep and ongoing spiritual connection to, and custodianship of, Ngurra.

From: Kim Barrett
Sent: Friday, 16 January 2026 9:01 AM
To: 'George Karavanas' <George@gsaplanning.com.au>
Cc: Tanya Wallis <tanya@gsaplanning.com.au>
Subject: RE: EXTERNAL: MEETING REQUEST - 142-150 Narrow Neck Road, Katoomba (SSDA)

Dear George,

Happy to meet from 2-3pm on Wednesday. I will send a TEAMS link.

Kind Regards

Kim Barrett | City Planning Manager | t 4780 5591 / 0414 195 591 | e council@bmcc.nsw.gov.au

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Working on Gundungurra and Dharug Ngurra (Country), I recognise the deep and ongoing spiritual connection to, and custodianship of, Ngurra.

From: George Karavanas <George@gsaplanning.com.au>
Sent: Wednesday, 14 January 2026 10:05 AM
To: Kim Barrett <kbarrett@bmcc.nsw.gov.au>
Cc: Tanya Wallis <tanya@gsaplanning.com.au>
Subject: EXTERNAL: MEETING REQUEST - 142-150 Narrow Neck Road, Katoomba (SSDA)

organization. Please exercise caution and do not open links or attachments if sender's email not known.

Hi Kim,

Hope you're well.

I confirm that our team are available **2-4pm on Wednesday 21st January** for a meeting with Council.

Can I kindly request that this meeting is held via Teams, as it is very difficult for myself and other key team members to travel from Sydney to Katoomba with other Court and meeting commitments over the coming weeks.

Regards,

George Karavanas

Managing Director – GSA Planning



ph 02 9362 3364

mob +61 0414 389 996

george@gsaplanning.com.au

insta GKaravanas

gsaplanning.com.au

467 Oxford Street

Paddington NSW 2021

Please note that I spend significant portions of the day in Court, panel meetings, design sessions and on site. I may not reply to emails immediately.

If you need to speak with me urgently and I haven't got back to you, please contact the planner in my office looking after your project or email info@gsaplanning.com.au with your enquiry...thank you.

From: Kim Barrett <kbarrett@bmcc.nsw.gov.au>

Sent: Friday, January 9, 2026 1:41 PM

To: Tanya Wallis <tanya@gsaplanning.com.au>

Subject: RE: EXTERNAL: MEETING REQUEST - 142-150 Narrow Neck Road, Katoomba (SSDA)

Hi Tanya,

Apologies, I have checked with the team and unfortunately this time won't work for key staff. We are happy to wait for your team to return from overseas if necessary, and would also prefer a face to face meeting so we can visit the site (which is located close to Council offices).

Would the following week. Our team would be available on the afternoon of 21/1 from 2-5pm, or 22/1 from 10-12 noon.

Kind Regards

Kim Barrett | City Planning Manager | t 4780 5591 / 0414 195 591 | e council@bmcc.nsw.gov.au

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1005 Katoomba NSW 2780

Working on Gundungurra and Dharug Ngurra (Country), I recognise the deep and ongoing spiritual connection to, and custodianship of, Ngurra.

From: Tanya Wallis <tanya@gsaplanning.com.au>
Sent: Friday, 9 January 2026 1:37 PM
To: Kim Barrett <kbarrett@bmcc.nsw.gov.au>
Cc: operations@fidesenvironmental.com.au; George Karavanas <George@gsaplanning.com.au>
Subject: Re: EXTERNAL: MEETING REQUEST - 142-150 Narrow Neck Road, Katoomba (SSDA)

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Hi Kim,

Hope you're well.

Just following up on below email to confirm if a Teams meeting at **1.30pm on Tuesday 13th January** works for you. Our team have confirmed availability for this time.

Thank you.

Kind regards,

Tanya Wallis

Senior Planner

(02) 9362 3364 | tanya@gsaplanning.com.au

467 Oxford Street, Paddington

gsaplanning.com.au

From: Tanya Wallis <tanya@gsaplanning.com.au>

Sent: Thursday, 8 January 2026 9:31 AM

To: Kim Barrett <kbarrett@bmcc.nsw.gov.au>

Cc: operations@fidesenvironmental.com.au

<operations@fidesenvironmental.com.au>; George Karavanas

<George@gsaplanning.com.au>

Subject: Re: EXTERNAL: MEETING REQUEST - 142-150 Narrow Neck Road, Katoomba (SSDA)

Hi Kim,

Thanks for getting back to us, much appreciated.

We are coordinating with our team to work out availability, but a meeting next **Tuesday 13th Jan at 11.30am** may work. Just awaiting confirmation from some of our consultants on this time, however would this potentially work for Council?

Unfortunately we are unable to travel from Syd to Blue Mountains next week due to other meeting commitments, and some of our team are overseas, so if we can do an MS Teams meeting that would be great. Hoping this is OK.

Kind regards,

Tanya Wallis

Senior Planner

(02) 9362 3364 | tanya@gsaplanning.com.au

467 Oxford Street, Paddington

gsaplanning.com.au

From: Kim Barrett <kbarrett@bmcc.nsw.gov.au>
Sent: Wednesday, January 7, 2026 10:27 AM
To: George Karavanas <George@gsaplanning.com.au>
Cc: Tanya Wallis <tanya@gsaplanning.com.au>; operations@fidesenvironmental.com.au
<operations@fidesenvironmental.com.au>
Subject: RE: EXTERNAL: MEETING REQUEST - 142-150 Narrow Neck Road, Katoomba (SSDA)

Dear Mr Karavanas,

Thank you for your email. Apologies for the delayed reply, staff have been away over the Xmas period.

A meeting face to face would be preferred if possible. Please let me know when you are back in the office and we anticipate being able to organise a meeting in the coming week if you are available.

Thank you for the WIP plans. These will not be circulated, as you have requested.

Kind Regards

Kim Barrett | City Planning Manager | t 4780 5591 / 0414 195 591 | e council@bmcc.nsw.gov.au

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1005 Katoomba NSW 2780

Working on Gundungurra and Dharug Ngurra (Country), I recognise the deep and ongoing spiritual connection to, and custodianship of, Ngurra.

From: George Karavanas <George@gsaplanning.com.au>
Sent: Tuesday, 16 December 2025 9:14 AM
To: Blue Mountains Corporate E-Mail <council@bmcc.nsw.gov.au>
Cc: Tanya Wallis <tanya@gsaplanning.com.au>;
operations@fidesenvironmental.com.au
Subject: EXTERNAL: MEETING REQUEST - 142-150 Narrow Neck Road, Katoomba (SSDA)

BMCC Cyber Security advice: This is the first time you received an email from this sender (George@gsaplanning.com.au). Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

Dear Blue Mountains City Council,

I am writing on behalf of the Applicant for the abovementioned SSD application, at No. 142-150 Narrow Neck Road, Katoomba. **We are seeking a meeting with Council at your earliest availability to discuss and obtain feedback on this matter. Please advise suitable dates/times and if Council's preference is via Teams or in-person.**

The project team have been liaising with DPHI to develop a scheme that achieves the intent and yield of the HDA-supported EOI for the site, which has resulted in a proposal that:

- Relies upon a height and FSR uplift of 15.6m and 1.17:1, to be sought via a concurrent rezoning request;
- Proposes eight main buildings across the site, each being four storeys above existing ground level with basement parking below, accommodating:
 - 218 residential apartments, noting 15% of the residential GFA is allocated to the provision of in-fill affordable housing;
 - 52 serviced apartments;
 - Resident facilities (ancillary wellness centre) within Building H.
- Corner building that accommodates a restaurant and various information & education facilities; and
- Incorporates associated siteworks, accessways, subdivision and staging, and landscaping.

Work-in-progress key plans are provided in the link below for review, **on a Without Prejudice (WP) basis**. We kindly request that these WP plans are not circulated to any persons or organisations outside the relevant officers providing feedback on this matter.

https://www.dropbox.com/scl/fo/mc9742j5niay9kkaiqdf/AM3u4AKgpMY_Blfq8tj_nCQ?rlkey=fgtuan83ql50id9v0sgrsyov3&st=4ozuoarr&dl=0

We look forward to further discussing this matter with Council, and await reply with suitable meeting dates.

Regards,

georgekaravanas

BTP MEngSc FPIA CPP MAITPM

managing director



95 paddington street, paddington nsw 2021

ph: 02 9362 3364 mob: 0414 389 996

insta: gkaravanas

e: george@gsaplanning.com.au

www.gsaplanning.com.au

We're on the move! From 14 December 2025, we'll be settling into our new home at 467 Oxford Street, Paddington. We're also taking a little festive break. The office will close on 18 December 2025, and we'll be back, refreshed, and ready for 2026, on 5 January.

Please note that I spend significant portions of the day in Court, panel meetings, design sessions and on site. I may not reply to emails immediately.

If you need to speak with me urgently and I haven't got back to you, please contact the planner in my office looking after your project or email info@gsaplanning.com.au with your enquiry...thank you.

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