

SUBMISSION: OBJECTION

Application: SSD-86456706 **Project:** Residential Flat Buildings at 142-150 Narrow Neck Road, Katoomba **Applicant:** VDM Prime Pty Ltd **Submission Date:** April 2026 **Position:** I object to the proposed development

1. Introduction

I am writing to formally object to the proposed State Significant Development (SSD-86456706) for a mixed-use development at 142-150 Narrow Neck Road, Katoomba. The proposal seeks consent for the construction and operation of eight four-storey buildings comprising 218 residential apartments, 52 serviced apartments, a restaurant, wellness centre, information and education facilities, basement car parking, internal roads, and associated subdivision and landscaping on a 1.684-hectare site.

The proposal also seeks a concurrent rezoning to amend the Blue Mountains LEP 2015 to increase the maximum building height from 8 metres to 15.6 metres and the floor space ratio from 0.6:1 to 1.17:1, effectively doubling the permitted height and nearly doubling the permitted density on this site.

The exhibition period for this application is **only 14 days** (17 April to 30 April 2026). For a \$92 million State Significant Development seeking to nearly double the height and density controls on the site, accompanied by 56+ technical documents, this is remarkably short and limits the community's ability to meaningfully engage with the proposal.

Having reviewed the Environmental Impact Statement and its supporting appendices in detail, I submit that the proposal presents unacceptable risks and impacts across multiple domains. My objection is grounded in the following key concerns, each of which is addressed in the sections below:

1. The concurrent rezoning bypasses strategic planning and far exceeds acceptable variation thresholds
2. Scale and character incompatibility with the surrounding area
3. Bushfire safety and inadequate evacuation capacity
4. Disproportionate scale relative to the host community
5. Transport and accessibility inadequacy
6. Ecological harm to the adjacent reserve and biodiversity corridor
7. Infrastructure capacity shortfalls: sewerage, water, power, and waste
8. Risk of project non-completion and irreversible site damage
9. Inadequate community engagement and consultation

- 10. Solar access non-compliance and amenity deficiencies
 - 11. Affordable housing shortfall
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2. The Concurrent Rezoning Bypasses Strategic Planning

2.1 Site-Specific, Applicant-Initiated Rezoning

The concurrent rezoning is not the product of a Council-led strategic planning process. It is entirely applicant-initiated and site-specific, designed to facilitate a single developer's commercial objectives. Blue Mountains City Council has explicitly stated that the site is **not identified as a strategic growth area**. The State Government has confirmed that the Blue Mountains is **not a location identified for significant housing growth**.

The proposed LEP amendments would create a bespoke planning envelope for this one site (a height limit of 15.6m and FSR of 1.17:1) while every other R3-zoned property in the locality remains subject to the 8m height limit and 0.6:1 FSR that were established through proper strategic planning processes.

2.2 Exceedance of the HDA's Own Variation Threshold

The Housing Delivery Authority's own guidelines contemplate a **20% variation** from existing planning controls for SSD declarations. The proposed height increase is approximately **95%** above the LEP control (8m to 15.6m), and the FSR increase is approximately **95%** above the LEP control (0.6:1 to 1.17:1). These are not minor adjustments; they are near-doublings that fundamentally change what the planning framework contemplates for this site.

3. Scale and Character Incompatibility

3.1 Surrounding Built Form Context

The site is surrounded by:

- **To the north and west:** One and two-storey detached dwellings with large yards
- **To the south:** Two to three-storey townhouses (The Escarpments / Yarrabee development at Nos. 152-166 Narrow Neck Road)
- **To the east:** The former Katoomba Golf Course, designated for ecological restoration as the Planetary Health Precinct

The proposal introduces **nine buildings of up to four storeys (15.6m)** with basement car parking into a streetscape where nothing exceeds three storeys. This is a fundamentally different typology and scale.

3.2 R3 Zone Objectives

The R3 Medium Density Residential zone objective explicitly requires development to have "a *scale and character that is consistent with adjoining residential land uses*." Nine four-storey residential flat buildings on a 1.684-hectare site represent a dramatic departure from this objective. The proposal does not achieve consistency with the surrounding low-density residential character; it overwhelms it.

3.3 Visual Impact

The Visual Impact Assessment (Appendix AL) rates impacts from several viewpoints as "**moderate**" to "**severe**". From The Escarpments (Viewpoint 1), the assessment identifies a 39% visual impact with a "moderate" rating. Despite the stepped building form and proposed landscaping, the introduction of eight four-storey buildings into a low-density escarpment-edge setting represents a permanent and substantial change to the scenic quality of the area, a quality that is central to the Blue Mountains' identity and value.

4. Bushfire Safety and Inadequate Evacuation

4.1 Inadequacy of the Bushfire Assessment

The entire bushfire assessment for this development is a six-page memo prepared by Bushfire Hazard Solutions (Appendix R). For a development proposing to house over 500 residents immediately adjacent to extensive bushland, this level of analysis is grossly insufficient. By comparison, the Arboricultural Report is 62 pages, the Social Impact Assessment is 112 pages, and the Biodiversity Development Assessment Report is 102 pages. The bushfire risk, a potentially life-threatening matter, has received the least rigorous treatment of any environmental factor.

Blue Mountains City Council considers the bushfire assessment **insufficient** for a development of this scale and population.

4.2 Reliance on Declassification from the Bushfire Prone Lands Map

The application relies heavily on the site's recent removal from the NSW Bushfire Prone Land Map to argue that bushfire risk is minimal. This is misleading. The declassification reflects a mapping update, not a change in the physical fire environment. The site remains bounded by dense native vegetation to the east, south, and southeast. The adjacent former Katoomba Golf Course and the Blue Mountains National Park beyond it contain continuous eucalypt forest, a landscape that has experienced catastrophic fire in recent memory, including the 2019-2020 Black Summer fires that burned through significant portions of the Blue Mountains.

The NSW Rural Fire Service correspondence (Appendix BB) confirms that its pre-DA advice is preliminary in nature and does not constitute an approval or endorsement. The RFS has not assessed the development at its proposed scale and density.

4.3 Evacuation Route Capacity

The development is served by only two vehicle access points:

- **The Escarpments**, a narrow residential cul-de-sac
- **Glencoe Road**, a local road described in the Traffic and Parking Impact Report (Appendix A1) as having one travel lane with parking on one side, and only a 25-metre passing bay

Both routes funnel onto **Narrow Neck Road**, which is the sole connection to the Great Western Highway and the Katoomba town centre. There is no alternative route.

No evacuation modelling has been undertaken for a scenario in which 500+ residents, plus restaurant patrons, serviced apartment guests, and staff, attempt to evacuate simultaneously via these two access points. During a bushfire emergency, the Great Western Highway itself becomes congested as Blue Mountains communities evacuate east towards Sydney. The Traffic Impact Report does not model emergency evacuation conditions.

4.4 Shelter-in-Place Concerns

The EIS does not address whether the buildings are designed to function as shelter-in-place refuges during a bushfire event. For a development of this scale in a bushfire-prone landscape, the absence of any discussion of Bushfire Attack Level (BAL) ratings, ember protection, radiant heat shielding, or independent water supply for firefighting is a serious omission.

5. Disproportionate Scale for the Host Community

5.1 Population Impact

The Social Impact Assessment (Appendix AH) provides the demographic baseline that demonstrates the fundamental mismatch between this proposal and the community it would be inserted into:

- Katoomba's population was approximately 7,964 persons at the 2021 Census.
- The Blue Mountains LGA's population was 76,904 persons, with projected growth to approximately 81,069 by 2041, an increase of roughly 4,165 persons over 20 years.
- The proposed development would accommodate an estimated 437 to 550 additional residents (218 apartments plus 52 serviced apartments at average occupancy rates), representing a **5.5 to 6.9% increase in Katoomba's entire population from a single project**.

To put this in perspective, the Blue Mountains Local Housing Strategy 2020 identifies a target of approximately 450 additional dwellings across the entire LGA over a five-year period. This single development proposes **270 dwellings, approximately 60% of the entire LGA's five-year target, on a single 1.684-hectare site.**

5.2 Mismatch with Community Demographics

The SIA documents a community that is ageing, with lower household incomes, and a growing proportion of lone-person and couples-only households. The median weekly household income in Katoomba (\$1,310) is well below the Greater Sydney median (\$2,077). The development's unit mix, dominated by studios (54) and one-bedroom apartments (121) which together comprise 80% of all residential units, does not reflect demonstrated local housing need. It reflects an investor-driven product targeting a metropolitan market, not the Blue Mountains community.

5.3 Inadequate Social Infrastructure

The SIA acknowledges that local social infrastructure, including health services, schools, emergency services, and public transport, is not scaled for a sudden population increase of this magnitude. The nearest hospital (Blue Mountains District ANZAC Memorial Hospital) and the local police, fire, and ambulance services serve a dispersed population across the Blue Mountains. Adding 500+ residents in a location 1.6 km from the town centre, with no established footpaths and a single bus route, places additional strain on services that are already stretched.

6. Transport and Accessibility

6.1 Genuine Isolation

The EIS characterises the site as "well-located" near Katoomba town centre and public transport. This characterisation is not supported by the evidence:

- The site is **1.6 km aerial / approximately 2 km walking distance** from Katoomba Town Centre, well beyond comfortable walking distance, especially given the steep terrain and **complete absence of footpaths** on Narrow Neck Road, Glencoe Road, or The Escarpments.
- The sole public transport serving the site is the **686G bus**, a loop service with only **4 morning services and 3 afternoon services**. This frequency is wholly inadequate for a development of 270+ dwellings and 52 serviced apartments.

- The EIS itself acknowledges that "*no established footpaths are provided along the street frontages surrounding the subject site*" and that public amenities and services are "*at a considerable distance from the subject site.*"

Blue Mountains City Council has explicitly stated it **does not accept** that the site is well-located near the town centre and transport.

6.2 Road Network Inadequacy

- **Glencoe Road** is a single-lane local road with only a 25-metre passing bay. It is not designed to function as a primary access route for a major residential precinct.
- The Traffic and Parking Impact Report's conclusion that impacts will be "very low" is based on current volumes being near-zero. This does not address whether the road infrastructure can safely handle the increase. Current peak-hour volumes at surrounding intersections are approximately 30 to 60 vehicles; adding 270+ dwellings, 52 serviced apartments, and a public restaurant will generate materially higher volumes on a network with minimal spare capacity by design.
- During both construction (36 months of heavy vehicle movements including concrete trucks, excavation equipment, and material deliveries) and operation, the impact on road safety and residential amenity on these narrow residential streets will be significant.

6.3 On-Site Facilities Undercut the Accessibility Argument

The inclusion of a wellness centre, restaurant, and information centre on the site actually undercuts the applicant's own accessibility argument. These are provided precisely *because* the site is not well-connected to existing services and amenities.

7. Ecological Impact on the Adjacent Reserve and Biodiversity Corridor

7.1 Native Vegetation Clearing

The Arboricultural Impact Assessment (Appendix K) confirms that **134 of the site's 206 trees are proposed for removal**, including 14 trees of high significance and 75 of medium significance. The Streamline Biodiversity Development Assessment Report (Appendix T) confirms that **0.6 hectares of native vegetation will be cleared**, and the site is identified within the **NSW Biodiversity Values Map**, triggering the Biodiversity Offset Scheme. In a World Heritage-adjacent landscape, this is a major clearing event.

7.2 Impact on the Planetary Health Precinct and Sydney Drinking Water Catchment

The site is directly adjacent to the former Katoomba Golf Course (Nos. 1-31 Acacia Street), which Blue Mountains City Council has designated as the **Planetary Health Precinct and Parklands**, a site planned for ecological restoration, community education, and climate resilience.

The Services and Infrastructure Report (Appendix X) confirms that stormwater from the development will be discharged to **two existing basins on the adjacent former golf course land**. Council has raised a legitimate objection that stormwater should be managed wholly within the site. The applicant's response, that the golf course basins were designed to accommodate upstream catchments, assumes a development intensity (~72% impervious area) that was never contemplated in the original golf course infrastructure design. The site lies within the **Sydney Drinking Water Catchment**, which heightens the sensitivity of stormwater discharge.

7.3 Threatened Species

The BDAR identifies the presence of the **Large-eared Pied Bat** (*Chalinolobus dwyeri*), a species listed as vulnerable under the NSW Biodiversity Conservation Act 2016, in the vicinity of the site. The report acknowledges potential impacts on this species and the triggering of the Biodiversity Offset Scheme, yet the development proceeds with the clearing regardless.

7.4 Edge Effects: Light, Noise, and Domestic Animals

The EIS does not adequately assess the ongoing operational impacts of a 270-unit residential development immediately adjacent to a bushland reserve. These include:

- **Artificial light spill** from 8 four-storey buildings, internal roads, car parks, and the restaurant into bushland habitat that supports nocturnal species
- **Noise from 500+ residents**, vehicles, a restaurant operating until midnight, and building services
- **Domestic cats and dogs** from 270 residential units posing a direct predation and disturbance risk to native fauna
- **Weed invasion** from ornamental plantings into adjacent native vegetation

These are permanent, ongoing impacts that cannot be offset by the Biodiversity Offset Scheme.

8. Infrastructure Capacity: Sewerage, Water, Power, and Waste

8.1 Sewerage

The Services and Infrastructure Report (Appendix X) confirms that the existing sewer infrastructure is not adequate to service the development. The report identifies the need for **sewer pump stations** to convey sewage from the lower portions of the site to the sewer main. Pump stations introduce ongoing mechanical maintenance requirements, failure risks (including sewage overflow during power outages or mechanical failure), and operational costs that will be borne by the future community association, not the developer.

The report also notes that *"further coordination with the water servicing coordinator is needed to finalise the sewer connection point"*, meaning the sewer connection has not been confirmed at the time of lodgement.

8.2 Water Supply

The development requires connection to the 200mm CICL water main in Narrow Neck Road. The Services and Infrastructure Report acknowledges that **water pressure boosting** will likely be required due to the site's elevation and the demands of the development. The adequacy of the existing main to service a 270-unit development, a restaurant, and fire services has not been confirmed by Sydney Water at the time of lodgement.

8.3 Electrical Supply

The development has a maximum electrical demand of **3,600 kVA**, requiring the installation of **four external substations** (2 x 1000 kVA and 2 x 1000 kVA) along the front property boundary. This is an extraordinary level of electrical infrastructure for what is otherwise a low-density residential street. The visual, acoustic, and electromagnetic impacts of four substations on the streetscape and neighbouring properties have not been assessed.

8.4 Gas Supply

The Services and Infrastructure Report states that the **gas supply to the site is conditional** upon Jemena extending the gas network, with no confirmation that this extension will occur. The ESD strategy and BASIX commitments may be compromised if gas supply is not available.

8.5 Waste Management

The Operational Waste Management Plan (Appendix AO) identifies that the development will generate substantial waste volumes requiring regular collection by heavy vehicles along Glencoe Road and The Escarpments, narrow local roads not designed for this level of heavy vehicle activity.

9. Risk of Project Non-Completion and Irreversible Site Damage

9.1 No Staging Plan

Section 4.6 of the EIS states: *"The project will not be staged as part of this development application."*

This means the entire \$92.28 million development (per the Estimated Development Cost report at Appendix Z) is proposed as a single, monolithic construction effort over a 36-month period. There is no provision for discrete phases that could be independently occupied if the project encounters financial difficulty. If the developer fails at any point during construction, the result is not a partially completed but functional development; it is an abandoned construction site.

9.2 Severe Weather Risks to Construction

The EDC report itself acknowledges that the 36-month construction period *"does not include the provisions for unforeseen events, defined as potential increases of time to complete, and associated with the advent of inclement weather, public holidays, coordination of trades, natural disasters, strikes, construction documentation delays."*

Katoomba sits at approximately 1,000 metres elevation and experiences:

- Annual rainfall of approximately 1,400mm, with intense storm events
- Regular sub-zero temperatures, snow, ice, and heavy frost in winter
- Bushfire seasons that routinely trigger total fire bans and halt construction
- High winds at the site's exposed, elevated position

A 36-month build program with only a 5% contingency allowance makes no realistic provision for these conditions.

9.3 Remote Location and Trade Availability

The site is 85 km west of Sydney CBD. The EDC estimates the project requires 108 direct construction jobs. There is no local labour pool of this size for multi-storey residential flat building construction. Workers, specialist trades, and materials must be sourced from metropolitan Sydney and transported via the Great Western Highway, a route subject to closures from weather, accidents, and rockfalls.

9.4 Irreversible Site Disturbance

If the project fails mid-construction, the following changes to the site cannot be reversed:

- **134 mature trees removed**, including 14 of high significance, trees that took decades to grow

- **9 metres of excavation into Banks Wall Sandstone** across five separate basement footprints, bedrock that cannot be replaced
- **Soldier pile walls, contiguous pile walls, and ground anchors** embedded into bedrock
- **0.6 hectares of native vegetation cleared** from a site within the NSW Biodiversity Values Map
- **Topsoil and natural soil profiles permanently disrupted** across the 1.684-hectare site

Restoring a site with multiple deep sandstone excavations and concrete retention structures to anything resembling its pre-development condition is economically and practically impossible.

9.5 No Financial Viability Evidence

The EIS contains no evidence of the developer's financial capacity to complete a \$92 million project. There is no bank commitment letter, no financier's confirmation, and no evidence of pre-sales or funding. The EDC report itself states it is "*not to be used for sales, marketing, nor by bank/financial institutions*" and is "*null and void*" if the submission exceeds 30 days from its date.

9.6 No Remediation Bond or Restoration Plan

The application contains no:

- **Remediation bond** or financial security for site restoration in the event of abandonment
- **Decommissioning plan** for the incomplete development scenario
- **Site restoration plan** addressing how excavations, retention structures, and cleared land would be rehabilitated
- **Environmental management plan** for the abandonment scenario

The Development Contract (Appendix AV) provides a 10-year window for the developer but contains no financial performance guarantees, no milestone obligations, and no remediation provisions if the developer defaults.

10. Inadequate Community Engagement and Consultation

10.1 No Design Information Shared with the Community

Blue Mountains City Council has described the pre-lodgement community engagement as **not "genuine or meaningful"**. No plans, concept sketches, or design information were shared with the community during the consultation period (September to November 2025). Residents were asked to comment on a proposal they could not see. This does not constitute meaningful engagement.

10.2 No Consultation with Council as Adjoining Landowner

Blue Mountains City Council is the owner of the adjacent former Katoomba Golf Course land (Nos. 1-31 Acacia Street), the site designated as the Planetary Health Precinct and Parklands. Council was not consulted as an adjoining landowner during the pre-lodgement engagement process. Given that the development proposes to discharge stormwater onto Council's land and create a permanent interface with the Precinct, this omission is significant.

10.3 First Nations Engagement Not Achieved

The EIS notes that multiple attempts were made to engage the **Deerubbin Local Aboriginal Land Council** from January 2026, but no response was received. Despite this, the proposal claims Connecting with Country outcomes. Meaningful First Nations engagement cannot be claimed without actual participation by the relevant Aboriginal community. The Connecting with Country framework requires genuine, reciprocal relationships, not unanswered correspondence.

11. Solar Access Non-Compliance

11.1 Failure to Meet ADG Requirements

The Apartment Design Guide (ADG) requires that at least **70% of apartments** in a development receive a minimum of 3 hours of direct sunlight between 9am and 3pm at the winter solstice. The application's own Solar Access Assessment demonstrates that only **62.84% of apartments** achieve this benchmark, a shortfall of 7.16%.

Furthermore, **7 apartments (3% of total)** receive **zero hours of direct sunlight** at the winter solstice. These are effectively sub-standard dwellings that will never receive any direct sunlight in winter.

11.2 Inexcusable on a Greenfield Site

This level of non-compliance would be concerning in an infill context with existing built-form constraints. On a **vacant greenfield site** with no surrounding buildings to cause overshadowing, it is inexcusable. It demonstrates that the site is being over-developed: the building footprints and massing have been pushed beyond what the site can accommodate while delivering acceptable residential amenity. Appropriate building placement and massing on an unconstrained site should readily achieve the 70% benchmark.

12. Affordable Housing Shortfall

12.1 Disputed Calculation Methodology

The applicant claims the development provides **15% affordable housing** of residential GFA, equating to approximately 42 affordable dwellings out of 218 total units (roughly 19% by unit count), managed by HomeGround Real Estate for 15 years.

Blue Mountains City Council has calculated the affordable housing provision as only **11% of total residential GFA**, arguing that the commercial floor space should be included in the denominator consistent with the relevant provisions of the Housing SEPP. The applicant relies on a DPHI email clarification that the 15% applies only to the residential component. This disputed methodology means the actual affordable housing benefit may be materially less than represented.

12.2 Unit Mix Skewed Toward Small Dwellings

The affordable housing component is heavily skewed toward studios and one-bedroom apartments, limiting its utility for families and larger households, the cohorts often most in need of affordable housing.

13. Blue Mountains City Council's Position

It is important to note that Blue Mountains City Council, the local planning authority with intimate knowledge of the area, has raised **serious, substantive concerns** across virtually every aspect of this proposal:

Theme	Council Position
Height and FSR	~95% exceedance of LEP controls; exceeds the HDA's own 20% variation threshold
Strategic context	Site is NOT identified as a strategic growth area
Accessibility	Does not accept the site is "well located" near the town centre or transport
Bushfire	Assessment is insufficient for a development of this scale
Stormwater	Should be managed wholly on-site; inadequate for Sydney Drinking Water Catchment
Engagement	Not genuine or meaningful; no plans shared; Council not consulted as adjoining landowner

Theme	Council Position
Solar access	Non-compliance is unacceptable on a greenfield site
Affordable housing	Calculates the provision at 11%, not 15%
Escarpment and slope	Built form in protected escarpment area; slope constraints not adequately addressed

No state authority has raised a formal objection, but several deferred detailed comment to the formal assessment stage. Council is the only authority to have engaged substantively with the proposal at this point.

14. Additional Concerns

14.1 Geotechnical Investigation Inadequacy

The Preliminary Geotechnical Assessment (Appendix L) was based on only **two boreholes** for a 1.684-hectare site requiring up to 9 metres of excavation. The report itself recommends "*further geotechnical investigation*" and notes that "*ground conditions are expected to vary across the site, and should be confirmed by a geotechnical engineer, predominantly in areas unobserved during the geotechnical investigation.*" Two boreholes for a development of this scale and complexity is inadequate.

14.2 Construction Noise and Vibration

The geotechnical report confirms excavation into sandstone will require rock saws, hydraulic breakers, and heavy ripping equipment, all of which generate significant noise and vibration. Vibration limits of 2 to 5 mm/sec PPV are recommended for adjacent residential structures, yet the 36-month construction period will subject the surrounding low-density neighbourhood to prolonged construction impacts. The restriction of hydraulic rock hammers to 8am to 6pm Monday to Thursday and 8am to 4pm Friday acknowledges the severity of these impacts.

15. Conclusion

I object to the proposed development on the grounds that:

1. **The concurrent rezoning bypasses strategic planning.** It is applicant-initiated, site-specific, and exceeds the HDA's own 20% variation threshold by approximately 95%. The site is not identified as a strategic growth area by either Council or the State Government.

2. **The scale and character are incompatible** with the surrounding one and two-storey residential area and the R3 zone objective requiring consistency with adjoining land uses.
3. **The bushfire risk assessment is inadequate.** A six-page memo for a 500+ resident development adjacent to bushland, with no evacuation modelling and reliance on a mapping declassification rather than an assessment of actual fire risk.
4. **The development is disproportionate to the host community**, representing a 5.5 to 6.9% increase in Katoomba's population from a single project, with approximately 60% of the LGA's five-year housing target on one site, in a town whose demographics, services, and infrastructure are not scaled for this growth.
5. **Transport and accessibility are inadequate.** A loop bus service with 7 daily runs, single-lane access roads, no footpaths, and a 2 km walk to the town centre cannot sustainably serve 270+ dwellings.
6. **The ecological impacts are unacceptable.** 134 trees removed, 0.6 hectares of mapped biodiversity values cleared, stormwater discharged to the Planetary Health Precinct and Sydney Drinking Water Catchment, and permanent edge effects on adjacent bushland habitat.
7. **The infrastructure is not in place**, requiring sewer pump stations, water pressure boosting, four electrical substations, and conditional gas extension, none of which have been confirmed as feasible by the relevant service providers at the time of lodgement.
8. **The risk of non-completion is real and the consequences are irreversible.** A \$92 million, unstaged, 36-month construction project in a remote, weather-exposed location with no evidence of financial capacity, no remediation bond, and no site restoration plan, where failure would leave permanent sandstone excavations and cleared native vegetation that cannot be restored.
9. **Community engagement was not genuine or meaningful.** No design information was shared, Council was not consulted as an adjoining landowner, and First Nations engagement was not achieved.
10. **Solar access is non-compliant.** Only 62.84% of apartments meet the ADG 70% benchmark, with 7 apartments receiving zero sunlight, on a greenfield site with no built-form constraints.
11. **Affordable housing may be overstated.** Council calculates the provision at 11%, not the claimed 15%.

The consent authority is urged to refuse the application or, at minimum, require:

- A comprehensive bushfire risk assessment with evacuation modelling
- A staged development plan with independently occupiable phases
- Evidence of financial capacity and a substantial remediation bond
- Confirmation of infrastructure capacity from all relevant service providers

- A site restoration plan for the non-completion scenario
 - Reassessment of the development's scale relative to the carrying capacity of the host community and its infrastructure
 - Genuine community and First Nations engagement
 - Redesign to achieve ADG solar access compliance
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This submission is made in good faith based on a detailed review of the publicly exhibited Environmental Impact Statement and its supporting appendices for SSD-86456706.