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Author, Broadcaster, Campaigner and 'Australian of the Year' 2010 (NSW)

Date: 21/04/2026

Director, Housing Delivery - State Significant Developments
NSW Department of Planning, Housing and Infrastructure
Lodged via the NSW Planning Portal

Objection to SSD-86456706

- Residential flat buildings at 142-150 Narrow Neck Road, Katoomba

Application: SSD-86456706 - Housing Delivery Authority pathway

1. About this submission

I object in the strongest possible terms to the proposal at 142-150 Narrow Neck Road, Katoomba (SSD-86456706) and ask that it be refused in its present form.

For transparency about my standing to make this submission:

- I am a local resident of the Blue Mountains and walk the area around Narrow Neck Road on a near daily basis. The escarpment outlook, the tree canopy along Narrow Neck Road, and the bushland of Katoomba Creek catchment are daily, lived amenities for me and for thousands of other residents and visitors.
- I am an environmentalist. I was the main founder of Planet Ark, the national environmental organisation established in 1992.
- I was named Australian of the Year for NSW in 2010 for my environmental work.

I therefore approach this proposal from two perspectives at once - as a local who knows this place on foot, and as someone who has spent more than three decades working on environmental policy in Australia.

2. Summary of objection

The proposal should be refused because it is fundamentally inconsistent with:

1. The environmental values of a site that adjoins the Greater Blue Mountains World Heritage Area and drains into the Katoomba Creek catchment;
2. The Blue Mountains Local Environmental Plan 2015, and in particular the Katoomba Precinct objectives which explicitly seek to retain the existing pattern of tall canopy trees along the ridgeline of Narrow Neck Road; and
3. The established and desired future character of Katoomba as a low-density town set within a World Heritage landscape.

The EIS asserts that the design is “consistent with the established and desired future character of the area”. That claim is not credible on the face of the proposal. Nine buildings of four to five storeys, containing 218 dwellings plus 52 serviced apartments, and requiring the removal of 134 of the 206 existing trees, cannot honestly be described as consistent with the low-rise, tree-dominated character of upper Katoomba.

3. Environmental and biodiversity grounds

3.1 Loss of 134 of 206 trees is not a minor impact

On the proponent’s own numbers, the development will remove 134 of the 206 trees on site. That is approximately 65% of the existing tree stock on a single site, at the top of an escarpment, on the very edge of a World Heritage Area.

The EIS states the site “does not contain extensive significant vegetation”. I reject that framing. The significance of vegetation in this location is not measured only by the listed status of individual specimens - it is measured by:

- its role as canopy buffer between urban Katoomba and the World Heritage escarpment;
- its role as habitat and movement corridor for fauna moving between the Jamison Valley, Narrow Neck Plateau and Katoomba Creek;
- its role in stormwater interception and slope stability on a steeply falling site above a sensitive creek catchment; and
- its role in the visual landscape viewed from every major lookout and walking track on this side of Katoomba.

The LEP itself recognises this role. Clause 7.6 of Blue Mountains Local Environmental Plan 2015, for the Katoomba Precinct, sets an explicit objective:

“promote future development of residential buildings within garden settings that retain the existing pattern of tall canopy trees as a scenically distinctive backdrop along the ridgeline of Narrow Neck Road...”

A proposal that removes roughly two thirds of existing trees directly contradicts that objective. It does not “retain” the canopy pattern - it dismantles it.

3.2 Katoomba Creek catchment

The site drains into the Katoomba Creek catchment. Concentrating 218 dwellings and 52 serviced apartments, plus associated hardstand, basement works, civil earthworks and construction runoff, in this location creates clear risks to downstream water quality, sediment loads and aquatic habitat.

Blue Mountains City Council has identified “environmental impacts on the Katoomba Creek catchment” as a key concern. The EIS needs to be assessed against that concern with a precautionary approach - not with generic assurances that construction will follow industry practice.

3.3 Proximity to the Greater Blue Mountains World Heritage Area

The Greater Blue Mountains Area was inscribed on the World Heritage List in 2000 for its Outstanding Universal Value, including its biodiversity and eucalypt diversity. Katoomba sits at

the heart of the visitor gateway to that property, and Narrow Neck is one of the most recognisable peninsulas of the property.

Under the Environment Protection and Biodiversity Conservation Act 1999 (Cth), actions likely to have a significant impact on the Outstanding Universal Value of a World Heritage property are controlled actions regardless of whether the project site is inside the listed boundary.

A nine-building, four-to-five storey development on the escarpment edge, visible from numerous World Heritage vantage points, warrants rigorous consideration against that framework and should not be waved through on the basis that the site itself is not formally listed.

The Mayor, Cr Mark Greenhill, has put it plainly in saying the development will “blight the landscape from almost every vantage point in Katoomba”. I agree with that assessment as a regular walker of these landscapes.

3.4 Habitat, connectivity and the “not significant vegetation” claim

The EIS claim that the site “does not contain extensive significant vegetation” should not be accepted without independent verification. I ask the consent authority to:

- Require an independent, on-site ecological assessment (including targeted fauna surveys at appropriate times of year) rather than relying on the proponent’s consultants;
- Assess the site explicitly against Biodiversity Conservation Act 2016 (NSW) triggers and the Biodiversity Offsets Scheme, given the scale of vegetation removal proposed;
- Require mapping of habitat connectivity between the site, Narrow Neck, Katoomba Creek and the World Heritage Area, not just a count of hollow-bearing trees on the parcel itself.

4. Scale, height and character grounds

4.1 The proposal is not “not dominant” - it is dominant by design

The EIS asserts the built form is “not dominant within the streetscape or landscaped setting of the locality”. That assertion is inconsistent with the proposal’s own description:

- Nine buildings on a single site.
- Predominantly four storeys, with one building up to five storeys.
- 218 dwellings plus 52 serviced apartments - effectively 270 residential units on one parcel.
- Removal of 134 of the 206 existing trees, i.e. removal of the very canopy that could soften the bulk.

In a suburb where the overwhelming built pattern is detached dwellings of one to two storeys set in treed gardens, a nine-building, four-to-five storey complex is by any ordinary meaning of the word dominant.

4.2 Inconsistency with Blue Mountains LEP 2015

The Katoomba Precinct objectives in clause 7.6 of Blue Mountains Local Environmental Plan 2015 seek to retain a specific visual and landscape pattern along the Narrow Neck ridgeline - “tall canopy trees as a scenically distinctive backdrop”, and “residential buildings within garden settings”.

A nine-building complex at four to five storeys, with two thirds of trees removed, is the opposite of “residential buildings within garden settings that retain the existing pattern of tall canopy trees”. The proposal is not a marginal departure from the LEP - it is a structural departure from it.

Blue Mountains Conservation Society has stated that it “supports appropriate housing that aligns with local planning rules and the Blue Mountains LEP (Local Environmental Plan)”. I share that position. I am not opposed to housing. I am opposed to this proposal because it is incompatible with the planning framework that has been built up over decades specifically to protect the character of Katoomba in a World Heritage setting.

4.3 Visual and landscape impact

The Narrow Neck ridgeline is visible from a wide range of public vantage points in and around Katoomba, including walking tracks, lookouts and streetscapes. The proposal places multiple four-storey built forms directly on that ridgeline. The visual impact is not speculative - it is a direct consequence of site selection and building envelope.

The EIS argues the buildings are “well articulated” and use a “considered material palette”. Articulation and materials do not cure a fundamental problem of scale on a sensitive ridgeline. They soften it, at best, in close-up views. In the middle and long distance views that define the Katoomba landscape experience, bulk and height are what register.

4.4 Character: “established and desired future character”

The EIS claims consistency with the “established and desired future character of the area”. The established character of upper Katoomba is low-rise residential set within tall-canopy bushland, on the rim of a World Heritage Area. The desired future character, as expressed through the LEP, Council planning controls, and repeated community engagement, is to retain that pattern.

Cr Greenhill has stated that the Council is “exceeding its housing targets”. I take that as an indication that the purported public benefit of the SSD pathway - unlocking housing supply that would otherwise not be delivered - is weak in this local government area. If housing targets are being met, the planning case for overriding local controls is correspondingly weaker.

5. Requested outcome

I request that the consent authority:

4. Refuse the application in its current form;
5. Require any future proposal on this site to be assessed against Blue Mountains Local Environmental Plan 2015, including clause 7.6 (Katoomba Precinct), rather than through an SSD pathway that displaces those controls;
6. Require an independent ecological assessment of the site and its role in habitat connectivity to the Greater Blue Mountains World Heritage Area, not a consultant assessment commissioned by the proponent;
7. Require an independent hydrological and water quality assessment of impacts on the Katoomba Creek catchment, pre- and post-construction;
8. Require that any revised proposal demonstrably retains the existing pattern of tall canopy trees on the Narrow Neck ridgeline, as required by the LEP, rather than removing approximately two thirds of the existing trees.

I also support the positions already on record from Blue Mountains City Council, the Blue Mountains Conservation Society, and the Member for Blue Mountains, the Hon. Trish Doyle MP.

6. Closing

This is the wrong proposal in the wrong place. Katoomba needs well-designed, appropriately scaled housing that works with its World Heritage setting, its LEP, and its community. SSD-86456706 delivers none of those things.

I ask that this submission be treated as a formal objection and recorded on the file for this application. Please contact me if you need any further information about my objection.

Yours sincerely,



Jon Dee

Australian of the Year 2010 (NSW)

Founder, Planet Ark, Rock Aid Armenia

Co-Founder, National Tree Day, One Tree Per Child

7. Sources and references

NSW Planning Portal - SSD-86456706 project page: planningportal.nsw.gov.au/major-projects/projects/residential-flat-buildings-142-150-narrow-neck-road-katoomba

Blue Mountains Local Environmental Plan 2015, clause 7.6 (Katoomba Precinct): classic.austlii.edu.au/au/legis/nsw/consol_reg/bmllep2015379/s7.6.html

Blue Mountains Local Environmental Plan 2015 (full): legislation.nsw.gov.au - EPI 2015-829

Greater Blue Mountains Area - UNESCO World Heritage Centre: whc.unesco.org/en/list/917/

Greater Blue Mountains Area - Commonwealth Department of Climate Change, Energy, the Environment and Water: dcceew.gov.au/parks-heritage/heritage/places/world/blue-mountains

NSW Housing Delivery Authority pathway overview: planning.nsw.gov.au - Housing Delivery Authority

Blue Mountains City Council - Have your say on the Narrow Neck Road proposal: bmcc.nsw.gov.au media centre

Blue Mountains City Council - Council objects to "grossly inappropriate" proposal: bmcc.nsw.gov.au media centre

Blue Mountains Conservation Society campaign - Katoomba SSD: bluemountains.org.au/campaigns/Katoomba-SSD.shtml

Blue Mountains Gazette coverage (Damien Madigan, 17-21 April 2026) - 218 dwellings spark fears for Blue Mountains: bluemountainsgazette.com.au/story/9226159,