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To whom it may concern

SSD-86456706 – proposed short-term rental apartments, restaurant and residential flat buildings at 142–150 Narrow Neck Road, Katoomba and rezoning

On behalf of Wilderness Australia (WA), I write to object to SSD-86456706. WA believes that this proposal for high-density development should not be permitted to override local planning provisions using a spot rezoning. While such provisions may be appropriate to address a crisis in Sydney's accommodation supply, they are inappropriate when applied to a regional local government area adjacent to Australia's most popular national park and part of a World Heritage Area.

Incompatibility with Strategic Planning

Katoomba is 100 km from the Sydney CBD. At such a distance, the site is unsuited to high-density residential development, being out of character with other dwellings in the vicinity and with Katoomba's status as a nature-focused tourism hub.

The site is poorly located for a spot rezoning to allow high-density development. The proposed site is greater than 2 km from the railway station and the regional shopping centre at the town centre. It is, by definition, not a 'well-located' site and is serviced by narrow roads.

Inappropriate gateway location

Narrow Neck Road is promoted by existing prominent street signage as a tourist gateway drive to nearby attractions of the World Heritage Area. Visitors coming

to Katoomba seeking relief from the intense development in Sydney would be disconcerted by a high-density development on the tourist route and so near to various lookout points, such as Cahills Lookout and Eagle Hawk Lookout.

Regulatory Consistency

Provisions in the Blue Mountains planning instrument seek to require the urban environment to be as compatible as possible with the surrounding World Heritage Area. These provisions should prevail over housing priorities to protect the integrity of the World Heritage property, which is the primary tourism asset of Katoomba.

The Blue Mountains Local Government Area (LGA) was exempt from the low and mid-rise housing mandates due to its environmental constraints. This LGA should also be excluded from the HDA State Significant Development pathway to avoid compromising the unique natural heritage values of this area.

The proposed development is not a minor variation of the planning rules governing built development. The proposal and spot rezoning will more than double the height and density limits in the local environmental plan. Furthermore, the practice of containing stormwater pollution on-site is dispensed with; instead, the proposed stormwater controls for the development are to be located on adjoining public parkland.

Failure to Deliver Affordable Housing

House prices in the Mountains are lower relative to those in Sydney. The allegation in the Environmental Impact Statement (EIS) that the development will help deliver much-needed housing is contradicted by market data. Modern builds in Katoomba typically command a 15 to 25 per cent premium over the existing median sale price. With a current median apartment price of approximately \$650,000, new one-bedroom units are projected to start at \$550,000 to \$675,000, and two-bedroom units near \$900,000. A three-bedroom apartment would perhaps sell for \$1,050,000 to \$1,400,000 or more, and comparable to *The Escarpments* villas adjoining the site.

Even with a 15 per cent discount for social housing, these units will not be cheaper than existing market-entry cottages or older apartments. The likely outcome of approval is not “affordable housing” but an elite “lifestyle ghetto” for investors, affluent work-from-home residents and retirees, offering no relief to the local demographic requiring affordable housing.

Furthermore, Katoomba apartment prices are unlikely to rise faster than Sydney prices, as the council is meeting its state housing targets by undertaking appropriate developments that are subjected to existing planning provisions.

The proposal has a major a short-term rental component

This controversial submission should be passed on to the Independent Planning Commission (IPC) to ensure adequate scrutiny of its various aspects. The proposal has a high component of its accommodation allocated to the “Airbnb” and short-stay markets. These tourism accommodation markets are outside the remit of the HDA.

Investor Market Focus

Potential apartment buyers will include investors hoping to capitalise on the Airbnb and short-stay markets. These investors will seek to acquire the serviced apartments as well as those upper-floor apartments with good views. Many of the proposed apartments would be made available for short-stay serviced and unserviced accommodation for the tourist market.

While the rental yield for apartments in Katoomba is less than 4 per cent, short-term tourism accommodation offers higher yields and can command premium prices during special events.

Further displacement of tourists away from fully serviced accommodation

A proposed input of hundreds of short-stay apartments would put downward price pressure on the fully serviced accommodation offered by establishments like the Carrington Hotel, further eroding Katoomba’s traditional employment base.

Social conflicts

Disputes between young tourists and long-term lifestyle occupants may oblige local police to attend to noisy parties. The council will be required to address several traffic management issues arising from heavier use of narrow local roads along the most direct route to the town centre. The council will also be required to attempt to resolve difficult conflicts on the adjoining Planetary Health Precinct Parklands, ranging from greatly increased dog walking to preventing damage to its endangered swamps.

Stormwater pollution problems are significant

The proponent’s stormwater strategy is an unacceptable imposition on public land, as landholders are responsible for managing stormwater on-site. The council-owned water park features in the Planetary Health Precinct and Parklands are to be repurposed as sediment detention basins. These mature water park features shall receive considerable amounts of sediment and muck from the proposed site.

The proposal to use the Planetary Health Precinct for three stormwater control ponds is unfair. A State Significant Development proposal should not be allowed to dump its stormwater wastes upon neighbouring public parkland.

Blue Mountains City Council, on behalf of its community, has a common-law right to ensure residents have access to continued peaceful enjoyment of the Planetary Health Precinct and Parklands. WA believes that the council is entitled to compensation for the loss of public enjoyment of these parklands due to the conversion of water park features into stormwater retention ponds.

Technical presentation errors and omissions

The proponent's stormwater management strategy is presented in a confusing manner on page 74 of the EIS report. The orientation of Figure 26, the Locality Plan (Stormwater), is reversed in Figure 27, the Catchment Plan. This prevents a reasonable understanding of the way stormwater flows from the proposed development site into the Planetary Health Precinct.

Plans for the stormwater detention basins 1A, 1B and 2, as well as associated drains shown in Drawing S703 of Appendix V, are missing from the documentation. The omitted retention basin drawings RL-0045-01-C03 and RL-0045-01-C04 mean that these critical stormwater management drawings cannot be reviewed. These plans may reveal the extent of works planned on the Planetary Health Precinct and Park by the proponent.

The excessive area of hardened surfaces within the proposal site did not allow room for on-site sediment controls and, as a result, important swamps downstream may be compromised. The undisclosed works in the omitted drawings may compromise the existing water park features on public land or be insufficient to protect downstream environments.

Ecological impacts and visual impacts on the World Heritage Area

Ecological impacts and visual impacts on the World Heritage Area must be considered separately on their own merits, with close attention to any impacts on the World Heritage property. The HDA should not place any weight on a court-issued development consent from the 1990s that did not consider the responsibilities created by World Heritage listing. The HDA pathway should not be used to bypass protections that have existed for 26 years to protect the World Heritage property and its integrity.

The proposed site as shown in this figure is in a visually prominent location, as indicated by the figure below:



Figure indicates that the proposal site is half covered in bushland and overlooks the Council's Planetary Health Precinct and Parkland with significant water park features

The proposed site overlooks the council's Planetary Health Precinct and Parkland with significant water park features. Although Appendix AC alleges there is no impact on the World Heritage values of the area, it does not adequately consider the ecological or visual impacts of the development on the World Heritage property.

Threat to endangered species in the World Heritage Area

Stormwater runoff should be retained on-site to prevent downstream scouring in the headwaters of the Kedumba River that flow over Katoomba Falls, where a critically endangered Dwarf Mountain Pine (*Pherosphaera fitzgeraldii*) population is located. Any sediment not captured by this proposal would go over the falls, potentially harming the Dwarf Mountain Pine community.

The increased sediment load arising in the stream from this proposed development will require the council to more frequently clean its gross pollutant trap on Cliff Drive above the falls. Cleaning the trap costs \$50,000 each time because the material must be disposed of at an appropriate waste facility. This trap helps to protect the Dwarf Mountain Pine and the World Heritage Area, so increased sedimentation could be another cost burden transferred to the council by the proponent.

Visual impacts omitted from the assessment

The visual impact analysis in Appendix AM does not examine views of the site when seen *from* the World Heritage Area, such as from Mt Solitary. It follows that the proponent cannot claim there is no impact if they have not assessed for visual impact potential on views from the World Heritage Area looking towards the massed collection of nine apartment blocks.

The restaurant block and at least three of the apartment blocks will obtain views of Mt Solitary, and the EIS reports have not adequately addressed the visual impact of the elevated frontage of the proposal along its south-eastern boundary. As a key part of the marketing strategy is to sell apartments to investors for the short-stay tourist market, it is likely the development will have an impact on views *from* the World Heritage Area. The proponent does not intend to screen out sandstone escarpment views or views over the Planetary Health Precinct from the apartments. If one can see sandstone escarpments from the third and fourth levels of massed apartment blocks on the development site, the development will be visible *from* the cliff edges above those escarpments.

Other impacts on the Planetary Health Parklands

The proponent's disinterest in preserving the natural environment is shown by the proposed removal of 134 trees and the retention of only two exotic pine trees on-site. Almost all of the bushland on the proposed site shall be removed by the construction of the nine apartment buildings. This bushland covers approximately half the site, yet it barely rates a mention in the EIS.

The proposal seeks to use exotic plants in a weak attempt to screen the development from the Planetary Health Precinct and Parklands. Draping verandas with exotic vegetation and using exotic hedges is not in keeping with the intent of the Planetary Health Precinct. Such plant drapery should not count as appropriate screening. The proponent does not intend to undertake effective bush regeneration to remove environmental weeds from its site, particularly privet, ivy, broom and blackberries.

Threat to endangered swamps from improper stormwater management

The increase in sediment and altered hydrology from this proposed development could threaten endangered downstream peat swamps in the Planetary Health Precinct and Parklands. Altered stream flows could wash away the peaty swamp soils and erode swamps to bedrock. This process of altered stream flows cutting down through a swamp will, in turn, accelerate the drainage of the affected endangered swamps. The peaty soil could then dry out and decompose, releasing tonnes of carbon dioxide. Such changes would also result in even

greater weed invasion in the swamps of the Planetary Health Precinct and Parklands.

The proposed agglomeration of apartment blocks is simply too big for Katoomba

The proposal is too large and intrusive in the local landscape. The nine large buildings will loom over the Planetary Health Precinct and Parklands, diminishing its scale relative to this large development proposal. The occupants of these buildings will use the Planetary Health Precinct Parklands as their backyard. This future use will compromise and constrain future options for the precinct—such as increasing dog walking instead of educational, cultural, botanical and artistic pursuits associated with appropriate tourism development.



*Too big – no massed buildings of this bulk and scale exist in South Katoomba
- it must compromise user experience of the Planetary Health Precinct and Parklands*

The idea of this precinct as a national example of a community-focused, environmentally sustainable precinct will be completely cancelled if this proposal is approved. Any sense of space and release from high-density urban environments for the council's site will be destroyed. No massed buildings of this bulk and scale exist in South Katoomba, and it must compromise the user experience of the Planetary Health Precinct and Parklands.

Traffic management is left for the council to resolve

Hundreds of vehicle movements per day would be generated by the proposal. Many of these movements shall take the most direct route to the nearest shops in Katoomba town centre, which is via Stuarts Road, Peckmans Road, Neal Street and then Waratah Street. This route is completely unsuited to additional traffic flows, as it has two pinch points. One narrow pinch point is on Stuarts Road and will require additional tree clearing, causing a loss of street amenity. The other narrow pinch point is on Neal Street between Loftus and Cascade Streets, where the road is effectively one lane wide.

This road should not be burdened with additional traffic, as it will become increasingly difficult for cars to pull over to allow oncoming traffic to pass. Resolution of this traffic problem will require the creation of unpopular one-way streets and complex traffic flow workarounds that will impact on the residents of Neal, Loftus and Cascade Streets.

Summary of failure of the EIS and proposal

Uncertainty of affordable housing: The proposal is not just to build long-term accommodation and none of which is likely to be offered at below market prices, but will also build apartments for the short-stay and “Airbnb” accommodation markets.

Inadequate visual assessment: The visual impact assessment did not consider the frontal view towards the south-east and the World Heritage Area, including Mt Solitary, of the four-storey apartments, restaurant buildings and underground car park proposals.

No guarantee of protection: There is no guarantee of protection for endangered species and communities from increased stormwater runoff.

Inadequate open space and on-site controls: The proposal does not ensure sufficient open space on-site or provide on-site pollution controls.

Inadequate environmental and infrastructure provisions: The proposal lacks an effective bush regeneration program, adequate screening with native vegetation or infrastructure provisions for the most direct route to the town centre to alleviate the traffic safety problems arising from hundreds of additional vehicle movements a day.

No compensation work for damage: The proposal does not intend to commission extensive bush regeneration and weed removal works on the Planetary Health Precinct and Parklands in compensation for the additional damages caused by its proposed use of the precinct as its backyard, its engineering works and the visual impacts of its nine large building blocks.

Existing consent not handed in: The proponent did not offer to relinquish interests in its existing development consent—for example, the possible use of the former golf course and club house or the proposed construction of a hotel.

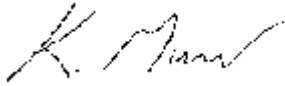
Conclusion

The proposal cannot add to existing building stock at or below the median price for apartments in Katoomba. The HDA should refuse consent for this development and associated spot rezoning proposal given its potential impacts on the community, the Planetary Health Precinct, threatened species, the World Heritage Area and loss of bushland on-site. If the HDA should not move to refuse the development, Wilderness Australia requests that this proposal be referred by the HDA to the IPC for a rigorous and

transparent review, because a significant component of the apartments will be for the short-term and “Airbnb” markets that are outside the remit of the HDA.

Thank you for the opportunity to comment.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'K. Muir', with a stylized flourish at the end.

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