

The NSW Department of Planning, Housing and Infrastructure

Attention: Caitlin Hopper, Planner

Submitted via NSW Planning Portal

Application No. SSD-86456706

Re: FORMAL OBJECTION — State Significant Development Application SSD-86456706

Proposed Residential Flat Buildings at 142–150 Narrow Neck Road, Katoomba NSW 2780

1. Introduction and Standing

I am a resident of a residential street immediately adjacent to the proposed development site at 142–150 Narrow Neck Road, Katoomba. I write to formally and strenuously object to the above-referenced State Significant Development application in its current form.

I acknowledge the NSW Government's obligation to address the housing crisis. However, the scale, density, and location of this proposal are wholly inappropriate for the unique environmental, geographic, and community context of Katoomba. The use of the Housing Delivery Authority (HDA) fast-track pathway to override decades of carefully considered local planning controls sets a dangerous precedent that this submission respectfully but firmly contests.

My objections span the following grounds:

1. Abuse of the TOD and Low and Mid-Rise Housing Policy frameworks for commercial gain
2. Inadequate, unsafe, and unreliable public transport
3. Unsafe and unsuitable road and pedestrian access conditions
4. Serious bushfire evacuation risk
5. Significant environmental and ecological damage
6. Adverse impact on tourism and the local economy
7. Incompatibility with the Blue Mountains' unique planning context
8. Accountability for risk assessments made in the EIS

2. Abuse of NSW Housing Policy Frameworks for Commercial Gain

This is the submission's most fundamental objection. The proponent appears to be exploiting NSW Government housing policy frameworks - specifically the Transport Oriented Development (TOD) Program and the Low and Mid-Rise Housing Policy - as a pretext to maximise commercial return from a uniquely valuable site. The development does not genuinely meet the intent, criteria, or purpose of either policy. On the contrary, both policies formally and explicitly exclude the Blue Mountains Local Government Area from their scope.

2.1 The Blue Mountains LGA Is Explicitly Excluded from Both Policies

This point cannot be overstated. The NSW Government's own Low and Mid-Rise Housing Policy exclusions documentation states unambiguously:

"All land within the Blue Mountains Local Government Area [is excluded]. Most residential land in this Local Government Area is bushfire prone and has environmental constraints. There is also an evacuation risk present throughout the local government area due to the single highway entry and exit. Any increase in dwelling capacity within this Local Government Area requires a strategic approach and technical studies to effectively examine and manage risks."

Similarly, the State Environmental Planning Policy (Housing) 2021 specifies that the Low and Mid-Rise Housing Policy does not apply to land within the Blue Mountains Local Government Area. The Hawkesbury, Blue Mountains and Wollondilly LGAs were specifically excluded from both stages of the Low and Mid-Rise Housing reforms - Stages 1 and 2 - due to their heightened risk of bushfire, flooding, limited evacuation routes, and environmental constraints.

Furthermore, the TOD Program's 37 nominated stations - the specific rail stations around which increased density is supported - do not include Katoomba Station. The TOD Program was designed for well-serviced metro and suburban stations in flat, urban areas with adequate infrastructure capacity. Katoomba does not meet any of these conditions.

2.2 The Proponent Cannot Genuinely Meet TOD or Low and Mid-Rise Policy Criteria

The TOD Program's stated assessment criteria require, at minimum:

- Transport, water, and wastewater capacity to support additional growth - not met. Bus services are severely limited (see Section 3) and no binding transport infrastructure commitments have been secured.
- Alignment with government priorities for housing growth in appropriate locations - not met. The NSW Government has itself determined that the Blue Mountains is not an appropriate location for this type of housing intensification, as evidenced by its explicit exclusion from both the TOD Program and the Low and Mid-Rise Housing Policy.
- Capacity for additional homes near the transport station - not met. The walking route from this site to Katoomba Station is not safely or practically walkable for a significant portion of the population, as detailed in Section 3 below.
- Absence of high-risk hazard constraints - not met. The Low and Mid-Rise Housing Policy expressly excludes land with high bushfire or flood risk. Both hazards are well-documented characteristics of the Blue Mountains LGA.

2.3 The Real Motive: Commercial Exploitation of the Site's Unique Attributes

It is not coincidental that the proponent has selected this precise site. The very qualities that make 142–150 Narrow Neck Road commercially attractive to a developer - proximity to the Three Sisters, Narrow Neck Lookout, escarpment views, the World Heritage Area setting, clean mountain air, and natural beauty - are the

exact qualities that the community has invested decades in protecting, and are exactly what the TOD and Low and Mid-Rise Housing policies were never designed to exploit.

A developer wishing to build high-density apartments in Kogarah, Lidcombe, or Hamilton - the types of flat, well-serviced, infrastructure-rich locations the TOD Program was genuinely designed for - would not generate the same premium on apartment values. This site, by contrast, offers panoramic views, World Heritage proximity, and an aspirational lifestyle setting that can command substantially higher sale prices per dwelling.

The HDA fast-track pathway is being used not to serve the public interest in housing affordability and supply in appropriate locations, but to extract maximum commercial value from a site whose qualities the community has worked tirelessly to protect. The 15% affordable housing component - the minimum threshold - is being used as cover for 85% market-rate and serviced apartment units at premium prices. This is the definition of policy capture for commercial gain.

I call on the Department to look beyond the policy labels applied by the proponent and assess honestly whether this application — located in a LGA explicitly excluded from the very policies it purports to rely upon — genuinely advances the aims of the NSW housing agenda, or whether it advances only the financial interests of the development proponent at the permanent expense of this community and its natural heritage.

3. Inadequate, Unsafe, and Unreliable Public Transport

The EIS appears to rely on nominal proximity to Katoomba Railway Station as the primary justification for the development's transport credentials. This reliance is fundamentally misleading on multiple grounds: it ignores the severe inadequacy of both rail and bus services, it misapplies urban walking-distance standards to mountain terrain, and it provides no binding commitments from Transport for NSW to improve services.

3.1 Train Services Are Infrequent and Unreliable for Commuting

Katoomba is served by a single rail line, the Blue Mountains Line, which operates infrequently and is subject to significant service disruptions. Unlike the rapid and frequent rail services that characterise TOD-appropriate stations such as Sydney Metro stops, the Blue Mountains Line is a regional intercity service with headways that can exceed 30 minutes or more during off-peak periods, and is regularly affected by weather-related delays, track works, and reduced weekend timetables.

- The commute from Katoomba to central Sydney (Central Station) takes approximately 2 hours. This is not a viable commuter rail connection for the volume of residents this development would generate. Residents requiring access to Sydney employment, education, or healthcare - particularly those in affordable housing units - will face daily travel of 4+ hours and high travel costs.
- The Blue Mountains Line is a shared corridor with freight services and is prone to disruption. Unlike metro systems, there is no redundant route. A service cancellation or delay leaves residents stranded with no alternative.

- The development of 270+ dwellings will place materially increased demand on an already capacity-constrained rail service at Katoomba Station, particularly on peak weekend services during tourist seasons when platforms are already dangerously overcrowded.

3.2 Bus Services Are Critically Insufficient

The only bus service proximate to the development site is Route 686G. Its limitations are severe and structurally incompatible with the needs of a high-density residential population:

- Route 686G operates at a frequency of approximately one service every 30 minutes - far below the minimum 15-minute frequency that transit planning guidelines identify as necessary to support meaningful car-free living.
- There are no bus services in the very early morning or late evening. This renders public transport entirely unavailable for shift workers, hospitality staff, early commuters, and those returning home after evening activities - precisely the populations most likely to occupy affordable housing units.
- No alternative bus route provides coverage. Route 686G is the only option. This represents a single point of failure with no redundancy.
- The restaurant, art gallery, and 52 serviced apartments will generate visitor demand, particularly when bus services do not operate. This guarantees a car-dependent destination in a conservation-sensitive area.
- No binding, enforceable commitments from Transport for NSW to upgrade bus frequency, extend operating hours, or introduce new services have been secured as part of this application. The EIS's transport claims are therefore entirely aspirational and unenforceable.

3.3 The Walking Route to the Station Is Unsafe and Non-Standard

While the site may satisfy a nominal distance threshold to Katoomba Station, this metric is wholly inapplicable in the Blue Mountains context. The walking route involves:

- Significant and repeated elevation changes across steep and winding mountain roads, incomparable to the flat suburban footpaths for which state walking-distance benchmarks were designed;
- Narrow road widths, absent or non-compliant footpaths, and poor pedestrian lighting along sections of Narrow Neck Road;
- Blind corners and inadequate sightlines creating genuine collision risk between pedestrians and vehicles, particularly on the curves of Narrow Neck Road;
- Hazardous conditions in adverse weather - rain, ice, and fog are far more frequent and severe in the Blue Mountains than in Sydney, making walking routes that seem passable in dry conditions actively dangerous in winter;
- Inaccessibility for elderly residents, people with mobility impairments, parents with prams, and anyone carrying shopping - groups who constitute a significant proportion of any residential population.

The Blue Mountains is not like many suburbs of Sydney. Applying the same flat-urban walking distance standard used to assess stations like Kogarah or Lidcombe to mountain terrain with no safe, level pedestrian infrastructure is technically indefensible and must not be permitted to stand as the basis for this approval.

4. Unsafe and Unsuitable Road and Pedestrian Access Conditions

Narrow Neck Road, the residential street immediately adjacent to the proposed development site, and the surrounding local road network were built to serve a small number of existing residential dwellings, golf course users, and tourist pass-through traffic. They are physically incapable of safely absorbing the vehicle and pedestrian volumes that this development would generate. This is not a matter of congestion inconvenience - it is a genuine and foreseeable public safety issue.

- The roads in this area are narrow, with many sections lacking the width to accommodate simultaneous two-way vehicle traffic and safe pedestrian movement. Adding hundreds of additional vehicle trips daily from new residents, delivery services, restaurant visitors, serviced apartment guests, art gallery visitors, and tourists will create serious and ongoing safety hazards.
- Existing residents of the streets immediately adjacent to the proposed development site already experience the roads as at or near practical capacity during peak tourist periods. Adding a permanent population of several hundred residents plus commercial visitors will render the roads chronically unsafe for all users - existing residents, new residents, pedestrians, and tourists alike.
- Mountain road geometry, steep gradients, sharp bends, limited sightlines, and the proximity of the escarpment edge mean that the same traffic volume increase that may be managed safely on a flat suburban arterial road will create disproportionately severe risk on these mountain roads.
- During the construction phase alone, potentially spanning several years, involving nine buildings, significant earthworks, and the removal of 134 trees, construction vehicles, machinery, and spoil removal trucks will use these same narrow roads, creating hazardous conditions for all existing residents and pedestrians daily.
- The influx of tourists visiting the restaurant, art gallery, and educational facility will add an uncontrolled and unpredictable traffic pattern to a road that does not have the shoulders, turning areas, or pedestrian infrastructure to manage it safely.
- No credible, independent traffic and pedestrian safety assessment specifically modelling this road network and its mountain geometry appears to have been conducted. I call on the Department to commission one before any determination is made.

5. Serious and Ongoing Bushfire Evacuation Risk

The Blue Mountains is one of Australia's highest-risk bushfire regions. This is an established, repeatedly demonstrated fact - not a theoretical concern. The 2019–2020 Black Summer fires caused catastrophic destruction throughout this region.

Significantly increasing the residential population density in a peninsula geography with constrained evacuation routes is a foreseeable and avoidable risk.

The EIS states the site has been 'reclassified as non-bushfire prone.' This administrative reclassification does not and cannot alter the physical reality of the surrounding landscape, the prevailing fire weather patterns, or the evacuation geometry of this location. The NSW Government's own Low and Mid-Rise Housing Policy exclusion states that 'most residential land in [the Blue Mountains LGA] is bushfire prone and has environmental constraints' and that 'there is also an evacuation risk present throughout the local government area due to the single highway entry and exit.'

- Narrow Neck is a peninsula formation bounded by the Jamison Valley and Megalong Valley. The geometry of safe evacuation from this locality is severely constrained. Permanently adding hundreds of residents to this peninsula materially worsens mass evacuation capacity for every existing resident.
- The same narrow roads identified in Section 4 above as inadequate for normal daily traffic will be the evacuation routes in a fire emergency. Under panic conditions with simultaneous outbound vehicle movements by hundreds of households, these roads risk catastrophic gridlock.
- Serviced apartment guests, restaurant diners, and gallery visitors will have no local knowledge of evacuation routes, no personal vehicle, and no prior familiarity with emergency warning systems - creating additional evacuation complexity and delay that could cost lives.
- The removal of 134 trees does not meaningfully reduce landscape-scale fire risk from surrounding bushland. It reduces local canopy humidity, raises local temperatures, and may alter localised fire behaviour in adjacent vegetated areas.

I call on the Department to require an independent, peer-reviewed bushfire evacuation capacity assessment from the NSW Rural Fire Service, specifically modelling the cumulative population load from this development on Narrow Neck Peninsula evacuation routes.

6. Significant Environmental and Ecological Damage

The Greater Blue Mountains World Heritage Area is a UNESCO-listed property of outstanding universal value, recognised for its extraordinary biodiversity, ancient geological formations, and vast eucalypt forest ecosystems. The Katoomba escarpment, Narrow Neck Plateau, and Katoomba Creek catchment form part of the ecological landscape that supports this World Heritage listing. The proposed development threatens this value across multiple dimensions.

- The removal of 134 of 206 trees on site - a 65% reduction in existing canopy cover - directly adjacent to the residential street immediately adjacent to the proposed development site and the Katoomba Creek catchment represents a profound and irreversible loss of ecological habitat, wildlife corridor connectivity, and landscape buffering function.

- The conversion of a 1.68-hectare largely pervious and vegetated site to dense impervious built surfaces will substantially increase stormwater runoff volumes and flow velocities into the Katoomba Creek catchment, causing downstream erosion, sediment pollution, waterway habitat degradation, and increased flood risk to downstream residents.
- Native wildlife will be severely impacted beyond the site boundary. The Blue Mountains escarpment supports numerous species of native birds, reptiles, marsupials, and invertebrates, many of which use the existing tree canopy and understorey on and adjacent to this site as habitat, foraging area, and movement corridor. The destruction of 65% of the site's vegetation will fragment these corridors and push wildlife into surrounding residential areas and roads, increasing vehicle strike mortality.
- Construction noise, vibration, dust, night lighting, and ongoing operational light spill and domestic predator pressure (cats and dogs introduced by new residents) will extend ecological harm well beyond the site boundaries, affecting native fauna using the adjacent escarpment habitat.
- Threatened and locally significant species that may use this site have not been adequately surveyed. Given the proximity to World Heritage-listed ecosystems, an independent, peer-reviewed biodiversity assessment is essential before any determination.
- The proposed floor space ratio of 1.17 and building heights of up to 15.6 metres across nine buildings far exceed what the Blue Mountains LEP, developed over decades of careful environmental assessment, determined was sustainable for this site. The HDA pathway is being used to override environmental protections that exist for demonstrably good reasons.

7. Adverse Impact on Tourism and the Local Economy

Katoomba's entire economic identity rests upon its natural beauty, heritage character, and proximity to world-class scenic attractions: the Three Sisters, Narrow Neck Lookout, Echo Point, the Scenic Railway, and the Greater Blue Mountains World Heritage Area. Tourism is the primary economic driver of this community. Visitors travel from across Australia and the world, specifically to experience a place that is unlike cities and unlike ordinary suburbs - a place of outstanding natural character.

7.1 The Development Destroys the Very Attraction That Tourists Come to See

Tourists do not travel from across the world or across Australia to look at high-density residential apartment towers. They come to see ancient sandstone escarpments, forested valleys, and a landscape utterly unlike anything in a city. Nine multi-storey buildings, rising to 15.6 metres, in the viewshed of Narrow Neck Lookout and the broader escarpment landscape, will irreversibly alter the visual character that makes Katoomba a destination of international significance.

- Once built, this visual impact cannot be undone. There is no remedy if the development proves to be as damaging as every informed observer, including the elected Mayor of Blue Mountains City Council, has predicted.
- What makes the Blue Mountains uniquely valuable as a tourism destination is precisely its distinctiveness - its difference from every other urban and

suburban place. A high-density residential development of the type proposed here could exist anywhere. It destroys the uniqueness that cannot be replicated once lost.

- If this development proceeds and others follow, as the precedent logic of HDA approval in the Blue Mountains implies they will, Katoomba risks becoming indistinguishable from any other mid-density outer suburban area. When that happens, there will be no reason for tourists to choose it over any other destination, and the tourism economy that sustains every local business, employer, and worker will collapse.
- The long-term economic damage to local businesses, hospitality operators, tourism services, and residents from the erosion of Katoomba's scenic and cultural identity will significantly and permanently outweigh any short-term construction employment or additional consumer spending from new residents.

7.2 Protecting Uniqueness Is an Economic Imperative, Not Mere Sentiment

The UNESCO World Heritage listing exists precisely because this landscape is of outstanding universal value - a value that belongs not just to the residents of Katoomba but to all of humanity. The Australian Government has international obligations under the World Heritage Convention to protect the Outstanding Universal Value of the Greater Blue Mountains Area. A development of this scale, density, and visual prominence in the landscape buffer of a World Heritage Area raises serious questions of compliance with those obligations.

I call on the Department to require an independent economic impact assessment modelling the long-term effect on tourism revenues from the visual, character, and ecological impact of this development on Katoomba's key attractions, and to assess this development's consistency with Australia's World Heritage Convention obligations.

8. Incompatibility with the Blue Mountains' Unique Planning Context

The Blue Mountains Local Government Area is not a suburb of Sydney. It is a UNESCO World Heritage-listed region with unique environmental values, topographic constraints, established bushfire and flood hazard, and a Local Environmental Plan refined over more than 30 years in close consultation with the community and informed by specialist environmental assessment.

The HDA pathway was designed to address the metropolitan housing crisis in areas with underutilised land, adequate infrastructure, and genuine capacity for density. Its application in the Blue Mountains, where infrastructure is demonstrably limited, roads are narrow and dangerous, bushfire and evacuation risk is extreme, environmental values are of international significance, and the community has been formally excluded from both the TOD Program and the Low and Mid-Rise Housing Policy for all these very reasons, represents a fundamental misapplication of the policy intent.

Blue Mountains City Council has not only opposed this application but was not even consulted before the Ministerial Order was issued. The elected representatives of this community and the professionals employed to manage its planning have been

excluded from meaningful participation in a decision that will permanently alter their community. This is procedurally unjust and must weigh heavily in the Department's assessment.

9. Accountability for Risk Assessments Made in the EIS

I wish to formally place on the public record my serious concern about the reliability of certain risk assessments in the EIS, particularly those relating to bushfire classification, traffic safety, and the characterisation of the development's impacts as manageable.

Where experts, consultants, or proponents assert in a public planning document that a risk does not exist or a hazard has been mitigated to an acceptable level, and subsequent events demonstrate this assessment was inaccurate and harm occurs to residents, the environment, or public infrastructure, it is imperative that such parties are held accountable. Public planning decisions are not abstract exercises. They have consequences that fall on real people in real communities for generations.

Those who today assert that there is no meaningful bushfire risk, no evacuation constraint, no traffic safety concern, and no adverse ecological impact must understand that this submission formally records their assertions, and that if harm arises in the future from circumstances characterised as absent or managed in this EIS, the community will hold those responsible parties to account through every available legal, regulatory, and democratic mechanism.

I call on the Department to ensure:

- All technical assessments, bushfire, traffic, ecology, stormwater and heritage, are independently peer-reviewed by parties with no commercial connection to the proponent;
- Any consent conditions are binding, enforceable, and monitored, with real consequences for non-compliance; and
- The names and credentials of all consultants who provided key risk assessments are publicly recorded as part of the determination, so that accountability is possible if their assessments prove to be wrong.

10. Conclusion and Requested Actions

For the reasons set out above, I formally object to the approval of SSD-86456706 in its current form. This application fails to genuinely meet the intent of the TOD Program or Low and Mid-Rise Housing Policy, relies on both frameworks that explicitly exclude the Blue Mountains LGA, and exploits the site's unique natural attributes - the very attributes the community has worked for decades to protect, to maximise commercial profit.

I respectfully request that the Department:

9. Refuse this application on the grounds that it is fundamentally incompatible with the infrastructure capacity, environmental values, bushfire evacuation risk, tourism significance, and unique physical character of Katoomba, and

that it does not genuinely meet the criteria of the NSW housing policy frameworks it purports to rely upon;

10. If not refused, subject the application to comprehensive, independent expert assessments of: (a) bushfire evacuation capacity from the NSW RFS; (b) traffic and pedestrian safety by an independent road safety engineer familiar with mountain terrain; (c) public transport adequacy with binding, enforceable commitments from Transport for NSW; (d) long-term economic and tourism impact; and (e) biodiversity impact by an ecologist independent of the proponent;
11. Reject the application of standard metropolitan walking-distance-to-station benchmarks in this mountain terrain context, and require a qualitative assessment that accounts for actual pedestrian safety, road conditions, and infrastructure;
12. Formally engage Blue Mountains City Council as a substantive stakeholder in the assessment process, notwithstanding the HDA pathway;
13. Assess the development's consistency with Australia's obligations under the UNESCO World Heritage Convention with respect to the Greater Blue Mountains World Heritage Area; and
14. Initiate a formal policy review of whether the Blue Mountains LGA should be entirely excluded from the HDA pathway, consistent with its exclusion from both the TOD Program and the Low and Mid-Rise Housing Policy.

Planning decisions have consequences that last for generations. The residents of Katoomba and the surrounding community will bear those consequences long after this application has been determined. The community asks that the full weight of that responsibility be felt in the rigour of this assessment.

Yours faithfully,

A concerned Katoomba resident

Objection to Application No. SSD-86456706