

Objection to proposed HDA SSD housing development at 142-150 Narrow Neck Rd Katoomba (SSD-86456706)

I'm a resident of Woodford in the Blue Mountains and wish to express my strongest possible objection to the proposed housing development at 142-150 Narrow Neck Rd Katoomba.

First I want to object to the 14-day public exhibition and submission lodgement time. This is a very large and complex development with over 50 documents accompanying the EIS. This time limit is grossly unfair to the community, as is the difficulty for many people in lodging an objection – having to create an account on the NSW planning portal and not being permitted to lodge a postal response. It seems as if the NSW Government is trying to discourage public involvement in important planning decisions affecting their local area.

This is a totally inappropriate and unacceptable development for the Blue Mountains and for the proposed site in particular in terms of its significant likely adverse environmental and visual impacts, and serious traffic and bushfire issues. Approving this development will create a precedent for more inappropriate development, contrary to all the hard work by the Blue Mountains City Council and the community over decades to protect our unique city – only one of two in the world located within a World Heritage Area – through the necessary strong development controls endorsed by the NSW government. Approving this development will trash local planning controls and undermine the city's World Heritage values.

I am also confused about the purpose of this development. I thought the Housing Delivery Authority (HDA) was meant to deliver housing, yet nearly a quarter of the apartments are to be serviced apartments, clearly earmarked for tourist accommodation. This seems to me to be against the intention of HDA projects and the reason for their fast-track approval path – to deliver more housing faster. I object to the use of the HDA pathway for tourist developments, especially when the assessment of their environmental impacts have been so downgraded by the recent reforms in the NSW planning system.

Significant likely adverse impacts on the state and federally-listed vulnerable/endangered ecological community, Blue Mountains Swamps, and federally-listed critically endangered Dwarf Mountain Pine. The development will likely have a detrimental effect on water quality entering the national park and Sydney's drinking water catchment via Katoomba Falls Creek.

This could not be a worse site for generating threats to the Blue Mountains Swamps community on the adjacent site immediately downhill, which in turn feeds the Katoomba Falls catchment. The cliffline around Katoomba Falls is one of only a handful of areas supporting the federally-listed critically endangered Dwarf Mountain Pine (*Pterosphaera fitzgeraldii*). The Katoomba Falls catchment is also part of Sydney's drinking water catchment.

Swamps are particularly sensitive to changes in water quality and the surface and groundwater flows that feed them, and are prone to sedimentation from vegetation removal and soil erosion upslope. The proposed development threatens to potentially destroy the swamp through surface and groundwater disruption, and reduced groundwater recharge areas. These threatening processes include land clearing, deep excavation on the hillside above the swamp, creating high velocity stormwater from hard surfaces, and pollution by silt and hard surface runoff. At worst, the scouring effects of high velocity stormwater flows into swamps can cause bank slumping and 'collapse', as happened to the Bullaburra Swamp as a result of a badly designed water detention basin capturing water from the Great Western Highway and discharging directly into the headwaters of the swamp. Managing erosion and stormwater water quality and flow into the nearby swamp, creek system and national park is a major challenge for this development. When the Escarpments estate next to the

development site was being constructed, every time it rained a plume of eroded soil would wash down the hillside into the local waterways.

I am therefore alarmed that it appears the management of stormwater to minimise its potential adverse likely environmental impact is not taken seriously in the EIS. It proposes that stormwater be piped off-site into water bodies on the adjoining property i.e. the original small basins on the golf course immediately above the swamp. Anyone who is familiar with the golf course knows the basins could not accommodate the amount of hard surface stormwater runoff that would be generated by this development, particularly in heavy rainfall events that are becoming more frequent in the Blue Mountains. There is also no certainty that this method could 'clean' the stormwater of pollutants including silt before discharge into the swamp and local watercourses to a level acceptable to Council and Sydney drinking water catchment standards. Besides which, this adjoining land is owned by the Blue Mountains City Council. My understanding is that development controls require all stormwater to be treated on-site. The proponent's stormwater plan shifts this management problem onto the Council and ultimately mountains' ratepayers. This is unacceptable.

The Blue Mountains City Council recently invited community members to take part in the Planetary Health Bushcare group on the golf course. Participants are to learn how to regenerate landscapes to increase biodiversity and improve habitat, while enjoying the beautiful Planetary Health site and sharing great conversations with fellow volunteers. The activity provides hands-on experience in identifying native plant species and invasive weeds, and learning appropriate methods for weed treatment and removal. All tools, gloves and training are provided by Council's Bushcare team.

This seems in to the development in terms of its potential impact on the precinct this would seem to be an uphill battle against the damage caused by the development

The potentially disastrous environmental impact of this development should be grounds enough for its refusal by the consent authority.

Significant likely adverse visual impact

Residents of the Blue Mountains know the escarpment area of Katoomba very well. It's where we take local and international visitors to see the spectacular view of the World-Heritage listed Blue Mountains National Park from Echo Point, Cahill's lookout and other viewing points around the southern escarpment. I also attend events at the Blue Mountains City Council's Planetary Health Centre and Precinct which is a wonderful repurposing of the old clubhouse and golf course adjoining the property.

My understanding is that the precinct in which the development is located is protected from inappropriate development along the southern scenic escarpment by Local Environmental Plan restrictions on building height and bulk. The proposed development is twice the allowed height of 8m in this area, and will visually intrude into the skyline. There's a reason for these development controls - the development site sits on one of the highest (if not the highest) ridgelines on the western fringe of Katoomba township, next door to the also-inappropriate 'Escarpments' and 'Yarrabee' developments which were built under a 30-year-old 'zombie' development approval. The 'Escarpments'/'Yarrabee' complex is clearly visible from the south-facing viewing platform at the Blue Mountains Cultural Centre where many local and international tourists visit. Given the steep slope of the hill on which the development will sit, the appearance will be of some 7 storeys in height, given the stacking of buildings behind and uphill of each other. That doubles the intrusion of the Escarpments/Yarrabee into the skyline from that viewing point as well as others. In other words, this development will be an eyesore – having a significant likely adverse visual impact from many lookouts and vantage points in Katoomba e.g. Echo Point, Cahill's Lookout, Narrow Neck, from points in Leura, Wentworth Falls and beyond, and from *within* the World Heritage Area. The

development will therefore also diminish World Heritage scenic values. I believe the proponent's Visual Impact Statement understates the adverse visual impact.

This building-stacking effect will be most noticeable from the Planetary Health Precinct (golf course) immediately adjoining, and looking uphill to, the development. There are particularly shocking architectural drawings in Appendix D of the EIS showing the stacking effect as seen from the eastern and south-eastern elevations which will confront visitors to the Planetary Health Centre and Precinct. The development will appear as a 7-storey wall of glass and bricks oppressively looming over the Precinct. There is a cruel irony in the Council's objectives for the Planetary Health Precinct including: "To develop and demonstrate innovative water management as integral to restoration, recharge, stormwater management, the design of infrastructure and site activations"; "To develop the site as an exemplar of Planetary Health, modelling social, economic and environmental (built and natural) sustainability outcomes, as a world class destination for learning and innovation" (BMCC Precinct Plan. Planetary Health Precinct & Parklands. October 2023). Approving this development would make a mockery of the Council's and community's vision for the precinct to be a demonstration site for the Blue Mountains Sustainability Model.

Traffic impacts and bushfire risk

Residents and Blue Mountains locals are familiar with the already congested road network and poor road conditions in this part of Katoomba. Roads are winding, narrow and without shoulders. The area is frequented by a growing number of tourists and tourist buses visiting various lookouts and scenic points in the area, and by a growing number of residents in the Escarpments/Yarribee estates. This will be exacerbated by a new large 'zombie' housing subdivision nearby, presently under construction. Traffic and parking chaos can also regularly occur from the nearby Scenic World during holiday periods and, at certain times of the year, large gatherings at the Katoomba Christian Convention Centre in the vicinity. In other words, this area is already a traffic and parking nightmare and will only get worse from the proposed development.

To put several hundred new residences and serviced apartments (plus their cars or transport vehicles) into this area is therefore irresponsible and especially dangerous during bushfires. Locals remember the large fire at Cahill's Lookout nearby a few years back where houses were lost. The Blue Mountains LGA is one of the most bushfire prone areas in Australia, increasingly so due to climate change. The development site could easily be surrounded by fire and cut off during bushfire. Evacuation out of the area could be easily hindered or blocked completely due to congestion on the inadequate roads, accidents on the road due to lack of visibility (smoke) and so on.

The Blue Mountains LGA was excluded from the NSW Government's low- and mid-rise housing reforms in 2024 precisely because of the bushfire risk and aversion to putting even more people into harm's way.

I urge the consent authority to refuse approval of this development for all the reasons above (and more)

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