

Submission opposing development proposal and request for BMCC exemption from the HDA

Proposed development address: Nos. 142–150 Narrow Neck Road, Katoomba NSW 2780

I am writing to strongly object to the proposed State Significant Development at 142–150 Narrow Neck Road, Katoomba. High-density buildings are fundamentally incompatible with the quiet residential character of this area and the community values of the Blue Mountains region. The proposal poses significant risks to our local environment, infrastructure, and the wellbeing of residents. A short-term holiday accommodation complex is not appropriate within this residential neighbourhood. There are many existing facilities in the Upper Blue Mountains that already service this need, and many better-suited locations for any new development.

I urge the Minister to exempt the Blue Mountains from the Housing SEPP / HDA pathway. The Housing Delivery Authority (HDA) powers, while intended to address housing supply issues, do not take into account the distinctive ecological and heritage significance of our area, nor the bushfire risks and infrastructure limitations we face. Imposing statewide planning controls would undermine the careful, locally informed planning that Blue Mountains City Council has developed over many years. The development planned for this site is essentially short-term tourist accommodation through the proposed 'Blue Mountains Alpine Retreat' centre. **Using the HDA as a pathway to approve this overdevelopment for non-local housing purposes is disingenuous.**

Furthermore, **I strongly oppose the Local Environmental Plan (LEP) rezoning application.** The current Blue Mountains LEP was made through community consultation and public submissions and was then determined by Council as being in the best interests of the community. Approving this rezoning would set a dangerous precedent, opening the door to large-scale developments that are clearly unsuited to our region. The current zoning exists to protect our natural environment, maintain the character of our towns and villages, and ensure that development occurs in a sustainable and considered manner.

The EIS states that neighbouring homes have a current maximum zoning height of 5.5 to 8 m. Increasing this height to 15.6 m would significantly change the visual character of the neighbourhood. When purchasing our home on Narrow Neck Road, we did so with the understanding that the current LEP zoning would dictate the nature of any future development of this site. **This proposed rezoning, without proper community consultation, is objectionable.**

I reject the relevance of the statement in the EIS that the site is 1.6 km (aerially) and 2 km (walking) from the town centre. It is approximately 3.5 km from the intersection of Narrow Neck Road and The Escarpments Road via the main roads. No visitors or residents of this site will realistically walk or cycle this distance: it is steep, there is no footpath, and the mountain weather is often inclement. Yes, there is a bus, but realistically most people will drive. A development that genuinely aims to create affordable housing needs to be closely located to the town centre and train station.

If there is to be any high-density housing in Katoomba in the future, it should be within the current urban city-centre footprint. There are many old and run-down buildings within <1 km

of the train station that could be purchased and rebuilt to support both affordable housing (with excellent access to public transport) and appropriately located short-term tourist accommodation. Developing 142–150 Narrow Neck Road does not support the urban renewal and investment in the Katoomba town centre that is urgently required.

The EIS makes a height comparison with The Carrington Hotel, which is a heritage site located on a high point in the town centre. **To suggest that the proposed development is visually acceptable because it is the same height as heritage site of The Carrington is inappropriate.** The Carrington Hotel is in the centre of town, surrounded by buildings of a similar era and character. The proposed development comprises nine four-storey buildings in a quiet residential neighbourhood of family homes—there is no meaningful comparison.

The current number of homes along residential Narrow Neck Road (~2 km) is approximately 126 properties. Adding another ~200 dwellings within this one site would significantly increase the number of residential vehicles using Narrow Neck Road. **The EIS does not address how this will affect the safety of residents as we enter and reverse out of our driveways,** particularly on the blind corner near the intersection of Narrow Neck Road and The Escarpments Road. This is an accident waiting to happen, and the community will pay the price.

The figures provided in the EIS to estimate **the amount of under-ground parking required appear insufficient.** As noted above, most residents and visitors will rely on private vehicles to access this site. We do not want vehicles parking on the nature strip opposite the development. Not only is this visually intrusive, it also creates a dangerous situation by reducing sightlines when entering and exiting driveways along Narrow Neck Road. The only reason less parking would be required is if a large proportion of people are arriving by tourist coach—in which case I reaffirm my earlier point that this development is a tourist facility, not a residential development, and should not be advanced via the HDA process. The request to reduce floor sizes to create many studio rooms also supports this intention.

I reject the claim that this development poses no threat to access and egress during a bushfire emergency. In reality, people will attempt to drive out along Narrow Neck Road towards the Great Western Highway. This is the direction away from the south-west, where a bushfire is most likely to come from given the location of surrounding bushland and the prevailing winds on this ridgeline. One vehicle accident due to smoke-reduced visibility, a fallen tree, or an active fire along this stretch of road could trap vehicles and put lives at risk.

I do not accept the proposal to remove 134 trees from a total of 206 on the site (65%). This strip of remnant trees along Narrow Neck Road must be retained as habitat for local birdlife, small mammals, reptiles, and insects. Despite the report stating that the value of the fauna habitat is low, I know these animals use this vegetation because I have seen them myself. There should also be consideration for the protection of the flora itself, not just its habitat value. This stand of trees also provides an important visual buffer between the four-storey buildings and existing homes across the road. Yes, some of the trees are dead or in poor health; however, this natural process contributes to the formation of tree hollows used for nesting and shelter (including by birds and possums). The EIS landscape plan indicates that much of this strip of native vegetation would be removed and replaced with deciduous trees. This is the wrong approach: the remaining native vegetation should be supported through replanting of local native plant species. These can be provided by the plant nursery of the Blue Mountains Wildplant Rescue Service Inc, which is located down the road.

As local residents, we are dreading the commencement of construction. We have only just had a reprieve after the completion of The Escarpments, and now the noise and construction traffic will recommence. The EIS states it will take three years to complete. That is three years of stress and disruption, impacting our health and wellbeing. What compensation will we receive if we need to soundproof the front of our home—especially the bedrooms—so that we are not woken at 6:30 am by idling trucks outside our house? How will the Government stop tradies from parking their trucks and vans on our front lawn? How do we stop them from blaring music across the whole neighbourhood while they work? We moved to the Upper Blue Mountains for peace and quiet and to be in nature. We will not be able to sell our house during construction if we decide we need to move. Our dream is turning into a horror show.

Conclusion

- I object to the proposed development and the associated LEP rezoning for 142–150 Narrow Neck Road, Katoomba.
- The proposal is inconsistent with the existing LEP zoning and the established low-density residential character of the locality, and would create an adverse precedent for similar site-specific upzonings in the Blue Mountains.
- The built form (including the proposed height and bulk) is not compatible with surrounding development and would unreasonably impact local amenity and visual character; comparisons to town-centre heritage buildings are not relevant to this residential setting.
- The site is not suitably located for a development of this intensity: it is not practically walkable to the town centre for most residents/visitors, and the proposal is therefore likely to generate high levels of private vehicle use, with resultant traffic, driveway safety, and parking overspill impacts on Narrow Neck Road.
- The bushfire risk context and evacuation/egress constraints are not adequately addressed in the EIS, noting reliance on Narrow Neck Road and the potential for congestion, reduced visibility, road blockage, or incident-related closure during an emergency.
- The extent of vegetation removal (including the loss of established native trees along Narrow Neck Road) would result in avoidable impacts to biodiversity values, habitat connectivity, and the existing landscape buffer for adjoining residences.
- The construction phase impacts (duration, noise, heavy vehicles, and on-street parking by workers) are likely to be significant and have not been adequately mitigated given the residential context.

For the reasons set out above, I request that the consent authority refuse the proposed State Significant Development and refuse the associated LEP rezoning. If the proposal is being advanced through an HDA/Housing SEPP pathway, I submit that this should not be used to facilitate an outcome that functions primarily as short-stay tourist accommodation in a residential area. Any future higher-density or affordable housing outcomes for Katoomba should be directed to appropriately zoned sites within the existing town-centre footprint, close to transport and services.