

Submission – SSD-86456706

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

I am a resident of Stuarts Road, directly adjoining the golf course site, and I object to the proposed development.

This objection is not to housing growth or to higher-density living. Additional housing supply is necessary, and well-located apartment development is an essential part of that response—and I approve of better-planned residential developments in the adjacent lot (The Escarpments) and in the old dairy (21 Stuarts Rd) on the opposite side of the golf course. The issue here is not whether density should occur, but whether it is being deployed in a way that is coherent with the objectives of good planning and effective housing policy. **In this instance, it is neither good planning nor effective housing policy.**

The proposal concentrates a substantial number of dwellings—over 200—on a site that lacks the defining characteristics that typically justify that level of density. The development is neither transit-oriented nor closely integrated with services, employment, or retail centres. Pedestrian access is limited, basic infrastructure such as continuous footpaths is absent, and the distance to key amenities is such that most trips—and in fact all trips to the closest train station—will be car-dependent. This is not a marginal shortcoming; it goes to the core rationale for permitting higher-density housing in the first place.

When density is located in areas without adequate accessibility, it does not deliver the usual benefits associated with urban consolidation. Instead, it generates additional traffic, increases infrastructure pressure, and imposes ongoing environmental and social costs. In effect, it is density without efficiency.

The scale and built form proposed here further amplify the mismatch. Nine four-storey buildings represent a concentrated uplift that sits uneasily within the physical and strategic context of Katoomba. This is not incremental infill or a transition in built form; it is a step-change in intensity that is not supported by corresponding infrastructure or planning justification, and completely reshapes the characteristic of the town and its main economy—tourism. I echo here the words of BMCC mayor: the submission is “grossly inappropriate for our Blue Mountains World Heritage region.”

Risk considerations also warrant closer scrutiny. The site is accessed via a limited road network in a bushfire-prone area. Introducing several hundred additional residents into a location with constrained evacuation options raises questions that go beyond routine design mitigation and speak to the fundamental suitability of the site for this scale of development.

Environmental impacts are similarly material. Increased site coverage will affect drainage and runoff towards the remaining swampland at the head of a watercourse which flows to Katoomba Falls and into the Jamison Valley. I note that the protection of this swampland is a significant part of the council Precinct Plan Former Katoomba Golf Course. Furthermore, the

visual and ecological consequences are heightened by the site's proximity to a World Heritage landscape. These are not incidental effects but central considerations in a location where environmental quality underpins both community identity and, as I stressed before, economic activity.

The choice of planning pathway is also significant. This proposal is being advanced as State Significant Development following a Ministerial call-in, rather than through the standard local planning framework. While SSD has a legitimate role, its use should be tied to clear strategic outcomes. There is a clear scope for this in increasing housing supply in strategic locations that, because of close proximity to infrastructure or planned growth, can significantly reduce pressure on house prices. In this case, the development does not align with the spatial logic of current housing reforms, which emphasise density in well-served, accessible locations—particularly around transport. The effect is to bypass local controls without demonstrating a corresponding state-level planning benefit.

From a policy perspective, this raises concerns about the consistency and credibility of the planning system. Housing supply is most effective when it is delivered in locations that maximise accessibility and minimise external costs. Departures from that principle, particularly through discretionary pathways, risk undermining both outcomes and public confidence.

I am a Professor of Economics at UNSW Sydney and co-director of the UNSW Resilient Democracy Lab. As I write in opposition to this submission, I realize that my concerns reflect not only my views as a local resident and a lover of our beautiful Blue Mountains. Rather, they also reflect my assessment of the broader importance of aligning planning decisions with clear, transparent, and consistently applied policy frameworks. Where large-scale developments are advanced outside those frameworks without strong justification, as in this case, the result not only affects the local ecosystem, but also weakens citizens' trust in the system as a whole.

For these reasons, I consider the proposal to be inconsistent with the principles of strategic planning and effective housing policy, and I urge that the application be refused.

Sincerely,

A handwritten signature in black ink, reading 'Gabriele Gratton'. The signature is fluid and cursive, with the first name 'Gabriele' and last name 'Gratton' clearly distinguishable.

Gabriele Gratton
Resident of Katoomba, NSW
Professor of Politics and Economics, UNSW
Co-director, UNSW Resilient Democracy Lab