

SUBMISSION AGAINST

SSD-86456706 Residential flat buildings at 142-150 Narrow Neck Road, Katoomba

Introduction

In my opinion the proposal represents an irresponsible gross overdevelopment of land in close proximity to the ecologically sensitive World Heritage listed Blue Mountains National Park, would have major negative impacts on the wellbeing of the existing residents of south-west Katoomba and yet does not appear to have been devised to aid in lessening the current housing crisis in NSW by being essentially not fit for purpose within the state significant housing development guidelines.

It is impossible in the short amount of time available for submissions (14 days) for members of the public to adequately consider the entirety of the proposal due to the overwhelming volume of the documents submitted as part of the EIS (over 2000 pages), however I will cover some of my main concerns stated above with a series of brief dot points (part A), followed by a slightly more detailed analysis of just one particular aspect of the EIS (The Arboricultural Impact Assessment, Appendix K) (Part B).

PART A

1. Ecological concerns

- a. Removal of a large number of trees shrubs and other plants within the substantial stand of remnant undisturbed natural vegetation. This area is one of the very few in the surrounding area in which my husband and I have frequently encountered pairs of endangered gang gang cockatoos over the past ten years of living here. I am highly concerned that many breeding hollows for these birds, which are situated high in the canopy and not discernable from the ground, will be removed.
- b. Extensive excavation required for the multi-level underground car parks is likely to have a greatly detrimental effect on existing natural underground water systems, leading to damage, if not complete death, of environmentally important water courses and swamp/hanging swamp areas downstream close to and on the escarpment leading into the Jamison Valley
- c. Slope Constraint Areas identified in the Council LEP are being ignored, building on which could lead to loss of slope stability and degradation of other local environmental values

2. Negative impacts on urban environment and local resident community

- a. The proposal is for an area of very compressed urban development unlike anything ever seen in the Blue Mountains, and completely at odds with the visual and social character of the surrounding residential area
- b. The addition of two restaurants and an art gallery, and the subsequent influx of people and their vehicles patronising these, represents a completely changed environment to the current "sleepy town" vibe currently experienced by local residents.
- c. The increased ambient noise produced by an 5-600 people living in close proximity to each other would have a major negative impact in an area which currently enjoys the beauty of sound made by little else but native birdsong and wind in the trees.

- d. The disruption to tranquility over the construction period, with an estimated 6 months of excavation and a further 18 months of construction with associated noise occurring from 7am six days a week would be immense, leading to a greatly reduced quality of life for those living especially in the immediate area – most of whom spend a great deal of their time within their homes and gardens (either in a work from home or retiree capacity).
 - e. Increased local traffic from construction vehicles and the eventual occupiers of the 250 apartments will have a major impact on the local council-maintained road system. Upgrades to Narrowneck and Glecoe Roads to be able to cope with the increased traffic would be necessary but to my knowledge are not addressed in the EIS.
 - f. Evacuation routes during a major bushfire event are likely to become congested and dangerous with such a large local population influx
 - g. Stormwater runoff within the Greater Sydney Drinking Water Catchment Area has not been adequately addressed in the proposal. Almost the entire area of the proposed development would be covered by impervious surfaces
3. Lack of contribution to addressing the current housing crisis
- a. The inclusion of 52 serviced apartments (approx. 20% of total development) and accompanying restaurant does nothing to address the current housing crisis. It would seem to be included solely for the purpose of financial gain
 - b. Given the mountainous terrain of the township of Katoomba, the site is not located within reasonable walking distance of the town centre and its amenities
 - c. Proximity to public transport: public transport near the site is limited to a single unidirectional bus route which during non-busy periods takes 20 minutes to get to town, via stops at various popular tourist attractions such as Scenic World and Echo Point. During peak tourist times these buses are often full when they leave town so cannot collect additional passengers along the residential route. In addition, during peak tourist times there is often a large buildup of traffic around the abovementioned sites and the time taken to reach the town centre can be highly unpredictable. If a connection with the once-hourly train service to Sydney is required it can be hit and miss whether you will make it. The location of the site is definitely not suitable for a daily public transport commute to Sydney for work!
 - d. The quality of “Blue Mountains” life in the within the proposed development would be questionable with the highly urbanised bulk and scale far more suited to the CBD of a large city. Buildings are only 3m apart in several areas, many aspects of the buildings would be shaded most of the time by other buildings and airflow would be greatly restricted. Fresh air, light, the natural environment and tranquility are arguably some of the most important aspects of enjoyment in a township which is proud to be situated within a spectacular World Heritage Area.

PART B

I am greatly concerned by the inadequate/incomplete consideration of the environment in the “Arboricultural Impact Assessment” and “Tree Survey” (Appendices K and AJ).

I also believe the conclusion in section in the EIS Section 7.7 Trees and Landscape, vis. **“In conclusion, the AIA is supportive of the extent of tree removal proposed, and general**

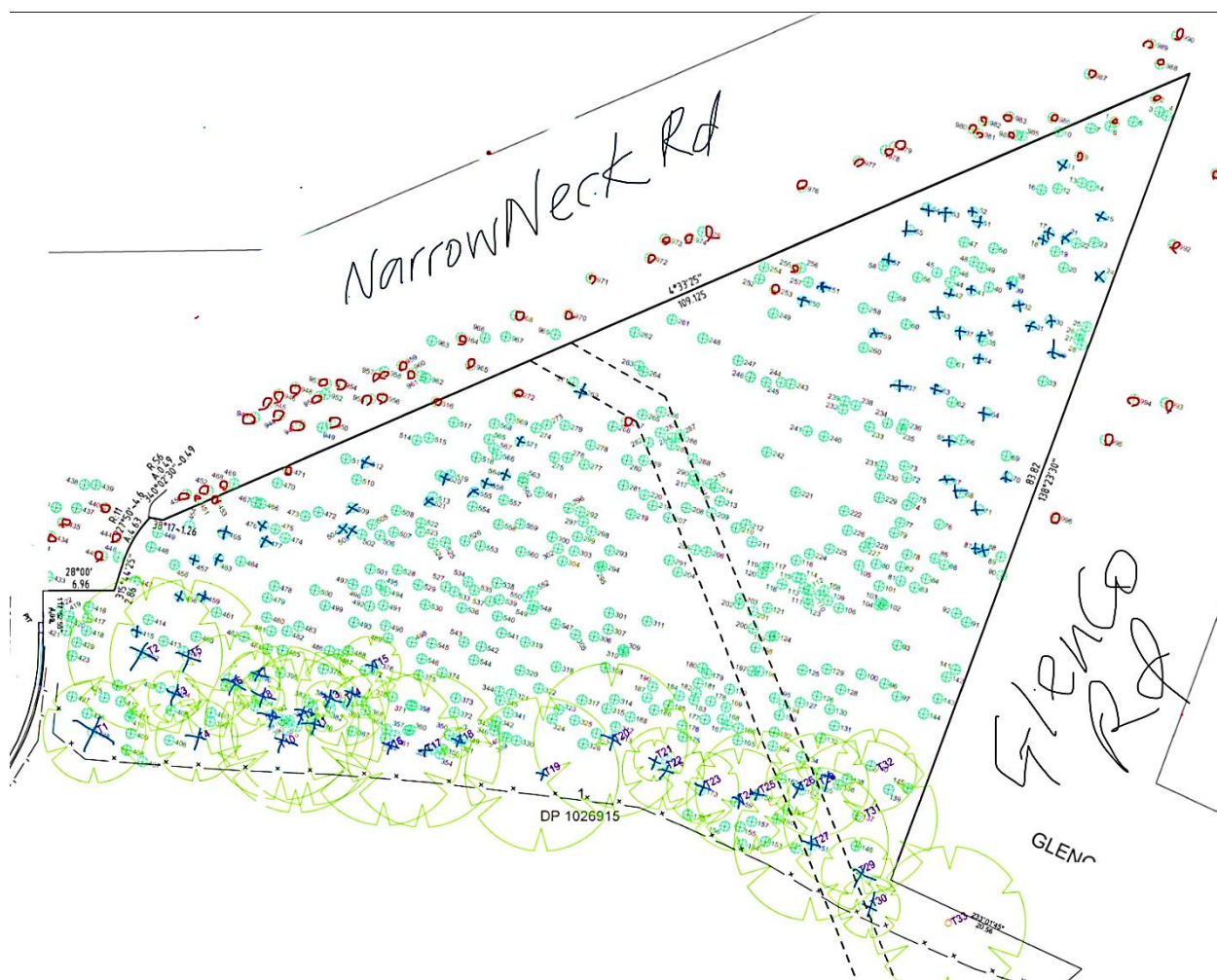
protection measures are recommended in section 4 of the AIA to minimise potential impacts to the trees to be retained.” to be highly misleading.

My assertions above are based on the following observations:

1. In the Tree Survey diagram (Appendix AJ) there are over 500 identified trees WITHIN the northwestern triangular “tree protection zone” alone. Of these identified trees, all physically marked in the field with numbered tags and recorded in the diagram, only 134 of these have been detailed in the Tree Removal Table (4.2 of Appendix K). I have marked these with a blue cross on my diagram below. All of these are situated towards the perimeter of the triangular section.

The remaining approx. 360 trees are situated in the central area of the triangle. These are not insignificant trees – I have taken photographs (shown below) of a small random selection of 5 of these which show they are extremely large, healthy and native to the area (these have identification numbers 295, 298, 301, 319 and 505). When overlaid with the building and footpath/road placement plans, it is evident that every single one of these trees not listed as slated for removal will be built over, ie. removed! My question here is :

Why have only 134 trees been documented as slated for removal, despite the AIA tree survey clearly identifying and numbering over 500 trees in the triangular area of the development zone alone, when the entirety of this area is planned to be built over? (NB This is a stand of remnant natural forest, not planted or landscaped.)





Tree #295



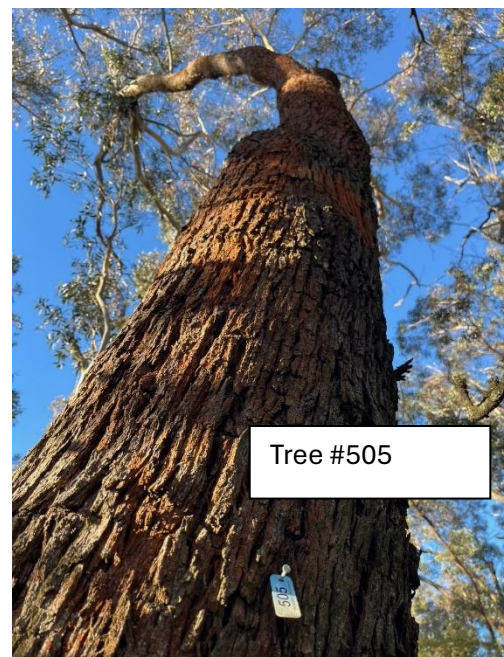
Tree #298



Tree #301



Tree #319



Tree #505

2. In the Tree Survey diagram (Appendix AJ) there are approximately 80 identified trees which fall OUTSIDE the development area, on Council owned land (ie. along the verges of Narrow Neck and Glencoe Rds). In the Tree Retention Table (4.1 of Appendix K), only 7 of the identified trees slated for retention fall inside the development border, the remaining 65 are situated on BMCC Council land. Trees listed as being retained are circled in red on my diagram above. My question here is:

Why are 90% of the trees listed for “retention” not actually growing within the proposed development zone at all, but adjacent to it on Council owned land?

3. In the Tree Removal Table (4.2 of Appendix K), 23 of the 134 listed have been identified as being **Mature**, having **Long useful life expectancy** and having **High Priority for Retention**. This would seem at odds with the EIS conclusion that the AIA is supportive of the extent of tree removal proposed. My questions here are:

On what basis does the EIS claim that the AIA is supportive of the extent of the tree removal proposed?

Where are the full assessments of the other approx. 360 trees which are shown on the diagram but not listed in the Tree Removal Table?

4. 15 of the trees listed in the Tree Removal Table (site numbers 56-70, ID#572, 573 and 625-654) seem to have not been shown on the diagram. My question here is:

What is the reason for this apparent omission?

Conclusion

I am completely opposed to the proposed overdevelopment on many grounds.

I am also suspicious of the veracity of many claims within the overall EIS, based on the dubiously selective nature in which the data in the Arboricultural Impact Assessment and Tree Survey have been documented and represented.

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Katoomba