

Dear Consent Authority,

I am writing to submit my opposition to the proposed development at 142-150 Narrow Neck Road, Katoomba and the proposal's use of the Housing Delivery Authority (HDA) pathway to circumvent Blue Mountains Local Environmental Planning.

The proposal for nine, 4-storey buildings, containing 214 units, plus 52 serviced apartments, of which only a few are dedicated for low income housing is a seriously flawed plan which will have significant impact on the local environment and residences of the Blue Mountains.

Unaffordable dense high rise development

As a resident of Narrow Neck Road I am deeply concerned that the NSW Housing Delivery Authority (HDA) pathway is being misused to fast track an inappropriate development. Primarily, I am seriously concerned that this particular proposal -in it's current form- is a disingenuous approach to provide affordable housing. The limited housing that this development has allocated is unsuitable for the purpose of the HDA pathway. The planning only has a limited number of cheaper units. The vast majority of the proposal 85% is designated for much more expensive units of which there is no demand for. The current Escarpment's development is having difficulty already selling off their prime townhouses which overlook the old golf course. There is no demand for this huge high rise Narrow Neck development. If completed the buildings will remain mostly uninhabited which would be against the essence of the HDA pathway.

Too big, in an unsuitable place, and no community consultation at all

I am not apposed to a smaller development on the site, one that stays within the guidelines set up by the Blue Mountains Local Government Area who has already zoned this site R3 Medium Density, which allows a maximum height of 8 metres (approximately 2 storeys). However, what is proposed significantly towers over these community approved guidelines. They seek to rezone the area, to allow multiple a four-storey, high density development! That is unacceptable. The Blue Mountians take the responsibility of stewardship of the World Heritage Listed area seriously. This proposal is a gross undermining of responsible planning. By seeking the HDA pathway the developers have sought to override the community built Blue Mountains Local Environment Plan (LEP). This proposal has not sought any community input. I live near the development and they have consulted us once as to their plans.

Too far from the town and train line

The proposal incorrectly states that the development is 'within reasonable distance to city etc'. This is simply not true. There is a significant walk to Katoomba town enimities and there is no direct path to a train station. It should be noted that the chosen location is also at a significant uphill walk from town. No one would walk to the town centre from here, so this development would be a terrible burden on the already choked roadways as residents would have to either bus or drive to shops. Furthermore, the site is not situated anywhere near employment nor industry. This is an isolated high rise far away from resources to support low income families which the HDA pathway is intended for. The site is situated inappropriate to its size and intended purpose. This is not a housing project as Katoomba has an abundance of unoccupied dwellings. This is a developers abuse of the HDA pathway to provide temporary accommodation for tourists. Private owners will buy them and not move in because they don't;t want to live in dense units. So they will rent them out as weekend accommodation for tourists. This will significantly impact local hoteliers and the tourist industry of both Katoomba and Leura and other neighbouring towns.

Inappropriate high rise, high density housing in Katoomba

There is already a vast amount of vacant housing in the Blue Mountains and specifically in Katoomba. Katoomba is too remote a location from industry. People rarely commute down the mountains for work in the city as Katoomba is too far away for transit. After COVID we saw a huge increase in people moving to the mountains. After this boom the upper blue mountains boom has died off completely as workers realise that Katoomba is too far away from work, even in greater Western Sydney. Young families have moved out, not because it is unaffordable, but because it is too remote from work. My children's school Leura Public has lost multiple classes over the last few years because they cannot fill them. Families are moving away because their work is too far from the Upper Mountains. Train services are inconsistent and commuting by car takes too long. These people are moving to the Lower Mountains, Penrith or Lithgow, closer to industry and work.

A great example of this is how long it is taking for places to sell in the Upper Blue Mountains. It took us a full year (54 open houses!) before we sold our own home to move into where we live now in Katoomba. The townhouses next to us are unoccupied. Real-estates are struggling to sell anything that isn't a heritage cottage. Modern buildings, townhouses and units are not at all desirable in the upper blue mountains area. They cannot fill the small development at The Escarpments even (some of which are quite cheap places), and these developers think that adding 200+ residence will help that!

This development is over sized for a small remote site

In the proposal there is little to no infrastructure around the site. Narrow Neck road itself cannot sustain such an amount of cars that the site will bring. Also, The Escarpment's road is a privately owned road for residents who already live there only. Homeowners privately pay to maintain that road themselves. Adding 200+ families would ruin access to the Escarpments. In the site planning for this proposal it shows access points on The Escarpments. This would be a serious violation of the current residents who would likely take legal action to block the use of The Escarpments. This would mean that the development would not have enough access points to support such a large build on a small site. It is poorly planned and too big for where it is.

Bushfire risks and evacuation danger, as well as road congestion

Such a huge development would add 200+ cars to Narrow Neck road, providing serious daily congestion and risk of danger during evacuations. The developers have situated this build far too far away from the terrain line. This means that every resident at that location will require an automobile to access the site and town services. Narrow Neck Road is already a narrow two lane road of 50km/ph. There are houses all along that road and no chance to widen it to support more traffic. The road already supports a growing number of large tourist buses which access the lookouts, already causing congestion. Each Cristian Centre Convention already causes traffic issues there. Furthermore, there is a fire station and National Parks Ranger's station along Narrow Neck which need to use this road in case of emergencies. They use Narrow Neck Road to respond to events at the Three Sisters and Scenic World sites and to service the National Park. In the event of an emergency (terrorist event) or natural disaster (fires, landslides), this proposed development would endanger vital access to these areas and ultimately the lives of the residents there.

We have already had recent bushfires along the Narrow Neck Road surrounding this development. It would be reckless to approve this project based on this fact alone. The proposed development is already situated in within bushfire prone land. The Blue Mountains City Council has already expressed concern that housing more people in bushfire prone areas is reckless and dangerous. The Blue mountains already has the highest density of residents situated in bushfire prone areas (26% of homes), which is projected to increase to 90% by 2090, due to climate change. This development would likely endanger its residents situated high on the rise where bushfires are known to encroach upon. This proposal is not safe and the plans submitted do not meet regulations of a dwelling in a bushfire area in terms of height and windows quality alone.

Significant Environmental Impact not addressed in the Environmental Impact Statement

The environmental statement attached to the proposal does not address serious concerns raised by the Blue Mountains Council and Blue Mountains Conservation Society. The location is situated adjacent to the threatened species which inhabit the Blue Mountains Swamps. Such a large scale development, its construction, water runoff, and subsidiary surface pollution would endanger the already critically endangered Dwarf Mountain Pine (*Pherosphaera fitzgeraldii*) and populations of lyre birds and local frogs. Lyre birds accept the lookout around the Kiosk which is just down from the development. Their numbers are already threatened and they rely on the swamps around them for food and shelter. Changes to the environment will threaten them further and significantly change the flora and fauna on that famous tourist site.

The site is situated in a World Heritage Area which needs to be carefully considered. Locals are custodians and the Blue Mountains Council has worked closely with the community and conservation to take that custodianship of the area seriously. The proposal has not adequately addressed the NSW Biodiversity Act and Commonwealth Biodiversity Act. In the proposal there are only token outcomes addressed. My concern is the plan to clear the site and add concreted dwellings will significantly interrupt the water cycle. This will dry out the swamp as the swamp cannot recharge itself under the pressure of the development. Concentrated stormwater risks, reducing groundwater infiltration, and eroding swamps. Concrete will change the PH balance of the soil and degrade the ecosystem. We have already seen significant changes to the weed population with the neighbouring development, with serious weed infestations killing off native plants species. My concerns are supported by the Conservation Society who is also opposed to this development for the environmental reasons which I have stated above. The proposed development has the potential to impact the Blue Mountains World Heritage Area, its tourist economy as well as flow on effects that go right through to the Sydney's drinking water catchment. That site is at the top of the mountain that feeds down into all those areas. It's not worth the risk when affordable housing should reclaim unused lots closer to the highway and train line.

For these reasons, I'd like the Consent Authority to reject this proposal outright due to it's evident unsuitability to that location.

Sincerely,
Jerome
29/4/2026