

Submission on

Development Application for Residential flat buildings at 142-
150 Narrow Neck Road, Katoomba

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29 April 2026

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1 Introduction

I wish to lodge an objection to *Development Application for Residential flat buildings at 142-150 Narrow Neck Road, Katoomba*. The reason for my objection is the application's **EIS fails to address the visual impacts on (i) Visitors to the Blue Mountains National Park (part of the Greater Blue Mountains World Heritage Areas and (ii) Users of the Planetary Health Centre that neighbours the proposed development site**. This represents a failure to meet planning obligations, and it is significant enough to reject the application because:

- Blue Mountains National Park, beyond its renowned natural attributes, had the highest number of visitors of all NSW National Parks in 2024/25 and not assessing the impact on such significant numbers of visitors is unacceptable.
- The Planetary Health Centre, a Blue Mountains City Council initiative, fosters community participation, nature, nature connection, learning and innovation and not assessing the impact on these community members is unacceptable.
- Not assessing the impacts on these two sites is inconsistent with Blue Mountains City Council's *Development Control Plan 2015* (last updated 2025), the *Blue Mountains Local Environment Plan 2015* (current), recommendations of the State government's National Parks and Wildlife Service and the Transport for NSW practice note cited by the EIS.
- In relation to development, visual amenity, along with bushfire risk, are the issues that the Blue Mountains community most relates to and is most concerned about.

I have provided further details in the following sections.

2 How the EIS Addresses Visual Impacts

Detailed analysis and discussion of visual impacts appear in Table 12 (Blue Mountains City Council – Meeting Feedback and Responses) in the body of the EIS and in appendices AL (*Visual Assessment Impact, Urban Design Group 2026*) and AM (*Visual Assessment Impact Appendix*).

In Section 1.2.1 (The Site and existing property) of Appendix AL it says:

“The subject site is located adjacent to the Blue Mountains Planetary Health Precinct in Katoomba, new South Wales, positioned on elevated terrain offering panoramic views across the Jamieson Valley and surrounding escarpments.”

KEY POINT 1

The corollary of this is that persons in the Jamieson Valley, surrounding escarpments and Planetary Health Precinct will, to varying degrees, be able to view the site and therefore potentially be subject to loss of visual amenity.

Figure 5 in Appendix AL shows the visual impact at 17 sites but none of these are located in the National Park or other bushland areas of the Jamison Valley, its escarpments, or within the Planetary Health Precinct. Only one site borders the Precinct, being located “on a grass vicinity adjacent to Stuarts Road”.

Now I turn to Table 12 main body of the EIS.

In relation to visual impacts on the Jamison Valley and surrounding escarpments:

- **Council expressed** “concerns regarding the protected escarpment area, noting that the relevant controls are intended to minimise the visual intrusion of built form when viewed from the Blue Mountains National Park and World Heritage Area”.
- **The EIS response to that was** “that the proposal is unlikely to result in any material visual impact when viewed from locations in proximity to the Blue Mountains National Park and World Heritage Areas”.

KEY POINT 2

The EIS response does not address Council’s concerns about visual impacts on the Blue Mountains National Park/Greater Blue Mountains World heritage Area. The response only relates to locations in proximity to the Park, ie. the limited 17 sites covered in the Appendix, none of which are in the National Park or World Heritage Area.

In relation to visual impacts on the Planetary Health Centre (the neighbouring site to the proposed development):

- **Table 12 shows no explicit Council commentary** in this regard. However, it does say that “Council has also raised concerns regarding amenity impacts on the adjoining Planetary Health Precinct, including potential overshadowing during the day and light spill at night.

If there is overshadowing then that implies the development will be visible from the Precinct, which in turn implies potential loss of visual amenity to the Centre’s users. Again, none of the 17 sites in the appendix are located where they could help determine any loss of amenity.

3 Planning Requirements and Recommendations

Blue Mountains City Council:

In relation to visual impacts on the Jamison Valley and surrounding escarpments, Section Controls (sub-section C3) of Council’s Development Controls Plan 2015 ¹(DCP 2015 - last modified 19 November 2025) states:

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[https://www.bmcc.nsw.gov.au/sites/default/files/docs/DCP%202015 Amendment%208 Consolidated.pdf](https://www.bmcc.nsw.gov.au/sites/default/files/docs/DCP%202015%20Amendment%208%20Consolidated.pdf)

“New development is to minimise visual impacts upon bushland settings, including scenic drives, the Blue Mountains National Park and other significant elements through the use of design, colours and materials which preserve important natural and cultural settings”.

The NSW National Parks and Wildlife Service:

Section 2.7 of the NPWS document ‘*Developments adjacent to National Parks and Wildlife Service lands - Guidelines for consent and planning authorities*’² (August 2020), states the following:

“

- Aim: There is no reduction of amenity on NPWS land due to adjacent development.
- Risks to NPWS Land: Certain developments may significantly intrude on the environment of NPWS lands, affecting the senses of wildlife and park visitors.
- Recommended approach: Planning authorities should take into account the visual (including lighting), noise, odour and air quality impacts of development adjacent to NPWS land to ensure that they do not affect the amenity or public enjoyment of the land. NPWS land should never be considered as a buffer zone between a development and other surrounding uses (such as residential areas).
- Planning authorities should consider whether it is appropriate to apply control measures so that the development is sympathetic with the park’s natural and cultural heritage values.

“

Blue Mountains Local Environment Plan 2015 (the current plan, available on the NSW Legislation website):

Clause 6.12 Protected Area – Escarpment begins with *(my emphasis in bold type)*

“

(1) The objectives of this clause are as follows—

(a) to preserve and enhance the **visual**, cultural and ecological values of the escarpment systems in the Blue Mountains,

(b) **to restrict development, including buildings, alterations and vegetation clearing**, so as to minimise any adverse impact on the perception of escarpments as significant natural features”

Guideline for landscape character and visual impact assessment Environmental impact assessment practice note EIA-N043 (Version 2.3, June 2023, Transport For NSW):

² <https://www.environment.nsw.gov.au/sites/default/files/developments-adjacent-npws-lands-200362.pdf>

³ <https://www.transport.nsw.gov.au/system/files/media/documents/2023/guideline-landscape-character-and-visual-impact.pdf>

In section 1.4.2 (Assessment Methodology) of Appendix AL, the EIS methodology is described as giving consideration to an earlier version (Version 2.0, 2013) of the guideline.

Section 6.2 of the practice note 'Identify existing viewpoints and their sensitivity to change' states:

"...a schedule of representative viewpoints within reasonable distance of the project and within the visual catchment should be developed. These should include residential properties (grouped into areas if appropriate), public buildings (eg schools, places of worship, libraries, museums, galleries), **public spaces (eg. parks, plazas, popular walks, meeting places)**, heritage items..."

Key Point 3

Consistent with the NPWS recommendations for planners, Council's DCP 2015, the Blue Mountains Local Environment Plan 2015, Transport for NSW Guideline and the scale of the development being proposed, the visual impacts on the National Park, including the Jamison Valley and surrounding escarpments, should have been assessed. It is a significant shortcoming that they were essentially ignored.

A visual impact assessment should also have been undertaken on the Planetary Health Centre as per normal planning requirements for impacts on neighbouring properties.

4 The Value and Users of the Blue Mountains National Park, including the Jamison Valley and surrounding escarpments

Blue Mountains National Park is one of eight parks making up the UNESCO listed Blue Mountains World heritage Area⁴. Australia nominated the area for UNESCO listing in 1998⁵. The nomination's statement of significance (Section 2.1) highlights the **naturalness** of the area and the need to protect it. It begins as follows:

*"The Greater Blue Mountains nominated area represents an extraordinary story of **natural antiquity, diversity, beauty** and human attachment*

*It is an environment in which key aspects of Australia's **exceptional natural and cultural [indigenous] histories** are protected and presented to a wide spectrum of the public".*

The extensive natural attributes, described in both the nomination and the listing, are far too numerous to list here but include:

⁴ <https://whc.unesco.org/en/list/917>

⁵ <https://bmnature.info/docs/documents/gbm-nomination.pdf>

- The area “supports an exceptional representation of the taxonomic, physiognomic and ecological diversity” of eucalypts
- “The geology and geomorphology of the property, which includes 300 metre cliffs, slot canyons and waterfalls, provides the physical conditions and visual backdrop to support these outstanding biological values”
- The site includes an outstanding diversity of habitats and plant communities that support its globally significant species and ecosystem diversity (152 plant families, 484 genera and c. 1,500 species). A significant proportion of the Australian continent’s biodiversity, especially its scleromorphic flora, occur in the area.

It’s the naturalness of the area as a whole that is of importance, not just isolated sites, and this includes the Jamieson Valley and surrounding escarpments.

Visitation

In 2024-25, the Blue Mountains National Park was the most visited park in NSW⁶. Apart from physically challenging activities such as bushwalking, canyoning and rock climbing, visitors engage in photography, painting and generally enjoying the flora and fauna of the region⁷. Scientists continue to visit the area to undertake studies.

Recognition of the role and activities of the traditional owners of the land also needs to be mentioned and Blue Mountains City Council has noted⁸:

“For countless generations the Traditional Owners of Country in what is now the WHA sustainably managed and lived in a harmonious balance with the land and waters and all that is within them, with this ensuring the health of the natural environment that in turn underpins the WHA status.

This Traditional Ownership was never ceded or surrendered and the relationships with and profound care for Country that Gundungurra and Dharug Traditional Owners still hold continues today.”

Key Point 4

A large and diverse range of people continue to visit and have a connection with the Blue Mountains National Park, including the Jamison valley and surrounding escarpments. The naturalness of the area is what attracts many of them. All these visitors are subject to a potential loss of visual amenity if the development proceeds. The Environmental Visual Assessment report fails to inform on the loss of visual amenity these people could experience which is unacceptable.

⁶ www.environment.nsw.gov.au/news/record-visits-nsw-national-parks-drives-economic-growth-and-regional-jobs

⁷ (<https://www.environment.nsw.gov.au/sites/default/files/greater-blue-mountains-world-heritage-area-strategic-plan-080491.pdf>)

⁸ <https://www.bmcc.nsw.gov.au/WHA/traditional-owners>

5 The Value and Users of the Blue Mountains Planetary Health Centre

In May 2024, Council approved the establishment of the World Health Centre on the site of the old Katoomba Golf Course and Clubhouse. As the Centre is still being developed, the activity level at the Centre is expected to grow significantly in the coming years. However, current activities at the Centre already include community days (Planetary Health, Word Animal, Skill Share), a volunteer program, nature connecting walks, bushcare, birdwatching, conferences and exhibitions⁹.

Centre attendees can reasonably be described as people who care about nature and sustainable living.

Key Point 5

People interested in nature and sustainability attend the Blue Mountains Planetary Health Centre. As the Centre neighbours the proposed development site, these people will potentially be subject to a loss of visual amenity if the development proceeds. The EIS fails to inform on the visual amenity loss these people could experience which is unacceptable

6 In Summary

- The Blue Mountains community, and thousands of visitors from near and far who visit the area, care about the natural environment and are concerned about loss of visual amenity.
- The EIS' Visual Assessment fails to inform on how the proposed development would look from the Jamison Valley and surrounding escarpments and also from the neighbouring Planetary Health Centre and therefore does not inform on the potential loss of amenity at these sites.
- Council's Development Control Plan (DCP 2015), the NSW National Parks and Wildlife Service document that I cited, the Blue Mountains Local Environment Plan, and the Transport for NSW Guidelines for Visual Assessment all suggest visual impacts on the Jamison Valley and nearby escarpments should have been addressed in the EIS.
- Visual impacts on the neighbouring Planetary Health Centre should have been addressed as per normal planning requirements regarding impacts on neighbouring properties.
- The two above-mentioned sites are visited by many people who appreciate nature and sustainability. The visual intrusion of the proposed development, its scale and unnatural style (despite the depiction of greenery covering the buildings), could lead to significant loss of visual amenity.

⁹ <https://www.bluemountainsplanetaryhealth.com.au/the-centre>

- **The EIS should, at the very least, be re-exhibited once it has been ammended to include a proper analysis of visual amenity impacts on the Blue Mountains National Park (Jamison Valley and surrounding escarpments) and the Blue Mountains Planetary Health Centre.**

It is my view that:

The proposed development is visually unnatural in character and incompatible not only with the proposed location but also with many parts of the Greater Sydney area. I then call for the proponent to redesign the development so that it's compatible with the area, its people and visitors and their aspirations.