

Submission on the Environmental Impact Statement for the Development proposal for 142—150 Narrow Neck Road, Katoomba

Lot 1 in DP 1026915

Application number: SSD-86456706

Applicant VDM Prime Pty Ltd Address Level 3, Suite 3.08, 100 Collins Street, Alexandria NSW

2015 ABN 44 635 821 69

Site Area sqm 16,840

I wish to state my opposition to:

- the proposed development at 142—150 Narrow Neck Road, Katoomba, hereafter referred to as the 'proposed development' or 'the proposal'.
- the use of the Housing Delivery Authority (HDA) pathway in the Blue Mountains.

I also request that:

- the Blue Mountains Local Government Area be exempted from the HDA pathway, generally
- the Consent Authority visit the development site, including the surrounding visitor destinations and environmentally sensitive areas
- the Consent Authority consult fully with the Blue Mountains City Council, and accept Council's recommendations.

As a resident in the Blue Mountains area of Winmalee for more than 25 years, I have experienced several bushfires affecting my area, and the general implications of greater urban development. I appreciate the unique nature of the Blue Mountains, and its unsuitability for urban planning policies applied to the Sydney Metropolitan area.

The issues with the proposed development that most concern me are:

1. The **safety of people** living in the neighbourhood, and in the proposed development specifically. The main access to the Great Western Highway is via one narrow winding road which runs close to the edge of an escarpment with a steep fall into bushfire-prone bushland. Bushfires can arise or change direction swiftly. Evacuation from this area and many others in the Blue Mountains is slow or impossible, and becomes more difficult with increasing population density.

Fire-fighting vehicles can be hampered in their access to fire-prone areas by people attempting to flee, sometimes from their own burning homes.

This is a scenario that can affect every part of the Blue Mountains as well as the area of the proposed development.

The Blue Mountains is one of the most bushfire prone areas in Australia—currently, 26% of homes in the area are exposed to high bushfire risk; This figure is expected to increase to 90% by 2090, due to climate change. A bushfire can throw embers for 5 km, well within range of the proposed development, whether it is zoned bushfire prone or not.

The Blue Mountains City Council has stated that housing more people in high bushfire-risk areas is reckless and dangerous.

The Environmental Impact Statement (EIS) fails to adequately address the issues raised by Blue Mountains City Council, as stated in Table 12.

Council has found that the memo from Bushfire Hazard Solutions including its attempts to consult with Fire and Rescue NSW and the lack of consultation with the NSW Rural Fire Service, is an insufficient assessment of the proposed development.

Council has requested the preparation of a Strategic Bushfire Assessment in accordance with Planning Direction 4.3 and Planning for Bushfire Protection 2019.

In Appendix AX Fire and Rescue Services (FRNSW), declined to comment.

'Thank you for your email regarding preparation of the EIS. Fire and Rescue Services (FRNSW) will not comment on this project at this time, however, will provide advice through the Dept. of Planning or other consent authority as the project progresses.'

In Appendix BB NSW Rural Fire Service also does not support a development application.

'Please note that the pre-DA advice is not intended to provide pre-approval of bush fire risk assessment to support a development application.'

2. The **scale and zoning**. This proposed development sets an unacceptable precedent for the Blue Mountains.

The proposed development is significantly larger than anything currently permitted in the Blue Mountains Local Government area. The site is zoned R3 medium density with a maximum height of 8 m (2 storeys) under the Blue Mountains LEP (Local Environment Plan). The developer is seeking rezoning to allow a four-storey, high density development.

3. **Undermining local planning and democracy**. The community of the City of the Blue Mountains, and their representatives on the Blue Mountains Council, know and value this area to an extent that is not possible for most people, without that experience. We are also the people who will be most directly affected by the consequences of poor planning policy. The HDA pathway overrides the Blue Mountains Local Environment Plan (LEP) and sidelines local Council and community input

The LEP reflects years of expert planning and community consultation and is tailored to the Mountains' unique environmental context. It includes strong environmental provisions to ensure that any new development is appropriately designed, scaled and sited.

According to the EIS, 'Engagement was undertaken in accordance with the SEARs and managed by Melliora Projects. Engagement included letterbox distribution to 50 immediate neighbours and 1,200 properties within a 1–2 kilometre radius...'

Yet, 'Council has advised that no information was provided regarding the two rounds of letterbox notification or the approximate 1 km consultation radius from the site. Based on feedback received from the community, Council has assumed that the second letterbox drop did not occur. Council has also noted that it was not notified as an adjoining landowner and has indicated that it will correspond separately with the proponent and the Department on this matter. In addition, Council considers that the consultation process did not include plans or concept sketches and, as such, does not regard the engagement as genuine or meaningful.'

The issue is what was done, not who arranged it. Council's comments have not been adequately addressed.

4. **Quality of life**. The unique geographic nature of the City of the Blue Mountains, where urban development is necessarily confined to ridges stretching like fingers into inaccessible rugged, bushland, limits the infrastructure that supports homes.

Increased population density overloads the available roads, parking, sewer, electricity, gas and storm water drainage.

5. Increased population adversely affects the **unique environment** that makes the Blue Mountains a desirable location for residents. and tourists.

The proposed site is adjacent to Blue Mountains Swamps, a Threatened Ecological Community. These swamps feed the Katoomba Falls catchment—one of a handful of areas supporting the Critically Endangered Dwarf Mountain Pine (*Pherosphaera fitzgeraldii*).

Increased hard surfaces would change water flow to the swamps, increase stormwater velocity and reduce groundwater infiltration, severely degrading these ecosystems.

Polluted runoff and weed spread would impact the Blue Mountains World Heritage Area (BMWA) and Sydney's drinking water catchment.

According to the EIS 'A Preliminary Site Investigation (PSI) concludes that there is a relatively low potential for significant contamination given the site history and existing site conditions. Due to the restricted access in parts of the site, the consultant recommends that further investigation be carried out once the site has been cleared. This would involve a targeted walkover of the parts of the site that were inaccessible during this current investigation including the infilled dam, area of buried irrigation pipes and area of discarded building waste.

Accordingly, the site is considered appropriate for the proposed development from a contamination perspective, with additional investigations to be carried out pre-construction.'

'Relatively low risk' is not the same as 'no risk' or a quantified risk. Although additional investigation before construction is desirable, it is not an adequate alternative to thorough investigation before approval.

6. Increased population density adversely affects **cultural, aesthetic and economic values** in the Blue Mountains.

This proposal threatens the distinctive character of Katoomba, and surrounding visitor

destinations. High density, multi-storey, urban-style development is incompatible with the Mountains' scale, landscape and cultural identity.

Inadequate provision for parking on the development site will choke local roads and roads within the development, impeding daily movement of traffic, and posing a significant risk during an emergency.

According to the EIS, the number of dwellings planned is 275. The number of basement car spaces is 298, just 23 spaces allowed for residents' second cars and visitors. This is obviously inadequate. The restaurant is expected to seat up to 50 patrons. Yet, only 18 parking spaces have been allowed for the restaurant, administration office and art gallery. This is so inadequate, it is comical. Presumably the extra parking is expected to be located on roadsides within and outside the development, posing a serious hazard for ingress and egress during an emergency, for the residents of the development and nearby housing, some of which is zoned as bushfire prone.

Wednesday, 29 April 2026