

To: NSW Department of Planning, Housing and Infrastructure

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

Application Number: SSD-86456706

Submitter Details:

- **Name:** Adam Carter
- **Address:** 3/25 The Escarpments, Katoomba 2780

Position: Objection to the proposed development at 142-150 Narrow Neck Road, Katoomba

I strongly object to:

1. The proposed development at 142–150 Narrow Neck Road, Katoomba; and
2. The application of the Housing Delivery Authority (**HDA**) pathway to this site and, more broadly, within the Blue Mountains Local Government Area (**LGA**).

I further request that the Blue Mountains LGA be excluded from the HDA pathway and the State Significant Development (**SSD**) framework for any future development proposals on the grounds outlined within my submission below.

1.0 Personal Impact Statement

I have lived in Katoomba since April 2020. Prior to moving to the Blue Mountains, I spent upwards of 10 years taking regular weekend trips from Sydney to the Blue Mountains in pursuit of my love of the outdoors.

I chose to make the Blue Mountains my home for its unparalleled access to world-class natural landscapes, with Katoomba in particular being the main gateway town to the Greater Blue Mountains World Heritage area. As someone that is deeply invested in hiking and trail running, my daily participation in this environment is the primary driver of my choice to live in Katoomba.

Having experienced Katoomba both as a tourist and as a resident over the past 15 years, I feel that I have a good sense of the character of the town and what makes it so unique, as well as the challenges that come from living in a regional town with limited infrastructure.

As a first-home buyer myself who struggled to enter the Sydney housing market and was ultimately only able to afford to purchase in a regional town, I support new developments that increase housing stock and ease pressure on both buyers and renters. However, I strongly contend that not every development is a good one and it is important that developments are not blindly approved without proper consideration. Each proposal must be assessed individually on its specific merits and demonstrate sound reasoning.

The understandable pressure on the NSW Government to meet its commitment under the National Housing Accord to deliver 377,000 new well-located homes across the State by 2029 must not override fundamental planning principles. Approving an inappropriate development adjacent to a World Heritage area, particularly one that is bushfire prone and lacks the necessary infrastructure for sudden population increases, invites disaster.

Overlooking these risks in favour of a development that disregards established planning criteria designed to balance growth with environmental protection will almost certainly have negative consequences for the Government and for residents of Katoomba.

Specifically, this proposal directly threatens the safety and lifestyle of my household and local community in Katoomba, as follows:

- **Unacceptable Bushfire Evacuation Risk:** The high-density project is situated in a high-risk ridge-top area with only one viable evacuation route (Narrow Neck Road); adding 270 households would dangerously increase clearance times during a fast-moving fire, jeopardising the ability of nearby residents to evacuate safely.
- **Infrastructure and Pedestrian Safety Deficiencies:** Local infrastructure cannot sustain a 6% population surge; the surrounding narrow, single-lane roads lack footpaths and inadequate commuter parking, will create significant traffic congestion and an "exponential risk" to pedestrian safety.
- **Unnecessary Doubling of the Density:** Overriding the *Blue Mountains Local Environmental Plan 2015* (LEP) to nearly double the allowable height and density is a strategic failure that disregards decades of community-led planning and infrastructure assessment.

The proposed development fundamentally alters the character of the Katoomba (and potentially the Blue Mountains more broadly if similar developments are to follow), transforming a conservation-focused sanctuary into a congested urban environment.

2.0 Procedural Objection: Inadequacy of the Public Exhibition Period

I would like to start by formally commenting on the fact that the public submissions process for this SSD application is entirely unfit for purpose and appears to have been designed intentionally to minimise the likelihood of any negative feedback on the proposed development, which I find incredibly disappointing.

Based on the appendices made available to the public for review, I note that the developer submitted their application to the Department of Planning, Housing and Infrastructure (DPHI) on 5 March 2026, after receiving confirmation of the Secretary's Environmental Assessment Requirements (SEARs) on 23 June 2025. Put another way, the developer had **255 days** to collate the materials that are now available for the public exhibition process. DPHI itself took **43 days** to take the documents prepared by the developer and make them available for public exhibition.

Now, DPHI expects members of the public to review the 55+ appendices submitted by the developer encompassing hundreds and hundreds of pages prepared by numerous external consultants, and provide a response within **14 days**. I find this quite outrageous and, on face value, appears to suggest that this is intentionally designed to be a one-sided process which fails to give members of the public adequate opportunity to thoroughly review, consider and respond to the serious issues that the proposed development raises.

3.0 The Proposed Development: Preliminary Comments

As described within the Environmental Impact Statement (EIS), the proposed development comprises 9 4-story buildings, consisting of 218 dwellings, 52 serviced apartments, and 316 car parking spaces.

Under the *Blue Mountains Local Environmental Plan 2015* (LEP), this particular site would be limited to a maximum building height of 8m, with strict "soft pervious area" rules for 40% of the site. These requirements are designed to ensure that rooftops stay below the tree canopy line, preserving the

"village" feel and ensuring the development isn't visible from the valley floor or the National Park and allow rainwater to soak in and feed the hanging swamps.

Under the SSD framework, the proposed development has requested the re-zoning of the site to **effectively double** the permissible building height to 15.6m and increase the amount of "hard surfaces" on the site by virtue of the significant number of buildings and driveways on the site.

At 15.6m, the proposed buildings exceed what is allowed even in the Katoomba town centre, making the complex highly visible from the World Heritage escarpment. In order to fit 270 apartments on the site, the SSD proposal requires significantly more "hard surface" (concrete, roads, and large building footprints) which will create a "heat island" and toxic stormwater runoff that would be impossible under the LEP's strict environmental clauses (specifically Clause 6.1 regarding biodiversity).

The proposal documentation fails to offer a compelling justification for amending the Blue Mountains LEP requirements to accommodate this site. The sole apparent reason appears to be that DPHI and the SSD framework have overridden existing regulations to permit these changes. The ability to take an action does not inherently equate to the necessity or appropriateness of doing so.

Further, given the DPHI is focused on the development of new homes to address chronic housing shortages in NSW, I find it odd that the proposal documentation provides no explanation as to why the proposed development includes 52 Serviced Apartments in addition to the 218 dwellings.

There is already significant hotel, motel and short term stay accommodation (**STRA**) in the Blue Mountains (discussed later in this submission). There is no need for additional serviced apartments to be added. This also appears to be at odds with the NSW Government's stated goal of creating new housing to address housing shortages in the State as people don't permanently live in serviced apartments, particularly in regional areas.

4.0 The Inconsistency of the Application of SSD Framework to Blue Mountains LGA

The Blue Mountains LGA was previously excluded from the NSW Government's 2025 Low and Mid-Rise Housing Reforms, which, among other things, allowed for 4-6 story apartments to be built within 800 metres of a train station.

While these reforms apply to most of Greater Sydney, the Blue Mountains LGA was granted a specific exclusion from these reforms. Relevantly, some of the key reasons for the NSW Government agreeing to this exclusion were:

- **Safety vs. Density:** The NSW Rural Fire Service (RFS) and the Department of Planning agreed that increasing density within 800m of railway stations in the Mountains (which are often the highest, most exposed ridges) would create an unacceptable risk to life.
- **The Groundwater Conflict:** The 2025 reforms allow for significantly more "hard surface" (roofs and concrete) and less "pervious area" (dirt and garden). If the reforms were applied, more rainwater would run off into drains rather than soaking into the ground to feed the swamps. This would lead to the "drying out" and eventual death of the swamps, which would be a breach of Federal environmental law.

Both of these reasons are unquestionably more directly applicable to the proposed development site, which sits less than 250 metres from the World Heritage listed Blue Mountains National Park (see Figure 1) than they would have been if the proposed development was instead situated within 800 metres of Katoomba train station (see Figure 2). On that basis alone, there is an inherent inconsistency in play that would suggest the SSD application cannot proceed, if the NSW Government and DPI accepts that these risks are elevated at the proposed site.

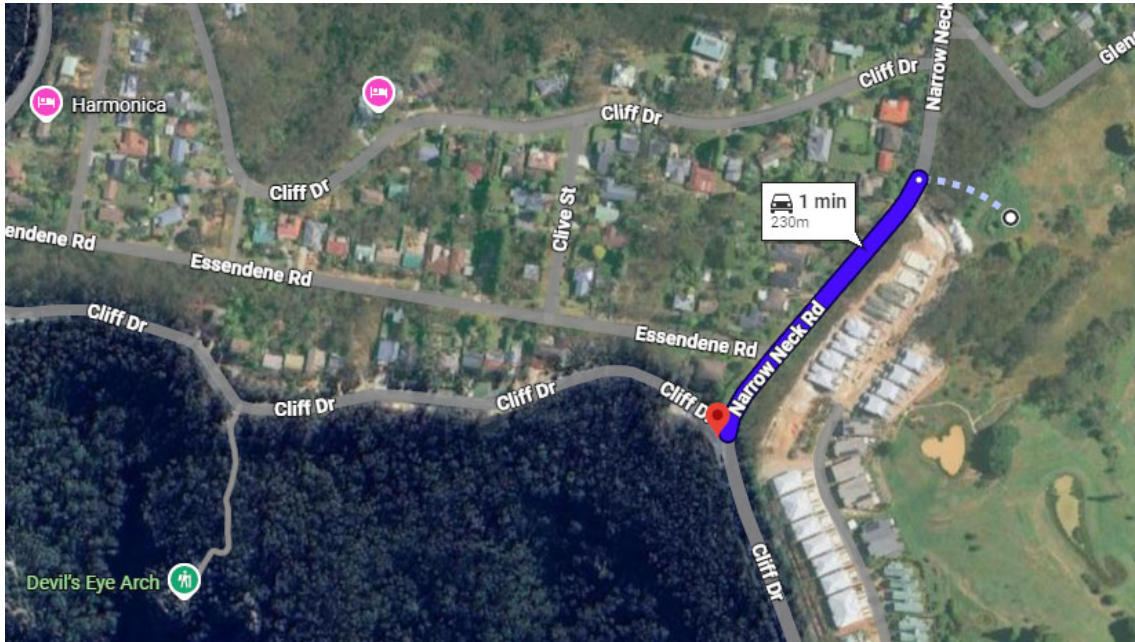


Figure 1: Proposed development site context - distance from World Heritage area

Source: Google Maps

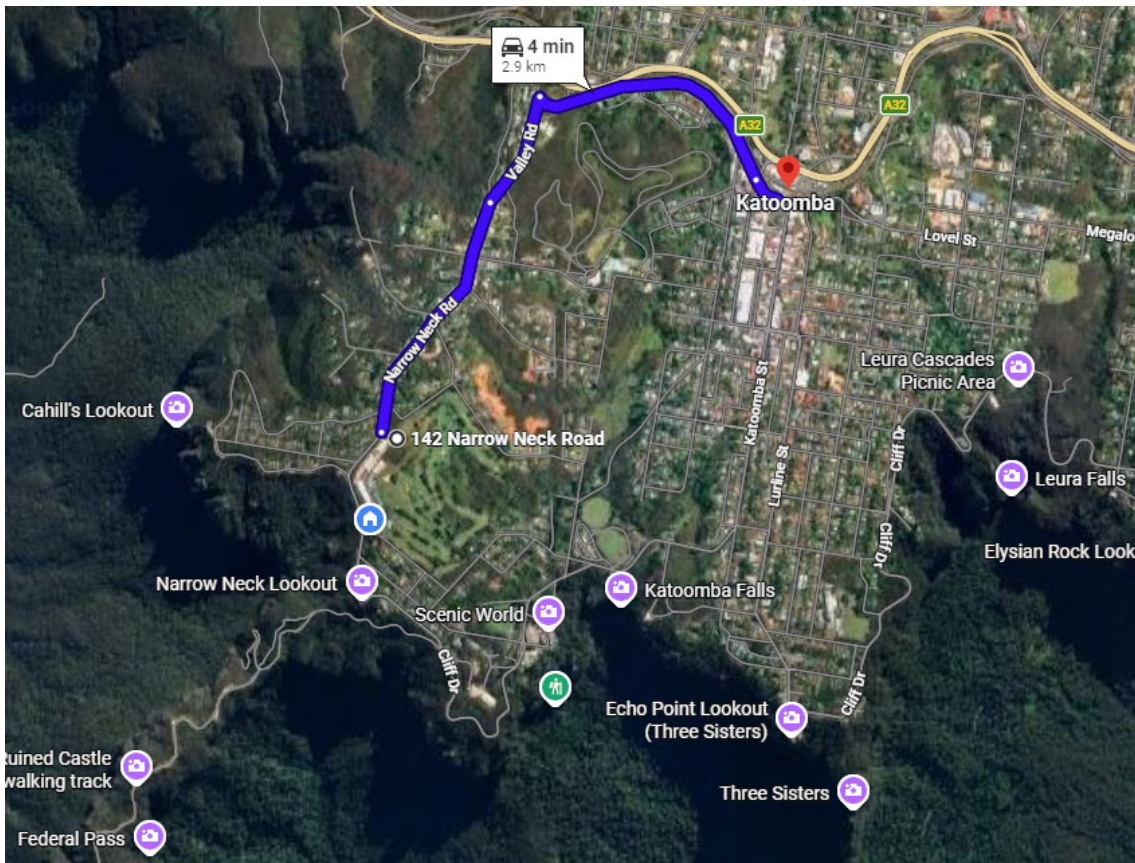


Figure 2: Proposed development site context - distance from focal point (Katoomba train station) of the 2025 Low and Mid-Rise Housing Reforms, which the Blue Mountains LGA was excluded from

Source: Google Maps

By excluding the Blue Mountains LGA from the 2025 reforms, the NSW Government has officially acknowledged that the region is too dangerous for *distributed* density along rail corridors (ie. the purpose of the 2025 reforms), and yet the SSD framework is now being used to create the opportunity to approve *concentrated* density in the exact same high-risk areas, albeit in a location that has even higher community and environmental risks associated with the site.

5.0 Detailed Reasons for Objection

While there are many reasons why this development should not go ahead as currently proposed, in the interest of time I have focused on **four fundamental reasons** that I believe should be fatal to the proposed development in its current form:

- The proposed development will not achieve the stated aims of the NSW Government.
- The Blue Mountains City Council (BMCC) is already projected to surpass its current housing development targets.
- Existing infrastructure is insufficient to support the proposed development.
- The scale of the proposed development presents an unacceptable bushfire risk.

5.1 The proposed development will not achieve the stated aims of the NSW Government

5.1.1 Consideration of alignment with NSW Government housing goals

I understand and appreciate that the purpose of the HDA and associated SSD framework is to prioritise large scale housing projects and remove approval authority from local councils to prevent administrative backlogs. I also recognise that the NSW Government has set an ambitious 5 year target of 377,000 new homes to be built by 2029. This target was set with the specific goal of addressing Australia's chronic housing shortage.¹

That said, the proposed development appears to be nothing more than an opportunistic attempt to use the SSD framework and HDA approval process to bypass the local planning laws, which clearly would not allow for a development of this scale to be built in the Blue Mountains LGA on account of it being so close in proximity to a World Heritage area.

I also think it is important to note that no one in the local community is actively asking for development of this type or scale. Let's be clear that the only party that the proposed development is in the best interests of is the developer themselves.

Accordingly, I have serious concerns that the proposed development will be completely at odds with what the NSW Government is trying to achieve with the SSD framework. The NSW Government's own website states that the 5 year housing targets:

*"are critical to address the housing crisis to meet the future needs of our community so they have access to a great place to live. The targets help us **address the housing shortage** and prioritise more diverse and **well-located homes in areas with existing infrastructure capacity** – such as transport, open spaces, schools, hospitals and community facilities".²*

¹ NSW Government, *Housing Targets - Frequently Asked Questions*, available at: <https://www.planning.nsw.gov.au/policy-and-legislation/housing/housing-targets/frequently-asked-questions-housing-targets> (accessed April 2026)

² NSW Government, *Blue Mountains Council's housing target*, available at: <https://www.planning.nsw.gov.au/policy-and-legislation/housing/housing-targets/blue-mountains-councils-snapshot> (accessed April 2026)

5.1.2 Limitations on Katoomba employment opportunities and impact “well-located” home policy goals

On the concept of “well-located” homes, I note that the DPHI released “The Sydney Plan”³ earlier this year in February 2026, which provides additional insight into the priorities of the NSW Government. There is a clear focus in *The Sydney Plan (2026)* on “**people living near jobs, services and amenities**”⁴ and prioritising growth in “areas where **infrastructure capacity exists or where investment can unlock land for new homes and employment opportunities**”⁵.

There is also a focus within *The Sydney Plan (2026)* on increasing the percentage of the population that has access to a large number of **employment opportunities within 30 minutes via public transport**.⁶

In this respect, *The Sydney Plan (2026)* estimates that only **200-300 jobs** will be created in Katoomba by 2034, increasing to 400-500 jobs in total by 2044.⁷ By any measure, this represents strong confirmation from the NSW Government that there are minimal expectations of new job opportunities in the Blue Mountains over the next 2 decades.

Employment categories

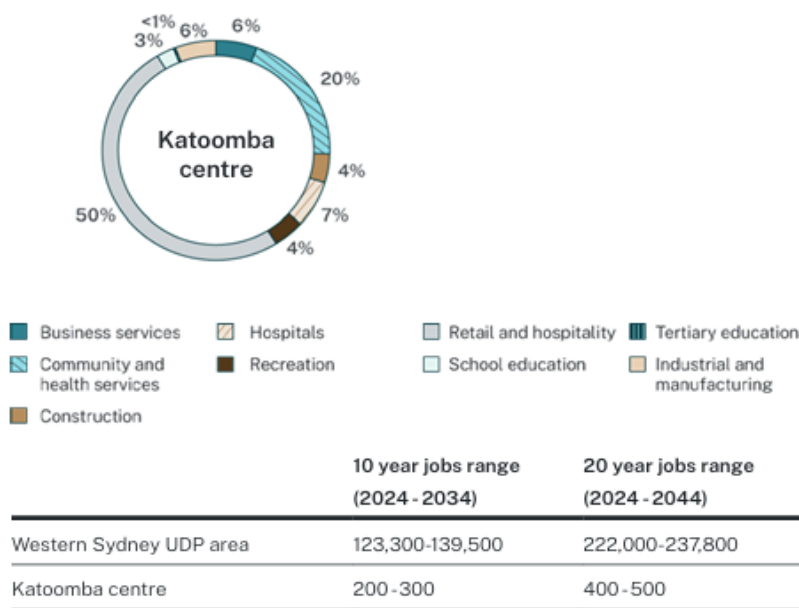


Figure 3: NSW Government 10 year and 20 year jobs growth forecast for Katoomba

Source: *The Sydney Plan, Appendix E: Jobs Guidance*

³ NSW Government, *The Sydney Plan*, available at: <https://www.planning.nsw.gov.au/plans-for-your-area/the-sydney-plan> (accessed April 2026)

⁴ NSW Government, *The Sydney Plan* (page 23), available at: <https://www.planning.nsw.gov.au/plans-for-your-area/the-sydney-plan> (accessed April 2026)

⁵ NSW Government, *The Sydney Plan* (page 42), available at: <https://www.planning.nsw.gov.au/plans-for-your-area/the-sydney-plan> (accessed April 2026)

⁶ NSW Government, *The Sydney Plan* (page 50), available at: <https://www.planning.nsw.gov.au/plans-for-your-area/the-sydney-plan> (accessed April 2026)

⁷ NSW Government, *The Sydney Plan, Appendix E: Jobs Guidance* (page 9), available at: <https://www.planning.nsw.gov.au/plans-for-your-area/the-sydney-plan> (accessed April 2026)

Despite this admission by the NSW Government, a target of **600 new homes** has been set for development in the Blue Mountains LGA by 2029.⁸

I don't have any major objections to this housing target, however, it is important to recognise that this housing target is not just for the suburb of Katoomba, but for the entire Blue Mountains LGA which spans from Mount Victoria in the West to Lapstone in the East, covering 1,431 square kilometres. For reference of the scale of the Blue Mountains LGA, it takes the best part of an hour to drive from one side of the Blue Mountains LGA to the other side and is a 60km drive. It is a massive area of land.

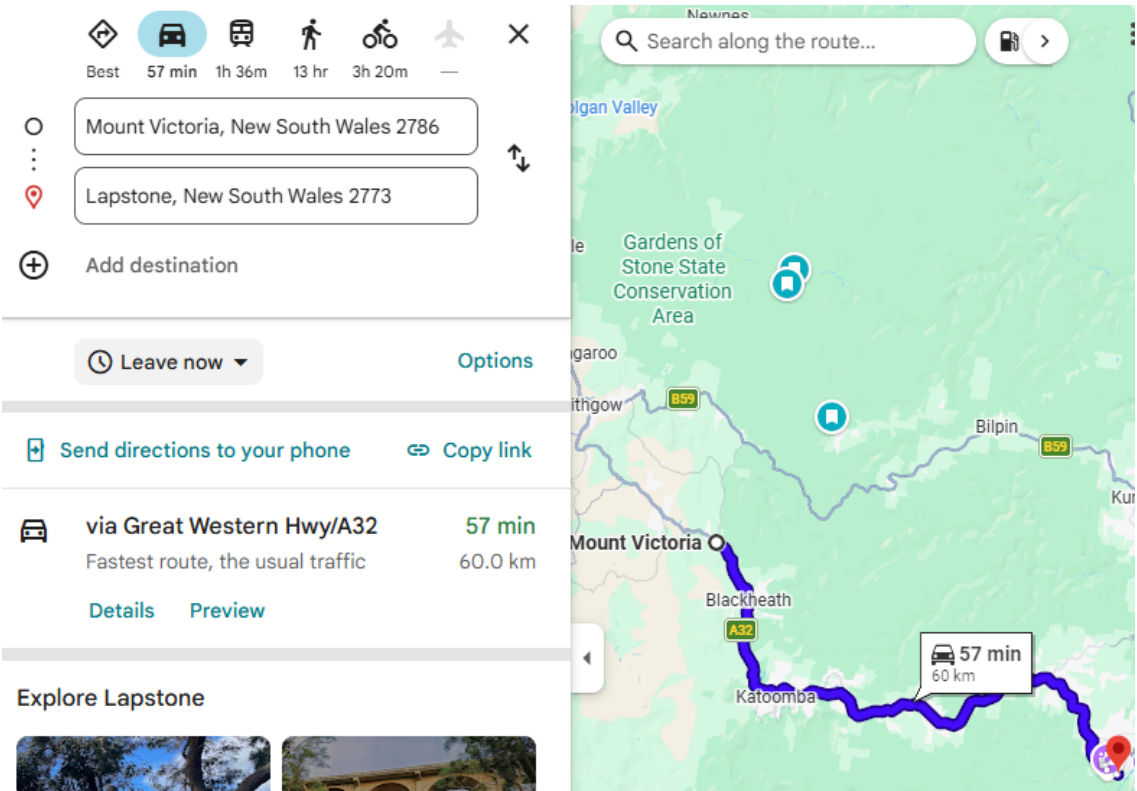


Figure 4: The unique size and scale of the Blue Mountains LGA
Source: Google Maps

⁸ NSW Government, *Blue Mountains Council's housing target*, available at: <https://www.planning.nsw.gov.au/policy-and-legislation/housing/housing-targets/blue-mountains-councils-snapshot> (accessed April 2026)

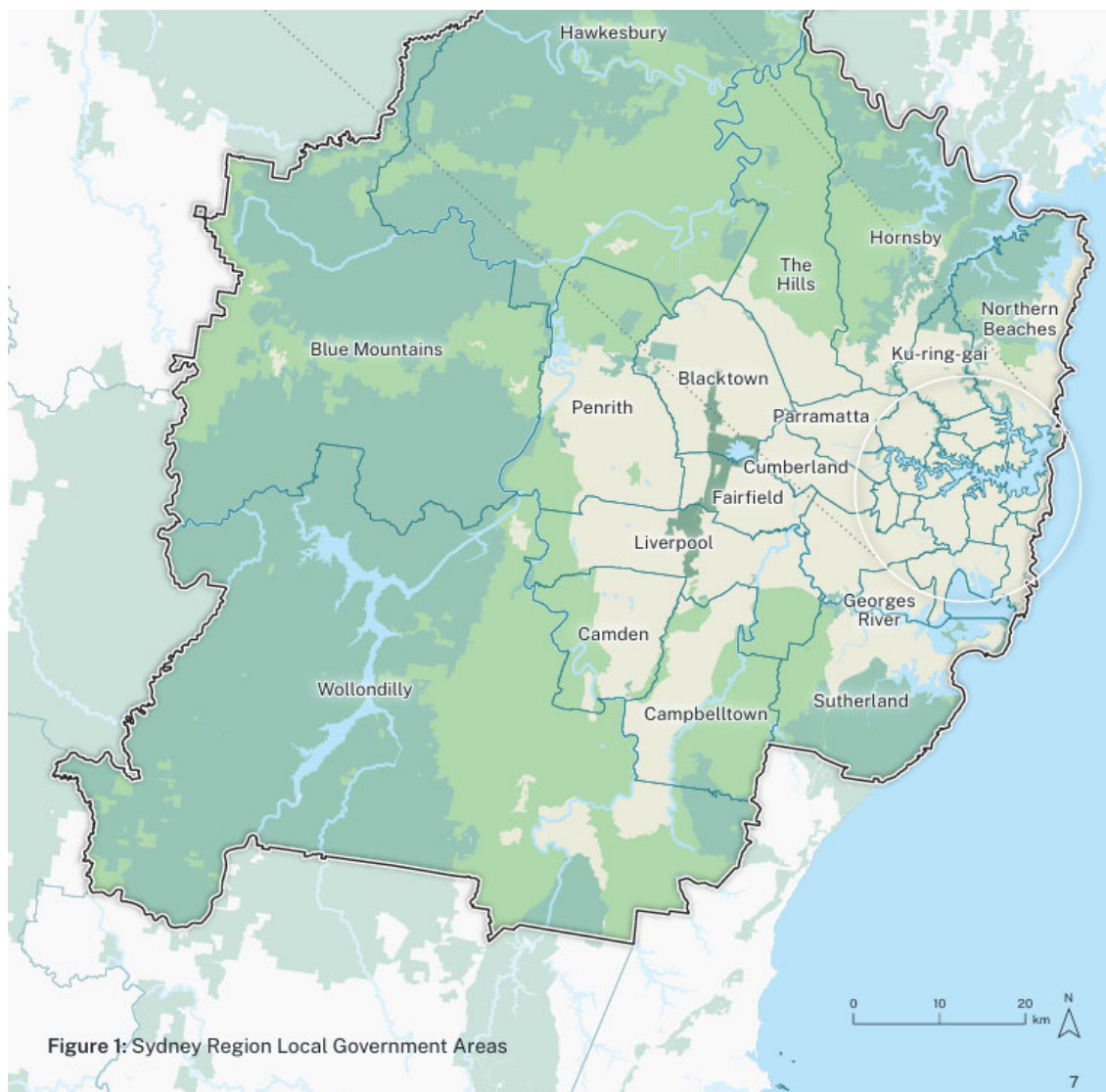


Figure 5: Scale of the distance between the Upper/Western side of the Blue Mountains and other LGAs in Greater Sydney

Source: *The Sydney Plan (2026)*, page 7

To the extent that the Australian Bureau of Statistics (ABS) 2021 *Census* results for Katoomba indicate that there is an average of 2.1 people per household⁹ (compared to 2.4 people per household in the broader Blue Mountains LGA¹⁰), it would be reasonable to assume that the construction of 218 residential apartments and 52 serviced apartments, if fully occupied, could accommodate approximately 570 additional residents of Katoomba.

If the goal of the NSW Government is to create well-located homes that are within 30 minutes of employment by public transport, this is a **fatal flaw** in the proposed development.

⁹ Australian Bureau of Statistics, *Katoomba 2021 Census Quickstats*, available at: <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL12085> (accessed April 2026)

¹⁰ Australian Bureau of Statistics, *Blue Mountains 2021 Census Quickstats*, available at: <https://www.abs.gov.au/census/find-census-data/quickstats/2021/LGA10900> (accessed April 2026)

There are currently limited employment opportunities within Katoomba itself, (certainly not enough for 570 new residents), nor does the NSW Government itself expect there to be anywhere near the required number of new jobs in Katoomba for this number of new residents for another 18 years, until 2044.

5.1.3 Consideration of public transport and infrastructure limitations for commuters

If the new residents of the proposed development are not able to take up employment in Katoomba, they would need to look for employment opportunities in the broader Blue Mountains LGA.

Based on the 2021 *Census* results, Katoomba's population of 8,200¹¹ makes up approx. 10% of the population of the Blue Mountains LGA of 78,100¹². Per ABS figures, the population spread across the Blue Mountains LGA is fairly dispersed with Springwood, Katoomba, Blaxland, Winmalee, Wentworth Falls, and Glenbrook each having populations greater than 5,000 and all other suburbs within the LGA having populations below 5,000.

As such, employment opportunities in other even smaller suburbs within the Blue Mountains LGA are perhaps more limited than those in Katoomba (which are already accepted by the NSW Government in its own report to be minimal), given Katoomba is one of the largest and most developed suburbs in the LGA.

If there are insufficient jobs in the Blue Mountains LGA for 570 new residents, the question then becomes, where would these residents need to travel to each day in order to obtain employment. *The Sydney Plan*¹³ shows that the closest CBD to Katoomba is Greater Parramatta (see Figure 6), which is a 70 minute drive in a best case traffic scenario (see Figure 7), or **80-90 minutes by public transport** (see Figure 7). By the NSW Government's own metrics, this is well outside of the 30 minute guideline for housing to be considered "well-located".

¹¹ Australian Bureau of Statistics, *Katoomba 2021 Census Quickstats*, available at: <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL12085> (accessed April 2026)

¹² Australian Bureau of Statistics, *Blue Mountains 2021 Census Quickstats*, available at: <https://www.abs.gov.au/census/find-census-data/quickstats/2021/LGA10900> (accessed April 2026)

¹³ NSW Government, *The Sydney Plan* (page 50), available at: <https://www.planning.nsw.gov.au/plans-for-your-area/the-sydney-plan> (accessed April 2026)

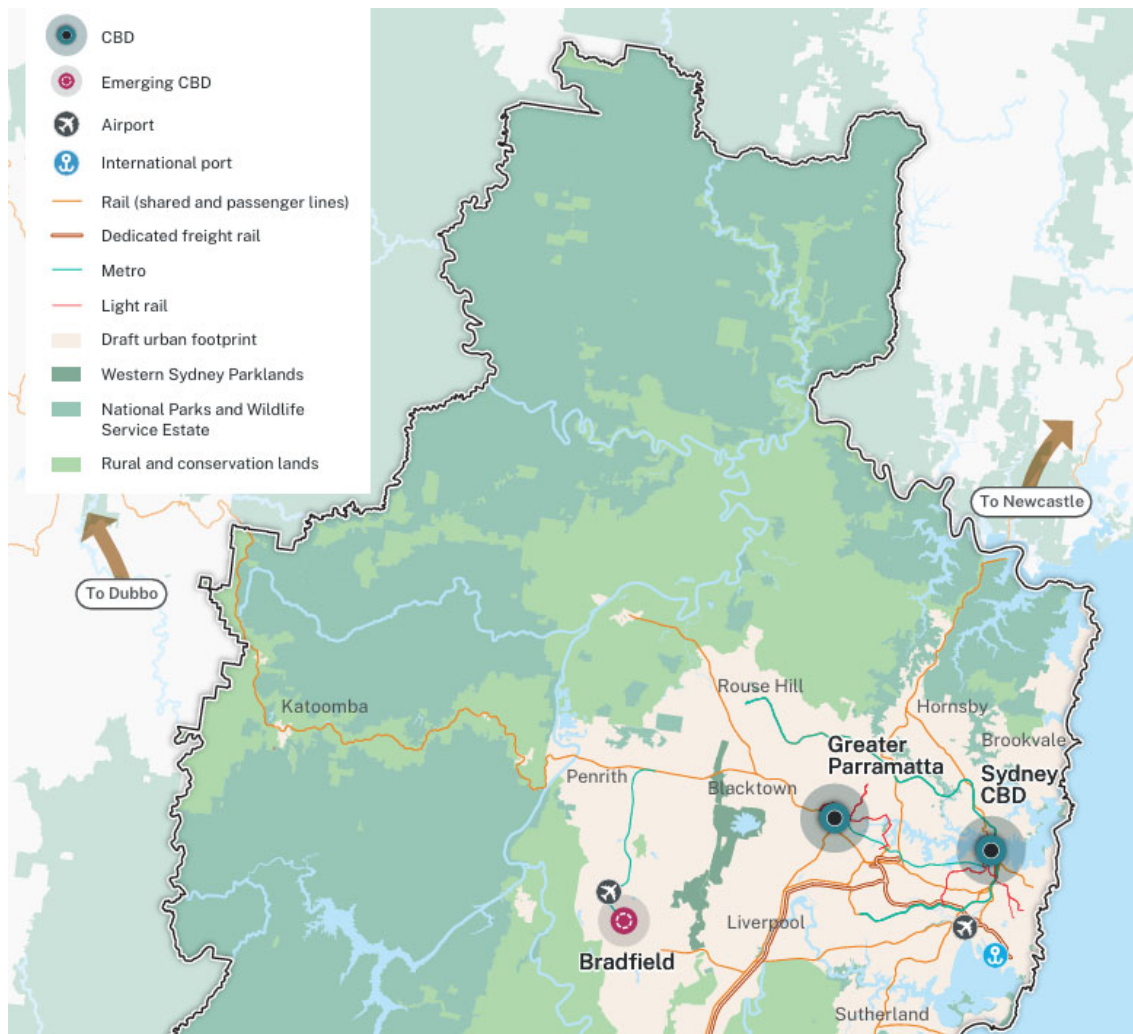


Figure 6: Scale of the distance between Katoomba and other LGAs in Greater Sydney

Source: *The Sydney Plan (2026)*, page 7

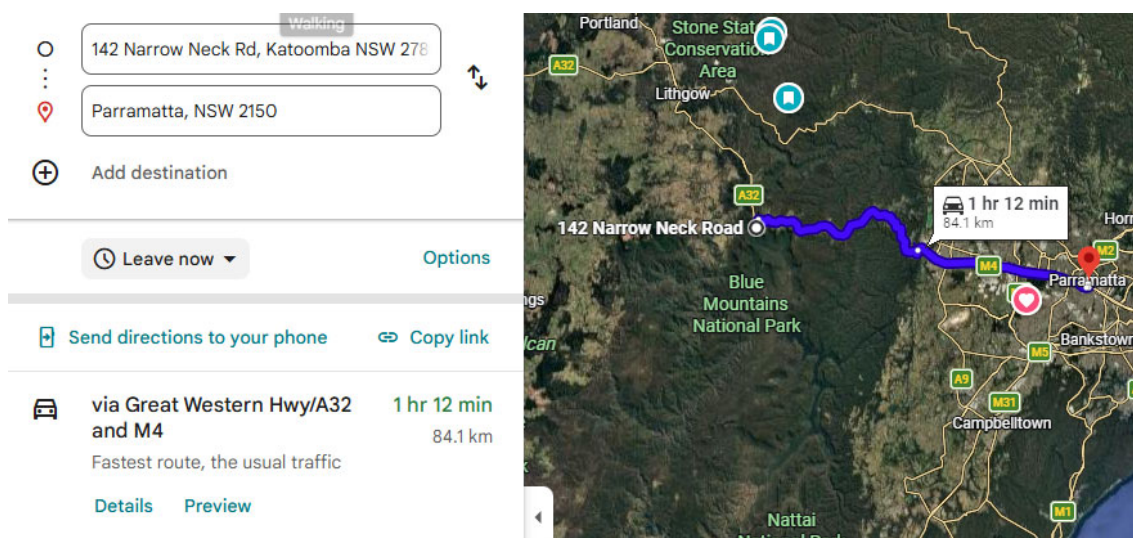


Figure 7: Indicative driving times between Katoomba and Greater Parramatta

Source: *Google Maps*

Additionally, the development site is approx. 3km from the closest train station, being Katoomba Station (see Figure 2) and there are no walking paths along Narrow Neck Road or surrounding roads that would allow commuters to walk from the development site to the train station in the event that they chose not to drive to the station. By any objective measure, this development site is at odds with the NSW Government's own stated goal of creating **well-located** new homes.

5.1.4 Consideration of accommodation demand drivers in Katoomba

The other aspect of this issue that the developer's proposal fails to acknowledge is that Katoomba is one of the most iconic tourist towns in Australia. Approximately 4.7 million people visit the Blue Mountains LGA annually, and Katoomba receives over 2 million of those visitors on its own. This is a huge number of short term visitors to Katoomba, which completely dwarfs Katoomba's residential population of just 8,200.

To the extent that Katoomba is a tourist town, the discussion of housing shortages must give proper consideration to the context behind "rental vacancies" (homes available for long-term tenants) and "unoccupied dwellings" (homes that are physically empty).

On any given weekend, visitors can easily outnumber residents in Katoomba town centre by 3 to 1. The town is very quiet from Mon-Thurs each week and then receives an influx of visitors from Sydney every Fri-Sun.

In this high demand environment for short term accommodation, the most likely outcome for the proposed development is that a significant portion of the dwellings will be purchased by investors who will use the properties either as a holiday home that allows them to visit the World Heritage Listed Blue Mountains a few times a year while sitting vacant for large portions of the year, or they will be listed on Airbnb or similar platforms as STRA.

In either case, the Blue Mountains LGA already has significant short stay capacity both through hotels and motels, as well as Airbnb listings. Historically, Katoomba has had a high number of "unoccupied dwellings" being dwellings that sit vacant (eg. holiday houses for wealthy families), often estimated at around 1 in every 10 homes¹⁵. There are also well over 1,000 properties listed on Airbnb within the Blue Mountains LGA at present, and over 330 in Katoomba alone. Local data suggests that nearly **20% of all rental stock** in the Blue Mountains is currently being used for short-term holiday stays rather than long-term residents¹⁶. This removes significant stock from the long-term rental market and contributes to low rental vacancy rates for residents.

While I acknowledge that rental vacancy rates in Katoomba could be higher in an ideal world, it is worth noting that lower mountains suburbs closer to Sydney, such as Springwood, have even worse

¹⁵ Blue Mountains Conservation Society Inc, *Housing in the Blue Mountains - Fast Facts* (page 3), available at: <https://www.google.com/url?client=internal-element-cse&cx=5d96b50adb15bb925&q=https://www.bluemountains.org.au/housing-reform-2024/docs/housing-fast-facts-2024.pdf&sa=U&ved=2ahUKEwjPrOPT3YyUAX5RmcHHSAAzwQFnoECAYQAQ&usq=AOvVaw0jDDIBiwcDNylkQ4nwP9m-&fexp=121636677,121636678> (accessed April 2026)

¹⁶ Blue Mountains City Council, *Council urges holiday homeowners to rent long term, to address housing shortages*, available at: <https://www.bmcc.nsw.gov.au/media-centre/council-urges-holiday-homeowners-to-rent-long-term-to-address-housing-shortages#:~:text=There%20are%20currently%20around%204700,Mountains%20are%20short%2Dterm%20rentals> (accessed April 2026)

vacancy rates, potentially indicating a more pressing need for additional housing in lower mountains suburbs rather than in Katoomba.

Should the NSW Government look at measures to further tighten the STRA rules within the Blue Mountains LGA, even if a portion of these unoccupied properties or STRA properties were to be transitioned back to the rental market, this would completely negate any need for additional houses to be developed in the Blue Mountains LGA under the SSD pathway, as this policy change would create excess housing capacity that is significantly greater than the 5 year target that was set by the NSW Government for the Blue Mountains LGA.

In the absence of any restrictions being placed on the developer in relation to the likely STRA use of the dwellings, there is an **unacceptable risk** that very few of the 270 new homes will do anything to achieve the goals of the NSW Government to reduce systemic housing shortages.

5.2 The BMCC is already projected to surpass its current housing development targets

Blue Mountains Mayor, Mark Greenhill, has publicly stated that the Blue Mountains LGA is already on track to surpass its State-endorsed housing target of 600 new homes within 5 years under the existing local planning controls, without the need for the SSD pathway to be activated. To the extent that the Blue Mountains LGA is already meeting the agreed growth strategy through local approvals¹⁷, there is no "emergency" need for the State to override local controls for massive developments.

The proposed development of 270 dwellings (218 residential apartments and 52 serviced apartments) represents over 40% of the entire 5 year target for the Blue Mountains LGA, with the development being located in a suburb that only accounts for 10% of the entire population of the Blue Mountains LGA (based on 2021 Census data).

If this development were to proceed, it would cause the LGA to significantly overshoot the agreed-upon growth strategy by nearly, which will have many negative impacts on Katoomba.

Furthermore, the application seeks to characterise the proposed development within the EIS as being consistent with the Blue Mountains Local Housing Strategy 2020¹⁸ which was prepared by BMCC. This is disingenuous, particularly in light of the various and serious unresolved concerns raised by the BMCC with the developer as outlined in Table 12 of the EIS.

5.3 Existing infrastructure is insufficient to support the proposed development

Based on the 2021 *Census* results, the current population of Katoomba is only 8,200.

Using these numbers, the proposed development will rapidly increase the population of Katoomba by approx. 6%. This is a significant jump, which raises the question of whether Katoomba has the required infrastructure in order to support this increase. The town's infrastructure is currently calibrated for a stable population, not a growth surge.

As a resident of Katoomba since 2020, the two issues that will certainly arise for such a large surge in population growth are in connection with (i) pedestrian safety and (ii) access to medical services.

¹⁷ Blue Mountains City Council, *Mayor slams "deeply flawed" State planning process for Narrow Neck Road proposal*, available at: <https://www.bmcc.nsw.gov.au/media-centre/mayor-slams-%E2%80%9Cdeeply-flawed%E2%80%9D-state-planning-process-for-narrow-neck-road-proposal> (accessed April 2026)

¹⁸ Environment Impact Statement (page 28-29) available at: <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-86456706%2120260304T234723.439%20GMT> (accessed April 2026)

The EIS outlines that access to the proposed development site will be via The Escarpments (a narrow, private road used by other existing residents of the Escarpments) and by Glencoe Road. Additionally, the EIS indicates that there will be capacity 316 car parks located on the development site to accommodate the 270 new dwellings. This will create a significant increase in traffic on these streets as well as along Narrow Neck Road. For reference, there are currently less than 50 dwellings and cars on The Escarpments and Glencoe Road, which means the development will add at least 5-6 times the amount of traffic to these roads, triggering significant increases in the amount of traffic congestion in the area.

The proposed development site is over 2km from the Katoomba railway station, and there are no footpaths connecting the development to Katoomba town centre or Katoomba train station, forcing pedestrians onto the road.

With this increase in the number of cars and traffic in the area, there will be an exponential risk to pedestrians. Currently there are **no pedestrian footpaths** on Narrow Neck Road, The Escarpments, or Glencoe Road. Nor are there any footpaths on any of the alternative roads that pedestrians may choose to walk on if travelling from the proposed development site to Katoomba town centre (Stuarts Road, Farnells Road, Neale Street). In addition, all of the roads in question are **single lane in each direction and narrow**, meaning that pedestrians are **forced to walk on the shoulder of the road**.

Additionally, given the close proximity to the escarpment, each of these streets are often shrouded in fog, creating significant safety hazards for pedestrians, cyclists and runners.

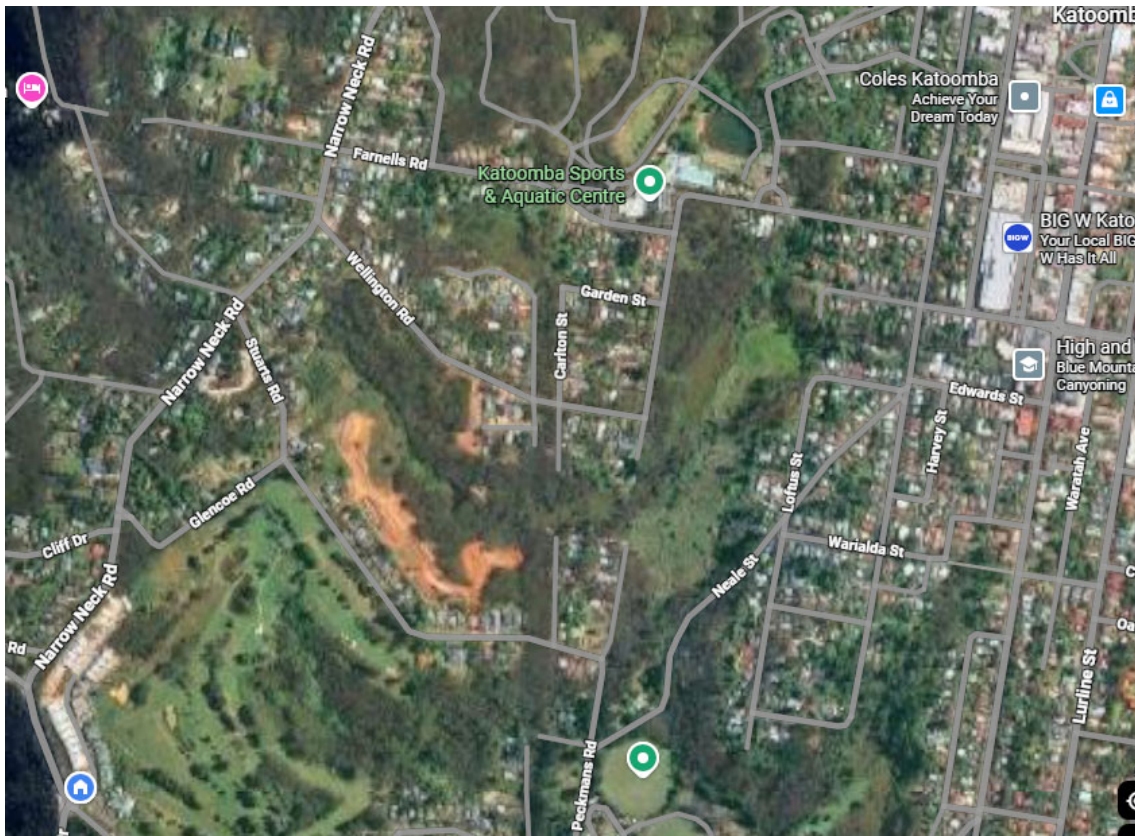


Figure 9: Potential pedestrian routes from 142 Narrow Neck Road to Katoomba town centre
Source: Google Maps

With the increase in vehicle traffic as well as pedestrian traffic arising from this development, this creates an unacceptable risk of a pedestrian being injured or killed in the area. The documents submitted by the developer are insufficient in this respect and do not adequately address this serious risk. The traffic report obtained by the developer also **incorrectly states that there are parking opportunities on both sides of Narrow Neck Road**. This is false, there is no space to park on Narrow Neck Road near the development site without blocking off the traffic lane.



Figure 10: Evidence of road width and no footpaths adjacent to 142 Narrow Neck Road

Source: Google Maps

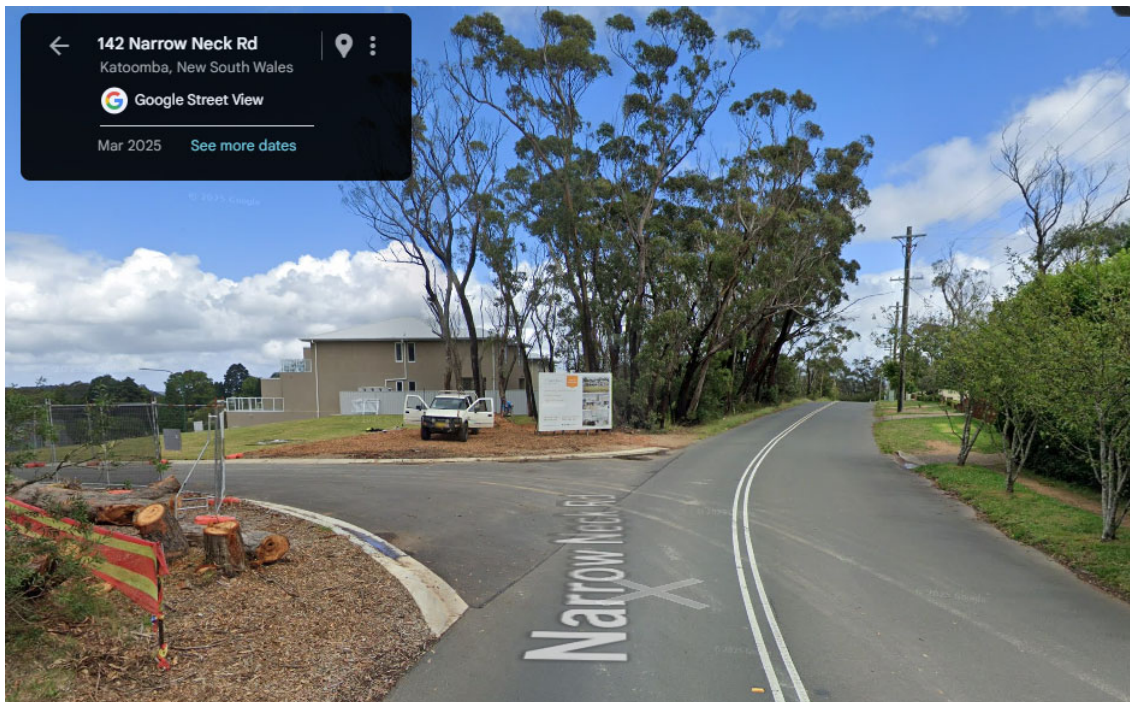


Figure 11: Evidence of road width and no footpaths adjacent to intersection between Narrow Neck Road and The Escarpments
 Source: Google Maps



Figure 12: Evidence of road width and no footpaths further along Narrow Neck Road
 Source: Google Maps

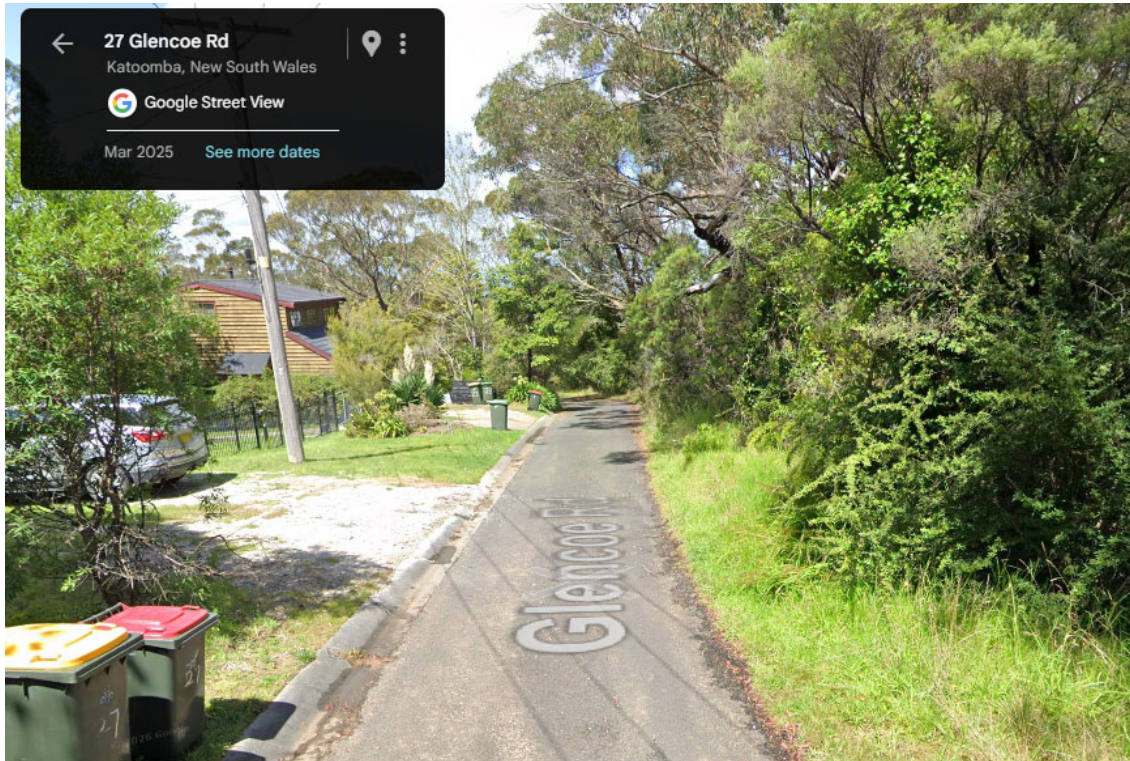


Figure 13: Evidence of road width and no footpaths further along Glencoe Road

Source: Google Maps

5.4 The scale of the proposed development presents an unacceptable bushfire risk

It is relevant to note, as is conceded in the private Bushfire Statement at Appendix R, the proposed development site was, until very recently, considered to be 'bushfire prone land'. The developer removed certain vegetation from the site which allowed it to be reclassified, thereby removing a key planning trigger to consider potential bushfire impact.

This is misleading in many ways as to the risk of placing a high density development on the site, as the proposed development site is essentially completely surrounded by bushfire prone land (see Figure 14) and there are limited roads that residents would be able to access in a major evacuation scenario.

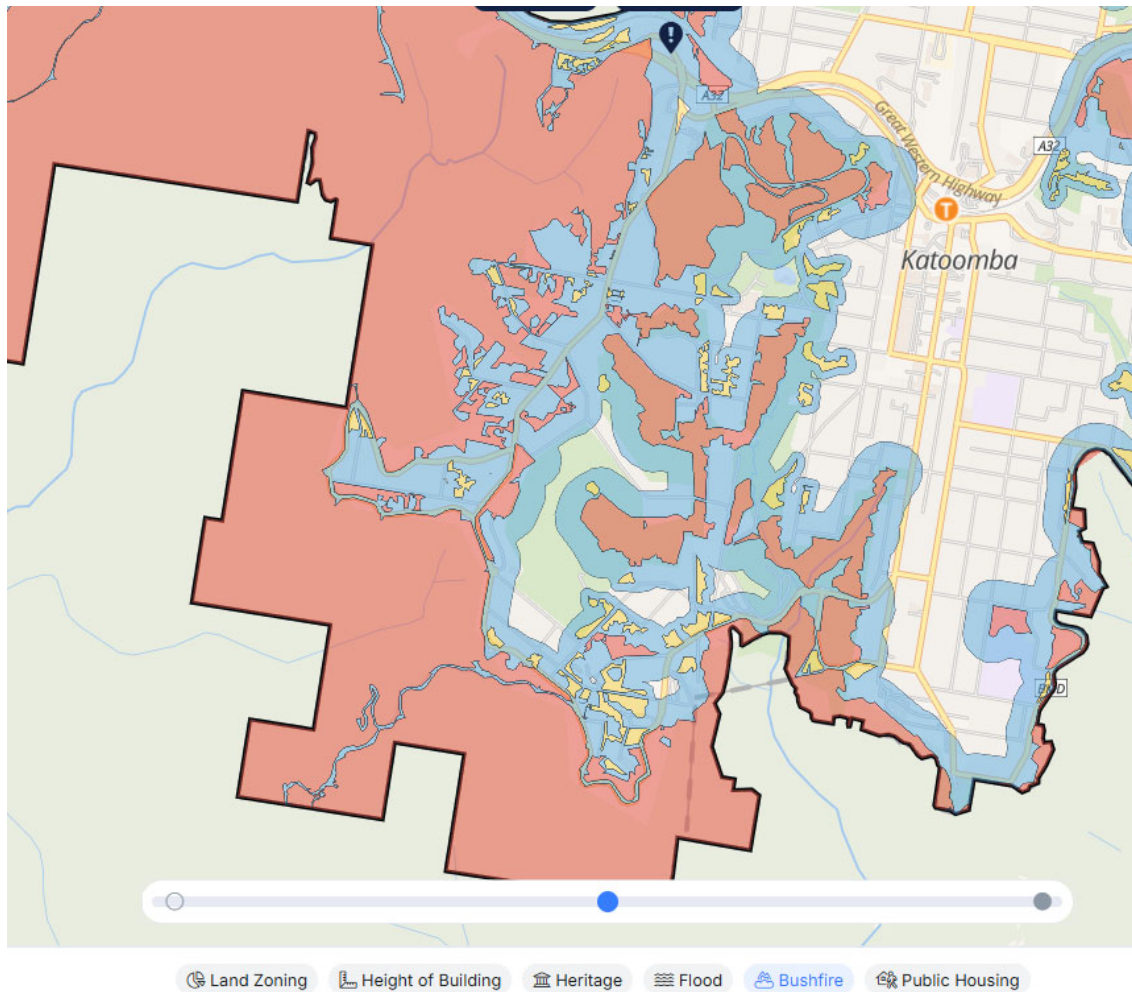


Figure 14: Evidence of bush fire prone land adjacent to the proposed development site

Source: Property Datamap, Katoomba 2780

Nonetheless, DPHI has indicated that:

Whilst the subject site is not mapped as bushfire prone land, the subject site adjoins land that is identified as bushfire prone.

*In accordance with the SEARs and Ministerial Direction 4.3 Planning for Bushfire Protection, the provided Bushfire Statement must consider the implications of adjoining bushfire prone land on the development and any **impacts on evacuation routes**, noting the proposed increase in residential density.*

Consultation with RFS and Fire and Rescue NSW must be demonstrated.

As a result of this declassification, the sole purpose of the private Bushfire Statement was to provide an assessment of the impact of the proposed development and increased residential density on potential evacuation routes.

Given the potential consequences of this assessment it is wholly inappropriate that this assessment has been issued within the private Bushfire Statement with essentially flippant disregard for potential loss of life. In approximately 6 short paragraphs, the view is reached that “the public roads can handle

the proposed increased volumes of traffic when a bush fire emergency occurs”, appearing to largely rely on the Traffic and Parking Impacts Report by TFF Consulting (Appendix AI), which in no way gave any consideration to things that would be relevant to a bushfire scenario such as:

- the speed of a bushfire impacting the area (particularly given the proximity to the escarpment cliff face and the fact that fires accelerate exponentially as they move uphill)
- whether the direction of the bushfire could block any access roads
- the presence of heavy smoke
- the impact on local roads of residents leaving the area on mass
- the impact of evacuation timelines if Narrow Neck road becomes clogged up to the Great Western Highway intersection
- roads being blocked by emergency service or other abandoned vehicles
- the impact of tourist traffic if a bushfire were to happen on a weekend

Narrow Neck Road is a single access route and is the only viable road connecting the proposed development site back to the Great Western Highway (particularly in the event of a bushfire approaching Cliff Drive from the South). It doesn't take an expert to realise that adding 270 households (plus any tourists in the area) will significantly increase the clearance time required to evacuate the residents in this area of Katoomba during a fast-moving fire.

The site is situated on a high ridge surrounded by bushfire-prone vegetation. As noted above, under extreme "catastrophic" conditions, fire moves significantly faster uphill. Placing a high-density population here is reckless because it places vulnerable residents in the direct path of fire with limited ways out.

Narrow local streets were never designed for the volume of traffic that 270 apartments would generate, especially during an emergency where fire trucks need to go in while residents are trying to get out.

Additionally, the private Bushfire Statement also states that as the proposed development site is not identified as being bushfire prone land, "a 'Shelter in Place' strategy could also be appropriate". Given the site is no longer considered 'bushfire prone land' and is not subject to the same BAL requirements that would be applicable to a development that was on 'bushfire prone land', this strategy would likely carry significant risk and has not been properly thought through to the required level of detail in the private Bushfire Statement.

From my understanding, the RFS generally opposes high-density "shelter-in-place" strategies for new developments in high-risk "ridge-top" locations, such as this one. Instead, they prioritise early evacuation as the appropriate emergency management strategy.

Perhaps most importantly, the RFS Pre-DA Advice Summary (Appendix BB) appears to indicate that the proposed development site's emergency and evacuation planning is **non-compliant**.

In my opinion, these serious risks have not been adequately addressed by the developer and would represent a significant disregard for potential loss of human life if the development were to proceed in its current form.

6.0 Conclusion

In summary, the current proposal for 142-150 Narrow Neck Road, Katoomba:

- Is strategically inconsistent with the NSW Government's previous decision to exclude the Blue Mountains LGA from the 2025 Low and Mid-Rise Housing Reforms
- Is not aligned with the underlying goals of NSW's housing policy objectives
- Is unnecessary as the Blue Mountains LGA is already meeting its housing targets
- Is unsupported by adequate infrastructure
- Presents an unacceptable bushfire risk nearby residents

These issues are fundamental and cannot be resolved through minor amendments.

7.0 Requested Outcome

I request that the application be:

(i) Refused in its current form

or, at minimum:

(ii) Substantially redesigned to comply with the *Blue Mountains LEP 2015* and demonstrate genuine alignment with State planning objectives and safety requirements.

Mandatory Declarations

- **Political Donations:** I declare that I have not made any reportable political donations in the last two years.
- **Privacy and Disclaimer:** I acknowledge that I have read the Department's Disclaimer and Declaration and the Privacy Statement. I understand my submission will be published on the NSW Planning Portal.

Signature: A. Cant

Date: 30-Apr-2026 | 07:02:31 AEST