

Objection to proposed development

Application number: SSD-86456706

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

I am writing to object to the above noted proposed mixed use development. I live adjacent to the proposed site and regularly walk, run and cycle along the streets in the area. I moved to Katoomba from Erskineville 6 years ago, drawn to the World Heritage listed Blue Mountains National Park and my love of hiking and trail running. Since then my partner and I have made Katoomba our home, continuing to the local community through the Rural Fire Service, local Animal Shelter and the Community Food Co-Op. I am not writing from a distance, this is my home.

I write this submission, not as an opposition to housing, we need more housing in the Blue Mountains, I am in opposition to the illfitting solution that this proposal offers. My objection rests on the following grounds,

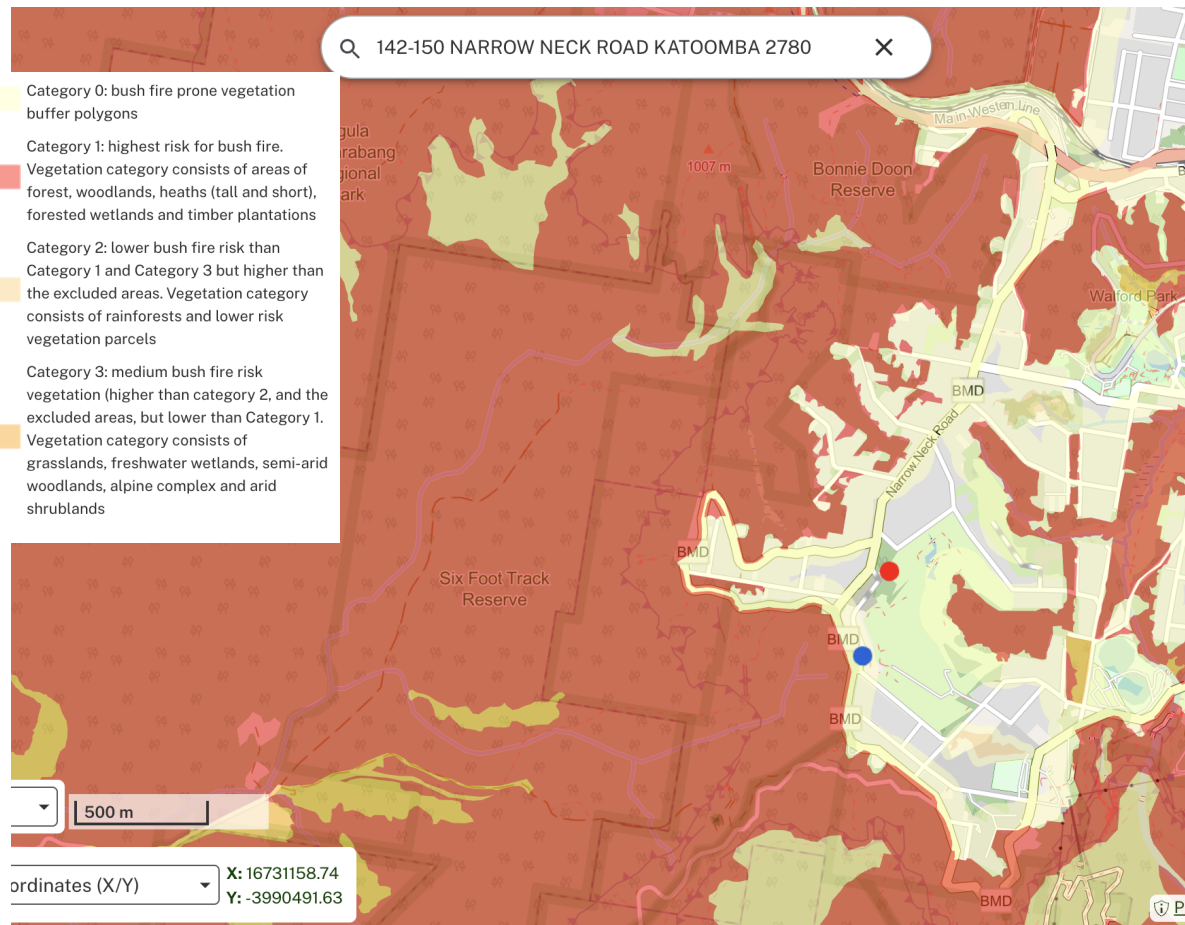
- **Bushfire risk has not been genuinely assessed.** The Bushfire Statement is a memo about road access, not a hazard assessment. Neither the RFS nor Fire and Rescue NSW have endorsed the proposal. The site was declassified as bushfire prone land one day after being declared State Significant Development.
- **The infrastructure cannot support it.** There are no footpaths, street lighting, cycle paths or even kerb and guttering. Public transport is limited to three afternoon bus services and an hourly train. The commuter car park reached capacity a decade ago.
- **It threatens a critically endangered species and a World Heritage Area.** Stormwater from this site drains to Katoomba Falls, home to the Dwarf Mountain Pine, a living fossil found nowhere else on Earth. The applicant's own BDAR flags this species as "known to occur within area" yet uses a streamlined assessment that does not evaluate downstream impacts.
- **Essential services are already overstretched.** There is a six week wait to see a GP in Katoomba. The median income is well below the state average. There is no plan to address healthcare, transport or employment for 270 additional households.
- **The Blue Mountains does not need this development to meet its housing target.** The target is 600 homes over five years. Nearly two thirds are already in the pipeline. This single project would represent 45% of the entire target, while regulation of short term rentals could return up to 500 homes to the long term market without impact to the environment.
- **It would damage the tourism economy that sustains this community.** 4.33 million visitors contributed \$1.19 billion to the Blue Mountains economy in 2024. That economy depends on the natural character and skyline this proposal would permanently alter.

The submission that follows addresses each of these grounds in detail, drawing on the applicant's own documentation, publicly available data, and my direct knowledge of this area.

Bushfire risk

The bushfire risk has not been adequately demonstrated or addressed in the proposal. The site is surrounded by category 1 bushfire prone land and was itself classified as Category 1 bushfire prone land until the 14th May 2025. This change in classification was made one day after the project was declared a State Significant Development, allowed due to the clearing of vegetation from the site. This site clearing did not remove the risk of fire however. The site sits on the Eastern Escarpment bordering the Blue Mountains National Park, the clearing of vegetation achieved nothing but the removal of a planning trigger.

Below: NSW RFS bushfire prone land mapping¹ - project site marked with red dot



Living with bushfire risk is part of life in the Blue Mountains however it is a risk managed through a number of measures including the following,

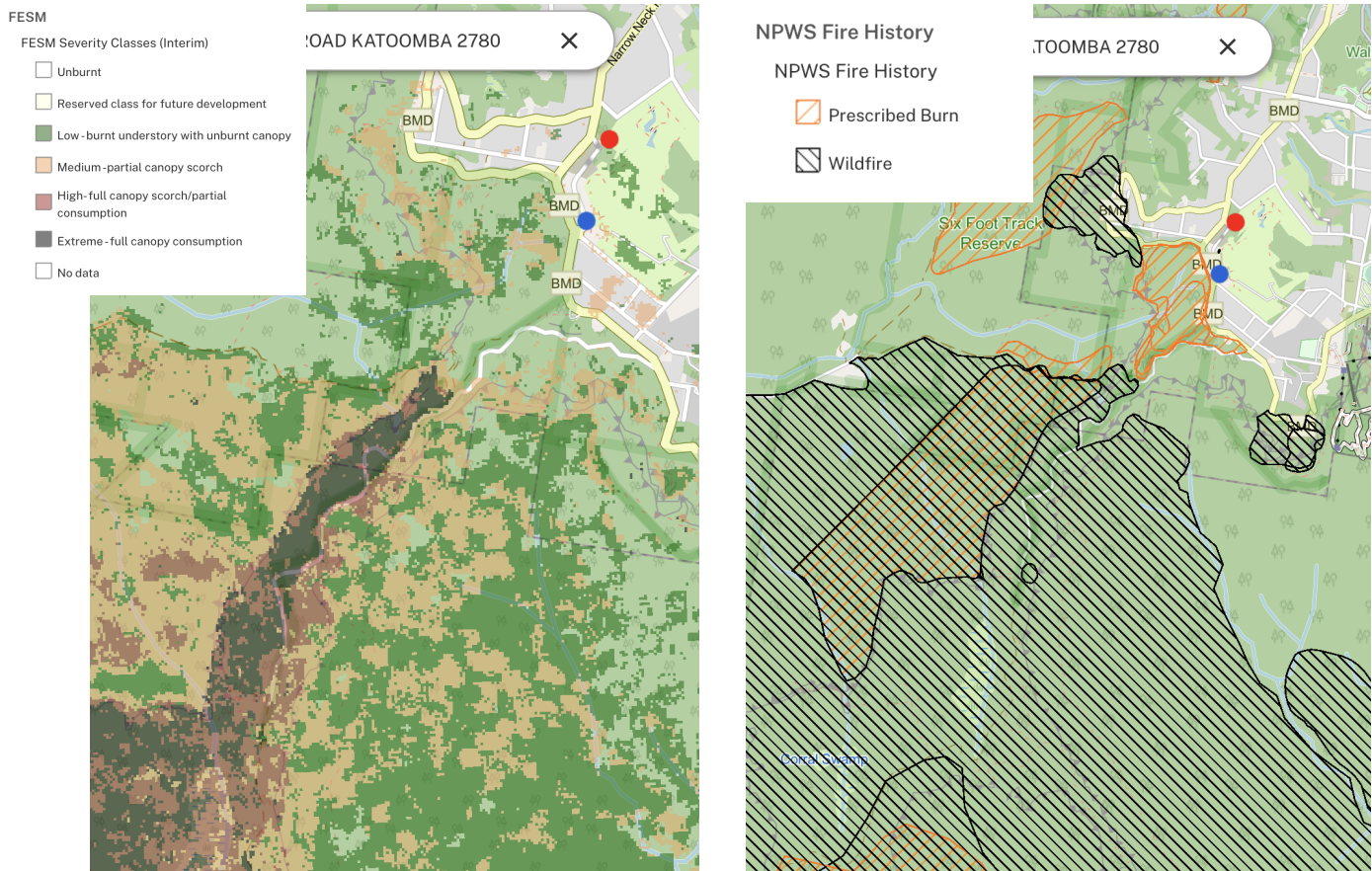
- The Blue Mountains Local Environmental Plan 2015 - maintaining low density zoning ensures the number of people needing to evacuate along constrained road networks during fire events remains proportional to the capacity of those road networks.
- *Planning for Bush Fire Protection 2019* - requires specific construction standards, Bushfire Attack Level (BAL) ratings for any development on or adjoining bush fire prone land.

The proposed project seeks to override both of these measures simultaneously, the concurrent rezoning would increase the permitted height to 15.6 metres and the Floor Space Ratio to 1.17:1 (from 0.3:1 to 0.5:1), while

¹ <https://geo.seed.nsw.gov.au>

the declassification of the site as bush fire prone land removed the trigger for BAL rated construction standards entirely.

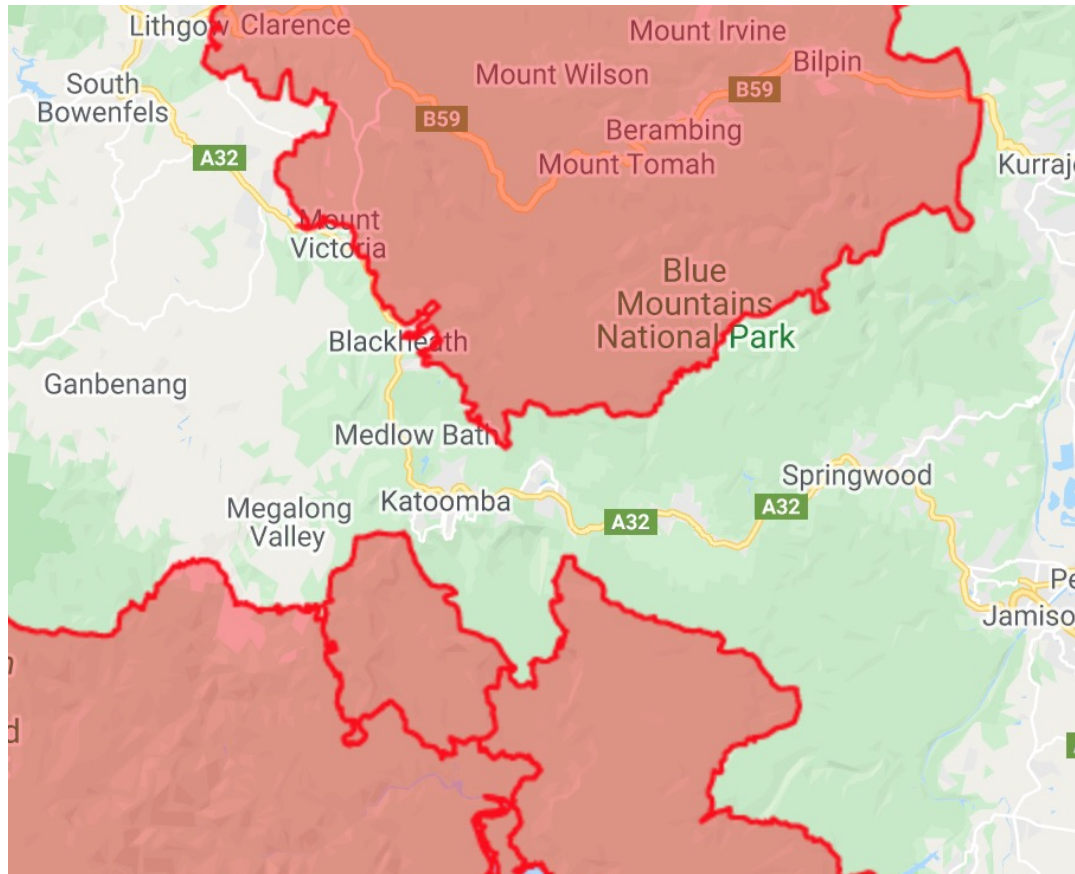
The Fire Extent Severity Mapping (FESM) and NPWS Fire history maps below demonstrate the very real risk of catastrophic bushfire to the proposed site.²



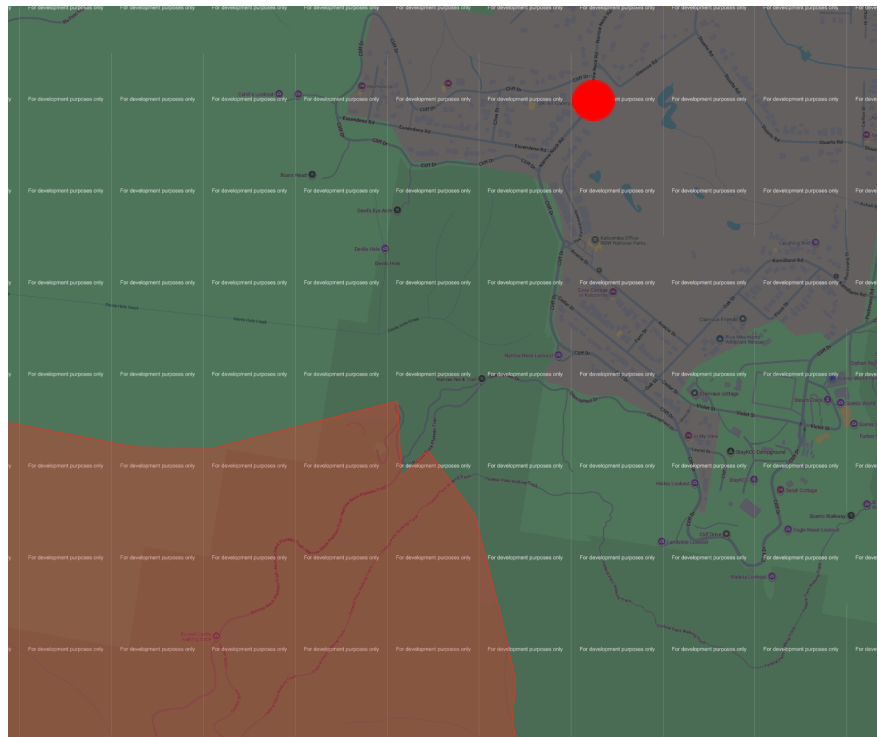
The 2014/2015 Cliff Drive fire came within ~570m of the proposed site, damaging and destroying homes in its path. During the 2019/ 2020 Black Summer the Ruined Castle fire came within 1km and mere minutes of the proposed site.

² Source: <https://geo.seed.nsw.gov.au/>

Map³ of the Black Summer in the Blue Mountains 2019/2020



Map⁴ of the Ruined Castle fire 2019/2020 proposed site marked with red dot



³ Source: <https://www.katoombaleurarfs.asn.au/639/black-summer/>

⁴ Source: <https://www.katoombaleurarfs.asn.au/639/black-summer/>

Below: The 2019/2020 Ruined castle fire taken from Echo Point - 3km / 5 minutes from the proposed site



Source: SMH



Source: Blue Mountains Gazette

Bushfires are not an abstract risk for our household, it is a risk we live with, plan around and prepare for every summer. My partner is a member of the NSW rural Fire Service. We understand the risks of living in a bushfire prone area and together with our community and local council, treat bushfire safety with respect. I have grave concerns that this proposal has not done the same.

- The Bushfire Statement (Appendix R) is not an assessment or statement but merely a memo limited to “an assessment of the access to and from the site”. There is no hazard assessment, no Asset protection Zone analysis, no radiant heat modelling, no construction standard assessment, nor an assessment of defendable space. Given the site is surrounded by Category 1 land this “Statement” is completely inadequate. To approve this project without genuinely assessing the true risks of the site would be gross negligence.
- Furthermore, the access assessment provided by this “statement” has not been independently verified. The RFS Pre-DA Advice Summary notes that the RFS “has not reviewed” the Traffic and Parking Impacts Report that the Bushfire Statement relied upon for its evacuation conclusions. The conclusion that “the public roads can handle the proposed increased volumes of traffic when a bush fire emergency occurs” is a dangerous one not verified by local experts.
- As noted in the RFS Pre-DA Advice Summary (Appendix BB) the proposed project fails to comply with bush fire protection measures, specifically in respect to emergency and evacuation planning. The Summary notes that the proposal fails to consider the impacts onto existing neighboring Bush Fire Prone Land. It would be unconscionable for this project to be approved without adequate bush fire protection measures in place.
- The proposal has not been reviewed nor endorsed by the relevant fire authorities. The RFS Pre-DA Advice Summary explicitly states that it “is not intended to provide pre-approval of bush fire risk assessment to support a development application”. Fire and Rescue NSW declined to comment on the proposal.
- The “shelter in place” suggestion is inappropriate for this development type and density. It is a dangerous proposition for 270 dwellings including short stay apartments occupied by visitors unfamiliar with bushfire risk. Shelter in Place is a last resort strategy, not a primary planning response

for a large scale residential development. Furthermore it requires specific building construction standards (BAL ratings), dedicated shelter areas, and detailed emergency management procedures, none of which have been assessed or proposed.

- A comprehensive Bush Fire Safety Authority assessment under section 100B of the *Rural Fires Act 1997* has not been provided, despite the Secretary's Environmental Assessment Requirements (SEARs) requiring consultation with both RFS and Fire and Rescue NSW to be "demonstrated."

Adding 270 dwellings with 332 car spaces to this location creates an enormous evacuation challenge. The "Bushfire Statement" itself acknowledges that access is limited to The Escarpments (a private community titled street) and Glencoe Road, both of which feed onto Narrow Neck Road, a single road heading north to the Great Western Highway. The nearest Neighbourhood Safer Place is a 7 minute drive away without traffic. This doesn't sound far but a fast moving fire can travel kilometers within that time frame. With over 428 additional residents/ 332 cars attempting to evacuate simultaneously along the narrow road network, the consequences could be catastrophic.

The approval of this proposal would be putting the HDA's desire for political fodder above the lives and safety of the people it purporting to serve.

Inadequate infrastructure

The existing road network and public transport infrastructure is demonstrably inadequate for a development of this scale. The existing road network surrounding the site was designed to serve a low density residential area,

- There are no footpaths on any street adjoining the site, no street lighting. Road shoulders are either extremely narrow or non-existent⁵.
- There are no designated cycle paths⁶ and with blind winding corners and narrow shoulders, cycling along these roads is unsafe in anything other than day light and low traffic volumes.
- Public transport is limited to a single loop bus service with just 3 afternoon services during peak periods. The claim that the area is "accessible"⁷ is inaccurate. This bus would take 20 minutes to reach the train station and town centre which is 1.6km away. It is faster for an able bodied person to walk this route than to take the bus but the terrain is limited and, as noted above, the road can be unsafe to walk on.
- The topography between the site and Katoomba town centre and train station involves significant grade changes⁸, presenting a further barrier to walking and cycling, particularly for elderly residents, people with reduced mobility, and families with young children, the very demographics the EIS identifies as the target market for the development⁹.
- Katoomba Train Station provides a connection East to Sydney and West to Lithgow however the proposal has failed to acknowledge the significant strain that this network is currently under. The car park contains 78 formal spaces, with an additional overflow of 50 places in Goldsmith Place and Myra Place, totalling 128 spaces across the commuter precinct. According to Blue Mountains City Council's Citywide Parking Strategic Plan, weekday occupancy of the commuter car park was regularly reaching

⁵ Appendix AI, Figure 3

⁶ Environment Impact Statement, Table 2, p.15

⁷ Environmental Impact Statement, section 3.1, Table 3, p.17

⁸ Environment Impact Statement, Table 2, p.15

⁹ Environmental Impact Statement, p 18-19

capacity almost 10 years ago back in 2018¹⁰. Anecdotally, demand has grown since then however the NSW Government has failed to fund any upgrades¹¹. The proposed project would place further pressure on an already saturated facility if even a modest proportion of new residents chose to commute by train. This would overwhelm any negligible remaining capacity and worsen spillover parking into surrounding residential streets. The Government needs to be prepared to overhaul transport infrastructure in the region if it wishes to increase the density of housing.

- The Traffic and Parking Impact Report describes Cliff Drive as having "2 travel lanes and parking opportunities on both sides of the street"¹². This is a materially inaccurate characterisation. Cliff Drive is a narrow local road with no formal parking lanes, no constructed kerb/guttering along much of its length. The report itself partially acknowledges this reality elsewhere, noting that Cliff Drive merely "provides parking on grass verges, used by some residents and visitors". Despite this, the report then relies on Cliff Drive as providing "additional roadside parking to accommodate overflow from the proposed development including evening overflow from the restaurant component. Representing informal grass verge parking on an unfinished road as "2 PARKING LANES" significantly overstates the available on street parking supply in the vicinity of the site and undermines the credibility of the report's parking adequacy assessment. Any honest appraisal of Cliff Drive's road conditions would conclude that it cannot reasonably be counted upon as supplementary parking for a development of this scale.
- The development proposes that it would generate approximately 48 additional vehicle trips in the AM peak hours and 60 in the PM peak hour¹³. This is double the existing peak hour traffic volumes recorded on the Narrow Neck Road and Glencoe Road Intersection¹⁴. Whilst the suggested increase in traffic doesn't sound like a large number, the existing transport infrastructure is deeply inadequate to handle this level of volume. I note that this assessment fails to consider the impacts of tourism traffic which at current housing density levels already creates dangerous conditions for cyclists and pedestrians during peak season.

The proposal creates an inherent contradiction, it relies on active transport and public transport accessibility to justify the density sought, while the physical conditions of the surrounding road network make safe active transport practically unachievable without significant infrastructure upgrades. Nothing in the EIS addresses how the gap in infrastructure will be closed. Included below are some photos depicting the existing infrastructure.

¹⁰ Blue Mountains City Council, *Citywide Parking Strategic Plan 2018 – Appendix 1A: Katoomba*

https://www.bmcc.nsw.gov.au/sites/default/files/docs/Appendix_1a_Katoomba_CPSP_-_FINAL_PRINT_2018.PDF

¹¹ Transport for NSW, *Commuter Car Park Program*, <https://www.transport.nsw.gov.au/commuter-car-park-program>

¹² Traffic and Parking Impact Report, Appendix AI to the Environmental Impact Statement, SSD-86456706 (TEF Consulting, 13 January 2026), pp. 3–5 (road descriptions and Figure 3) and p. 22 (on-street parking demand and overflow parking assessment).

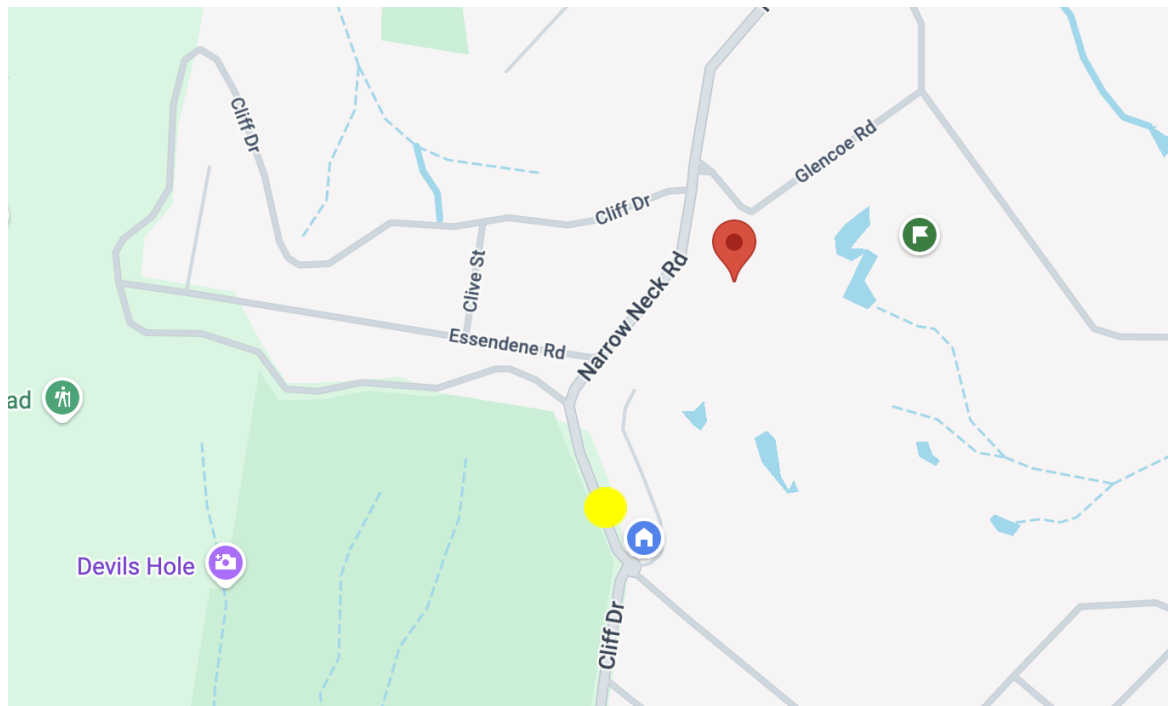
¹³ Appendix AI, p.25

¹⁴ Appendix AI, Figure 5



Above: photos of Cliff drive looking at the corner of Cliff Drive and Narrowneck Road. Note the lack of footpaths, street lighting, narrow shoulders and blind corners.

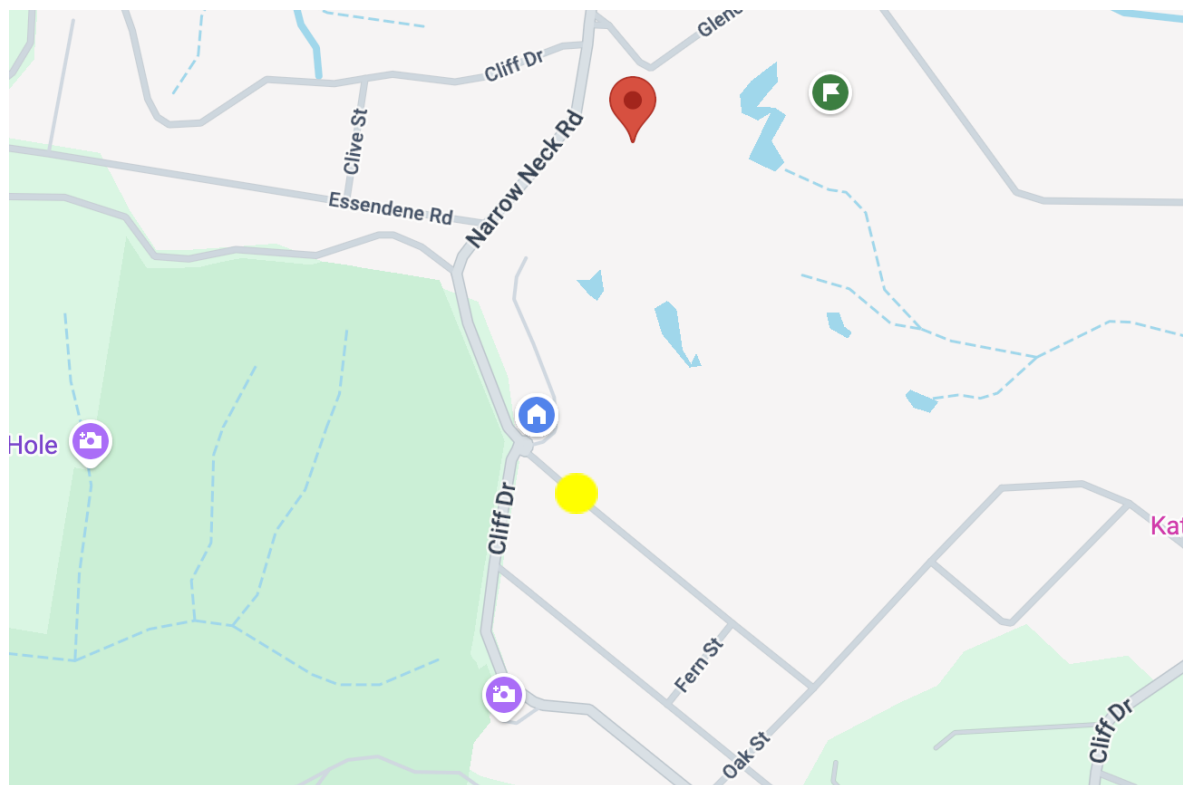
Below: the proposed site marked with a red pin, position of photos marked with yellow dot.



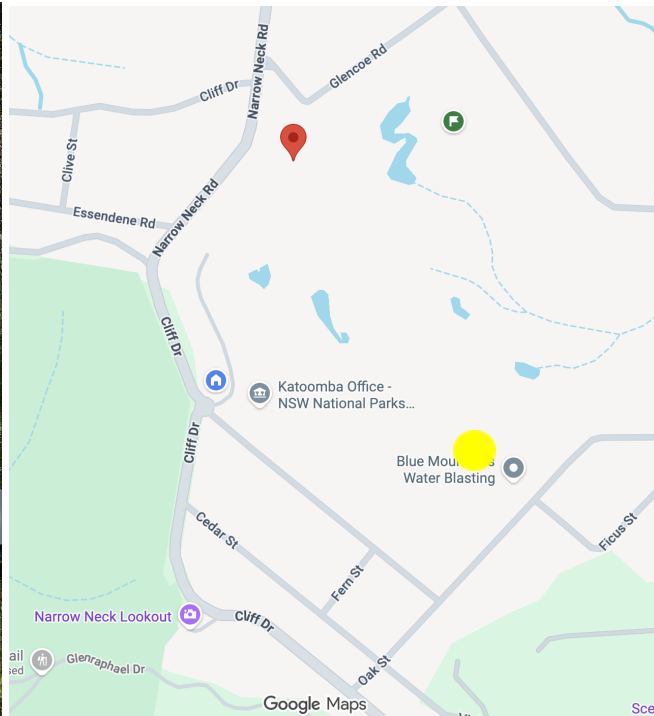
Below: The photo depicts the road conditions at the corner of Cliff Drive and Nelson Road. This is 500m/ 1min drive from the proposed site. The narrow shoulder, lack of foot and cycle paths, blind corner and rise make it unsafe for development of this scale. The proposed site marked with a red pin, position of photos marked with yellow dot.



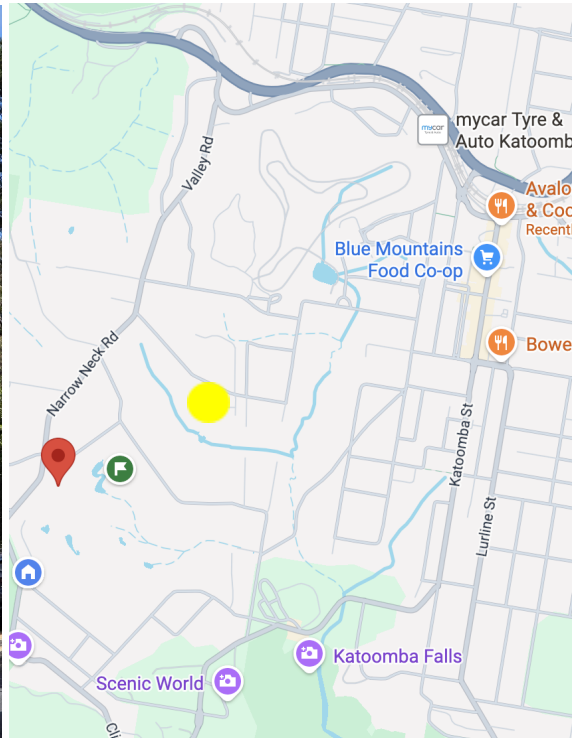
Below: Acacia Street between Cliff Drive and Fern Street. Site marked with red pin, position of photos marked with yellow dot. This what the traffic report refers to as “2 parking lanes” despite inaccurate street names being used on the map (Acacia Street was incorrectly referred to as Cliff Drive). Note the lack of road markings, lack of formed edges and lack of safe pedestrian passage when verges are being used for parking.



Below: The intersection of Acacia Street and Oak Street. This is on one of two routes to Katoomba town centre. Note the narrow road shoulder, lack of footpaths and cycle paths which would make for unsafe passage with increased traffic volume. Proposed site marked with red pin, position of photo marked with yellow dot.



Below: Kamillaroi road, one of two routes from the proposed site to Katoomba town centre. Pedestrian access is currently only manageable due to low traffic volumes and slow moving traffic. Cars currently have capacity to cross lines and allow a safe distance when passing pedestrians and cyclists. Higher traffic flows would pose significant risk to pedestrian safety. Proposed site marked with red pin, position of photo marked with yellow dot.



I live nearby and regularly walk, jog and cycle along these streets, but given the lack of infrastructure I have to be selective about when I do this. I will only move along these roads on foot or bike when it is daylight and I can reasonably expect low traffic volumes comprised mostly of residents (Ie, week days, early mornings on weekends but almost never on public holidays/ festive periods). Tourists to the region are often unfamiliar with sharing the streets with bikes and pedestrians and don't drive with this awareness, they often drive at higher speeds and do not allow safe space when passing. Without dramatically increasing public transport options and undertaking a comprehensive upgrade of the road networks, implementing the proposed development would be reckless and result in pedestrian incidents.

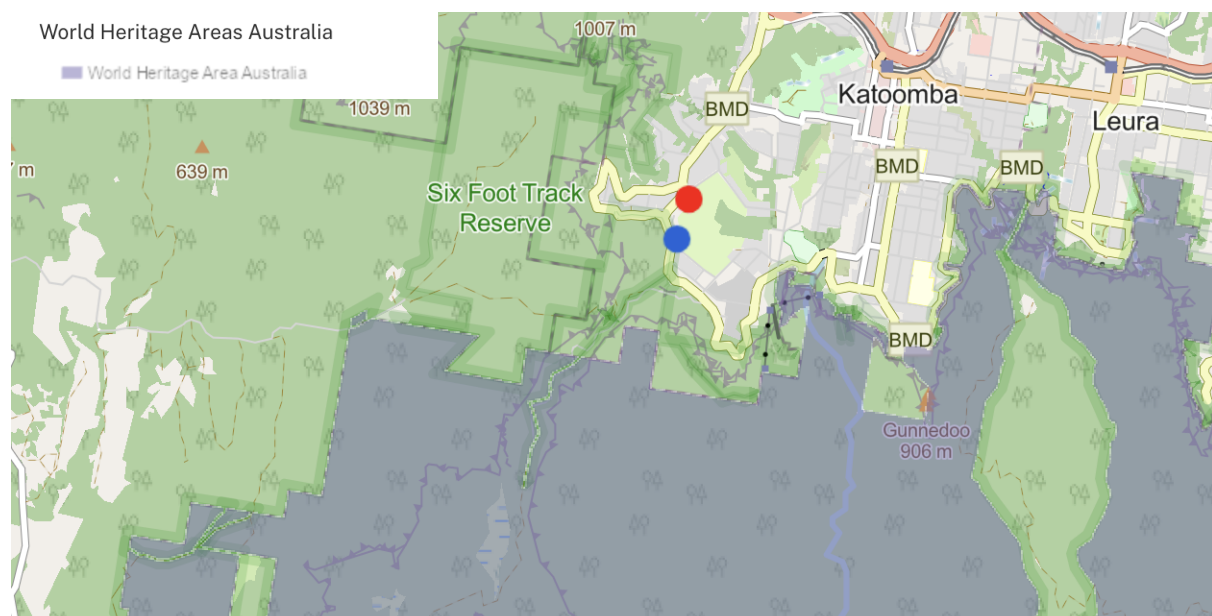
Infrastructure upgrades should be a precondition of consent rather than an afterthought. In a suburb whose streets are so underdeveloped, we don't even have kurb and gutters. It would be reckless to approve a development of this magnitude.

Environmental impacts

The proposed site sits directly between the Blue Mountains Planetary Health Precinct, a project connecting community with nature, focused on sustainability and environmental restoration, and the World Heritage listed Blue Mountains National Park. The irony of proposing a large scale, high density development in a location dedicated to ecological values should not be lost on the HDA.

World Heritage implications

The Greater Blue Mountains Area was unanimously inscribed on the UNESCO World Heritage List on 29 November 2000¹⁵. It is one of only two places in the world where an urban population lives within the boundaries of a World Heritage Area. It is an internationally rare situation comparable only to Banff in the Canadian Rocky Mountain Parks World Heritage Site, which imposes strict "need to reside" requirements on its population to manage its environmental impact¹⁶.



¹⁵ UNESCO World Heritage Centre, *Greater Blue Mountains Area*, <https://whc.unesco.org/en/list/917/>

¹⁶ Banff, Alberta — Wikipedia, https://en.wikipedia.org/wiki/Banff,_Alberta; Blue Mountains City Council, *About the World Heritage Anniversary*, <https://www.bmcc.nsw.gov.au/WHA/About>

As the above map¹⁷ shows, the proposed development site (marked by the red dot), sits ~150m from the World Heritage boundary¹⁸. The assertion that the proposal is “not likely to impact on Matters of National Environmental Significance (MNES)”¹⁹ warrants close scrutiny given the scale of the development and the unique sensitivity of the receiving environment immediately downstream. I challenge this assertion and call for the proposal to be referred to the Commonwealth Minister for assessment under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

The imperative to protect this area is not merely a local one, it is not even a state or national duty, this area has been recognised as being of outstanding universal value. Not international, but universal value. The World Heritage Convention exists to identify and protect cultural and national heritage and ensure its transmission to future generations. Australia ratified the Convention in 1974, and in doing so accepted the duty to identify, protect and conserve its World Heritage properties and ensure their transmission to future generations. To approve a development of this scale on this site, with significant downstream implications would not only cause considerable ecological implications but newsworthy political implications.

Impact to critically endangered species

Existing within this environment, directly below the plateau on which the proposed development sits is Katoomba Falls. Katoomba falls is home to the critically endangered²⁰ Dwarf Mountain Pine, a living fossil that exists nowhere else on Earth except on the sandstone cliffs and waterfall spray zones of the Southern Escarpment. Its species is over 200 million years old with lineage with fossil records extending back to the late Permian period, it predates the dinosaurs.²¹

The Dwarf Mountain pine is classified as critically endangered by the International Union for Conservation of Nature (IUCN) and is facing a very high risk of extinction in the near future. The species has been declared an Asset of Intergenerational Significance under Section 153G of the National Parks and Wildlife Act 1974, one of the highest levels of protection available under NSW law.²² The NSW Conservation Action Plan identifies alteration to hydrological regimes as a key risk to this species and requires management of changes to natural flow regimes that can affect water availability, increase risk of erosion or lead to disturbance of dwarf mountain pine habitat.

Stormwater Contamination and Increased Flows

The development proposes to replace 70% of what is currently porous, vegetated land with impervious hard surfaces (roofs, roads, driveways, and paved areas). Research demonstrates that converting vegetated land to impervious surfaces dramatically increases stormwater runoff volume, from approximately 10% of precipitation in a forested catchment to 55% or more in a heavily developed one.²³ This means the waterways below the escarpment, and the Dwarf Mountain Pine populations that depend on natural spray zone hydrology, would be subjected to significantly greater volumes of water than they have experienced in their recent ecological history.

¹⁷ <https://geo.seed.nsw.gov.au/>

¹⁸ Environmental Impact Statement, SSD-86456706 (Keylan Consulting, January 2026), Sections 5.2 (EPBC Act), 7.5 (Visual Impact), 7.11 (Stormwater and Flood Management), and 7.13 (Biodiversity); Appendix AR (BMCC Correspondence and Feedback).

¹⁹ Environmental Impact Statement, SSD-86456706 (Keylan Consulting, January 2026), Sections 5.2 (EPBC Act), 7.5 (Visual Impact), 7.11 (Stormwater and Flood Management), and 7.13 (Biodiversity); Appendix AR (BMCC Correspondence and Feedback).

²⁰ Thomas, P. (2013), *Pherosphaera fitzgeraldii*, IUCN Red List of Threatened Species, <https://www.iucnredlist.org/species/30534/2793882>

²¹ Podocarpaceae - Wikipedia, <https://en.wikipedia.org/wiki/Podocarpaceae> (molecular evidence supports divergence during the late Permian)

²² NSW National Parks and Wildlife Service, *Conservation Action Plan: Dwarf Mountain Pine (Pherosphaera fitzgeraldii)*, June 2023, <https://www.environment.nsw.gov.au/sites/default/files/adopted-conservation-action-plan-dwarf-mountain-pine-pherosphaera-fitzgeraldii-230133.pdf>

²³ US EPA, Urbanization - Stormwater Runoff, <https://www.epa.gov/caddis/urbanization-stormwater-runoff>

Blue Mountains City Council's own water quality monitoring has revealed that contaminants, including pesticides, herbicides, fungicides, heavy metals, petroleum hydrocarbons, concrete leachate, sewage, and excess nutrients, are already making their way into local waterways from existing urban catchments.²⁴ Monitoring has revealed major dieback and deterioration of Dwarf Mountain Pine at the Katoomba Falls. The proposed development with its residences, restaurants, serviced apartments, and associated landscaping would introduce additional sources of contamination through fertiliser use, pesticide application, increased sewage load with associated overflow risk, and construction-phase sediment and chemical runoff.

Council itself has stated in its feedback on this application that "stormwater should be managed wholly within the site and achieve a neutral or beneficial outcome for stormwater quality, given the sensitivity of the catchment".²⁵ The proposal does not achieve this, it proposes discharging stormwater off site to the golf course basins. The EIS makes no attempt to trace the downstream impact pathway from those basins to the escarpment and the critically endangered species habitat below which is itself a significant gap in the assessment. In a catchment that drains directly to habitat supporting one of Australia's most critically endangered species, this is not acceptable.

The Blue Mountains Planetary Health Initiative, based at the adjacent former Katoomba Golf Course, represents a significant public investment in waterway restoration and ecological recovery in this very catchment.²⁶ Approving a major development that would increase pollutant loads and stormwater volumes into the same waterways that this initiative is working to rehabilitate would be directly counterproductive.

²⁴ Blue Mountains City Council, *Water Quality*, <https://www.bmcc.nsw.gov.au/waterquality>; The Habitat Advocate, *Blue Mountains City Council's neglect of Katoomba Falls and Kedumba River*, <https://habitatadvocate.com.au/blue-mountains-city-councils-neglect-of-katoomba-falls-and-kedumba-river/>

²⁵ Environmental Impact Statement, SSD-86456706 (Keylan Consulting, January 2026), Sections 5.2 (EPBC Act), 7.5 (Visual Impact), 7.11 (Stormwater and Flood Management), and 7.13 (Biodiversity); Appendix AR (BMCC Correspondence and Feedback).

²⁶ Blue Mountains City Council, *Planetary Health Precinct & Parkland Plan Endorsed*, <https://www.bmcc.nsw.gov.au/media-centre/planetary-health-precinct-parkland-plan-endorsed>

The map²⁷ below identifies land with high biodiversity value of the Katoomba falls catchment area, together with the proposed stormwater drainage figure for the proposed site (red dot) and the location of Katoomba Falls (highlighted in yellow).



Figure 27: Catchment Plan

Inadequacy of the Streamlined Biodiversity Development Assessment Report (BDAR)

The applicant has submitted a Streamlined BDAR rather than a full report, relying on the "Small Area" module on the basis that only approximately 0.6 hectares of native vegetation will be cleared.²⁸ A streamlined assessment only assesses impacts on species at risk of Serious and Irreversible Impact (SAII) and does not require the full species credit calculations, detailed habitat assessments, or comprehensive offset obligations that a standard BDAR demands.²⁹ The use of this simplified assessment pathway for a development of this scale and sensitivity is inadequate, and the Department should require a full BDAR before proceeding with any assessment.

- The applicant's own EPBC Protected Matters Search Tool results, included in the BDAR appendices, identify the Dwarf Mountain Pine (*Pherosphaera fitzgeraldii*) with habitat "known to occur within

²⁷ <https://geo.seed.nsw.gov.au/>

²⁸ Streamlined Biodiversity Development Assessment Report (BDAR), Appendix T to the EIS, SSD-86456706 (Fides Environmental, 3 March 2026), Sections 1.4, 2.2, 8.1, and EPBC Protected Matters Search Tool results.

²⁹ Narla Environmental, Biodiversity Development Assessment Report (BDAR), <https://www.narla.com.au/biodiversity-development-assessment-report>; NSW Biodiversity Assessment Method 2020, Appendix C.

area." Despite this, the BDAR concludes that "no SAIL were identified from the project site". A streamlined assessment is not designed to rigorously evaluate indirect or downstream impacts on critically endangered species whose habitat lies beyond the development footprint but within the impact zone.

- The 0.6-hectare vegetation clearing figure understates the true biodiversity impact of the development. The total site area is 1.684 hectares. The proposal involves removing 134 of 206 trees on and adjacent to the site, including 14 trees assessed as being of high retention value.³⁰ The conversion of a largely vegetated, porous site to approximately 70% impervious coverage fundamentally changes the site's ecological function. This includes its role in the local hydrological cycle, in ways that a vegetation clearing area alone does not capture.
- The streamlined assessment does not adequately address the hydrological impacts on downstream critically endangered species habitat. The EIS confirms that stormwater from the site will be discharged to Basins 1A and 2 within the former Katoomba Golf Course, which drain into the Kedumba catchment and over the escarpment at Katoomba Falls, directly into the spray zones where Dwarf Mountain Pine populations survive. The NSW Conservation Action Plan for this species identifies "alteration to hydrological regimes" as a key risk.³¹ A full BDAR would require a more rigorous assessment of these indirect impacts and is called for.
- Blue Mountains City Council's own water quality monitoring has documented that contaminants including pesticides, herbicides, heavy metals, sewage, and excess nutrients are already making their way into local waterways from urban catchments. It also documents that major dieback of Dwarf Mountain Pine has been observed at the Katoomba Falls, Leura Falls, and Wentworth Falls subpopulations, the sites most affected by urban runoff.³² A streamlined assessment provides no framework for evaluating how a major new source of urban stormwater contamination would compound these existing threats.
- The development site sits approximately 150 metres from the Greater Blue Mountains World Heritage Area. The EPBC Act requires that any action likely to have a significant impact on World Heritage values, including actions taken outside the World Heritage boundary, must be assessed.³³ A streamlined BDAR does not provide the level of assessment commensurate with this obligation.

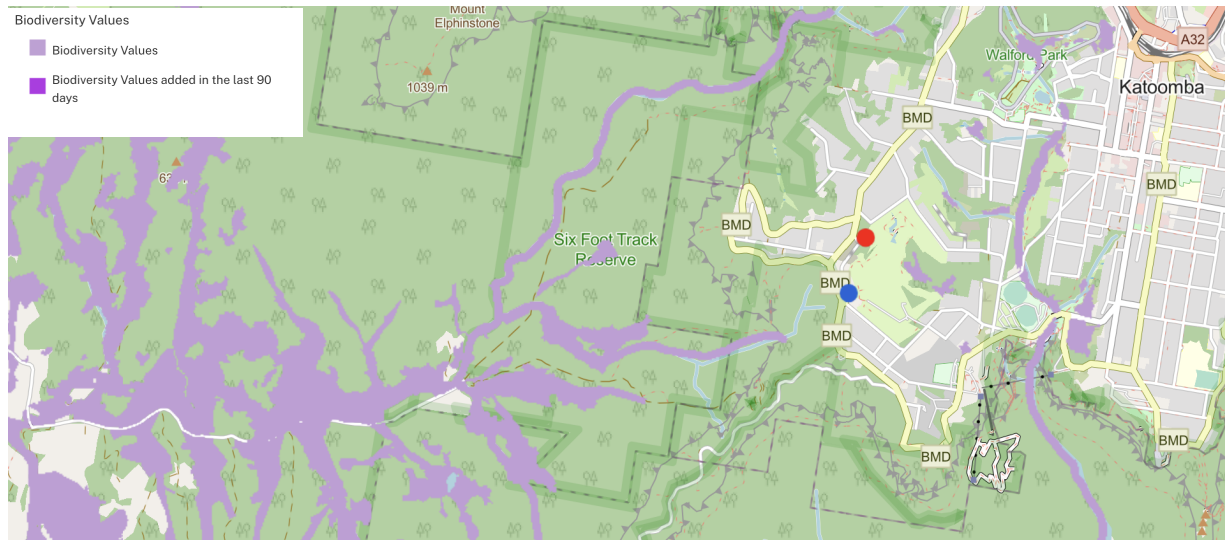
³⁰ Environmental Impact Statement, SSD-86456706 (Keylan Consulting, January 2026), Sections 7.11 and 7.13; Appendix K (Arboricultural Report).

³¹ NSW National Parks and Wildlife Service, Conservation Action Plan: Dwarf Mountain Pine (*Pherosphaera fitzgeraldii*), June 2023, <https://www.environment.nsw.gov.au/sites/default/files/adopted-conservation-action-plan-dwarf-mountain-pine-pherosphaera-fitzgeraldii-230133.pdf>

³² Blue Mountains City Council, Water Quality, <https://www.bmcc.nsw.gov.au/waterquality>

³³ DCCEEW, What's Protected Under the EPBC Act: World Heritage, <https://www.environment.gov.au/epbc/what-is-protected/world-heritage>

The map³⁴ below identifies land with high biodiversity value that is particularly sensitive to impacts from development. Note the sensitive area in which the proposed site sits, as marked by the red dot.



The Greater Blue Mountains World Heritage listing was specifically based on its outstanding biodiversity — including the evolutionary refugia represented by species like the Dwarf Mountain Pine. The EIS's dismissal of potential impacts on MNES, while its own BDAR flags critically endangered species habitat as "known to occur within area" and its own stormwater plans show runoff draining toward that habitat, raises a serious question about whether the EPBC Act referral obligations have been properly considered.

Lack of essential services, transport, and employment

The EIS presents this development as meeting a housing need, but it does so without any honest assessment of whether the surrounding area can actually support the people who would live here. Housing is not simply about shelter it requires access to healthcare, shops, employment, and to transport that connects people to all three. On each of these counts, the proposal fails.

Healthcare services

The Blue Mountains has been in a well-documented GP crisis for years. The Federal Member for Macquarie has described it as a crisis that "bites deep in the upper mountains," driven by the previous Government's decision to strip towns east of Blackheath of GP priority status in 2019, making it difficult to attract and retain doctors.³⁵ Katoomba Medical Practice has publicly stated that the shortage of doctors and nurses is causing significant delays for patients and stretching the capacity of existing practices.

At the time of writing, new patient appointments in Katoomba routinely involve waits of six weeks or more and the overflow often lands at the local hospital. I experienced the impact of this a few years ago, experiencing a severe migraine and unable to see a Dr due to lack of availability. I had no other option but to go to the local hospital for what could have been treated by a GP.

The 2025 Special Commission of Inquiry into Healthcare Funding confirmed that patients in regional areas like the Blue Mountains have significantly poorer health outcomes, less access to healthcare, and greater financial

³⁴ <https://geo.seed.nsw.gov.au/>

³⁵ Susan Templeman MP, GP Crisis Bites Deep in Upper Mountains, <https://www.susantempleman.com.au/news/media-releases/gp-crisis-bites-deep-in-upper-mountains/>; Blue Mountains Gazette, Shortage of GPs due to zoning, <https://www.bluemountainsgazette.com.au/story/7838405/win-on-gp-shortage-in-the-mountains/>

barriers to treatment compared to metropolitan counterparts.³⁶ Rapidly adding 270 dwellings with an affordable housing cohort and no corresponding investment in health services, would place an already overstretched system under further strain.

Cost of living and access to retail

Katoomba's median personal income is \$649 per week, well below the NSW median of \$781 per week.³⁷ The suburb lacks major retailers, meaning residents pay a premium for everyday goods or travel to Penrith (a 50-minute drive) for access to stores like Chemist Warehouse or bulk retailers. For residents of affordable housing, the demographic this development claims to partly serve, the absence of competitively priced retail is a genuine daily cost burden that the EIS does not acknowledge.

Transport isolation

I have addressed the inadequacy of the road network in the infrastructure section of this submission. However, the transport challenges extend well beyond road conditions.

- Train services from Katoomba to Sydney Central take approximately 75 minutes, with services running roughly hourly during off-peak periods.³⁸
- The local bus service (route 686G) provides just three afternoon services during peak periods.³⁹
- Rideshare and taxi services are scarce and expensive due to limited availability, a reality well known to anyone who has tried to get an Uber in the upper mountains after dark. A recent trip from Katoomba to Blackheath, a 15 minute drive, cost over \$50 one way.

The 2021 Census reveals the consequence of this transport isolation: 14.3% of Katoomba households have no motor vehicle at all, and a further 49% have only one. Only 1.7% of Katoomba residents commute by train, and just 0.3% by bus. The overwhelming majority (55.3%) drive to work.⁴⁰ This is not a well connected location where residents can realistically live without a car.

For households in affordable housing, often single income or receiving government support, the cost of car ownership, or the consequences of being without one, represents a significant barrier that the proposal entirely fails to address. Research consistently shows that households in car dependent locations spend up to 25% of their income on transport alone, compared to 9% in well-connected areas.⁴¹ Placing affordable housing in a transport-poor location does not solve a housing problem, it relocates disadvantage.

Employment

The proposal assumes residents will find work locally or commute, neither assumption withstands scrutiny. Katoomba's employment profile is dominated by health care and social assistance (16.7%), accommodation and food services (13.4%), education (10.8%), and retail (10.0%).⁴² These are predominantly low-wage, part-time sectors. 24% of Katoomba's workforce is employed part-time, almost equal to the 24.3% in full-time work.³ There is no significant professional services, technology, or corporate employment base in the upper mountains.

³⁶ NSW Special Commission of Inquiry into Healthcare Funding, Final Report, May 2025; Blue Mountains Gazette, NSW report reveals critical regional GP shortages,

<https://www.bluemountainsgazette.com.au/story/8968845/nsw-report-reveals-critical-regional-gp-shortages-in-new-report/>

³⁷ Australian Bureau of Statistics, 2021 Census QuickStats — Katoomba (SAL12085),

<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL12085>

³⁸ Transport NSW, Blue Mountains Line Timetable, <https://transportnsw.info/routes/details/intercity-trains/bmt/02BMT>

³⁹ Environmental Impact Statement, SSD-86456706, Section 3.1 and Appendix AI (Traffic and Parking Impact Report), Bus Route 686G timetable.

⁴⁰ Australian Bureau of Statistics, 2021 Census QuickStats — Katoomba (SAL12085),

<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL12085>

⁴¹ The Link Between Housing Affordability and Transportation, Citizens Research Council of Michigan,

<https://csrcmich.org/the-link-between-housing-affordability-and-transportation>

⁴² Australian Bureau of Statistics, 2021 Census QuickStats — Katoomba (SAL12085),

<https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL12085>

For residents who need to access higher paying employment, the commute is prohibitive. Penrith, the nearest major employment centre, is a 50 minute drive or over an hour by train. Sydney and Parramatta are further still, a 75 minute train journey on an hourly service that would require residents to be at Katoomba station before 6:30am to secure a parking space in the already-saturated commuter car park.⁴³

Nearly a quarter (23.9%) of Blue Mountains residents travel 50 to 250 kilometres to reach their workplace, one of the highest rates in Greater Western Sydney.⁴⁴ Adding 270 dwellings without any plan to improve transport frequency, expand the commuter car park, or attract local employment is setting residents up for daily hardship.

The EIS identifies target demographics including young families, downsizers, and key workers.⁴⁵ Yet the site offers these groups limited healthcare access, expensive and infrequent transport, a constrained local job market, and no affordable retail. The proposal creates housing without creating liveable conditions.

The proposal does not fit the local need

My submission does not oppose housing, it opposes an illfitting solution delivered through an inappropriate process. The Blue Mountains have a genuine housing need, but that need is for affordable, well located long term homes, not an extremely dense isolated and ill connected solution. There are more effective and less damaging ways to address the housing shortfall, and the existing evidence suggests this proposal is neither necessary nor proportionate.

The Blue Mountains is already on track to meet its housing target

The NSW Government has set the Blue Mountains a target of 600 new completed homes by 2029.⁴⁶ According to the NSW Department of Planning's own housing snapshot, nearly two thirds of these homes are already planned, under assessment, or under construction. The Blue Mountains Conservation Society has described this target as "achievable under the current Local Environmental Plan" and representing "a sustainable and environmentally responsible increase in housing".⁴⁷ This single proposal would represent 45% of the entire Blue Mountains housing target, delivered on one site, through an expedited process that bypasses the local planning controls designed to manage growth responsibly. The target does not require, and was never premised upon, a development of this scale.

The Blue Mountains was assigned the lowest housing target of any council in Greater Sydney precisely because the NSW Government recognised what this proposal ignores: that the Blue Mountains is not a typical urban area. The Minister acknowledged "the unique circumstances of the Blue Mountains LGA and the significant constraints on development, including that the area is unsuitable for significant urban expansion".⁴⁸ Seventy percent of the LGA sits within the World Heritage listed Blue Mountains National Park. The remaining developable land is constrained by bushfire risk, steep topography, limited transport infrastructure, and sensitive downstream ecology. The target of 600 was set with these constraints front of mind to then use the

⁴³ Blue Mountains City Council, Citywide Parking Strategic Plan 2018 — Appendix 1A: Katoomba, https://www.bmcc.nsw.gov.au/sites/default/files/docs/Appendix_1a_Katoomba_CPSP_-_FINAL_PRINT_2018.PDF

⁴⁴ Western Sydney Regional Information Service, Transport and Travel to Work in Greater Western Sydney, 2024, https://www.westir.org.au/wp-content/uploads/2024/05/Transport-and-Travel-to-Work_Final-Draft_2024-05-07-min.pdf

⁴⁵ Environmental Impact Statement, SSD-86456706, pp. 18–19.

⁴⁶ NSW Department of Planning, Housing and Infrastructure, *Blue Mountains Council's Housing Snapshot*, <https://www.planning.nsw.gov.au/policy-and-legislation/housing/housing-targets/blue-mountains-councils-housing-snapshot>

⁴⁷ Blue Mountains Gazette, *ConSoc approves of new housing target for Blue Mountains*, <https://www.bluemountainsgazette.com.au/story/8667609/consoc-approves-of-new-housing-target-for-blue-mountains/>

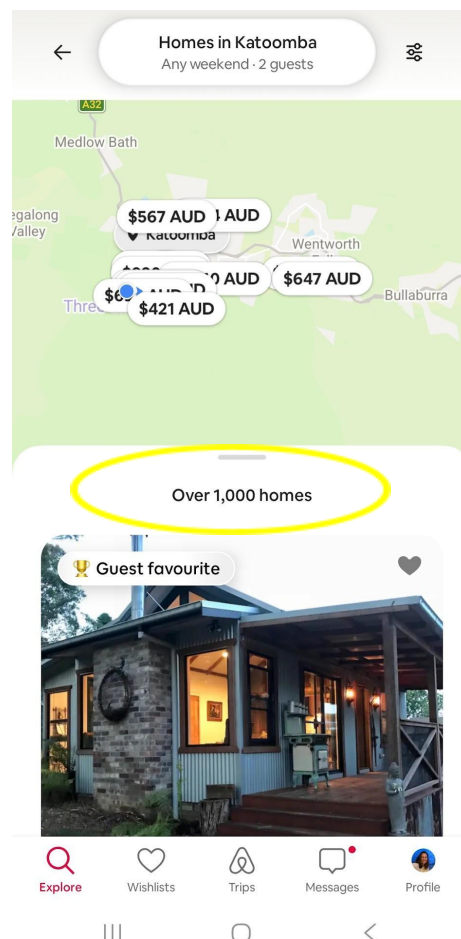
⁴⁸ Blue Mountains Gazette, *ConSoc approves of new housing target for Blue Mountains*, <https://www.bluemountainsgazette.com.au/story/8667609/consoc-approves-of-new-housing-target-for-blue-mountains/>

HDA pathway to fast track a single development that overrides the very planning controls the target was designed to work within is to undermine the logic of the target itself.

Short term rentals are the immediate problem, not a lack of new builds

Blue Mountains Mayor Mark Greenhill has identified approximately 1,000 Airbnb properties across the Blue Mountains, with roughly 800 between Wentworth Falls and Blackheath alone.⁴⁹ The Mayor told Council that "short-term rentals have soaked up properties that were needed for affordable housing" and that the impact is already being felt by local businesses who cannot retain staff because young workers can no longer afford to live in the area. As the Mayor put it: "Imagine if you could regulate those to the extent that just half came back to the long-term rentals market 500 houses".

Five hundred long-term rentals returned to the market would nearly match the entire Blue Mountains housing target of 600, without a single tree felled, a single road widened, or a single litre of additional stormwater directed toward critically endangered species habitat. The NSW Government is currently undertaking a review of short-term rental accommodation regulation. It is perverse to fast-track a 270-dwelling development on a sensitive escarpment site while the far more effective lever of STRA regulation remains unresolved.



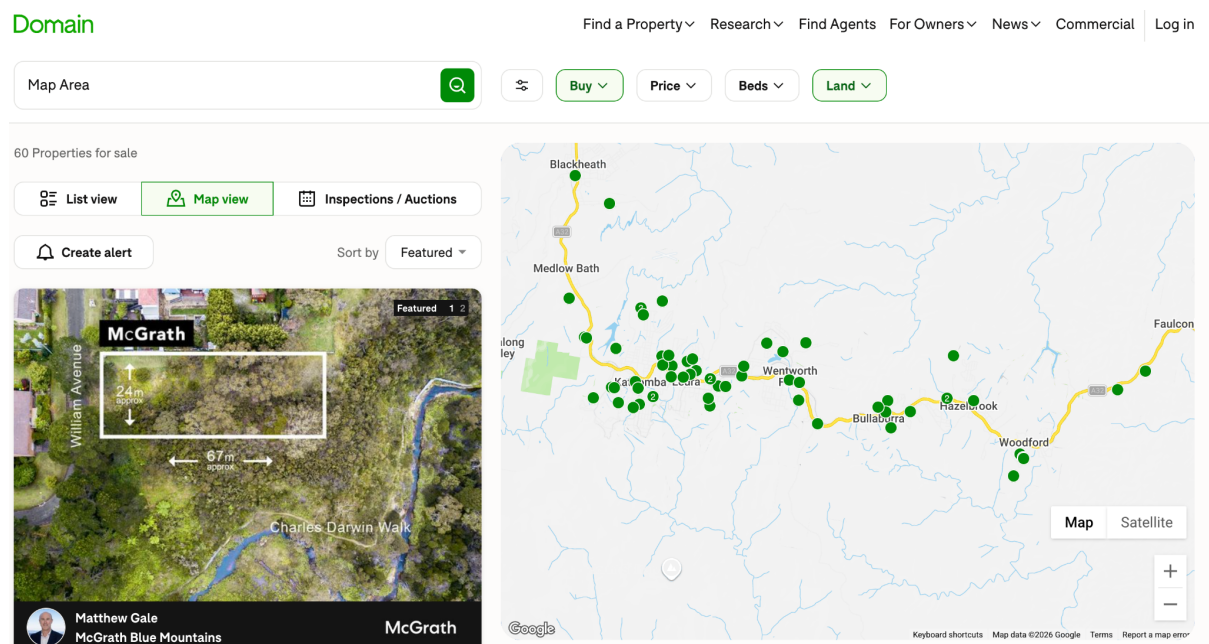
Above: A quick search on AirBnB shows over 1,000 available homes spanning a small portion of the Blue Mountains LGA, Medlow Bath to Bullaburra.

⁴⁹ Blue Mountains Gazette, *Housing crisis: councils unite for fairer access to long-term rentals*, 2 September 2024, <https://www.bluemountainsgazette.com.au/story/8745185/blue-mountains-face-housing-crisis-amid-airbnb-surge/>

Significant supply of vacant land, ready to build

There are currently over 70 vacant residential land parcels in Katoomba alone⁵⁰, many are fully serviced with water, electricity, and sewerage, zoned for low density residential development, and located closer to the town centre and existing infrastructure than the proposed site. If the NSW Government genuinely wished to address housing supply in the upper Blue Mountains, a program of building grants, helping individuals construct homes on existing serviced land, would deliver owner occupied housing, support local builders/ trades, and distribute growth across the existing urban footprint rather than concentrating it in a single, infrastructure poor location. Not to mention concentrating wealth on an offshore developer.

The estimated development cost of this proposal is \$75 million.⁵¹ A fraction of that sum directed toward grants for construction on existing vacant lots would deliver more appropriate housing outcomes with significantly less environmental and infrastructure impacts and better community outcomes.



Above: A domain search (29th April 2026) shows 60 properties currently available for sale in the area from Falconbridge to Blackheath.

The area already has excess of short term accomodation

The proposal includes 52 serviced apartments and a restaurant. The Fairmont Resort at Leura, located just 5km away, already provides 224 rooms with restaurant, conference and spa facilities and is planning to add a further 190 rooms.⁵² Katoomba's main street has 10 or more retail and commercial tenancies currently available for lease, and the town has a well-documented history of shopfront vacancy that prompted a dedicated pop-up shop campaign to fill empty premises.⁵³ Adding more serviced apartments and a restaurant at a location 1.6km from the town centre risks drawing activity away from the existing commercial heart of Katoomba rather than supporting it. The local economy does not need more capacity, it needs the latent capacity it already has to be used.

⁵⁰ <https://www.nestoria.com.au/katoomba/land/sale> (accessed April 2026)

⁵¹ Environmental Impact Statement, SSD-86456706, p.3 (estimated development cost)

⁵² Blue Mountains Gazette, Dr Jerry Schwartz proposes roller coaster for Fairmont Resort, <https://www.bluemountainsgazette.com.au/story/9232615/dr-jerry-schwartz-proposes-roller-coaster-for-fairmont-resort/>

⁵³ commercial Real Estate, Shop & Retail Properties For Lease in Katoomba, <https://www.commercialrealestate.com.au/for-lease/katoomba-nsw-2780/retail/>; Blue Mountains Gazette, Katoomba push for pop-up shops, <https://www.bluemountainsgazette.com.au/story/1640982/katoomba-push-for-pop-up-shops/>

The scale is disproportionate to the community

Katoomba has a population of 8,268 people.⁵⁴ At the Blue Mountains average household size of 2.2 persons, this development would house approximately 594 people, a 7.2% increase in Katoomba's population delivered in a single project, on a single site, in a location with no footpaths, limited public transport, and a six week wait to see a GP. By comparison, the entire Blue Mountains LGA contains 35,080 homes. This proposal alone would increase the LGA's total housing stock by nearly 0.8%, concentrated entirely in one of the most environmentally sensitive and infrastructure poor locations in the municipality. The community impact of adding 270 dwellings at this density, in this location, is not incremental, it is transformative, and commensurate investment in infrastructure, services, and environmental protection would need to be ensured to match it before this project could be reasonably considered.

To put this in perspective, adding 7.2% of a suburb's population through a single development would be the equivalent of dropping 1,005 dwellings onto one site in Maroubra, or 8,400 in the Parramatta LGA. In Minister Scully's own electorate of Wollongong (population 214,564), the equivalent would be a single development of over 7,000 dwellings, roughly the size of an entire new suburb materialising overnight.⁵⁵ No planning authority would contemplate approving a development at that proportional scale without a comprehensive infrastructure and services plan to match. Yet that is precisely what is being proposed for Katoomba.

Impact on our tourism economy

The Blue Mountains' economy depends on tourism, in 2024 we hosted 4.33 million tourists who contributed \$1.19 billion to the local economy.⁵⁶ That tourism exists because of the area's natural character, the escarpments, 3 sisters, bushland, and its village streetscapes. People travel from around the world to visit Katoomba Falls, walk through our World Heritage listed National Park, and to experience a landscape that feels fundamentally different from the city they left behind. The moment that character is compromised, the economic foundation of this community goes with it.

Accommodation and food services is the second-largest employment sector in Katoomba, employing 13.4% of the local workforce.⁵⁷ These are not jobs that can be replaced by other industries, they exist because visitors come, and visitors come because of what this place looks and feels like. Nine four storey apartment buildings rising above the ridgeline on the escarpment would be visible from the valley below and from the town centre. The applicant's own Visual Impact Assessment repeatedly acknowledges that the development "rises above the existing ridgeline" and impacts upon the "sky outlook" from multiple public viewpoints.⁵⁸ In a landscape whose value is defined by its natural skyline, breaking that skyline with a high-density residential complex is not a minor visual intrusion, it is a fundamental alteration of the scenic quality that underpins the region's tourism economy.

This site also sits directly on the course of Ultra Trail Australia, the largest trail running event in the southern hemisphere. In 2024, UTA attracted 6,870 participants from around the world, with 95% travelling from outside the Blue Mountains. They stayed an average of three nights and spent \$729 each, generating \$16.4 million in direct spending and a total gross economic impact of \$25.5 million.⁵⁹ The UTA course runs along Narrow Neck,

⁵⁴ Australian Bureau of Statistics, 2021 Census QuickStats — Katoomba (SAL12085), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL12085>

⁵⁵ ABS 2021 Census QuickStats: Wollongong LGA (214,564 × 7.2% ÷ 2.2 average household size = ~7,017 dwellings).

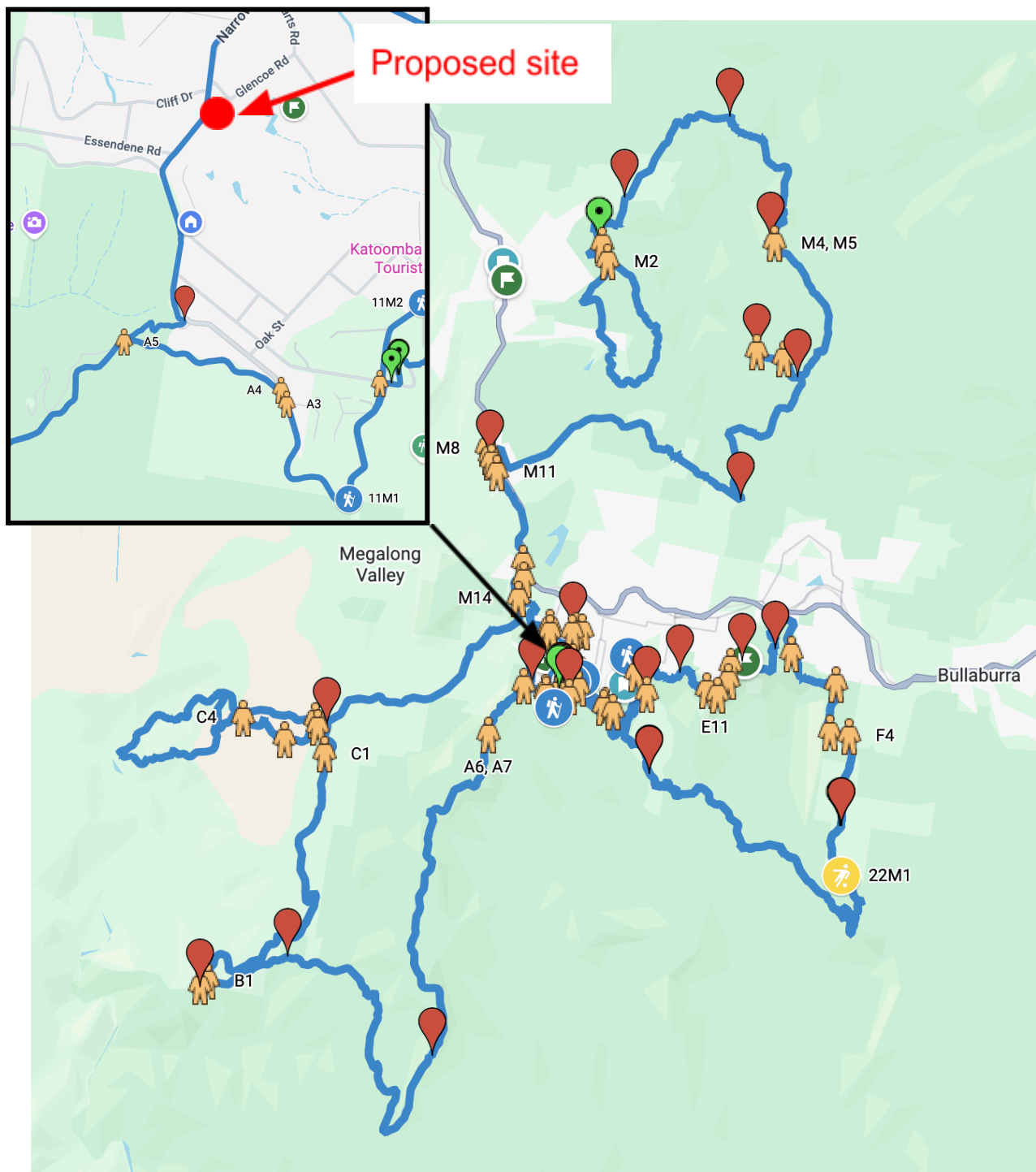
⁵⁶ Destination NSW, *Blue Mountains Regional Tourism Statistics*, <https://archive2024.destinationnsw.com.au/tourism/facts-and-figures/regional-tourism-statistics/blue-mountains>; Blue Mountains City Council, *Tourism bouncing back in the Blue Mountains*, <https://www.bmcc.nsw.gov.au/media-centre/tourism-bouncing-back-blue-mountains>

⁵⁷ Australian Bureau of Statistics, 2021 Census QuickStats — Katoomba (SAL12085), <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL12085>

⁵⁸ Visual Impact Assessment, Appendix AL to the EIS, SSD-86456706 (Urbaine Design Group), Viewpoints 1–11.

⁵⁹ Ben Patterson Economics, *Economic Impacts of Ultra-Trail Australia 2024*, <https://www.benpatterson.co.nz/wp-content/uploads/2025/03/Economic-impacts-of-Ultra-Trail-Australia.pdf>

directly past the proposed development site. The transition from bushland to Katoomba's quiet, leafy residential streets is one of the most iconic stretches of trail running in Australia. The proposed development would fundamentally alter that experience, replacing a natural ridgeline with a built form silhouette visible to every runner on the course and to the thousands of spectators and volunteers who support them. This is not an abstract amenity concern, this event is broadcast globally, this is a quantifiable threat to a \$25.5 million annual event that depends entirely on the landscape character this proposal would degrade. The Blue Mountains does not attract visitors with buildings. It attracts them with the absence of them. Shown below are the 2026 UTA Course maps and the proximity to the proposed site.



Conclusion

Blue Mountains City Council's Local Environmental Plan and Development Control Plan exist for good reasons. They reflect decades of community input and careful consideration of what is appropriate for a World Heritage-listed region with significant bushfire risk, sensitive ecology, and a unique village character. Overriding those controls through a state level fast tracked process, with a public exhibition period of just 14 days does not constitute adequate community engagement for a development of this scale and significance.

This proposal is too large, too dense, and too poorly serviced by infrastructure for this location. The bushfire risk is real and has not been adequately addressed. The planning process has been rushed. And the impact on the character, environment, and community of Katoomba of the Great Blue Mountains World Heritage Area would be significant and irreversible.

I respectfully request that this application be refused for a smaller scale development that aligns to local planning guidelines which consider the ecological significance of the site along with the limitations of the surrounding infrastructure.

Leigh Foster

Resident, Katoomba NSW