

Objection Submission: SSD-86456706, 142 to 150 Narrow Neck Road, Katoomba

Project: Residential flat buildings at 142 to 150 Narrow Neck Road, Katoomba

Application number: SSD-86456706

Submitter: Property owner, resident and rate payer, Katoomba NSW 2780

Position: Objection

Lodgement method: NSW Planning Portal

Submission

To the Department of Planning, Housing and Infrastructure,

I object to the proposed State Significant Development for residential flat buildings at 142 to 150 Narrow Neck Road, Katoomba, application SSD-86456706.

I am a resident of 3 Fern Street, Katoomba. I support appropriate, well planned housing in the Blue Mountains, including affordable housing where it is genuinely delivered in the right locations and at a scale that is consistent with local planning controls, environmental constraints, bushfire safety and the established character of Katoomba. This proposal does not meet that test.

The NSW Planning Portal describes the proposal as a mixed use development comprising nine separate buildings, 218 dwellings, 15 percent affordable housing, 52 serviced apartments, a restaurant and an art gallery. The Blue Mountains Conservation Society submission guide identifies the site as approximately 1.6 hectares and notes that the proposal is for nine four storey buildings. The proposal is being assessed as State Significant Development under the Housing Delivery Authority pathway.

The scale, form, location and assessment pathway of this proposal are inappropriate. It should not be approved.

Grounds of objection

Inconsistency with local planning controls and the intended character of Katoomba

The proposal is a major intensification of land use on Narrow Neck Road. The Housing Delivery Authority record for the proposal notes that the development will likely require concurrent rezoning for height and floor space ratio uplift. The Blue Mountains Conservation Society submission guide states that the site is zoned R3 Medium

Density and has a maximum height of 8 metres, approximately two storeys, under the Blue Mountains Local Environmental Plan.

That means the proposed four storey built form is not a minor variation. It is a material departure from the existing planning framework. The Blue Mountains Local Environmental Plan and Development Control Plan have been developed over many years to manage development in a highly constrained and environmentally sensitive local government area. Those controls should not be overridden to accommodate a proposal of this scale.

Narrow Neck Road is part of the distinctive residential and visitor landscape of Katoomba. A development of nine separate buildings, including residential flats, serviced apartments, a restaurant and an art gallery, would introduce a built form and intensity that is out of character with the local area. Katoomba is not an inner Sydney suburb and should not be planned as one.

The Housing Delivery Authority pathway is not appropriate for the Blue Mountains

I object not only to this development, but also to the use of the Housing Delivery Authority pathway for developments of this kind in the Blue Mountains.

The Blue Mountains is a Metropolitan Rural Area with exceptional environmental, landscape, heritage and bushfire constraints. The Housing Delivery Authority pathway is designed to accelerate high yield housing delivery, but this kind of fast tracked pathway is unsuitable where local planning controls exist precisely to manage sensitive environmental and safety risks.

The use of the Housing Delivery Authority pathway for this proposal creates an unacceptable precedent. If a development of this scale can proceed through a pathway that uplifts height and floor space ratio controls in Katoomba, similar proposals could follow across other Blue Mountains towns. That would erode the local planning framework and weaken community confidence in orderly, evidence based planning.

Housing targets should be delivered through development that is consistent with the Blue Mountains planning framework, not by bypassing the controls that protect the area from inappropriate overdevelopment. I request that the Blue Mountains Local Government Area be exempted from the Housing Delivery Authority pathway for developments of this kind.

Bushfire risk and evacuation constraints

The Blue Mountains is one of the most bushfire affected urban landscapes in NSW. Any substantial increase in residential density in Katoomba must be assessed with extreme care, including evacuation capacity, emergency

access, defensible space, smoke impacts and the cumulative effect of placing more residents and visitors in constrained locations.

This proposal would add a large number of permanent residents and serviced apartment occupants to the Narrow Neck Road area. Serviced apartments also introduce a visitor population that may be less familiar with local bushfire conditions, local roads and emergency warnings.

The submission guide identifies that the site is located on bushfire prone land, with limited evacuation routes, and that only one main evacuation route leads to the Great Western Highway. The guide also notes that this evacuation route is vulnerable during fires. These risks should be given substantial weight.

The proposal should not be approved unless the consent authority is satisfied, on conservative evidence, that bushfire risk, evacuation and emergency management can be managed without unacceptable risk to residents, visitors, emergency services or the broader Katoomba community.

Traffic, parking and local road impacts

Narrow Neck Road and the surrounding local road network are not suited to a development of this intensity. A proposal involving 218 dwellings, 52 serviced apartments, a restaurant and an art gallery would create traffic movements from residents, visitors, staff, service vehicles, waste collection, deliveries and emergency access.

The likely traffic and parking impacts need to be assessed not only on the development site, but across Katoomba's already constrained local road network. The proposal risks increasing congestion, visitor pressure and parking spillover in surrounding residential streets. This would adversely affect local amenity and the daily movement of residents.

Public transport in this part of Katoomba is limited, meaning that the proposal is likely to generate significant car dependence. The proposal should be refused unless the consent authority is satisfied that all traffic, parking, access, servicing and emergency movement impacts can be managed without shifting the burden onto nearby streets and residents.

Environmental, landscape and stormwater impacts

The Blue Mountains has environmental constraints that are not comparable to metropolitan infill areas. Increased hard surfaces, excavation, stormwater runoff, lighting, noise and vegetation impacts can have consequences beyond the immediate site.

The submission guide identifies that the site is adjacent to Blue Mountains Swamps, a Threatened Ecological Community. It also states that these swamps feed the Katoomba Falls catchment, an area supporting the critically

endangered Dwarf Mountain Pine, *Phoradendron fitzgeraldii*. Increased hard surfaces may alter water flows, increase stormwater velocity and reduce groundwater infiltration, with potential impacts on sensitive ecosystems.

The development should be assessed in terms of its cumulative impact on local biodiversity, scenic values, stormwater quality, downstream catchments, Sydney's drinking water catchment and the relationship between Katoomba and the surrounding World Heritage listed landscape. The presence of an Environmental Impact Statement does not remove the need for a cautious approach where the scale of the proposed uplift is inconsistent with local controls.

The consent authority should apply the precautionary principle. If there is uncertainty about environmental, hydrological, visual or bushfire impacts, that uncertainty should weigh against approval.

Infrastructure capacity and local amenity

The proposal would place additional pressure on local infrastructure, including roads, sewer, electricity, waste services, emergency services and visitor management infrastructure. These issues should be assessed cumulatively, not in isolation.

The development would also affect the cultural, aesthetic and economic values of Katoomba. The character of Katoomba, its landscape setting, visitor destinations and liveability are central to the town's identity and economy. High density, multi storey development of this type is incompatible with the scale, landscape and cultural identity of the Blue Mountains.

Affordable housing does not justify inappropriate overdevelopment

The inclusion of 15 percent affordable housing is noted. However, affordable housing should not be used to justify a development that is otherwise incompatible with the site, the local planning framework, environmental constraints and community safety considerations.

The proposal also includes 52 serviced apartments, a restaurant and an art gallery. These components indicate that the development is not solely directed to meeting local housing need. The overall scale and mix of uses should therefore be assessed carefully and should not be accepted simply because part of the residential component is identified as affordable housing.

Requested decision

I respectfully request that the Department:

- Refuse SSD-86456706 in its current form.

- Give full weight to the Blue Mountains Local Environmental Plan, Development Control Plan and the established local planning framework.
- Reject the proposed height and floor space ratio uplift where that uplift would undermine the intended character, safety and environmental protections of Katoomba.
- Oppose the use of the Housing Delivery Authority pathway for developments of this kind in the Blue Mountains.
- Request that the Blue Mountains Local Government Area be exempted from the Housing Delivery Authority pathway for developments of this kind.
- Require the consent authority to visit the development site and surrounding areas, including local roads, visitor destinations, bushfire evacuation routes and environmentally sensitive areas, before making any decision.
- Require any future proposal for the site to be substantially reduced in scale and assessed through a process that provides proper community consultation and gives appropriate weight to local planning controls.
- Recognise that the Blue Mountains should not be treated as another metropolitan infill location for high density housing delivery.

Katoomba can and should accommodate appropriate housing. This proposal is not appropriate housing for this site. It is excessive in scale, unsuitable for the local planning context, and inconsistent with the environmental, character, traffic, infrastructure and bushfire constraints that define the Blue Mountains.

For these reasons, I object to the proposal and request that it be refused.

Kind regards,

Owner and Resident, Katoomba NSW 2780