

Dear NSW HDA,

I'm writing to submit my opposition against the proposed residential flat buildings at 142-150 Narrow Neck Road, Katoomba, for reasons below.

1.0 Housing demand, local economy and strategy

Firstly, I question, who will live here? The proposed location is removed from the town centre and requires car or bus transport to Katoomba station. The local BMCC strategic plan identifies that the local economy is a "high casualised workforce" with "largely home-based and creative businesses", and "57% leave the Blue Mountains each day, to work outside the LGA." (Blue Mountains City Council 2020). This statistic is for the entire LGA. It is an easy deduction to make, therefore, that almost all of the workforce who leave the LGA, are based in the mid-lower Blue Mountains. If we use Springwood as an example, the transport to the nearest LGA, Penrith, is 1 hour by train. Transport from Katoomba Station to Penrith Station would be 1 hour 30 minutes, which is not including transport from home or to work. This means residents of this proposed development would need to have their own businesses, work for local businesses, or be retired. If lived in by permanent residents, this proposal generates more demand on the local economy, but not any diverse supply.

The BMCC (2020) identifies that Katoomba is a local and tourist shopping destination, but the growth strategy is not in duplication, but in diversification. Suggestions include night time economy and local events. Growth must be managed carefully, as large influxes of tourists and residents pose difficulties with managing conservation and safety around the area. As the development proposes restaurants and an art gallery, which are already common in Katoomba, it is suggested the developers have not considered the strategic growth of the town.

Although housing and affordable housing are needed state-wide, the benefits to the density in this location are very limited. If it were to be approved, the question then turns to feasibility and profit for the developer. How long will the proposed housing supply turn into short-term tourist accommodation? The HDA's objective to achieve an increase in state-wide housing supply, therefore, remains unmet.

2.0 Bushfire risk

In the Environmental Impact Statement (EIS) prepared by GSA Planning (2025), it is stated that "the site is not mapped as bushfire prone land," which "ensure(s) safety, resilience, and long term environmental performance." The NSW RFS responded, but only saying it wasn't their place to provide advice yet (NSW Department of Planning, Housing and Infrastructure 2026, Appendix R).

Although we must wait on their expert opinion, referring to the bushfire mapping, it is evident that the development is within a bushfire prone area, despite not being mapped as such. If we are assuming on car reliance for access to work, especially outside the LGA, the basement parking poses a problem. It is further risk in the event of a bushfire, including fire load and/or a slow evacuation process. The increase in density results in an increased risk for surrounding residents, in both hazard load and evacuation demands. Council has also raised concerns of this in the EIS, and their concern and request for further information is appropriate.

3.0 Regional strategic growth

The Greater Sydney Region Plan identifies key areas of growth within the Western Parkland City as the new Western Sydney Airport, Liverpool, Penrith, Campbelltown and Macarthur regions (NSW Government 2018). This reinforces my point 1.0, that the workforce demand and economic growth are in areas which are far from Katoomba. While denser levels of development in lower mountains locations closer to these could be appropriate, such development at the moment in Katoomba is unsupported by current and near-future economic infrastructure.

4.0 Aboriginal consultation

Although not a primary priority of the Housing Development Authority, I still implore for a duty of care towards the genuine consultation of the Aboriginal voice. The Connecting with Country Framework, created at the state level, asks for a shared custodianship of the land and genuine, ongoing engagement (NSW Government Architect 2023).

The EIS notes that initial consultation and six follow ups were made with no responses (GSA Planning 2025, Table 11). However, the absence of response should not be interpreted as indifference and is more likely to reflect inauthentic consultation approaches. The HDA should acknowledge this and not discharge it's responsibility towards Country, genuine consultation, and culturally appropriate outcomes. Given the site's sensitive location within a Heritage National Park, consideration should be given to a genuine Aboriginal voice, alongside your housing supply priorities, before approval.

5.0 Conclusion

I do recognise and agree that housing supply in NSW is an issue and must be addressed. But, this must also be appropriately balanced with the available economic and social infrastructure supply, demand, and future projections alongside a changing population.

Although this site is capable of development, the contexts suggest the current proposal to be inappropriate. The application demonstrates negligence towards genuine bushfire considerations and Aboriginal consultation. Given the sensitive nature of this location, an acceptable development proposal would demonstrate more site-specific considerations in it's design process.

Yours sincerely,
Kathleen Reichardt

References

Blue Mountains City Council 2020, Blue Mountains Local Strategic Planning Statement: Blue Mountains 2040 – Living sustainably, Blue Mountains City Council, viewed 24 March 2026, <https://www.bmcc.nsw.gov.au/sites/default/files/docs/Blue%20Mountains%20Local%20Planning%20Statement%2031%20March%202020%20.pdf>.

GSA Planning 2025, Statement of environmental effects: 142–150 Narrow Neck Road, Katoomba (SSD-86456706), prepared for VDM Prime Pty Ltd, NSW Planning Portal Major Projects, viewed 24 March 2026, <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-86456706%2120260304T234723.439%20GMT>.

NSW Government 2018, Greater Sydney Region Plan: A Metropolis of Three Cities, NSW Department of Planning and Environment, viewed 24 March 2026, <https://www.planning.nsw.gov.au/sites/default/files/2024-04/greater-sydney-region-plan.pdf>.

NSW Government Architect 2023, Connecting with Country, NSW Department of Planning and Environment, viewed 24 March 2026, <https://www.planning.nsw.gov.au/sites/default/files/2023-10/connecting-with-country.pdf>.