



# Upper Blue Mountains Conservation Society

(INCORPORATED)

Nature Conservation Saves for Tomorrow's People

P.O. BOX 29

WENTWORTH FALLS

N.S.W. 2782

20 March 1990

Town Clerk  
Blue Mountains City Council  
KATOOMBA 2780

Dear Sir,

Proposed Development: No. 18 Pulpit Hill Road, Katoomba  
Portion 207

Educational Establishment Recreation Facility (WPECA Ltd)

File No. 17529

This submission constitutes an objection to the proposed development by World Plan Executive Council of Australia Limited (WPECA) for an academy at Invincibility Point (not an accepted geographical or locality name), Radiata Plateau, Katoomba. Our objection is based on the applicant's plans on public display which are accompanied by a statement of environmental effects prepared by the "Planning Workshop" dated January 1990

Also accompanying this objection is the Society's proposal for this land and adjoining land in the report "A Proposal for World Heritage Nomination - Land Acquisition of Blue Mountains Great Southern Escarpment" (UBMCS Inc. 27 February 1990).

You will note that the UBMCS Inc. lodged an objection to any development on the subject land on Radiata Plateau in Submission No. 191 to Commissioner Simpson in the public hearing relevant to EMP Stage 1.

The Society maintains that the land forms part of the Southern Escarpment and is the only remaining undeveloped peninsular of that escarpment. The application of "Bushland Conservation Zone" to this land violates the specific conservation objectives under Clause 4 of EMP 1 for escarpments and hence would lead ultimately to deterioration of the natural and heritage qualities of this land and the surrounding area of Pulpit Hill.

If this development is permitted it will not be possible to fulfill the objectives of Clause 4 even under the Bushland Conservation Zone.

Hence, retention of the Bushland Conservation Zoning on this land violates the basic aims of the Council's own Draft Environmental Management Plan, which sets out to preserve sensitive environments, escarpments, natural water-courses and creek systems.

To permit this development, Council would create a de-facto subdivision and provide a precedent for legal action by other land-owners to seek rezoning approval on other rural lands. This would lead to an urban sprawl counter to the Council's objectives in EMP 1 in regard to "Land between Towns" which seeks to contain villages and conserve inter-urban bushland.

The nature of WPECA's proposed activities on the site is unclear. Although purporting to be an educational/recreational establishment, it provides

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in the first stage (and later too) for a CLINIC. Perusal of literature available from the Transcendental Meditation (TM) movement overtly suggests that a major use of this establishment will be as a health/medical centre. The proposed academy is not simply an educational establishment, and is certainly not a use with the prime purpose of conserving the natural environment, whether by works, education or interest.

Our objection relates in detail that this development constitutes a massive intrusion on the Radiata Plateau itself. It forms a very high proportion of the Plateau Creek catchment, dominating the ridgeline. It is not possible to correct the effects of such disturbance, and the intrusion of up to 400 people, by any known technology. We are presently unable to correct the massive pollution of the escarpment and creeks elsewhere in the Mountains, and yet, Council would permit further disturbance of a stable watershed with no guarantee, legally or technologically of environmental protection.

Similarly there is no guarantee of public access under the terms of the development application.

Furthermore, no details of the methods of water pollution control, sedimentation, runoff, or accident safeguard systems are provided. There are no technical details showing the failure rates of such systems, and what emergency procedures are offered should, for example, a sewer line leak occur.

The environmental statement makes no mention of the likely effects of buildings and construction activities on the forest and swamp. Disturbance of the site by excavation will cause drainage of water tables, damage to trees and nutrification of the soil and water. Buildings will shade trees and compress the soil around the root zone. Death of native trees will occur with weed invasion a certainty.

The size of the development will produce a management problem beyond the economic capacity of the organisation (WPECA). There is no economic study accompanying this application, thus Council is not shown how realistic is the proposal, and whether true environmental protection can be guaranteed.

The Conservation Society requests Council to -

- (a) reject the development application
- (b) change the zoning on Portion 207 to 7(e)
- (c) change the zoning on Portion 17 to 7(e)
- (d) investigate 7(e) zoning for all lots - Portions 207, 208, 17, 137, 138, 133 and 139.
- (e) recommend to the applicants that much smaller TM establishments on other sites would be in accordance with Council planning (as recommended by the Simpson Report pp.72 - 73).

Other opinions expressed within the Simpson Report undoubtedly impinge on the outcome of this development application before Council. Neither Council nor the Public has had time to consider, accept or reject the Simpson recommendations. It is therefore appropriate for Council to place a moratorium on consideration of all development applications on areas affected by the EMP 1, until a decision has been made on, and

acceptance given to the final form of the EMP 1. Failure to do this will lead to inconsistency of zoning application and legal action against the Council by landowners.

The Society requests additional time of four weeks for the public to consider the implications of the Simpson report on this development and the issues raised for bushland conservation, land between towns and 7(e) areas elsewhere in the City. In particular it is noted that the principle of the so-called "merit-based planning" is at risk if this development application is accepted.

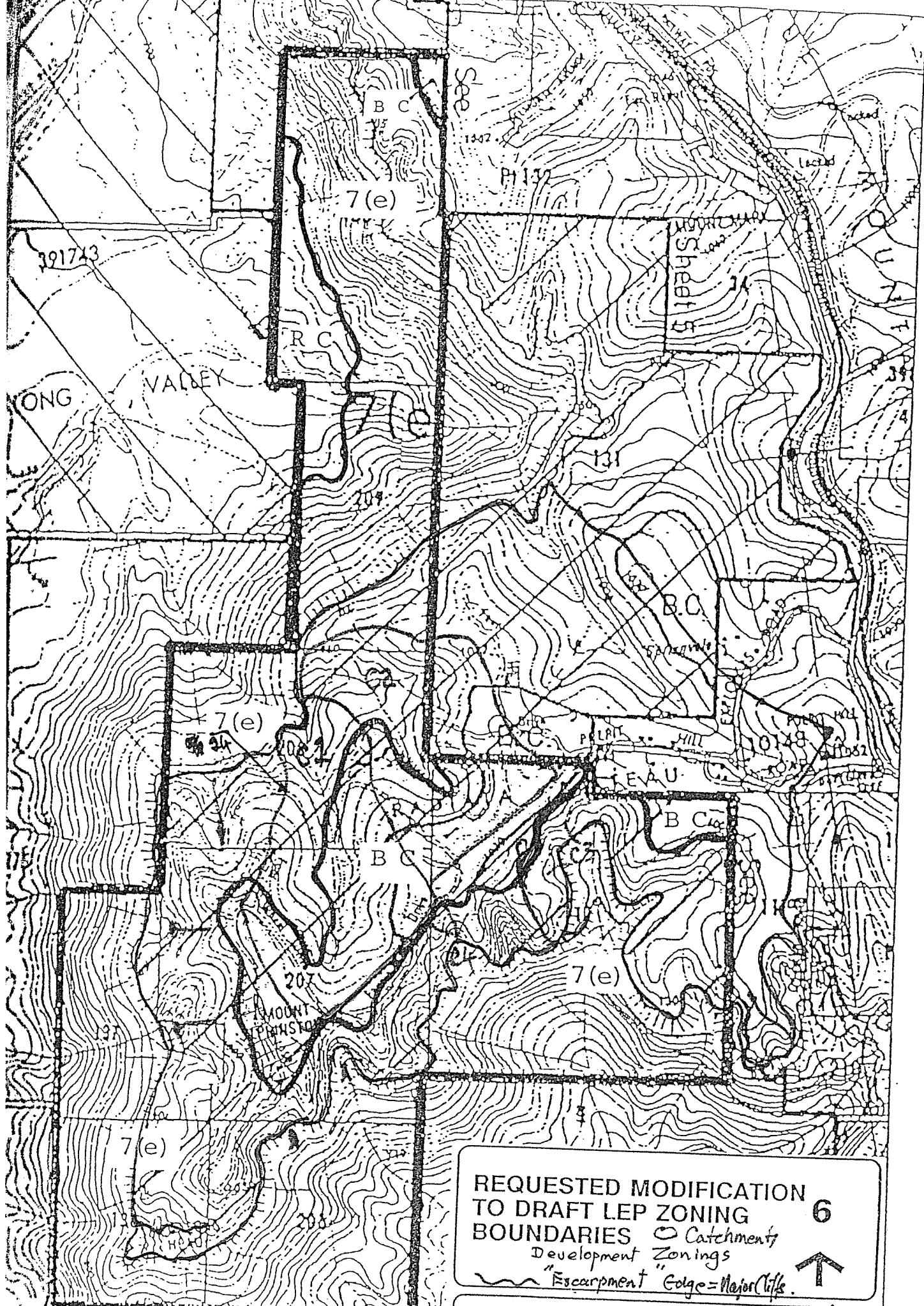
The Society also asks for Council's support of its proposal for World Heritage Nomination of the Southern Escarpment and to provide that no development takes place on it.

Yours sincerely,

*Dulcie Toseland*

Dulcie Toseland  
President  
UPPER BLUE MOUNTAINS  
CONSERVATION SOCIETY.

NOTE: The Society is preparing a "late multi-paged" detailed submission on the basis of the Simpson Report in relation to this proposed development.



**REQUESTED MODIFICATION  
TO DRAFT LEP ZONING  
BOUNDARIES** **6**

○ Catchment  
Development Zonings  
"Escarpment" Gorge = Major Cliffs



Prepared for W.P.E.C.A.  
By PLANNING WORKSHOP

dur. = 143 = 36 ha.  
dur. C1 = 61 = 25 ha. C2 = 96 ha.  
800 = 100 ha.  
∴ 1 = 0.25 ha. = 24