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ACPI/DPHC, (27), 29/5/90

**National Parks and Wildlife Service**  
**BLUE MOUNTAINS DISTRICT**



The Town Clerk,  
Council Headquarters,  
PO Box 189,  
KATOOMBA NSW 2780

Includes  
Blue Mountains National Park  
Kanangra Boyd National Park  
Hartley Historic Site  
The Heritage Centre, Govetts Leap Road  
P.O. Box 43  
Blackheath, NSW 2785

Our reference  
GL:CI:BM  
Your reference BM/1326

Telephone (047) 87 8877

30th March, 1990.

Stamp: GLN: 15  
REC 18 APR 1990  
Handwritten initials and numbers in a grid format.

Dear Sir,

PROPOSED ACADEMY FOR THE TEACHING  
OF TRANSCENDENTAL MEDITATION AND RELATED  
DISCIPLINES, RADIATA PLATEAU, KATOOMBA

The Service has received notification of the Development Application for the above proposal. The Service interest is in relation to the previously identified proposed conditions to Blue Mountains National Park, together with responsibilities for rare species and cultural resource matters.

In your consideration of the Development Application we would appreciate the following comments being considered.

- 1. Provisions of Planning Instruments
  - 1.1 The existing zoning (LEP No 4) is Rural 1 (a2). As a result of Commissioner Simpson's public hearing the Draft LEP zoning was altered to Bushland Conservation (BC) and Rural Conservation (RC). Under the present and proposed zoning 'resort' development is specifically precluded. Under the proposed zonings education establishments, motels, medical centres and recreational establishments are permissible only if consistent with the zoning objectives.

The construction of an extensive complex, the majority of which is devoted to accommodation (415 bedrooms) would appear to be inconsistent with the intent of the zoning.

The current development application should be rejected on the grounds that the proposal is inconsistent with the intent of present and proposed landuse zonings. In addition the proposal is inconsistent with the intent of the Draft Environmental Management Plan to retain the existing character of each township and maintain their physical separation by areas of bushland.

- 1.2 In the Draft LEP, Radiata Plateau was identified as regionally significant with high visual and environmental significance and the potential for some form of low key development with the application of strict environmental controls. The current proposal is not considered low key.

Later it identified the Radiata Plateau as a major crucial omission from the publicly owned escarpment protection system and that it should be acquired by the State Government as Regional Open Space on the basis of landscape, conservation and recreation values.

## 2. Visual Aspects

- 2.1 The height of the proposed buildings exceeds the 8 metre limit for escarpment preservation areas under LEP No 4.
- 2.2 The proposed developments will be visible from the south-eastern margin of the Shipley Plateau, is proposed for addition to Blue Mountains National Park. This area contains the important Double Echo Point and Hargreave Lookouts.
- 2.3 The visibility may give rise to negative economic effect given the loss of general tourist amenity.
- 2.4 Commissioner Simpson correctly identified that escarpment protection involves protection of not just the area immediately adjacent to the cliff line but also the entire area above the cliff line. Escarpment preservation is an important objective of the Environmental Management Plan.

### 3. Bush Fire Hazard

- 3.1 The Statement of Environmental Effects describes the site as being within an isolated extreme bushfire risk area. Council is responsible for the protection of developments and are reminded of the guidelines set out in the Department of Environment and Planning Circular 74. The planning controls for high or medium fire hazard areas state that the option of exclusion of development should be considered first.
- 3.2 In all new developments the entire fire protection measures should be confirmed within the development. No extra burden for protection works should be necessary on completion of the project outside the development area.
- 3.3 In consideration of the above points and the combination of principles of circular 74 it is our view that the proposal must have a substantial effect on aspects of the natural environment and visual amenity. The necessity to clear large areas of the development precinct to achieve the above objectives should be clearly understood.

The assessment of the overall effect of protection measures must consider the effect on the environment and in particular the protection of rare plants should they be found on the site. These matters have not been addressed by the environment review.

### 4. Water Supply

Insufficient information has been compiled to determine the impact that drawing large amounts of ground water will have on the hydrology of swamps and streams of the plateau top and seepage on the cliff faces. Each of these sites contains sensitive plant communities of conservation significance.

### 5. Rare and Endemic Plants

*Darwinia fascicularis* spp. *olisontha*, *Acacia asparagoides* and *Persoonia acerosa* are rare plants known to occur on the Radiata Plateau. It is highly likely that other plants of conservation significance also occur here. No detailed flora or fauna surveys have been included in the Statement of Environmental Effects. It is a requirement under the Bushland Conservation Zoning (BC) that protection of natural conservation features such as important wildlife habitats and rare flora be maximised. The Service would require a site

inspection and identification of locations of rare species and subsequent protection thereof.


6. Cultural Heritage

The Statement of Environmental Effects contains no archaeological survey of Aboriginal cultural heritage. The Service would require an archaeological survey to determine the effect of proposal developments or aspects of heritage value.

7. General Remarks

- 7.1 The Service objects to the proposal as it is inconsistent with the intention of current and proposed planning guidelines.
- 7.2 The statement of Environmental Effects is seriously inadequate to allow a proper review of the effects on the environment.
- 7.3 The Service recommends that before the Council further consider the application that an adequate and comprehensive Environmental review take place with specific attention to the items above.
- 7.4 The Service would be available to discuss issues of concern and provide detailed requirements of surveys and analysis required.

Yours faithfully,

  
G. Manson,  
Superintendent,  
For Director