

Planning Considerations re: DA X/709/2015

Submission opposing Maharishi's Global Administration Through Natural Law Ltd.

Development Application No: X/709/2015 at 28 Pulpit Hill Road (Lot 41)

by Glenn Humphreys

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Even very limited building would have irreversible impacts on the plateau:

Points to consider:

Ecology and hydrogeology on the ridge and below the cliffline on Radiata Plateau

- a field inspection of Radiata Plateau around Pulpit Hill Road was conducted by the Department Hydrogeologist of the Water Resources at my request around 1994 (Contact: D.Mckbbin ref: 1756505). It was noted by him that the *"sandstone scarp margins around the plateau groundwater outflow supports important and environmentally sensitive 'hanging valley' vegetation communities."* It was also noted that *"storage capacity in the local aquifer is limited because of the dissected nature of the plateau terrain"* In particular the *"groundwater occurs in both fracture zones and porous layers throughout the sandstone sequence"*. It was also observed that *"the very low salinity suggests relatively short residence time of the ground water in the aquifer system"*.

Given the above information any proposed development of this site (including its onsite effluent treatment system) would seriously jeopardise the Blue Mountains Swamps in this vicinity.

Previously; BMCC acknowledged that *"Due to the environmental significance of the property, it would be preferable to have no extension of the urban/bushland interface beyond the current development in Pulpit Hill Road"*.

In addition BMCC acknowledged that the privately owned plateau was a significant part of the Blue Mountains Southern Escarpment which they described in Council's Environmental Management Plan (EMP1) as *"the city's most significant natural asset because of its value as a unique natural environment and as a recreation and tourism resource base."*

Further, the Blue Mountains Environment management Plan –Environmental Study-Stage 1 stated

“At present (1989), there are still major and crucial omissions from the publicly owned escarpment protection system. In particular, these are:-

Radiata Plateau at West Katoomba” (it lists other areas as well)...and then goes on to say “Retention of these lands under private ownership alienates the recreational resource from public use and enjoyment, while all other natural and cultural resources remain vulnerable to degradation”.

I should remind BMCC that previously they provided a submission to the State Government requesting an Interim Protection Order on Radiata Plateau and requested the full acquisition of Radiata Plateau.

The submission outlined some of the critical values of the ecosystems, and acknowledged the legislative requirement of government bodies to protect these rare plants and ecosystems. That submission assessed the acquisition as a significant priority for inclusion in the public reserve system.

Against BMCC’s Acquisition Criteria, an assessment was carried out on Radiata Plateau. The site scored a massive 94 out of a possible 100. This assessment included the watercourse (30 out of a possible 30), Significant vegetation (20 out of a possible 20), Slope (8 out of 10), Contiguous with National Park (25/25) – this includes Cahills Lookout Reserve, East Megalong Reserve and East Megalong Natural Area (allocated for inclusion in the Blue Mountains National Park in early 2004).

The NSW National Parks and Wildlife Service delivered a report on Radiata Plateau in Nov. 1993. One of its recommendations states that *“The District’s preference is that no development or small scale development take place on this site due to considerations of protection of escarpment values, water quality and rare and endangered plant species”.*

The undeveloped nature of the plateau reveals its magnificence when viewed from Shipley Plateau, Kedumba, Jamison or Megalong Valley.

Any development can cause a reduction, or complete cessation of public access to places the Blue Mountains locals and tourists have been consistently using for recreation (bushwalking, cycling rockclimbing etc) and research opportunities.

The Mountains Conservation Society quite rightly point out that once any development is approved then developer rights will become more entrenched- which will pave the way for further development expansion that will result in ‘death by a thousand cuts’ to Radiata (Elphinstone) Plateau.

I would like to remind you in assessing this development proposal that some of the most flagrant symptoms of environmental destruction are acknowledged as serious problems in the Blue Mountains only when they have assumed such epidemic proportions that they appear to defy solution. The plethora of escarpment development and development in green spaces between town are cases in point.

I would like to add, that the saying; *"It's no good protecting the waterfall if you don't protect it's source"* is fully applicable in this situation. The natural and heritage values of Radiata Plateau must not be examined in isolation from the rest of the environment on Radiata Plateau, **including the area designated for potential development.**

Nobody can really assess the economic worth of Radiata Plateau, but if an attempt is made at valuation in terms of park potential it offers all our community, it may well be a most valuable asset in the National Estate.

It is my view that the first principle of any BMCC environment management plan is to ensure the protection of our unique natural environment. This should be achieved by preserving areas of significant conservation value, controlling escarpment development, preserving bushland between towns, excluding development from bushfire hazard areas etc.

Allowing this development to go ahead would violate these aims and be a reversion to the uncontrolled development practices of the past, which the BMCC LEP seeks to rectify.

Thank you for considering this submission,

Yours truly,

Glenn Humphreys

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