



# Blue Mountains Conservation Society Inc

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**Nature Conservation Saves for Tomorrow**

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Dear Mr Greenwood

## **Strategic Tourism and Recreation Planning Study Options Paper**

The Blue Mountains Conservation Society is a community based volunteer organisation with over 850 members. The goal of the Society is to promote the conservation of the environment in the Greater Blue Mountains region. I am writing to you in regards to the the introduction of a new Special Purpose Tourist zone (SP3).

The introduction of the SP3-Tourist zone would change the nature of tourist developments in the Blue Mountains. The new zone would promote concentrations of tourist facilities which will inevitably lead to the development of more large scale resorts which will impact on the visual and natural amenity of the Blue Mountains. This form of future development may jeopardise the many small-scale operators that promote appreciation of the natural environment and sustainable practices. Anecdotal evidence suggests the reason that many overnight tourists come to the area is for the small-scale accommodation options which are integrated with the community.

### **Objectives**

The Society strongly objects to the proposal having only the one objective for this zone, which is *"To provide for a variety of tourist -orientated development and related uses"*.

With tourism so dependent on the internationally recognised environmental features of the area, strong environmentally protective objectives are justified.

As many of the proposed SP3 sites are immediately adjacent to the World Heritage area, it is essential that any development within this zone has a neutral or beneficial effect on adjacent World Heritage Property.

All of the draft LEP 2015 zones which are the subject to the SP3 rezoning proposal contain at least some environmental objectives; viz E3, E4, RE1, RE2, R1, RU4. The lack of environmental objectives in the SP3 zone is a weakening of environmental protections.

### **Adverse Environmental Impact**

The introduction of the SP3 zone will weaken the protective measures available in LEP 2015 to avoid adverse environmental impact in new developments in the following ways:

- Clause 6.1 (7) combined with the development focus of the sole objective for the Tourism Zone would significantly weaken the ‘no adverse environmental impact’ test in Clauses 6.1 (5) and (6).

Clause 6.1 (7) states that

*“in determining whether an adverse environmental impact cannot be avoided ...the consent authority shall: (a) have regard to the purposes for which the land is intended to be used with reference to the zone objectives applying to the land”*

- Removal of the application of Clause 6.28 of DLEP 2015. Currently Tourist developments in the existing zones (RU2, RU4, E3, and E4) are subject to Clause 6.28 of LEP 2015 which not only limits the scale of the development but also ensures that any development ‘does not adversely impact on the .....environmental values of the land’.

Transferring these zones to SP3 zone will therefore weaken the environmental protections as developments will longer be subject to this clause.

### **Encroachment into E2**

Where proposed Tourist Zones are adjacent to an E2 zone, there is the potential for the development to encroach 10m into the E2 zone (clause 5.3). Considering this together with the weakening of environmental impact tests, as outlined above, there should be a reassessment of zone boundaries to ensure adequate buffers are in place to compensate for the erosion of standards.

### **Protected areas**

Many of these sites have Protected Areas currently identified on the maps, in particular “Protected Area-Escarpment”. It is a concern that these Protected Areas will not be as well protected in the new SP3 zone because of its single purpose objective. One obvious consequence will be to adversely alter the escarpment skyline across much of the Mountains.

### **Multiple uses/exclusive enclaves**

Development of exclusive high end tourist facilities does not promote the multiple uses of facilities and public/private interaction. In some places (e.g. Blackheath Caravan Park) it will inevitably reduce community access to public reserves.

### **SP3 and Community Strategic Plan for the City of the Blue Mountains**

Any weakening of environmental protections runs counter to the plan, *Sustainable Blue Mountains 2025*. Environmental sustainability and the awareness of our unique location as a City within a World Heritage Area are central to the Community Vision.

**In conclusion**, there does not appear to be any benefits for the community or the environment in concentrating new tourist development into a few exclusive precincts. If the SP3 zone were to be introduced, the Society would have grave concerns about how Council could guarantee the protection of the World Heritage Area, unspoilt views of, and from, escarpments, impacts on watercourses and waterfalls, scheduled plant communities, State and Commonwealth-listed threatened plant and animal species and so on.

### **The Society therefore opposes the introduction of this new zone.**

However, if the SP3 zone were to be included in the LEP, the following additional controls should be added:

- an additional objective for SP3 to address conservation of the environment (if permitted by Department of Planning) and
- an additional clause to section 6 of the LEP to cover SP3 zones, to substitute for the loss of provisions in clause 6.28
- the inclusion of community facilities permitted with consent in SP3
- the area of each SP3 zone reduced to ensure sufficient “buffer areas” are retained and/or transferred to an adjacent zone, which would ideally be an E2 zone; eg increasing the E2 zone around the creekline adjacent to the Blackheath Caravan Park.

### **COMMENTS ON SITES BEING CONSIDERED BY COUNCIL FOR SP3 ZONE**

The Society is specifically concerned about the impacts of applying the SP3 zone on the six following proposed sites:

The Society recommends the retention of the existing zoning to all sites as there is no environmental or community benefit for any of these sites being rezoned for intensive tourism.

### **Site 1 Blackheath Caravan Park**

Whilst already developed, the Blackheath Caravan Park area is not an appropriate site for a larger scale tourist development because of its proximity to the sensitive environment of Popes Glen Creek. The recent small developments within the existing Caravan Park have resulted in building rubble being deposited on the edge of the creek. Any intensification of development would:

- direct increased runoff into the stream increasing erosive potential
- decrease infiltration into groundwater
- send sediment plumes downstream
- increase weed propagules travelling further downstream (with increased volume and velocity of water)
- threaten the integrity of the World Heritage Area into which Popes Glen Creek flows (as a result of the above listed effects).

Any rezoning should be increasing the Environmental Protection zones, not increasing the intensity of development permitted immediately upslope.

A significant environmental rehabilitation project commenced in 1990 in the headwaters of Popes Glen Creek. This area is also a demonstration site for best-practice Urban Stormwater management. If any sort of high-end or gated development were to take place as allowed under SP3, there would be a loss of access to the rehabilitation project for both bushcare volunteers and the range of visitors who frequently inspect the stormwater infrastructure.

**Recommendation: that the existing zoning be retained.**

### **Site 3 274 -318 Hat Hill Road, Blackheath**

Most of this area is undeveloped and zoned for Environmental Protection (E2), which will be retained. The flatter areas nearer the road, currently E3 are being considered for the Tourist Zone. This area is surrounded by steeply sloping land and Blue Mountains Swamps as listed under the Threatened Species Conservation (TSC) Act and Environment Protection and Biodiversity Conservation (EPBC) Act. Retaining adequate well vegetated natural bushland buffers is essential for their protection, as well as for the protection of the National Park and World Heritage Area downslope.

A rezoning to SP3 would weaken the assessment criteria for future development on this land (see discussion on SP3 zone above).

**Recommendation: that the existing E3 zoning be retained.**

### **Site 5 Hydro Majestic Hotel, Medlow Bath**

The existing R1 and E3 zones adequately allow for the proposed recreation facilities. Whilst this site is obviously a significant tourism centre, the possibility of community uses should not be excluded in the future by this change of zone.

Development on this site already impacts on significant vegetation downslope, watercourses and on the integrity of escarpment views. As the development area is located on an escarpment edge, the potential for environmental impact is significant, and hence the development assessment protections provided in Clause 6.1 (5) need to be reaffirmed, not undermined by the lack of an environmental objective (refer to Clause 6.1 (7)). It appears that clause 6.28 will also not apply.

**Recommendation: that the existing zoning be retained.**

However, if the SP3 zone were to be applied to this site, it is essential that environmental safeguards also be introduced, such as:

- an additional objective is permitted by DPE to address conservation of the environment, and
- an additional clause in section 6 of the LEP to cover SP3 zones.

### **Site 8c Scenic World, Violet Street, Katoomba**

Any further development on this site on the edge of the escarpment has the potential to damage the bushland and waterways in the valley below – on both E2 land and National Park. More not fewer safeguards are required.

Intensification of development means an increase in impermeable surfaces and hence:

- increased volume & velocity of runoff into streams increasing erosive potential
- increased potential for weed seeds and sediment to be transported into the National Park
- decreased infiltration into groundwater.

These downstream and downslope impacts would result in degradation of the World Heritage Area and the Sydney Metropolitan drinking water catchment. The location of Scenic World is known for its geological instability. Some concern must be expressed about the security of additional developments on the escarpment here.

The Society objects to the application of the SP3 zone to this site because of the weaker development application assessment criteria available for this zone, to prevent adverse environmental impact. The specific concerns are outlined in the introductory section of this submission.

**Recommendation: that the existing zoning be retained.**

### **Site 9 Leura Golf Course & Fairmont Resort, Leura**

Any further development on this site on the edge of the escarpment has the potential to damage the bushland and waterways in the valley below – both E2 land, the National Park and the Blue Mountains World Heritage Area. More not less safeguards are required. The likely impacts from intensification of development are similar to the downslope/downstream impacts outlined in 8c above, as well as visual impacts.

Whilst the Society does not object to the concept of a tourist zone applied here, it does object to the SP3 proposal as presented which will weaken the application of environmental safeguards in Clauses 6.1 (5),(6) and (7).

**Recommendation: that the existing zoning be retained.**

### **Site 12 Queen Victoria Hospital, 215-229 Tablelands Rd Wentworth Falls**

The former Queen Victoria Hospital, originally built in 1902, has both local and State Heritage significance. A significant population of the rare Blue Mountains Water Skink, as well as populations of two threatened plants *Persoonia acerosa* and *Pultenaea glabra* have been found on undeveloped land surrounding the Queen Victoria Hospital buildings. In addition it contains an unusual diversity of hybrid mallee eucalypts, and is an important breeding and feeding area for the listed vulnerable Glossy Black Cockatoos.

The hospital land extends to the clifftops which has scenic importance. The retention of public access to clifftop areas is an important local and tourist issue. It is also an isolated site in a high bushfire risk area (as recent events amply demonstrate) and therefore unsuitable for intensive development.

**Recommendation: that the existing zoning be retained.**

A full outline of the reasons the Society opposes the application of SP3 zone on this site is included in the Appendix.

### **COMMENTS ON SITES NOT CURRENTLY CONSIDERED FOR RE-ZONING**

The Society supports Council in retaining the existing zoning of these additional 10 sites, rather than zone them for intensive tourist uses (SP3).

### **Site 2 Rhododendron Gardens, Blackheath**

This site is at the headwaters of Hat Hill Creek, which in less than 6km, flows over the escarpment into the Grose River and the National Park Wilderness Area. It is critical

that no further development occur within close proximity of this creekline and that all of the natural vegetated areas remain and be rehabilitated to protect the Grose Valley from weed invasion and the river from sediment.

The Society supports the retention of the Public Recreation zone and particularly that the requirement of the Lands Department be complied with; viz 'that the area be retained in its natural state'. 'An understorey of rhododendrons, azaleas and suitable trees' planted in natural bushland, is hardly 'natural state', particularly when *Rhododendron ponticum* is already recorded as invasive in the Blue Mountains (Botanic Gardens and Blue Mountains DCP).

#### **Site 4 Megalong Valley, p35**

Currently economic activity in the Megalong Valley is based around rural industries, including farm gate sales, and small scale rural tourism ventures (farmstays, horseriding, vineyards and so on). The SP3 zone specifically excludes farm and rural development and therefore is not considered an appropriate zoning for the Megalong Valley as it does not reflect the current development or economic base.

#### **Site 6 Katoomba Airfield, Medlow Bath**

Whilst the Society would wish to see this land zoned NP and returned to the National Park, we appreciate the firefighting issues involved and hence support the recommendation to retain existing zonings at this stage.

The loss of environmental protections in a rezoning to SP3 would be detrimental for this sensitive site, which has steep slopes and contains hanging swamps.

#### **Site 7 Radiata Plateau, 28 Pulpit Road, Katoomba**

Radiata Plateau (28 Pulpit Hill Road) has significant scenic and environmental importance as it is largely intact bushland adjacent to escarpment cliff lines and close to the Blue Mountains World Heritage Area. The site contains:

- A considerable coverage of at least nine Blue Mountains City Council scheduled vegetation communities including *Blue Mountains Heath and Scrub* that plays an important role in providing habitat for migrating honeyeaters from interstate; *Eucalyptus oreades Open Forest/Tall Open-forest*, an iconic community of the Upper Mountains; and *Ceratopetalum apetalum-Doryphora sassafras Rainforest* whose special antiquity has international recognition.
- *Blue Mountains Swamps* that are listed as a Vulnerable Ecological Community under the NSW Threatened Species Conservation Act (1995) and as an Endangered

Ecological Community (called *Temperate Highland Peat Swamps on Sandstone*) under the Commonwealth's Environmental Protection and Biodiversity Conservation Act (1999). Because of its dependence on groundwater flow this community could be degraded by any upslope development.

- A number of TSC Act Vulnerable and Endangered plants and animals including the swamp-dependant Giant Dragonfly (*Petalura gigantea* - endangered) and the Blue Mountains Water Skink (*Eulamprus leuraensis* – endangered; also listed under EPBC Act). The TSC Act Endangered *Pherosphaera fitzgeraldii* (Microstrobos) that is sensitive to water flow and water chemistry disturbances reaches its north-western limits on this property that also supports one of only ten known sites of the Endangered shrub *Leionema lachnaeoides* (TSC Act; EPBC Act).

The option to retain the existing zoning is therefore strongly supported. Large scale development will inevitably impact on the highly constrained site – on scheduled vegetation, endangered communities and species, steep slopes and watercourses.

#### **Site 8a Echo Point Lookout, 44-50 Echo Point Rd Katoomba**

Retention of the existing zones (RE1, E1 and E2) is recommended.

#### **Site 8b Echo Point Motor Inn, 18 Echo Point Rd Katoomba**

No comment, as the issues involved are not relevant to the Society.

#### **Site 10 Breakfast Point & Environs, Wentworth Falls**

Retention of this area in the National Park and of the existing zone is recommended.

#### **Site 11 Wentworth Falls Lake**

The recreational uses of the Lake area and the environmental sensitivity are best regulated by the combination of the RE1 and E2 zones.

It is recommended that the existing zones be retained on this site.

#### **Site 13 Former Lawson Golf Course**

The Society supports the option to retain the LEP 2015 zones pending the outcome of an adopted masterplan developed in consultation with the community.

It is recommended that the existing zones be retained on this site.

#### **Site 14 South Lawson Park, Lawson**

Due to the site's environmental constraints that include scheduled vegetation communities, the presence of TSC Act listed plants and animals, the best set of waterfalls in the Middle Mountains and high bushfire risk, it is unsuitable for any forms of accommodation and hence not appropriate to zone SP3. A review is needed on the adequacy of the E2 zone to provide riparian buffers at the headwaters.

It is recommended that the existing zones be retained on this site.

#### **Site 15 Knapsack Reserve, Glenbrook**

Knapsack Reserve Glenbrook has significant environmental importance as it contains:

- A large area of Scheduled Vegetation including the Critically Endangered *Shale/Sandstone Transition Forest* (Threatened Species Conservation Act 1995) and a substantial area of the also Critically Endangered *Sydney Turpentine-Ironbark Forest* (TSC Act). These communities are both listed with the same classifications under the EPBC Act (1999). Both communities grow in highly erodible clay soils which are extensive in the flattest part of the Reserve, so would be impacted on by any tourist accommodation there.
- Sandstone communities such as the *Corymbia gummifera-C. eximia* Open-forests and Woodlands that are found on the plateau edges and steeper escarpment slopes which include a diverse assemblage of sclerophyllous plants and faunal habitats and are also visually important when approached from the Cumberland Plain
- Vital habitat for fauna listed under the TSC Act (1995) including the Glossy Black-cockatoo, a Vulnerable species that particularly relies on the presence of species of the Casuarinaceae family for their survival in the Lower Blue Mountains.
- An unexpected resident of rocks and trees of the escarpment of the Reserve, the White-bellied Sea-eagle. Pairs of breeding birds, who have long established territories here, could be dislocated by development.

In addition to environmental values, the Reserve has long been a public place of visitation by tourists (to the heritage locations of Marge's and Elizabeth's lookouts) and of walking recreation by locals and visitors. In particular it is an important open recreational space for the residents of Glenbrook and Lapstone who have limited bushland walking tracks outside of the National Park. It is important that the Reserve remains accessible to all the public, and not appropriated by any private commercial developer.

The current downhill mountain biking course illustrates the inadvisability of attempting to develop the sandstone areas of the Reserve for any further active recreational facility. This track carves a very ugly and erodible swathe through once diverse and attractive bushland. It dangerously conflicts with walkers and visitors to Marge's Lookout where the course cuts across the public access walking track/road at the base of a steep slope. Knapsack Reserve is therefore not appropriate for either tourist accommodation or an expanded downhill mountain biking course because of the significant environmental constraints and because of conflicts with traditional public use of its bushland.

It is recommended that the existing zones be retained on this site.

**Site 16 'Khandala', Birdwood Ave, Katoomba**

Intensive development is not appropriate for this site because of its escarpment location, steep slopes and scheduled vegetation. The existing provisions for low impact small scale tourist development as permitted in E4 is appropriate.

It is recommended that the existing zones be retained on this site.

Yours Sincerely



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## **APPENDIX**

### **Site 12: Queen Victoria Hospital, Wentworth Falls**

The former Queen Victoria Hospital site is located on Tableland Road, Kings Tableland, 4km south of the Great Western Highway at Wentworth Falls. The site has conservation significance due to the following:

- presence of a relatively high number of environmentally sensitive vegetation communities, including heaths and hanging swamps;
- presence of threatened flora and fauna;
- relatively pristine downstream catchments due to the current limited development;
- very high intrinsic visual qualities, including scenic views from and to the escarpment; and
- presence of significance Aboriginal and European cultural sites

In addition, rezoning of the site to allow intensive tourism development is not appropriate due to the lack of infrastructure and the high bushfire risk.

#### **Lack of infrastructure**

There is no mains water or mains sewage disposal at the site. This has implications for bushfire responsiveness as a large and well supplied on-site water supply system would have to form part of any large development. High level treatment for on-site sewerage disposal would also have to be established, to avoid impacts on neighbouring creeks and swamps. This infrastructure development would result in a very large development footprint if a major tourism development proceeded on the site.

#### **Bushfire risk**

The bushfire risk to the site is significant as the area is located within a Major Bushfire Risk area in the Blue Mountains District Bushfire Management Committee's Bushfire Risk Management Plan. The former Queen Victoria Hospital site is especially vulnerable due to its remoteness from the other developed areas on the northern section of the Tableland, compounded by the fact it is surrounded by natural bushland and heritage gardens, and the lack of reticulated water supply to the site. Protecting the heritage buildings and gardens of the site during a major bushfire event would be a particular challenge.

In addition, access is problematic. Past the main residential development, the road narrows and in some areas is being encroached upon by verge vegetation. The Bushfire Risk Study undertaken as part of a former development application for a proposed redevelopment on the Queen Victoria Hospital site reinforced that there is a severe risk in relation to accessing Kings Tableland generally during a fire, especially the end of Tableland Road. The Bushfire Risk Study noted that, given the length of Tableland Road

and the nature of the adjoining bushland along its length, the “...roadway would be under severe threat during a major fire event” (Conacher Travers Pty Ltd 2001a, p18). The Study concluded access for emergency service vehicles would therefore be impacted if there was a fire threat, and that it would not be advisable to use the road for evacuation purposes during major fire events. The Study recommended that, as the access to the former Queen Victoria Hospital site would be restricted should there be a fire event, the residents should be evacuated to “...safe refuges within the (site)” (ibid) rather than being extricated from the site. Given the intensity of the potential fire threat it would be very problematic to find a safe refuge on the site of the former Queen Victoria Hospital without significant clearing of native vegetation, especially if the proposed redevelopment was large and involved a significant number of people staying overnight.

### **Aboriginal Cultural Heritage**

No comprehensive Aboriginal cultural or archaeological assessment has been undertaken over the Queen Victoria site. However, it is well established that Kings Tableland is highly significant to the Aboriginal community of the Blue Mountains. Kings Tableland is recognised as traditional land of the Gundungurra people. The Gundungurra Native Title Claim extends over Kings Tableland. There are a number of recorded Aboriginal cultural sites located on Kings Tableland including open camp sites, occupation shelters, axe grinding grooves, stone arrangements and art sites including cave paintings and rock engravings (Stockton 1996, p57).

### **European Heritage Values**

The former Queen Victoria Hospital group of buildings and its surrounding gardens was assessed as part of the Blue Mountains City Council review of heritage items. According to the draft *Blue Mountains State Heritage Inventory - Former Queen Victoria Memorial Hospital* the site is of State heritage significance because:

*The continuous use of the Kings Tableland premises for health care for 96 years and the importance of the building and grounds give the complex heritage significance at the State level...Queen Victoria Hospital group is of outstanding importance as a purpose-designed sanatorium of the Edwardian period. While there have been substantial alterations and additions to the group, the original grouping of pavilions and cottages can be easily discerned...The survival of the “open air” chalets for consumptive patients is extremely rare. The pavilions are therefore of State importance (Jack et al 2005).*

This assessment of the significance of the site is supported by a previous study undertaken in 1999. Prior to the sale of the site by the NSW Dept of Health, the NSW government commissioned the preparation of a Conservation Management Plan (CMP) (Noel Bell Ridley Smith & Partners and Cultural Resources Pty Ltd 1999), *Queen Victoria Nursing Home Wentworth Falls, Conservation Management Plan prepared for the New South Wales Department of Health*. The CMP assessed the site, including the buildings and landscaped areas, as State significant (ibid, p53).

The CMP was endorsed by the NSW Heritage Council in February 2000. In relation to the site's significance, the NSW Heritage Council noted the CMP's assessment of the site as State significant and based on this assessment the NSW Heritage Council concluded that the "...site is of State significance and should be considered for listing on the SHR [State Heritage Register]" (NSW Heritage Office 2002).

Additionally, the site was listed by NSW Department of Health under its sec 170 Heritage and Conservation Register, when it was owned by the department. Section 170 of the Heritage Act requires government agencies to keep a register of heritage items, which is called a Heritage and Conservation Register.

Lastly, the small 'open air' chalets at the Queen Victoria Hospital site are listed on the Register of the National Estate by the Commonwealth Department of the Environment and Heritage as an Indicative Place.

### **Impacts on the Greater Blue Mountains World Heritage Area (GBMWAH)**

Nearly all of the Queen Victoria Hospital site is bordered by the Blue Mountains National Park. The Blue Mountains National Park forms part of the GBMWAH. World Heritage listing is the highest level of international recognition that maybe given to an area, which acknowledges its outstanding international values and global significance. The GBMWAH was nominated on the basis of its unique natural values, predominantly on the basis of its outstanding examples of highly diverse ecosystems and communities of plants and animals, particularly eucalypt-dominated ecosystems.

One of the biggest impacts on the ecological integrity and therefore the World Heritage values of the GBMWAH are impacts from activities and developments near or adjacent to the GBMWAH. These have been identified in the GBMWAH Strategic Plan as including:

- properties adjoining the GBMWAH which are highly valued but are under pressure from increasing residential and tourism development (DEC 2005, p16) and
- incompatible land management of adjoining land by private land holders and government agencies (DEC 2005, p19).

Any large re-development on the queen Victoria Hospital site may require Commonwealth assessment and approval. Under the Commonwealth *Environmental Protection and Biodiversity Conservation Act 1999* approval of the Commonwealth Minister for the Environment and Heritage is required for any developments which have a significant impact on the GBMWAH, whether they occur within or outside of the GBMWAH.

### **Significant vegetation communities**

A number of regionally significant vegetation communities can be found on the Queen Victoria Hospital Site. These include:

- Open Forest/Tall Open Forest
- Blue Mountains Heath
- Blue Mountains Swamps
- Blue Mountains Escarpment Complex

Development on the Queen Victoria Hospital site should be avoided in the catchment of Waterfall Creek, given the headwaters of the creek drain into a significant Blue Mountains Swamp. Blue Mountains Swamps are also listed nationally as an endangered ecological community under the Commonwealth *Environmental Protection and Biodiversity Conservation Act 1999*. As a consequence, approval of the Commonwealth Minister for the Environment and Heritage is required for any developments which have a significant impact on Blue Mountains Swamps, including developments which may impact on hydrological conditions on which the swamps depend.

In addition the Blue Mountains Heath which occurs on Kings Tableland, including on the Queen Victoria Hospital site, is considered the largest area of heath in the Blue Mountains (BMCC 1984, p6). The Kings Tableland Heath community is very large and is therefore of particular conservation value as it contains not only a complex mosaic of vegetation units but also shows examples of all gradations from heath to scrub and from heath to sedge swamp (ibid, p46). Blue Mountains Heath vegetation community supports a number of bird species which are specialised heathland and swamp dwellers that are uncommon and regionally significant in the Blue Mountains, such as the Beautiful Firetail.

In addition the site contains an unusual diversity of hybrid mallee eucalypts. The other significant vegetation communities on the Tableland also provide habitat for a range of native flora and fauna, including a number which are threatened (BMCC 2002a, p126).

### **Threatened flora and fauna**

A study of the native flora and fauna between Katoomba and Wentworth Falls, which included Kings Tableland, recorded 558 native plant species (Smith and Smith 1995, p4). Blue Mountains flora is characterised by an unusual number of species with restricted distributions, many endemic to the region. Consequently, the Blue Mountains has one of the highest densities of rare species in Australia (ibid, p4).

The Smith and Smith study of Katoomba to Wentworth Falls recorded 43 species of plants which have special conservation significance at either a regional, local or statewide level (ibid, p4). Of these 10 have been recorded on Kings Tableland (BMCC, 2006). Two special flora species *Persoonia acerosa* and *Pultenaea glabra* have been found on the former Queen Victoria Hospital site (Conacher Travers 2001b). Both are listed as vulnerable under the *NSW Threatened Species Conservation Act* and any development which has a significant impact on these species requires a Species Impact Statement and the concurrence of the Office of Environment and Heritage.

A total of 230 native fauna species have been recorded in the vicinity of Kings Tableland, including 26 mammals, 155 birds, 29 reptiles and 20 frogs (Urban Bushland 1999, p35).

Out of these species of fauna, 10 species listed under the *NSW Threatened Species Conservation Act* have been considered likely to occur on the Queen Victoria Hospital site (Conacher Travers 2001b). These include Spotted-tailed Quoll, Squirrel Glider, Eastern False Pipistrelle, Common Bentwing Bat, Glossy Back Cockatoo, Powerful Owl, Sooty Owl, Blue Mountains Water Skink and Giant Burrowing Frog (ibid). The population of the Blue Mountains Water Skink on the former Queen Victoria Hospital site is especially significant and this population has been included in this species' Recovery Plan. The Queen Victoria hospital site is also recognized as an important breeding and feeding area for the endangered Glossy black Cockatoos.

### **Other environmental impacts from inappropriate development**

Previous planning studies and Council Reports have identified inappropriate development as a major issue impacting on the values of Kings Tableland (BMCC 1984, BMCC 1986, BMCC 1989, BMCC 2006). The 1984 study identified the visual effect of development on the Tableland as a significant consideration, and identified a number of already existing developments that were unsympathetic and unsuitable (BMCC 1984, p19). Impacts on water quality from development; degradation of natural vegetation through inappropriate uses; insufficient site controls during actual construction; clearing of locally significant vegetation communities for residential and other development; and inappropriate intensive ribbon development along Tableland Rd impairing the bushland setting have all previously been identified as issues resulting from inappropriate development detrimentally impacting on the values of the Tableland (BMCC 1984 and BMCC 1986).

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