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Nature Conservation Saves for Tomorrow

The General Manager
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15 November 2019

By email to: localplanningstatement@bmcc.nsw.gov.au

Draft Local Strategic Planning Statement

The Blue Mountains Conservation Society (BMCS) is a community-based volunteer organisation with over 850 members. Founded in 1961, the BMCS is the oldest continuing conservation organisation in the Blue Mountains. Its mission is to help conserve the natural environment of the Greater Blue Mountains, and to increase awareness of the natural environment in general.

The BMCS is pleased to have the opportunity to comment on the Draft Blue Mountains Local Strategic Planning Statement, *Blue Mountains 2040: Living Sustainably*.

General comments on the Draft Local Strategic Planning Statement (LSPS)

The Blue Mountains Conservation Society commends the Blue Mountains City Council for producing a Draft Local Strategic Planning Statement (LSPS) that is responsive to the *Blue Mountains Community Strategic Plan 2035*, the requirements of the *Western City District Plan (2018)* and the enduring local planning principles developed in recognition of our unique natural environment and situation as a city in a World Heritage listed national park.

The BMCS is pleased to see that these enduring planning principles, which have informed the environmental and heritage protections in our local planning instruments and controls for decades, have been carried forward and reinforced in the Draft LSPS. These principles continue to be strongly supported by the community, as evidenced by the community's strong engagement in the development of the Blue Mountains LEPs 2005 and 2015, and the outcomes of community consultations for the Blue Mountains Community Strategic Plan and the Draft Blue Mountains LSPS.

As the Council well knows, the Blue Mountains City Council had to fight the state government to have these enduring planning principles retained in the Blue Mountains LEP 2015, the *Greater Sydney Regional Plan. A Metropolis of Three Cities (2018)* and the *Western City District Plan (2018)*. The BMCS ran its own strong community education and engagement campaigns supporting the retention of these planning principles, and also lobbied local parliamentary representatives, various Commissioners of the Greater Sydney Commission, senior personnel in the Department of Planning and the then Minister for Planning, Rob Stokes.

Through the consistent efforts of the Blue Mountains City Council and the Blue Mountains Conservation Society over the past decade of planning reform in NSW, the government has apparently thought better of its most egregious policies which would have compromised these enduring planning principles. We believe the outcome of all these efforts by the Council and the Society has been an increasing recognition by the NSW government and Greater Sydney Commission of the natural constraints limiting growth in Blue Mountains, and a greater appreciation of the responsibility of governments at all levels to protect and enhance the Greater Blue Mountains World Heritage Area. However, this achievement must now be secured through the LSPS and the review of LEP/DCP 2015 which will follow. It is imperative that the Blue Mountains' planning principles endure in coming iterations of our community strategic plans and local planning instruments and development controls.

Since the finalisation of the Greater Sydney and District Plans, and Blue Mountains LEP 2015, growing concerns about global warming and its impacts on life on our planet have come to the forefront. The Draft LSPS necessarily responds to the increasing threat of climate change, particularly heightened bushfire risk, to our community and our natural assets. This heightened risk serves as a timely reminder of the constraints on development in the Blue Mountains and the imperative to protect the community and natural environment through responsible planning. However, we believe that many of the recommended Actions in this area need to be strengthened and/or brought forward, particularly considering Council commendably declared a 'climate emergency' in February, the third Council in the state to do so. More recently, Local Government NSW also declared a 'climate emergency' at its annual conference in October 2019.

A 20-year vision of our city must therefore include strong actions to mitigate climate change impacts and reduce carbon emissions. While Council is to be commended for its Carbon Abatement Action Plan and adopting a target of becoming carbon neutral by the end of 2036, this applies only to Council's own operations. The BMCS believes that Council's Actions to achieve this target should be brought forward and that stronger carbon abatement and climate change mitigation actions should apply to all activities undertaken in the Blue Mountains LGA. These actions include introducing relevant development controls and standards, and design and materials requirements, applied to all new buildings and refurbishments, and initiatives to retrofit existing houses. Stronger action needs to be taken to reduce vegetation loss. Other actions and initiatives can also be developed in partnership with businesses, schools and residents. If Council truly wants the Blue Mountains to become the 'sustainability capital of Australia', strong LGA-wide carbon emission reduction and climate change mitigation measures must be included in the LSPS and translated into development and other controls when LEP/DCP 2015 are reviewed next year and finalised in 2021.

Yours sincerely,



Tara Cameron

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Summary of BMCS comments and recommendations on the Draft LSPS (recommended changes in italics).

The BMCS is generally highly supportive of the Draft LSPS, with specific comments and recommendations as follows.

Priority 1: Living sustainably in the City within a World Heritage National Park

BMCS generally supports Actions 1.1 – 1.20, but strongly questions Action 1.21.

Action 1.1

- The Society recommends that Shaws Creek be included in Council's maps.

Action 1.6 (and Action 8.3)

The BMCS recommends an amendment to Action 1.6 in light of the new Plan of Management being developed by NPWS:

- Council will begin to work with the NSW National Parks and Wildlife Service to develop a framework or Memorandum of Understanding, for the coordinated delivery of infrastructure where this jointly benefits and impacts the World Heritage National Park and the Blue Mountains local government area. *This Memorandum of Understanding should also cover Council's role and involvement in the development of the new Plan of Management for the Blue Mountains National Park.*

Action 1.10

- Ground truthing of Blue Mountains Significant Vegetation Communities should be a short term Action (2020 – 2021) not a medium term Action.

The following additional medium term Actions (2021–2025) should be added:

- Council will review and implement targeted ground truthing of non-scheduled Blue Mountains vegetation communities.
- Council will work to improve knowledge of the local occurrences of rare or threatened plant and animal species and make this information available on interactive maps, and to Council outdoor workers and their supervisors.

Action 1.11

The BMCS recommends an amendment to Action 1.11:

- Action 1.11. Council will update Blue Mountains Local Environmental Plan 2015 and Development Control Plan 2015 *to ensure the protection of native vegetation, containment of the developed area (urban & commercial), energy efficiency and enhancement of water sensitive urban design controls.*

The BMCS recommends the additional related following Actions:

- Council will work with the NSW State Government and the Rural Fire Service to undertake a review of the 10:50 Vegetation Clearing Code of Practice with particular consideration of the considerable removal of tree cover on properties that are not

adjacent to bushland and in the light of a demonstrated reduction in bird species in affected areas.

- Council will work with the State Government to review the tree lopping/tree removal industry to particularly ensure that only qualified, licensed contractors who are cognizant of tree regulations carry out related activities in the Blue Mountains.
- Council will establish an active and effective monitoring system to ensure strict adherence by residents and contractors to the provisions of the 10:50 VCCP, including understory clearance, and to the Council's Tree Preservation regulations.

Action 1.13

The BMCS previously developed, in conjunction with Council, a booklet distributed to all new residents called 'Living in the Bush'. The Society is keen to update and republish this booklet, and would be keen to discuss this project with Council. It could form part of Action 1.13.

Action 1.14.

The Society suggests amending Action 1.14 as follows:

- Council will investigate opportunities and state government support, to retrofit existing residential properties in 'active management' catchment areas, with rainwater tanks and other water sensitive urban design measures, to improve water quality in these catchment areas *and contribute to climate adaptation*.

Action 1.20

The BMCS recommends an amendment to Action 1.20:

- Action 1.20. Council will continue to pursue a whole of government response to the protection of the Blue Mountains World Heritage Area, in the context of increased tourism and the opening of the Western Sydney Airport, *fire risk and climate change*.

Action 1.21.

The BMCS strongly questions this Action. Before committing any Council resources to its pursuit, which is likely to be costly, Council needs to assess whether there is any likelihood of its success.

Council should instead add Actions that align with Strategy 2.3.b statement of BMCC Delivery Program and Operational Plan, "All levels of government and community work together to protect the Greater Blue Mountains World Heritage Area":

- Council will develop as part of the MOU appropriate formalised communication between BMCC and NPWS in relation to land management (e.g. weeds) across the interface between tenures to support more effective and efficient protection of World Heritage values.
- Council will develop an MOU with the NSW government to undertake effective weed control in the transport corridor.

Priority 2: Managing bushfire risk and responding to climate change in our unique environment

The BMCS generally supports the Actions under Priority 2, but urges Council to reconsider Action 2.5.

The BMCS recommends:

- That Council includes the Bushfire Prone Land maps in the final version of the LSPS and as an overlay on the Urban Footprint Map.

The BMCS recommends additional medium term Actions under this Priority:

- Council will work with the NSW government to develop mechanisms to implement a policy of closer settlement to reduce exposure of residents to bushfire risk and to stop the loss of bushland and biodiversity in areas currently undeveloped.
- Council will review the fire trail maintenance policy with the Rural Fire Service with a view to balancing risk with maintenance of biodiversity.

Action 2.2

The BMCS recommends an amendment to Action 2.2:

- Council will update and appropriately implement the Local Emergency Management Plan *which will include proactive measures to enable and encourage residents to plan and be prepared for local emergencies.*

Action 2.3.

The BMCS recommends an amendment to Action 2.3.

- Action 2.3. Council will review the Local Link Road Strategy, to identify potential new routes that may facilitate the mobility of residents and visitors within and to the Blue Mountains *whilst not impacting bushland.*

Action 2.5.

The BMCS urges Council to reconsider this action. The Society respects indigenous fire management practices, however we urge caution. Local traditional indigenous fire management techniques are not as well understood as compared to other parts of Australia. The vegetation in the LGA is in part different to what it was 200 years ago, changing climatic conditions and extreme weather events present new challenges and a balance must be achieved between property protection and best ecological practices. The BMCS believes that science-based knowledge and methodologies must be employed in all instances of fire management in Blue Mountains landscapes.

Action 2.6.

The BMCS recommends an amendment to Action 2.6.

- Action 2.6. Council will investigate and report on feasibility and options for achieving a low carbon City, with an initial focus on Council operations *but extending into partnerships with business, schools and residents.*

Action 2.9.

The BMCS recommends additional related Actions:

- Council will work with the NSW government to improve the LEP template to enable Councils to incorporate ESD Principles as legally binding objectives of the Plan.
- Council will develop education and incentive programs for retrofitting existing homes including insulation and double glazing, solar panels, solar hot water and water tanks.

Action 2.14.

The BMCS recommends an amendment to Action 2.14.

- Action 2.14. Council will investigate *and implement* initiatives to achieve net zero carbon emissions for all council buildings and facilities by 2030.

Action 2.18.

The BMCS recommends an additional related Action:

- Council will, in the context of climate change and increases in extreme weather conditions and bushfire risk, work with the Department of Planning, Industry and Environment to develop and implement a strategy to reduce the urban area to a 'defendable footprint', including the acquisition of vacant land and/or the implantation of more restrictive planning controls, on areas deemed high risk.

Priority 3: Planning for the increased well-being of our community

Action 3.14.

The BMCS recommends that:

- Action 3.14.becomes a short term Action instead of a long term Action.
- Action 3.14 is amended to: Council will advocate for improved transport links to medical facilities, including services from the Blue Mountains to Westmead *and Nepean Hospitals*.

The BMCS also recommends an additional related Action under this Priority:

- Council will advocate for improved direct transport links via train and/or bus to the tertiary education hub at Kingswood (WSU and TAFE campuses), and for a bus link from Springwood Station to WSU and TAFE at Richmond.

Priority 5: Preserving and enhancing heritage, character and liveability

The BMCS strongly supports the proposed Actions under Priority 5, **particularly Action 5.1** (residential character zone), **Actions 5.3 and 5.6** (Aboriginal history and heritage), **Action 5.7** (exemption from the Low Rise Medium Density Housing Code), **Action 5.8** (design controls on medium density housing) and **Action 5.9** (maintaining a Blue Mountains character within 'hidden density' development).

However, the BMCS recommends the following amendments:

- Action 5.8. Council will develop design controls and guidelines for medium density housing, appropriate to the Blue Mountains context *and to carbon abatement and climate change mitigation.*
- Action 5.9. Council will review local planning controls to ensure dual occupancy and secondary dwelling development continues to achieve the character and liveability outcomes expected in the Blue Mountains context, *as well as carbon abatement and climate change mitigation outcomes.*

Priority 6: Meeting the diverse housing needs of our community

The Society generally supports the commentary and Actions in Chapter 6 of the LSPS, and in the accompanying Housing Strategy (see additional comments later).

Specifically:

- The BMCS supports Council's nominated housing target of 550 new dwellings over the period 2021 to 2026.
- The BMCS cautiously supports the expansion of seniors housing in drinking water catchments but only if the strict neutral and beneficial test on water quality is maintained. Seniors housing should only occur consistent with conditions on page 101 of the Housing Strategy.
- The BMCS strongly supports Council continuing to seek an exemption from the Exempt and Complying Code (Low Rise Medium Density Housing Code) to protect environmental and character values of the Blue Mountains.

The BMCS recommends:

- That the LSPS should include an expanded explanation of how the Sustainable Development Threshold was developed and the fact it has been used consistently for a number of years for planning purposes to define urban areas.
- That Action 6.3 be amended to: Council will pursue opportunities for hidden density and infill development, such as additional locations for secondary dwellings, with appropriate planning controls to *maintain character, landscape and building quality and design, including sustainability standards.*
- That an additional Action should be included for a proactive education and communication campaign on the approvals, standards and controls for infill and secondary development in the Blue Mountains, aimed at residents and building companies active in the local area.
- That Council adds to Priority 6.6 that Council will closely monitor housing development and accelerate actions under this plan if the current vacant land is exhausted more quickly than predicted.
- That an additional action be added to the effect that Council pursue ways to better monitor and regulate short terms rentals such as AirBnB, including amendments to the DCP and developing a local Code of Practice.

Priority 7: Sustaining a healthy local economy, including a focus on Katoomba as our Strategic Centre

The BMCS generally supports many of the Actions under Priority 7. In particular we strongly support **Action 7.10**, **Action 7.14** and **Action 7.11**.

However we recommend an amendment to Action 7.11:

- Action 7.11. Council will work with NSW TAFE and other tertiary education providers to advocate for improvements to local course availability to address skill gaps which align with our comparative advantage in areas of outdoor recreation and eco-tourism, *environmental science and natural area management, conservation and sustainability*.

The BMCS recommends an amendment to Action 7.13:

- Action 7.13: Council will advocate and support the development of smart city and digital technology and other infrastructure, *including provision of co-working spaces in Katoomba and Springwood*, which improve connectivity and productivity.

Further, we recommend an additional Action under this priority:

- Council will work to receive funding for a feasibility study to be undertaken, by suitably qualified consultants or individuals, on the City of Blue Mountains becoming a Green City, following the model of Freiburg Germany adapted for Blue Mountains conditions.

Priority 8: Managing increased tourist visitation

The BMCS generally supports many of the Actions under Priority 9, particularly revenue-raising from tourists to fund infrastructure and better management of tourist facilities and visitor flows. However, we believe that tourism and visitor management strategies need to be strengthened and more attention given to 'sustainable tourism'.

The BMCS therefore recommends additional Actions under this Priority:

- Council will investigate the establishment of a system to monitor on-line social media sites to quickly determine special places being newly targeted by tourists and outdoor adventurers with a view to rapidly establishing visitor impact control measures
- Council will investigate the regulation of geo-caching and similar activities (by permits).
- Council will support the introduction of environmentally sustainable tourism events and tours such as environmentally themed conferences or tours (e.g. birdwatching tours and sustainable housing tours)

Regarding accommodation, the Blue Mountains Conservation Society recommends that:

- Council should not support further large tourist development (hotels and resorts) until a comprehensive accommodation study is completed which includes availability and occupancy rates for smaller operators.

And given the projected rise in tourist visitation over the next 20 years, the BMCS recommends an additional Action under this Priority:

- Council will work towards quantifying the concept of ‘sustainable tourism’ and developing measurable performance indicators related to defined ‘sustainable tourism’ objectives, in consultation with relevant expert natural area managers (e.g. NPWS) as well as the tourism industry.

The Blue Mountains Conservation Society also re-states its opposition to:

- ‘Big Tourism’ development in the Blue Mountains
- Alienation of public land (the Katoomba Golf Course in this case) to intensive, commercial tourist development
- ‘Glamping’, eco-lodges and accommodation within National Parks.

Action 8.3 (and Action 1.6)

The BMCS recommends an amendment to Action 8.3 in light of the new Plan of Management being developed by NPWS:

- Council will begin to work with the NSW National Parks and Wildlife Service to develop a framework or Memorandum of Understanding, for the coordinated delivery of infrastructure where this jointly benefits and impacts the World Heritage National Park and the Blue Mountains local government area. *This Memorandum of Understanding should also cover Council’s role and involvement in the development of the new Plan of Management for the Blue Mountains National Park.*

Priority 9: Improving local transport connections and accessibility, including walking and cycling

The BMCS recommends an additional medium term Action to supplement Action 9.1:

- Council will advocate for improved bicycle and pedestrian access along Hawkesbury Road between Hawkesbury Lookout and High School Drive Winmalee.

And longer term:

- Council will investigate creating a substantial separated and sealed road verge for cyclists in both directions, from Hawkesbury Lookout to at least High School Drive Winmalee, and for an all-weather footpath/walking trail paralleling the road.

And in view of ongoing issues with services and facilities for truck drivers, the BMCS recommends:

- Council will urgently work with Transport for NSW to establish 2 truck service centres, particularly to overcome the present use of the truck pull-in area outside the Glenbrook Reserve at night for driver “comfort stops” when the public facilities in Glenbrook Park are closed.

Specific comments and recommendations on the Local Strategic Planning Statement Local Planning Priorities and Actions.

THEME: SUSTAINABILITY

Priority 1: Living sustainably in the City within a World Heritage National Park

BMCS generally supports Actions 1.1 – 1.20, but strongly questions Action 1.21.

Strong planning controls in LEP 2005, and the environmental planning approaches which informed them, were fundamental to achieving the World Heritage Listing and its maintenance. The Society supports Council's opposition to the Western Sydney Airport and Warragamba wall-raising on the grounds of the potential of these projects to compromise World Heritage values.

Action 1.1. Council will adopt & commence implementation of the Water Sensitive Blue Mountains Strategic Plan.

Shaws Creek is not acknowledged in most Council plans/documents/maps and needs to be included. For example, the faint drainage lines north of Hawkesbury Rd are mostly obliterated by the Key on the Sustainability map on page 35 of the LSPS.

The BMCS therefore recommends:

- Shaws Creek to be included in Council's maps.

Action 1.6 (and Action 8.3). Council will begin to work with NSW National Parks and Wildlife Service to develop a framework or Memorandum of Understanding, for the coordinated delivery of infrastructure where this jointly benefits and impacts the World Heritage National Park and the Blue Mountains local government area (refer to Priority 8).

The BMCS recommends an amendment to Action 1.6 in light of the fact that NPWS is commencing the development of a new Plan of Management for the Blue Mountains National Park. It is essential that all levels of government (Local, State and Commonwealth) are involved in the Plan of Management process as this will guide park management priorities, including infrastructure development, for the next ten years. In addition, off park impacts, such as urban development, are a major contributor to the national park's biodiversity and ecological health. Accordingly, Action 1.6 should be amended to read:

- Council will begin to work with the NSW National Parks and Wildlife Service to develop a framework or Memorandum of Understanding, for the coordinated delivery of infrastructure where this jointly benefits and impacts the World Heritage National Park and the Blue Mountains local government area. *This Memorandum of Understanding should also cover Council's role and involvement in the development of the new Plan of Management for the Blue Mountains National Park.*

Action 1.10. Council will review and implement targeted ground truthing of Blue Mountains Significant Vegetation Communities listed in Schedule 3 of Blue Mountains Local Environmental Plan 2015.

Ground truthing must be done as a matter of urgency particularly as consultants for DA and other development activities are using Council maps instead of their own fieldwork. There needs to be an acknowledgement that Shale/Sandstone Transition Forest is more widely distributed than is currently mapped. The species definition being used is too narrow and the fringe areas of this community are often downgraded to something else by both Council and consultants. This should be addressed in the LEP 2015 review.

Other vegetation communities and their boundaries also need thorough checking. Vegetation communities are frequently missing from published maps (e.g. as in 21 Stuarts Rd Katoomba). This is significant for checking BAM calculations etc.

Recommendations:

- Ground truthing of Blue Mountains Significant Vegetation Communities should be a short term action (2020 – 2021) not a medium term action.

The following additional medium term goals (2021 – 2025) should be added:

- Council will review and implement targeted ground truthing of non-scheduled Blue Mountains vegetation communities.
- Council will work to improve knowledge of the local occurrences of endangered plant and animal species and make this information available on interactive maps, and to Council outdoor workers and their supervisors.

Action 1.11. Council will update Blue Mountains Local Environmental Plan 2015 and Development Control Plan 2015 to ensure the protection of native vegetation and enhancement of water sensitive urban design controls.

The BMCS would like to see the rezoning of undeveloped residential bushland blocks from E3 and E4 to E2 Environmental Conservation, particularly where a house and an APZ would require removal of most or even substantial areas of bushland. While rezoning presents problems for the Council, without tough measures native vegetation will continue to diminish or be downgraded in quality. Such action is also necessary to support Action 1.20.

Rezoning and acquisition is also required for Priority 2: Managing Bushfire Risk.

The BMCS therefore recommends an amendment to Action 1.11:

- Action 1.11. Council will update Blue Mountains Local Environmental Plan 2015 and Development Control Plan 2015 to ensure the protection of native vegetation, *containment of the developed area (urban & commercial), energy efficiency* and enhancement of water sensitive urban design controls.

See also comments under Action 2.9.

Additional related Actions – tree removal

Tree removal is a major problem in the Blue Mountains with tree loppers still actively touting for business. In the lower Mountains tree removal is resulting in large areas of tree loss (e.g. in Lapstone, parts of Winmalee, Hawkesbury Heights), bird species are seriously diminishing

and temperatures are rising. Trees more than 10m from a residence both within and outside the 10:50 zone have been and continue to be cut down. Understorey removal is similarly occurring without regulation and machinery is used all the time despite 10:50 regulations to the contrary.

Council must better monitor this situation and impose serious fines on owners and loss of license for contractors with the second offence. As a further deterrence, a DA should not be considered for land that has obviously been slashed or 'mysteriously' burnt-out prior to the DA submission. A waiting period of 3-5 years before submitting a DA in those circumstances could be considered.

Tree removal contractors need to have a minimum agreed qualification, and must be licensed and registered with the Council (after reading appropriate tree removal policies). All tree removal and serious lopping contracts should be notified to Council (perhaps on-line with no or minimum charges) 7 days prior to the activity, with appropriate provisions for emergency work. Approval must be given based on 10:50 maps, and with reference to threatened communities etc.

The 10:50 regulation should only apply to properties that are in the immediate bushland interface and then it must not be mandatory.

The BMCS therefore recommends the additional following Actions:

- Council will work with the NSW State Government and the Rural Fire Service to undertake a review of the 10:50 Vegetation Clearing Code of Practice with particular consideration of the considerable removal of tree cover on properties that are not adjacent to bushland and in the light of a demonstrated reduction in bird species in affected areas.
- Council will work with the State Government to review the tree lopping/tree removal industry to particularly ensure that only qualified, licensed contractors who are cognizant of tree regulations carry out related activities in the Blue Mountains.
- Council will establish an active and effective monitoring system to ensure strict adherence by residents and contractors to the provisions of the 10:50 VCCP, including understorey clearance, and to the Council's Tree Preservation regulations.

Action 1.13. Council will expand the existing environmental education program to include a Sustainable Living Kit and other educative tools for residents, on the importance of sustainable living within the Blue Mountains.

The BMCS previously developed, in conjunction with Council, a booklet distributed to all new residents called 'Living in the Bush'. The Society is keen to update and republish this booklet, and would be keen to discuss this project with Council. It could form part of Action 1.13.

Action 1.14. Council will investigate opportunities and state government support, to retrofit existing residential properties in 'active management' catchment areas, with rainwater tanks and other water sensitive urban design measures, to improvement water quality in these catchment areas.

BMCS argues that this action is also one which will contribute to climate change adaptation, which will further open up funding grant opportunities.

The Society suggests amending Action 1.14 as follows:

- Council will investigate opportunities and state government support, to retrofit existing residential properties in ‘active management’ catchment areas, with rainwater tanks and other water sensitive urban design measures, to improve water quality in these catchment areas *and contribute to climate adaptation*.

Action 1.17. See discussion under Priority 7.

Action 1.20. Council will continue to pursue a whole of government response to the protection of the Blue Mountains World Heritage Area, in the context of increased tourism and the opening of the Western Sydney Airport.

The BMCS strongly urges Council to work with the state government to reduce the inholdings and ‘fingers’ of development that extend into the GBMWA, which is counter to Council’s policy direction of containing the urban footprint. These developments are highly vulnerable in an increasing bushfire prone environment. They also introduce risks to the integrity of the National Park (weeds, water, erosion, pest species etc) and seriously impact on biodiversity through land clearing for developments and associated APZs. Such edge effects translate into a diminishment of overall GBMWA biodiversity.

See also comments under Action 1.11.

The BMCS recommends an amendment to Action 1.20:

- Action 1.20. Council will continue to pursue a whole of government response to the protection of the Blue Mountains World Heritage Area, in the context of increased tourism and the opening of the Western Sydney Airport, *fire risk and climate change*.

Action 1.21. Council will advocate for the World Heritage listing of our towns and villages as a culturally significant place.

The BMCS strongly questions this Action. Before committing any Council resources to its pursuit, which is likely to be costly, Council needs to assess whether there is any likelihood of its success.

Council should instead add Actions that align with Strategy 2.3.b statement of BMCC Delivery Program and Operational Plan, “All levels of government and community work together to protect the Greater Blue Mountains World Heritage Area”:

- Council will develop as part of the MOU appropriate formalised communication between BMCC and NPWS in relation to land management (e.g. weeds) across the interface between tenures to support more effective and efficient protection of WH values.
- Council will develop an MOU with the NSW government to undertake effective weed control in the transport corridor.

Priority 2. Managing bushfire risk and responding to climate change in our unique environment

The BMCS generally supports the Actions under this Priority (see specific comments later). We particularly commend Council's Carbon Abatement Action Plan and commitment to council buildings and facilities achieving net zero carbon emissions by 2036. We also support Council's participation in the Cities Power Partnership and other climate change initiatives.

However, the BMCS urges Council to strengthen its commitment to achieving net carbon emissions for its operations and investigate *and implement* initiatives by 2030 at the latest (see discussion at Action 2.14).

We also believe that action should also be taken immediately to introduce measures to reduce carbon emissions and mitigate climate change impacts across the *whole* city, particularly given the Council's oft-stated aspiration to be 'the sustainability capital of Australia'.

Recommendation (bushfire):

- That Council includes the Bushfire Prone Land maps in the final version of the LSPS and as an overlay on the Urban Footprint Map.

Justification: Readily accessible maps will be a useful tool for Council to use in its negotiations with the NSW government regarding the 'containment principle' and not increasing housing density in areas mapped as bushfire prone (LSPS p. 44). The maps are also valuable for community awareness of the limitations on development in the Blue Mountains.

The BMCS recommends additional medium term Actions under this Priority (bushfire):

- Council will work with the NSW government to develop mechanisms to implement a policy of closer settlement to reduce exposure of residents to bushfire risk and to stop the loss of bushland and biodiversity in areas currently undeveloped.

Justification: Mechanisms need to be developed with the NSW government to prevent further development on high bushfire prone land particularly where large APZ zones are required (often bigger than the actual development) – see comments for 1.20 above. As rezoning of land with existing development rights is not permitted by state government planning policies, solutions need to be explored.

- Council will review the fire trail maintenance policy with the Rural Fire Service with a view to balancing risk with maintenance of biodiversity.

Justification: The North and South Lawson fire trail widening has seriously damaged track-side vegetation with a considerable loss of terrestrial orchid numbers (eg the Flying Duck Orchid in South Lawson), and of other significant plants eg *Atkinsonia* from North Lawson fire trail. Some fire trails are very wide and their necessity could be reduced (along with their environmental impacts) if the spread of development was stopped.

Action 2.2. Council will update and appropriately implement the Local Emergency Management Plan

The BMCS recommends an amendment to Action 2.2:

- Council will update and appropriately implement the Local Emergency Management Plan *which will include proactive measures to enable and encourage residents to plan and be prepared for local emergencies.*

Action 2.3. Council will review the Local Link Road Strategy, to identify potential new routes that may facilitate the mobility of residents and visitors within and to the Blue Mountains.

The BMCS recommends this Action be amended to ensure consistency with Action 1.11. Action 2.3 needs to have a clear guarantee included that no new roads will be formed through bushland or even close to it.

Recommended amendment:

- Action 2.3. Council will review the Local Link Road Strategy, to identify potential new routes that may facilitate the mobility of residents and visitors within and to the Blue Mountains *whilst not impacting bushland.*

Action 2.4. Council will review policy options for waste collection for denser types of residential development

This action needs to include implementation as well as reviewing policy options.

There are many waste options that BMCC can pursue:

- Road base from recycled plastics rather than bitumen (links to affordability of road maintenance Priority 9)
- Biofuel and biomass can be utilised for energy from collection of organic /green waste rather than taking it off site to Blayney. For example in Freiburg Biogas, which is produced during the fermentation of organic waste, is used to cogenerate electricity. **Biomass** can be burned to heat buildings, and to generate electricity. Additionally, organic waste can be used to generate compost at a BM site. The market for this compost would include residents, the growing number of community gardens and new emerging schemes such as Farm it forward. <http://www.lyttletonstores.com.au/farmitforward>
- Council should partner with businesses providing opportunities such as the following so that BM residents have the opportunity to deliver non-standard waste products without having to go to Sydney e.g. Sheridan Outlet has launched a recycling program that aims to divert textiles from ending up in landfill. Customers are invited to return old quilt covers, sheets and towels to be broken down into raw fibres that can be repurposed into new products.
- In the Green cities/Freiburg example, the Fifty/Fifty project is a system of financial incentives that enables schools to keep 50% of the savings from electricity and water consumption achieved through basic and non-investment measures.

- Additionally, ‘Adhering to the maxim “no waste means no disposal”, Freiburg has for a long time engaged in comprehensive and effective waste avoidance, effectively reducing its quantities of residual waste’.

See also discussion under Priority 7.

Action 2.5. Council will investigate opportunities with Traditional Owners to integrate traditional fire management practices on Ngurra (Country)

The BMCS urges Council to reconsider this action. The Society respects indigenous fire management practices, however we urge caution. Local traditional indigenous fire management techniques are not as well understood as compared to other parts of Australia. The vegetation in the LGA is in part different to what it was 200 years ago, changing climatic conditions and extreme weather events present new challenges and a balance must be achieved between property protection and best ecological practices. The BMCS believes that science-based knowledge and methodologies must be employed in all instances of fire management in Blue Mountains landscapes.

Action 2.6. Council will investigate and report on feasibility and options for achieving a low carbon City, with an initial focus on Council operations.

This action requires a time line and implementation commitment. The focus on council operations rather than carbon offsets is commendable, but should also be extended to partnerships with business, schools and residents.

Recommended amendment:

- Action 2.6. Council will investigate and report on feasibility and options for achieving a low carbon City, with an initial focus on Council operations *but extending into partnerships with business, schools and residents.*

See also discussion under Priority 7.

Action 2.8. Council will update the Waste Avoidance and Resource Recovery Strategic Plan 2017-2021 to consider options for the collection of food waste, including food waste from the commercial sector.

See comments in Action 2.4.

Council should also review the carbon generation of the Green Bin program which trucks green waste to Blayney and back across the mountains.

Collection of food Waste needs to be a closed loop system within the Blue Mountains footprint.

Action 2.9. Council will develop planning controls to strengthen sustainability requirements for new housing and development in the Blue Mountains.

The BMCS strongly supports this Action. However, given the declared ‘climate crisis’ by the Council and Local Government NSW, we believe that the principles of Ecologically Sustainable Development should be strengthened in NSW legislation.

We therefore recommend additional related Actions:

- Council will work with the NSW government to improve the LEP template to enable Councils to incorporate ESD Principles as legally binding objectives of the Plan.
- Council will develop education and incentive programs for retrofitting existing homes including insulation and double glazing, solar panels, solar hot water and water tanks.

The BMCS believes that sustainability measures should be extended to existing homes. The preamble to Priority 2 states: “Detached residential development is the highest energy user by sector in the Blue Mountains during the same period [2016-17], representing 63.5% of total energy use. Hence, interventions affecting the electricity used in detached housing represent the greatest opportunity to achieve Blue Mountains energy and greenhouse gas management objectives, followed by interventions to reduce transport emissions” (p.45).

In terms of the planning controls to strengthen sustainability requirements for new *and existing* housing that could be incorporated into the LEP/DCP, we suggest the following:

- DCP standards need to be raised to ensure that only sustainable developments can be approved.
- Passive solar design should be promoted as the simplest way to meet sustainable building standards.
- Energy efficiency. Passive solar designs need to be actively promoted through LEP and DCP standards with more standards on orientation, windows, eaves and size of buildings. This is important for all buildings to meet carbon abatement/climate action goals as well as for the comfort of residents and workers. Cross ventilation standards are also critical.

Each of the essential components of passive solar design need to be addressed in the LEP or DCP:

- Size of rooms and buildings. Incentives for smaller spaces need to be provided; e.g. trading flexibility with site set back.
- Rooms need to have the capacity to be closed off, so not all rooms need to be heated/cooled all the time and smaller rooms are easier to heat than large ones.
- Houses of less than 130 sq m should be encouraged not only for energy efficiency reasons but also to meet the growing demand for small low maintenance dwellings.
- East-west orientation and maximization of windows on northern side. Sunlight access requirements as in DCP F1.2.7 [C1 (a)] for size of windows should relate to the size of the rooms. Whilst 3 hours of sunlight from 1 sq m of windows may be sufficient for a 3.6 x 3.6 room mid-winter, it is not for a larger space.
- Whilst small south facing windows are useful for encouraging cross-ventilation in summer, there needs to be the capacity to close these off/insulate in winter.
- Eaves or at least awnings over windows should be compulsory on all northerly windows/ glass doors.
- Insulation is another obvious component of passive solar design.

- Materials used should also be covered by the DCP. Sustainability has also to do with the embodied energy, reusability and long-lasting durability (life-cycle) of the materials used in construction, not to mention their effect on health, run-off pollution and degradation of the surroundings.
- Water tanks should also be installed in all homes and incentives for addition to existing homes, as well as solar hot water.

A lot of useful information and possibilities in Freiburg Green City template and Transition towns network <https://transitionnetwork.org/>

See also discussion under Priority 5.

Action 2.10. Council will investigate options for electric car charging stations within Council car parks and other Council owned land.

The wording of this action should be stronger and be more focussed on implementation within 2 years. There are possible partnerships, for example with NRMA, to expedite this action.

Action 2.11. Council will collaborate with NSW Police on investigating the potential to incorporate the construction requirements for an Evacuation Centre into the design of any new, suitable Council or other public facilities

The BMCS suggests that Council could also investigate the potential for large private commercial developments to be included in this Action.

Action 2.12. Council will collaborate with, and seek investment from tertiary institutions, to develop an International Centre of Excellence for sustainable living, environmental science or Planetary Health in the Blue Mountains (including climate change and bush fire).

This is a very commendable action and could also link with sustainable tourism in the Blue Mountains so that visitors come to see best practice examples, such as solar projects and innovative waste treatment, throughout the Blue Mountains LGA.

This Action could also link with a sustainability festival as an annual cultural and educational event. It could also be instrumental in forming linkages with schools and the integration of a solar curriculum. For example, a third of all schools in Freiburg also have their own solar projects, where committed students, teachers and parents have jointly installed solar systems on school roofs. These, together with energy efficiency and energetic renovation projects, strengthens the identification with the schools, enriches the learning environment and leads to more young people with interest in technical careers.

See further discussion under Priority 7 and 8.

Action 2.13. Council will continue to advocate for reduction in freight movements on the Great Western Highway through the Blue Mountains.

The BMCS supports this action, particularly given the announcement in the *Blue Mountains Gazette* of 6 November of the duplication of the highway. Any actions taken by Council should also include actively working to promote more freight on rail.

However there is a current unsatisfactory situation that Council must urgently address: the lack of truck services and facilities that have led to problems (e.g. driver “comfort stops”) at informal truck pull-over areas, especially outside Glenbrook Nature Reserve.

See discussion and recommendation under Priority 9.

Action 2.14. Council will investigate initiatives to achieve net zero carbon emissions for all council buildings and facilities by 2036.

The BMCS would like to see this commitment strengthened to include *implementation* and to bring forward the timeline.

The BMCS therefore recommends an amendment to Action 2.14:

- Action 2.14. Council will investigate *and implement* initiatives to achieve net zero carbon emissions for all council buildings and facilities by 2030.

Action 2.17. Council will work towards the establishment of core infrastructure at key locations throughout the City (including bus layovers and transport hubs) to enable the movement of tourists through key village centres (initially focused on Katoomba/Leura and Wentworth Falls), via sustainable modes of transport.

The BMCS also suggests that Council engage the NSW government in the provision of adequate public transport services i.e. trains.

This action should be articulated to express a definite commitment and more ambitious timelines. Also further to the comments below - see comments in Priority 9:

Innovative transport and employment opportunities can be considered here such as bike rickshaws, electric scooters, electric trams/buses and more walking opportunities – incentive to walk one way so that a single fare is cheaper than a return fare, and visitors are provided with maps, including access to facilities along their route.

Car share options need to become normalised – for example there are apps available that Council can utilise to facilitate car share for events up and down the mountains. For example: Ticket price reduction can be an incentive for people who utilise this approach.

See also discussion under Priority 9.

Action 2.18. Council will, in the context of climate change and increases in extreme weather conditions, work with the Department of Planning, Industry and Environment on a reconsideration of the 1 in 100 year flood level and risk profiles for new development in flood mapped areas.

This Action only recognises flood. The BMCS suggests that the Council works with the NSW government in a similar way to plan for increased risk of fire, as discussed on pp.91-92 of the *Draft Blue Mountains Local Housing Strategy* (2019).

The BMCS therefore recommends an additional related Action:

- Council will, in the context of climate change and increases in extreme weather conditions and bushfire risk, work with the Department of Planning, Industry and Environment to develop and implement a strategy to reduce the urban area to a 'defendable footprint', including the acquisition of vacant land and/or the implantation of more restrictive planning controls, on areas deemed high risk.

This Action should include the development of strategies, resources and regulatory tools to minimise risk of increasing fire threat to people. It should include mechanisms to ensure that development is contained within a restricted urban footprint, and the acquisition of properties with development rights to be rezoned to prevent development.

See discussion under Actions 1.11 and 1.20.

Priority 3: Planning for the increased well-being of our community

Action 3.14. Council will advocate for improved transport links to medical facilities, including services from the Blue Mountains to Westmead Hospital.

It is a completely unacceptable situation that Blue Mountains residents do not have a direct rail or transport link to both Westmead and Nepean Hospitals. This Action should be a **short-medium term** priority not long term, and both hospitals must be included.

The BMCS therefore recommends:

- That Action 3.14 becomes a short-medium term Action not a long term Action.
- That Action 3.14 is amended to: Council will advocate for improved transport links to medical facilities, including services from the Blue Mountains to Westmead *and Nepean Hospitals*.

Additionally, transport links to educational facilities are also inadequate.

The BMCS therefore recommends an additional Action under this Priority:

- Council will advocate for improved direct transport links via train and/or bus to the tertiary education hub at Kingswood (WSU and TAFE campuses) and Nepean Hospital, and for a bus link from Springwood Station to WSU and TAFE at Richmond.

THEME: LIVEABILITY

Priority 5: Preserving and enhancing heritage, character and liveability

The BMCS generally supports the approach taken in the *Draft Blue Mountains Character Study* (2019) and *Draft Blue Mountains Character Statement* (2019), and supports Council's approach of containing development within existing urban areas. However, we believe more thought has to be given to what 'mountains character' means in the context of climate change impact mitigation and 'sustainability', and how these principles can be incorporated into development controls and standards along with character preservation.

The Society strongly supports the proposed Actions under Priority 5, **particularly Action 5.1** (residential character zone), **Actions 5.3 and 5.6** (Aboriginal history and heritage), **Action 5.7** (exemption from the Low Rise Medium Density Housing Code), **Action 5.8** (design controls on medium density housing) and **Action 5.9** (maintaining a Blue Mountains character within 'hidden density' development). We agree with Council's pursuit of a zoning outcome, rather than a weaker character 'overlay', to protect areas currently covered by the LEP 2005 'Living Conservation' zone (proposed to become R6 Residential Character Conservation).

The BMCS has supported Council in advocating for the introduction of the R6 Residential Character Conservation zone and seeking an exemption from the Low Rise Medium Density Housing Code in submissions and representations to the NSW government and Greater Sydney Commission. The LSPS and *Draft Blue Mountains Character Study (2019)* cite the Society's "The Blue Mountains is not another suburb of Sydney" campaign during the development of the Sydney Metro Plan and Western City District Plan.

The Society therefore strongly supports Council's determination to protect the Blue Mountains' residential character areas and built heritage against development pressure and the state government's residential intensification policies. These and other policies, such as the RFS's 10/50 clearing code, already are destroying these character values as well as the natural environment. The 'Land Between Town' provisions (clause 6.13 in LEP 2015) must be maintained to prevent strip development along the highway, for aesthetic and environmental reasons, as well as for maintaining the distinct character and identity of mountains' towns.

However, given the LSPS is a 20-year vision which must include consideration of the increasing impacts of global warming and Council's declared 'climate crisis', development controls and standards for *all new and refurbished buildings* must also incorporate passive solar and other carbon abatement and climate change mitigation design elements as well as 'mountains character'. It is critically important for both character protection and carbon abatement and climate change mitigation outcomes to be strengthened or given effect through amendments to LEP 2015 and DCP 2015.

The BMCS therefore recommends the following amendments:

- Action 5.8 Council will develop design controls and guidelines for medium density housing, appropriate to the Blue Mountains context *and to carbon abatement and climate change mitigation*.
- Action 5.9 Council will review local planning controls to ensure dual occupancy and secondary dwelling development continues to achieve the character and liveability outcomes expected in the Blue Mountains context, *as well as carbon abatement and climate change mitigation outcomes*.

The BMCS believes that both 'mountains character' and sustainability outcomes can/has to be achieved through strong development controls and standards, and sustainable building design, particularly if the Blue Mountains aspires to be 'the sustainability capital of Australia'.

Priority 6: Meeting the diverse housing needs of our community

BMCS strongly supports Council's analysis of housing constraints within the Blue Mountains Local Government Area, especially given the topography, the environmental constraints and the limited availability of large green field sites for new housing subdivisions. The Society strongly opposes the future subdivision of currently large lots and acreages in bushland

areas into small residential lots, given the bushfire risk, environmental impacts on the World Heritage Area and poor sustainability outcomes.

The Society generally supports the commentary and Actions in Chapter 6, and in the accompanying Housing Strategy, but has the following additional comments:

- The Society supports the Council's nominated housing target of 550 new dwellings over the period 2021 and 2026. The Society believes, based on Council analysis, this target is achievable under the existing planning framework without the need for new residential lots being created.
- The Society supports improving housing diversity in the Mountains including the creation of smaller residential houses suitable for singles, couples and an aging population. The Society agrees that a "nuanced place based and incremental approach is needed". However, care must be taken in terms of the advocated approach of promoting infill and hidden density development, including secondary dwellings and dual occupancies, to increase housing diversity and affordability. Ensuring appropriate high quality and sustainable infill development and secondary dwellings, consistent with the character of a local area is necessary. Many building companies are currently advertising that they can build low quality secondary dwellings or similar structures (such as cabins) in the Blue Mountains, without development consent, even in high bushfire areas.

Action 6.3 should therefore be amended to: Council will pursue opportunities for hidden density and infill development, such as additional locations for secondary dwellings, with appropriate planning controls to *maintain character, landscape and building quality and design, including sustainability standards.*

Given that hidden density and infill development is the strategy for improving housing supply, diversity and affordability, **an additional Action should be included for a proactive education and communication campaign on the approvals, standards and controls for infill and secondary development in the Blue Mountains, aimed at residents and building companies active in the local area.**

- The Society notes that under the current rate of construction of new single dwellings, vacant land will be exhausted by 2043 (i.e. almost within the life of the plan which is 2040). **The Society recommends that Council add to Priority 6.6 that Council will closely monitor housing development, and accelerate actions under this plan if the current vacant land is exhausted more quickly than predicted.** Thresholds or triggers in terms of the percentage of vacant land left available should be used to accelerate priority actions.
- The Society supports the continued use of the Sustainable Development Threshold to define the limits of the urban footprint. **An expanded explanation of how the Threshold was developed and the fact it has been used consistently for a number of years for planning purposes to define urban areas should be included in the Plan.** It is also not clear that the urban area, as detailed in the maps, are urban areas as defined by the Sustainable Development Threshold or are urban areas as defined by the fact they have existing urban residential development.
- The rise of short term rental tourism market needs to be carefully monitored and better regulated, as this is an increasing issue across the LGA. The sector is largely self-regulated and unmonitored, and short terms rentals are increasingly subject to complaints by residents of noise, poor waste management, and over use (in terms of large numbers of people per house). As the strategy outlines, building of secondary

dwellings, instead of contributing to housing diversity and affordability, could also just result in an increase in short terms rentals. Alternatively separate buildings or cabins are being built on residential lots, without bathroom or kitchen facilities, instead of a secondary dwelling, in order to capitalise on the short term tourism accommodation market. This represents a lost opportunity for a secondary dwelling to be built. **The Society therefore recommends an additional action that Council pursue ways to better monitor and regulate short terms rentals such as AirBnB, including amendments to the DCP and developing a local Code of Practice.**

- The Society cautiously supports the expansion of seniors housing in drinking water catchments but only if the strict neutral and beneficial test on water quality is maintained. Senior housing should only occur consistent with conditions on page 101 of the Housing Strategy.
- The Society strongly supports Council continuing to seek an exemption from the Exempt and Complying Code (Low Rise Medium Density Housing Code) to protect environmental and character values of the Blue Mountains.

THEME: PRODUCTIVITY

Priority 7: Sustaining a healthy local economy, including a focus on Katoomba as our Strategic Centre

The Blue Mountains Conservation Society (BMCS) generally supports many of the Actions under Priority 7 and highly supports several initiatives in particular:

- Action 7.10: Council will collaborate with, and seek investment from tertiary institutions, to develop an International Centre of Excellence for sustainable living, environmental science or Planetary Health in the Blue Mountains (including climate change and bush fire).
- Action 7.14: Council will investigate opportunities to become a centre for sustainable industries, that aligns with the strengths and values of living within a World Heritage Area

And considering how important TAFE has been in the Blue Mountains for training many local residents in outdoor recreation and environmental sciences over many years, along with tourism and hospitality, the BMCS also strongly supports:

- Action 7.11: Council will work with NSW TAFE and other tertiary education providers to advocate for improvements to local course availability to address skill gaps which align with our comparative advantage in areas of outdoor recreation and eco-tourism.

However, we believe that Action 7.11 needs to be expanded to include course offerings to encourage and serve emerging local sustainability-related initiatives and industries, and to bring it into alignment with Action 7.14. On the TAFE NSW website are many courses in areas of conservation, sustainability and environmental management, business management, bush regeneration etc that are currently unavailable in the Blue Mountains. Many of these courses offer a credit transfer pathway to university courses or an integrated diploma to degree course. Demand for such courses locally at TAFE and university level could be generated through Action 7.14. But the larger aspiration of establishing a Centre of

Excellence for sustainable living, environmental science or Planetary Health in the Blue Mountains (including climate change and bush fire) (Action 7.10) also requires the Blue Mountains to develop a reputation, culture and identity as a sustainability 'hub'. This can be enabled through Action 7.14, by encouraging new sustainability-related initiatives and nurturing the already emerging but often unrecognised local sustainability-related economy.

The BMCS therefore recommends that Action 7.11 be amended to read:

- Action 7.11. Council will work with NSW TAFE and other tertiary education providers to advocate for improvements to local course availability to address skill gaps which align with our comparative advantage in areas of outdoor recreation and eco-tourism, *environmental science and natural area management, conservation and sustainability*.

Blue Mountains Green City

The Blue Mountains City Council's often-stated aspiration is for the Blue Mountains to become the 'sustainability capital of Australia'. The BMCS wholeheartedly supports this idea, but Council needs to elaborate on what that means and how it will be achieved, and not just for Council operations. This requires co-ordinated planning. There are already several cities in Europe which have aspired to and become 'Green Cities'. While these cities are not directly analogous to the City of Blue Mountains, in terms of their statutory responsibilities and circumstances, they nevertheless offer a concrete example of what could be achieved in the Blue Mountains such that it "is recognised nationally and internationally as a creative model for sustainable living and learning about sustainable communities" (*Blue Mountains Community Strategic Plan 2035, 2017, p.8*).

In our submission to the Greater Sydney Commission's *Draft West District Plan (2017)* the BMCS expressed its disappointment that, apart from intensified tourism development and the purported spin-off economic benefits of the Western Sydney Airport, little consideration had been given to economic development in the Blue Mountains. The fortunes of the tourism industry are tied to the state of the world economy, currency exchange rates, and bushfires that can shut down the tourism sector short-term or longer, as the *Visitor Economy, Retail and Employment Studies Final Report (2019)* recognises. The bushfire risk in the Blue Mountains is only going to increase through global warming.

We therefore argued for the development of a more diversified and resilient Blue Mountains economy, citing the *Sustainable Blue Mountains 2025. Community Strategic Plan*:

Key Direction 5: Sustainable Economy. Values, Aspirations & Aims

We value business and industries that are in harmony with our surrounding World Heritage environment. We are recognised as a Centre of Excellence for sustainability that strives to create significant employment and educational opportunities.

Through responsible economic development we have strengthened and diversified our local economy. We are a leader in sustainable business and industry. Young people are attracted to work, live and study in the Blue Mountains.

Sustainable Blue Mountains 2025. Community Strategic Plan, p.71

The BMCS concurs with this vision of the Blue Mountains and was disappointed that these aspirations and aims were not reflected in the *Draft West District Plan*. There was plenty of discussion in the plan about the need to generate 'knowledge-intensive jobs' or 'smart' jobs and industries in the West District, which then included Penrith and Hawkesbury LGAs, but it seemed the only vision for economic development in the Blue Mountains was increased

international tourism of the conventional kind. The BMCS argued that this did a dis-service to the Blue Mountains community which, on 2011 census figures, was more highly educated and had more residents in professional occupations than the other LGAs in the then West District. Our community is also highly environmentally aware and active on planning and development issues and would be highly supportive of development of innovative sustainability-related businesses and industries. We reminded the GSC of the Blue Mountains LGA's unique status as a city in a World Heritage Area and argued that, with proper support, it could become a hub of innovative, sustainability-related businesses and creative arts, and sustainability-related research and educational centres. These would generate local jobs and educational opportunities, and wider interest and visitation other than for tourism of the conventional kind. We suggested that some of the industrial areas in Katoomba and other areas in the Blue Mountains e.g. Lawson could be revitalised and become 'sustainability hubs' for small-scale 'smart', innovative industries focussed on environmental technology and renewable energy, eco building designs and materials, waste management and water saving technologies, for example.

We noted that there was already an emerging 'informal' and little recognised innovative, 'smart', sustainability-related economic sector in the Blue Mountains and cited several examples of start-ups, small businesses and not-for-profits which we believed deserved more attention and support. And lest the development of this sector be dismissed as 'pie in the sky', we cited the example of the Freiburg Green City and Future Lab in Germany where environmental policy, solar technology, sustainability and climate protection have become the drivers of economic growth. Freiburg has attracted innovative industries and educational and research facilities, hosts international sustainability conferences and international visitors wishing to learn about sustainable communities. It is also a tourism hub for the nearby Black Forest.

See Freiburg Green City <https://www.freiburg.de/pb/.Len/372840.html>

Also Freiburg Future Lab: http://www.freiburg-future-lab.eu/intro_english.htm

The BMCS therefore recommends an additional medium-term Action under Priority 7 (also recommended in our submission to the Greater Sydney Commission's Draft West District Plan):

- Council will work to receive funding for a feasibility study to be undertaken, by suitably qualified consultants or individuals, on the City of Blue Mountains becoming a Green City, following the model of Freiburg Germany adapted for Blue Mountains conditions.

The Visitor Economy, Retail and Employment Studies Final Report (2019)

Given the potential of the Blue Mountains LGA to position itself at the forefront of sustainability initiatives and leadership, education and research, particularly given its unique status as a city in a World Heritage Area, the BMCS is very disappointed with the *Visitor Economy, Retail and Employment Studies Final Report (2019)*. Although focussed on the development of Katoomba as a District Centre with a target of up to 2,800 additional jobs to be created by 2036 (*Western City District Plan*), what is missing is any consideration of the City's aspirations, set out in the *Blue Mountains Community Strategic Plan 2035*, regarding 'sustainability' and the desired international leadership in this field. Instead, the *Katoomba Employment Study* proposes a very unimaginative and limited set of 'Priority Actions' focussed on increasing jobs in the traditional Katoomba employment sectors e.g. tourism and hospitality, retail, health and education, mainly of the conventional or already existing kind. And while the importance of supporting and publicising Indigenous culture and the creative arts sector is welcome, almost invisible in the report is the more recently emerged wellness and 'sustainability'-related food and the organic and sustainable produce sector.

This sector is already an important drawcard for the Blue Mountains – for example the ‘edible garden’ trail which supports and aligns with the mountains’ strong ‘slow food’ movement.

Further, there is no mention of encouraging the generation or attracting of innovative, sustainability businesses and industries to the Blue Mountains; nor is there any recognition of existing sustainability-related businesses and industries in the Blue Mountains e.g. alternative or re-used building materials and the sustainable housing design and renewable energy sectors. Worse, the *Katoomba Employment Study* states on p.109 that one of the local community’s priorities – “protecting World Heritage Areas” – is “woven into our recommendations for employment growth in Katoomba”. However, no further reference to this priority is found in the report; nor is ‘protecting World Heritage Areas’ apparent in any recommendations. And even though the stakeholder workshop undertaken for the *Employment Studies Final Report* concluded that “A successful Katoomba would be recognised as a world leader in sustainability”, there is no discussion of what this means and looks like in practice, or a plan to achieve this.

This limited vision of economic development in Katoomba and the Blue Mountains generally, and failure to explore opportunities in sustainability-related industries, is the product of the limited consultation undertaken for the *Employment Studies Final Report*. Like the *Visitor Economy Report*, only local business owners (including ‘nature tourism’ operators), the Blue Mountains Economic Enterprise and Blue Mountains Tourism and Accommodation Association were invited to the consultation, held in March 2019. This is an inadequate basis for planning for the Blue Mountains to become the ‘sustainability capital of Australia’.

So we were very pleased to see the discussion – in the *Draft Local Strategic Planning Statement* under Local Planning Priority 7 and its Actions – about developing partnerships with tertiary institutions and the proposal “to host a centre of excellence in the Blue Mountains, for environmental science, sustainable living or Planetary Health” (p.83 LSPS). This seems to be a return to some of the Key Directions in the *Community Strategic Plan*. Similarly, we are pleased to see the Council state: “Beyond and indeed within Katoomba, opportunities for innovation and attraction of sustainable industries which align with the Blue Mountains context, exist across this sector” (p.85 LSPS). This is a welcome contrast to the examples of models of economic development and recommended projects in the *Employment Studies Final Report*.

Regarding these mooted projects, the BMCS particularly objects to the idea of a ‘South Katoomba Tourism precinct’ located on the old Katoomba golf course. Instead of more top-end, high-priced accommodation and facilities, the Blue Mountains community needs more low-key, low-cost venues for smaller events, gatherings and conferences.

Action 7.13. Council will advocate and support the development of smart city and digital technology and other infrastructure that improve connectivity and productivity.

The BMCS supports the 2019 *Blue Mountains Visitor Economy, Retail and Employment Studies Final Report’s* suggestions about the provision of co-working spaces/innovation hubs e.g. in the council-owned Civic Centre in Katoomba and, we would add, Springwood, with associated retail tenancies. The Council could also consider investigating affordable retail rent in Katoomba.

The BMCS therefore also recommends an amendment to this Action:

- Action 7.13. Council will advocate and support the development of smart city and digital technology and other infrastructure, *including provision of co-working spaces in Katoomba and Springwood*, which improve connectivity and productivity.

Finally, the Council could consider introducing a 'local currency' as way of keeping money in the Blue Mountains economy.

Priority 8: Managing increased tourist visitation

The BMCS generally supports the Actions under this priority. However, as noted in our previous discussion on the *Visitor Economy, Retail and Employment Studies Final Report*, we reject the proposal – which was apparently put forward by local tourist operators through the consultation process – for the development of a 'South Katoomba Tourism Precinct' to be located on the Katoomba Golf Course. It was suggested that this precinct could include large scale accommodation with conference facility, authentic indigenous tourism experiences, a range of accommodation experiences and recreation and adventure based activities (p.69). The report also recommended consideration of 'Glamping/Eco tourism' located in the national park. These initiatives are reminiscent of the more egregious tourist development proposals in the 2011 *Strategic Tourism and Recreation Planning Study* (the 'Stafford Report').

While it seems these particular recommendations from the *Visitor Economy, Retail and Employment Studies Final Report* have not found their way into the LSPS and its 'Actions' or, in the case of the Katoomba Golf Course, would be subject to a masterplanning process, the Blue Mountains Conservation Society would again at this point like to re-state its opposition to:

- 'Big Tourism' development in the Blue Mountains i.e. intensive tourist development and large-scale hotel and resort development
- Alienation of public land (the Katoomba Golf Course in this case) to intensive, commercial tourist development
- 'Glamping', eco-lodges and accommodation within National Parks.

We would also like to remind the Council that the *Greater Blue Mountains World Heritage Area Strategic Plan* (2009) identified one threat to World Heritage values as "inappropriate recreation and tourism activities, including the development of tourism infrastructure, under increasing visitor pressure from Australian, overseas and commercial ventures", and another threat as "lack of understanding of heritage values" (p.23). Further, the *GBMWhA Strategic Plan* states that there is "some concern that benefits will not be evenly spread, that larger business interests may dominate at the expense of both Aboriginal tourism enterprises and smaller, locally based and more eco-oriented tourism enterprises and that a high turnover in tourism and hospitality operators (due to business failures) may be detrimental to the quality of visitor services" (p.36).

The Blue Mountains Conservation Society continues to share these concerns, particularly in the face of persistent 'big tourism' proposals and the ongoing desire by the tourism industry to develop large-scale, top-end resorts on or near the escarpment areas on sites adjacent to the World Heritage Area.

What is sustainable tourism in a World Heritage Area?

The term 'sustainable tourism' is often used to badge tourism in the Blue Mountains. The *Blue Mountains Destination Management Plan* (2017, p.17 at point 2.3) states that sustainable tourism "recognises the needs of both visitors and residents, while protecting and enhancing opportunities for tourism growth into the future. It requires careful and

sensitive management to ensure that that destination's social, cultural and environmental capital are protected and remain an asset envied by those that visit and treasured by those that live here. In the Blue Mountains context, a sustainable tourism offer requires a strong commitment to the World Heritage listed natural environment together with close collaboration between community, tourism operators and Council. A strong partnership will ensure tourism works in harmony with the local environment to deliver not only a strong tourism sector but a resilient community who benefit directly from the visitors it hosts. This approach will secure the environmental, economic and social outcomes required to be both a world class premier tourist destination and an enviable liveable city within a world heritage national park for its residents”.

However, ‘business as usual’ tourism in the Blue Mountains is arguably already unsustainable on the definition above, let alone with a projected range of 1-2 million *additional* visitors p.a. by 2038 (a 33% increase on current annual visitation, p.52 *Visitor Economy Study*). Short term ‘mass market’ tourist visitation is already having a detrimental effect on the social, economic and environmental fabric of the Blue Mountains. Residential amenity is already negatively impacted in places like Leura and around Echo Point, provision and management of infrastructure such as toilets and waste disposal is already inadequate and visitor flow seems beyond the Council’s capacity to manage. Crowding and traffic and parking chaos is now normal at peak visitation times. Local residents have observed increasing poor bush toileting practice at popular sites in Blackheath and Wentworth Falls. Others report that they remove the rubbish (e.g. food and drink packaging) left by tourists at popular layovers and which is polluting bushland and creeks flowing into the national park. Other residents and visitors report that unregulated camping at Mt York camping ground is having an unacceptable environmental impact.

The rapid dissemination of information by social media is promoting a rapid intensification of tourist numbers in previously less frequently visited natural places, especially those that provide views or water experiences. Often these are sites that have limited or no visitor infrastructure including adequate off-street parking, screening from local residences, stable well-maintained tracks and steps, and toilet facilities. Environmental impacts can be quickly apparent and seriously degrading; local residents may experience considerable disruption and inconvenience. Recent examples of such sites include Little Switzerland Drive (Kings Tableland), Minne-Ha-Ha Falls (North Katoomba), Paradise Pool (Linden) and Peggy’s Pool (Faulconbridge).

The BMCS therefore recommends additional Actions under this Priority:

- Council will investigate the establishment of a system to monitor on-line social media sites to quickly determine special places being newly targeted by tourists and outdoor adventurers with a view to rapidly establishing visitor impact control measures
- Council will investigate the regulation of geo-caching and similar activities (by permits).
- Council will support the introduction of environmentally sustainable tourism events and tours such as environmentally themed conferences or tours (e.g. birdwatching tours and sustainable housing tours).

The enormous cost of providing the infrastructure and staff to manage ‘point focussed’/intense tourist visitation seems to be outstripping the council’s and ratepayers’ capacity to fund, a challenge which is also facing the only other city located in a World Heritage National Park, Banff in Canada (see <https://banff.ca/558/Economic-Impact-Study>). So why should we be encouraging more of the same (through promotional campaigns) i.e.

more mass tourism of the conventional kind, particularly the 1-day organised coach tours favoured by the fastest-growing market, tourists from Asia (p.46, 51 *Visitor Economy Study*)? Do we really want this to be the future of Blue Mountains? The BMCS contends that this current model of tourism is by its nature unsustainable.

The problem of burgeoning tourist numbers in already over-visited places overseas like Venice, Amsterdam and Barcelona is increasingly being met with local residents' protest actions and the application of restrictions on accommodation, reduction of the number of cruise ships allowed to visit Venice, and introduction of tourist visitation 'schedules' and 'shifts' etc. See <https://www.theguardian.com/cities/2018/jul/17/residents-in-tourism-hotspots-have-had-enough-so-whats-the-answer>

Some actions under Priority 8 in the LSPS go some way in generating more revenue from tourists (e.g. parking and camping fees) and relieving the pressure on over-visited sites. However, we believe that the concept of 'sustainable tourism' needs to be re-examined in the context of our World Heritage Area status and perhaps quantified and assessed against key indicators developed in consultation not only with the tourism industry but, even more importantly, with experts in the field of national park and world heritage asset management e.g. the Greater Blue Mountains World Heritage Area Advisory Committee, the NSW National Parks and Wildlife Service and other interested parties such as the Blue Mountains Conservation Society, local Bushcare and Landcare groups and Blue Mountains World Heritage Institute.

We therefore suggest an additional Action under Priority 8:

- Council will work towards quantifying the concept of 'sustainable tourism' and developing measurable performance indicators related to defined 'sustainable tourism' objectives, in consultation with relevant expert natural area managers (e.g. NPWS) as well as the tourism industry.

UNESCO, the administrator of World Heritage sites, has its own manual on managing tourism at world heritage sites, *Managing Tourism at World Heritage Sites: a Practical Manual for World Heritage Site Managers*: <http://whc.unesco.org/uploads/activities/documents/activity-113-2.pdf>. Even when this manual was published, in 2002, the problem of over-tourism and managing tourists at World Heritage sites was already emerging. The manual outlines the threats of tourism to World Heritage sites, including impacts on the local community, and proposes a set of strategies and solutions. These are similar to ones that are being implemented in non-World Heritage Area tourism 'hot spots' overseas. Some of these strategies also align with the Actions in the LSPS. The manual also recommends developing assessable indicators of management objectives.

While the tourism activity mainly referred to in *Visitor Economy Study* does not strictly take place *within* the World Heritage Area (i.e. the national park), the main environmental impacts of mass tourism in the Blue Mountains derive from our unique situation as a city located *atop* a World Heritage-listed national park. All human activity including tourist activity on the developed ridge top has an impact on the World Heritage asset downhill, unlike the only other city located in a World Heritage Area, Banff Canada, which sits on the valley floor. Council recognises these same environmental threats identified in the UNESCO manual – impacts of construction work for tourist development and infrastructure, pollution generated by hotels, water pollution in the World Heritage Area and so on – and its responsibility for environmental stewardship. This awareness is reflected in the LSPS and in the provision of enforceable controls in Blue Mountains LEP 2015 to mitigate tourist and residential development impacts on the World Heritage Area. Nevertheless, tourism planners,

developers and managers would do well to consult the OECD Manual and the *Greater Blue Mountains World Heritage Area Strategic Plan* (2009).

Managing our World Heritage asset and protecting its ‘outstanding universal value’ cannot be just an optional add-on or afterthought to tourism development but must be an integral part of planning it.

Visitor Economy Study (Urbis, 2019).

The *Visitor Economy Study* undertaken as part of developing the Local Strategic Planning Statement really offers more of the same unsustainable tourism, and seems to be underpinned by a ‘predict and provide’ model. That is, if more tourists are coming, we need to provide more accommodation (in the form of large hotels/resorts for instance), develop more infrastructure, develop more tourist sites to spread the load out over more areas, and address the increasing problem of road and rail capacity.

Managing increasing visitor number is one of the major challenges facing the Blue Mountains City Council and arguably requires stronger responses and actions in the LSPS. But we also need to be encouraging more tourism of the low impact, low eco footprint kind. Tourist operators are already expressing concerns about the economic sustainability of large resorts and hotels across the year, given potential oversupply of this kind of accommodation (p.54). Apart from questions of economic viability, the BMCS has resisted, and will continue to resist, the tourism industry’s attempts to commandeer inappropriate sites (including national park land) for large scale resort and hotel development, and ‘eco cabins’ in national parks.

The Blue Mountains Conservation Society therefore recommends that:

- Council should not support further large tourist development (hotels and resorts) until a comprehensive accommodation study is completed which includes availability and occupancy rates for smaller operators.

Furthermore, despite statements about ‘protecting and preserving the World Heritage Area’ and that tourist development should not negatively impact on the World Heritage Area, the *Visitor Economy Study* gives no consideration of what that means or looks like in practice. The push for more tourists and bigger tourism development seems to counter the warnings in *Greater Blue Mountains World Heritage Area Strategic Plan* (2009) of the threat to World Heritage values of “inappropriate recreation and tourism activities, including the development of tourism infrastructure, under increasing visitor pressure from Australian, overseas and commercial ventures” and a “lack of understanding of heritage values” (p.23). This gives more credence to our suggestion that the concept of ‘sustainable tourism’ needs to be re-examined and perhaps quantified in consultation with experts in the field of national park and World Heritage asset management. Which brings us to our next point.

A word on consultation for the Visitor Economy Report (2019) and Blue Mountains Destination Management Plan (2017)

Planning in NSW and the Blue Mountains is supposed to be underpinned by the principle of Ecologically Sustainable Development; that is, economic, environmental, social and equity considerations are meant to be integrated in decision-making processes. **Given our argument about the necessity for integrated tourism planning, development and management, it continues to concern the Society that we (and other relevant bodies) are not regarded as ‘stakeholders’ in the development of tourism plans.**

The developers of the *Blue Mountains Destination Management Plan* and the *Visitor Economy Report* chose not to consult the Society. Instead, only business and tourism operators and their representative organisations were consulted at the 'stakeholder' workshop held in March 2019. This limited representation of interests leads to a failure to seriously consider and take into account what 'sustainable tourism' actually means and looks like in a World Heritage area. It also produces very one-sided outcomes reflecting the economic interests of the tourism sector and displays a disregard and lack of understanding of the principles of Ecologically Sustainable Development. Further, the unbalanced recommendations of such consultations and reports often then provoke the ire of environmentalists and the community, thus setting up further conflict. This lack of integrated planning and favouring of sectional interests is not good enough in increasingly uncertain times as we face the effects of global warming, particularly on the Greater Blue Mountains World Heritage Area itself. If we are to be 'fit for the future' we need to re-think what the Blue Mountains LGA could be other than just a tourist destination, and a tourism destination of the 'mass market' kind.

The BMCS believes that, given the projected rise in tourist visitation over the next 20 years, the Council should be considering stronger and more pro-active management of visitor flows.

Action 8.3 (and Action 1.6). Council will begin to work with NSW National Parks and Wildlife Service to develop a framework or Memorandum of Understanding, for the coordinated delivery of infrastructure where this jointly benefits and impacts the World Heritage National Park and the Blue Mountains local government area (refer to Priority 1).

The BMCS recommends an amendment to Action 8.3 in light of the fact that NPWS is commencing the development of a new Plan of Management for the Blue Mountains National Park. It is essential that all levels of government (Local, State and Commonwealth) are involved in the Plan of Management process as this will guide park management priorities, including infrastructure development, for the next ten years. In addition, off park impacts, such as urban development, are a major contributor to the national park's biodiversity and ecological health. Accordingly, Action 1.6 should be amended to read:

- Council will begin to work with the NSW National Parks and Wildlife Service to develop a framework or Memorandum of Understanding, for the coordinated delivery of infrastructure where this jointly benefits and impacts the World Heritage National Park and the Blue Mountains local government area. *This Memorandum of Understanding should also cover Council's role and involvement in the development of the new Plan of Management for the Blue Mountains National Park.*

Action 8.6. Council will implement Parking Precincts Plans and Permit Parking Policy, including paid parking at Echo Point and other tourist destinations.

This Action should continue to include provision of Blue Mountains' residents parking permits for Echo Point and for other tourist destinations.

Action 8.12. Council will work towards the establishment of core infrastructure at key locations throughout the City (including bus layovers and transport hubs) to enable the movement of tourists through key village centres (initially focused on Katoomba/Leura and Wentworth Falls), via sustainable modes of transport.

This core infrastructure should include water refill stations (for drink bottles) at all destinations, and provision of recycling bins and signage about the impact of litter on the Blue Mountains environment.

Priority 9: Improving local transport connections and accessibility, including walking and cycling.

The BMCS generally supports the Actions under this Priority.

Action 9.1: Council will review and continue to implement the Pedestrian Access and Mobility Plans and Bike Plan to prioritise connections around town centres, and advocate for increased state government funding for accessible pedestrian pathways.

Action 9.9 Council will continue to seek funding and construct the Great Blue Mountains Trail, creating shared pedestrian and cycleway linkages between Leura, Katoomba, Blackheath and Mount Victoria.

In reference to 9.1 and 9.9 Pedestrian access also needs to include seating at regular intervals. Local artists could pitch for site specific/place orientated seats which contribute to the character and narratives of each area. See the process for the Three Capes walk in Tasmania re seat design: <https://www.utas.edu.au/news/2015/12/23/25-helicopters-hiking-and-hands-on-experience/>

A Blue Mountains travel pass – hard copy and app – could be developed with detailed walking routes, bike hire, toilets, parks, facilities etc. listed.

The BMCS recommends an additional medium term Action to supplement Action 9.1:

- Council will advocate for improved bicycle and pedestrian access along Hawkesbury Road between Hawkesbury Lookout and High School Drive Winmalee.

And longer term:

- Council will investigate creating a substantial separated and sealed road verge for cyclists in both directions, from Hawkesbury Lookout to at least High School Drive Winmalee, and for an all-weather footpath/walking trail paralleling the road.

Hawkesbury Heights and eastern Winmalee residents need a safe walking facility that is smooth enough to push strollers (not compressed stone) and safe road crossing places. This has been promised for too long - it is time for the Council to prioritise this work.

There is space to tar the road verge without negative environmental impacts. Currently cyclists risk the road space. The Hawkesbury Lookout Bends to Shaws Creek are incredibly dangerous for cyclists but that problem is much tougher to resolve.

Action 9.7. Council will undertake a best practice review of latest transport technologies, their operation and potential application within the Blue Mountains, including promoting the Blue Mountains as a trial site for new technologies including car sharing options, driverless buses, parking sensors, apps and the like.

This should also link with employment opportunities for novel forms of transport such as electric rickshaws, scooters, innovative fuel options such as use of recycled cooking oil in tandem with traffic calming infrastructure.

Action 9.8. Council will work with Transport for NSW to advocate for additional train services and improved train carriages for long distance commutes for both residents and visitors (including improved WiFi, dedicated carriages for visitor information).

There also needs to be liaison with Transport NSW around particular events in the mountains to ensure that track work does not occur at the same time e.g. Blue Mountains Music Festival, Winter Magic. Also when major events occur e.g. school climate strike, grand finals etc., Council should advocate for State Rail to be more responsive to providing more carriages.

Truck service centres and facilities

The BMCS, like the Council, would like to see a reduction in freight movements on the Great Western Highway through the Blue Mountains in the medium to longer term. However, there is an urgent current need to establish at least two highway service centres, including one for east bound traffic in Blaxland or Glenbrook that can accommodate trucks 24/7. At present there is a disgusting situation outside the Glenbrook Native Plant Reserve where trucks pull in for driver “comfort stops” before heading on to the M4. During the day some drivers risk the highway crossing to use conveniences in the park but at night the situation is horrid and confronting for people going to the Reserve after dark for meetings, and even considered to be a security risk. A second centre before Katoomba (west bound) could also provide ready access to toilets, refreshment etc for people who may have taken 2 or more hours to drive from Sydney and then take another hour to find public facilities and parking.

Such centres might also help with the complete lack of public toilet availability after 6pm and before 8am (7am sometimes). Opening of facilities on railway stations should also be a priority.

The BMCS therefore recommends an additional action under this Priority:

- Council will urgently work with Transport for NSW to establish 2 truck service centres, particularly to overcome the present use of the truck pull-in area outside the Glenbrook Reserve at night for driver “comfort stops” when the public facilities in Glenbrook Park are closed.

Further comments:

- Council’s document does not sufficiently acknowledge that the footprints of road realignment projects will depend on the size of vehicles the new roads are designed for. For example, if it is accepted that B-double trucks are not going to operate between Katoomba and Mount Victoria, the pressure to remove further bushland in creating a four-lane highway between those towns will be reduced.
- The document identifies the Blue Mountains as a suitable trialling site for new technologies, including autonomous vehicles and all-electric vehicle routes, but other sections of the document lack acknowledgement of potentially environmentally friendly consequences.

- Council should question the ‘value’ in a 4 lane highway, as international research has shown that motorways generate an increase in traffic volume which leads to no net improvement after a few years. Observation of the GWH section eastwards of Katoomba would indicate that the traffic flows improved for 18 months-2 years, after which time the congestion situation returned to the previous level.
- It appears that State Government will try to engineer a four-lane divided highway of conventional width between Katoomba and Little Hartley. It is questionably economical to use such a wide corridor when so much bushland is likely to be disturbed and use of autonomous vehicles might render such a corridor width unnecessary.
- It is desirable that the BMCC Great Blue Mountains Trail project be completed by 2025 as foreshadowed in the document. However, cyclists do not voluntarily choose to use a separated cycleway at all locations where one is provided. Introduction of autonomous vehicle technology may make it safer for cyclists to share existing road carriageways with motor vehicles.
- Between Medlow Bath and Wentworth Falls, the Great Blue Mountains Trail route serves tourist attractors on the Jamison Valley escarpment. Bicycle trip attractors near the centres of Katoomba and Leura also need intensive investigation and possible provision of bicycle infrastructure.
- It is fortunate the document mentions walking routes between railway stations and tourist trip attractors. However, allocation of funds to these projects appears so far very limited. In towns like those between Wentworth Falls and Blackheath, where there is pressure to alienate bushland and expend considerable funds for car parks, there need to be more projects to encourage use of alternatives to private cars.