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Nature Conservation Saves for Tomorrow

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By Email to: council@bmcc.nsw.gov.au

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cc EPSKatMasterPlan@bmcc.nsw.gov.au
Ms Kim Barrett kbarrett@bmcc.nsw.gov.au

Dear Dr Dillon

Draft Katoomba Master Plan 2022.

The Blue Mountains Conservation Society is a community-based volunteer organisation with 900 members. The goal of the Society is to promote the conservation of the environment in the Greater Blue Mountains region.

Thank you for the opportunity for the Society to have a representative on the community reference group involved in the development of the Katoomba Master Plan. The Society appreciates and values the early and ongoing engagement of the community in the master Plan process.

The Society also appreciates the opportunity to lodge a submission during the public consultation process, and appreciates the extension given to the Society to lodge a submission.

Our comments on the Master Plan are outlined below.

Chapter 1 pp1-18

The Society supports the recognition of the Aboriginal traditional owners (p12) in the draft Masterplan, and the recognition of key Aboriginal cultural sites of the Gully and the Three Sisters, and the importance of retaining and conserving the cultural value of these sites.

The Society also supports the recognition of the impacts of climate change on the Blue Mountains community (p17), and the need for the Master Plan to build and enhance climate change resilience within the urban context of Katoomba.

The Society recommends that the Strategic Context section (p10) should reference important strategic planning processes currently underway and how the Katoomba Master Plan will link to and co-ordinate with these other processes. These other key strategic planning processes currently occurring include:

- Revised Blue Mountains National Park Plan of Management
- BMCC Southern Escarpment Scenic Master Plan
- Revised BMWHA Strategic Plan

Chapter 3.3 Environment p30

The Society supports the key environmental issues listed for Katoomba (water, environmentally protected areas including the Greater Blue Mountains World Heritage Area (GBMWA) and areas on private land and Council owned land, slope, ecological communities, bushfire, urban heat and tree canopy.

In terms of the strategies (p33) listed the Society supports these and has the following recommendations:

Strategy 1 Protection of the GBMWA would be aided by better education and understanding of the WHA values surrounding Katoomba. The Society recommends adding to this strategy *“including through environmental education strategies such as signage, public art works and events.”*

Strategy 6 *Increasing urban tree canopy* should be specifically included as part of establishing the north-south green corridor.

Chapter 3.5 Economics and activities

In terms of the strategies listed (p38) the Society supports these but has the following recommendations:

Strategy 1 The goal of enhancing and diversifying tourism experiences needs to occur within the environmental and ecological sustainability constraints of Katoomba, including the fact it is surrounded by the GBMWA. The Society recommends adding to this strategy *“consistent with environmental and ecological sustainability constraints of Katoomba”*.

Chapter 3.6 Mobility

In terms of the strategies listed (p42) the Society supports these but has the following recommendations:

A new Strategy 7 should be inserted which focuses on walking tracks and trails. Walking tracks were identified as a key issue (p40) under this heading but there is no strategy which addresses this issue. The Society recommends a strategy is included along the following lines: *Enhance and improve existing network of bushwalking tracks, including investigating expanding bushwalking tracks to link natural areas.*

Northern Investigation Area

Addition of MinnieHaha Reserve

The Society requests that the area of the Master Plan be extended to the north to include Minnehaha Falls Reserve, a significant tourism location as well as a well used recreation area for the local community. The Reserve (both within the Crown Land and National Park) is being seriously degraded due to high visitation rates and the lack of investment in infrastructure and land management to cope with the high level of use. Resolution of these issues needs to be planned in the context of other high use tourist locations in Katoomba, rather than as an isolated problem.

Key Initiatives pp64-65

Street tree planting (p64) - ACTION N1. The “consideration” of native species is not good enough. A key objective ought to be the re-introduction of local native species.

Community Garden – ACTION N4. The “green space” identified on the map p 63 and in the text on p64 is the Harold Hodgson Reserve. The Community Garden is only one part of the Harold Hodgson Reserve. Bushland is being rehabilitated on the western side of the Reserve by the Upper Katoomba Creek Bushcare Group. Council has a commitment to rehabilitate the creekline and there is an indigenous food garden in southern section.

Dog Off Leash area - ACTION N4 is supported for Bureau Park if proper fencing is established to prevent dogs going into the remnant bushland area that is part of the buffer along Yosemite Creek. Melrose Park is currently an off leash area which is well used and located away from significant bushland, so has minimal impact. This is not identified on the maps and is appropriate to be continued.

Improved Active transport – ACTION N3 is supported. The lack of footpaths in North Katoomba discourages walking.

Resource Recovery and Waste Management Facility p66

The Society supports the proposal to re-purpose the Katoomba Resource Recovery and Waste Management Facility into a site for future sustainable industries including circular industries and expanded recycling opportunities. The Society would be keen to be involved in the further proposed investigations for the site, with the Society keen to see a priority on diverse and locally based industries on the site with an emphasis on re-use and re-purpose as there is limited capacity for waste disposal or storage.

Future use of the site needs to take account of the following:

1. Proximity to the two arms of Yosemite Creek to the east and west of site, and therefore the need for:
 - densely vegetated native buffers along areas adjacent to the creek and surrounding bushland;
 - the need for buffers around the landfill sites to be deeply rooted and dense to deal with groundwater pollution;
 - ongoing groundwater pollution monitoring, to ensure the vegetated buffers are protecting the creek from pollution; and
 - ongoing weed control both on site and in adjacent natural areas to limit the spread of weeds.

2. Variable ground bearing pressure, due to the possibility of fill with limited structural integrity.

In terms of the proposal to develop the Council owned land on Marmion Rd adjoining the existing waste facility, the Society is concerned that any redevelopment for housing and/or industrial uses will be environmentally detrimental unless there is:

- An adequate buffer to the swamp;
- No housing directly “backing” on to bushland (given rubbish and weed incursions behind back fences).

Employment lands pp70-71

The Society supports reviewing the zoning of employment lands in Cooper/Whitton Street (Action N9) to assess its suitability for diverse housing and urban services. However, as part of the review of zoning adequate protective buffers must be included for the tributaries of Katoomba Creek, and the following issues considered:

- The “drain” to the east of #39 Cooper Street is not aligned properly to deal with the stormwater from the road, nor could it adequately deal with future development upslope;
- The length of piping below Melrose Park to Letitia Street needs to be reviewed to ensure it can cope with more intense development without creating more problems for the receiving creek;
- The tributary of Katoomba Creek to the west of Frelander Ave needs to be assessed for potential impact of development.

The Barton Street area needs more adequate vegetated buffers to protect Yosemite Creek prior to any intensification of use. Water sensitive design is also required rather than channelling into stormwater “drains”.

The Woodlands Road Industrial Area has been for many years the source of weed infestation to Yosemite Creek and to Minnehaha Falls and beyond. Strict controls on the steeply sloping land are required and resources to ensure compliance.

In terms of the “Active Travel” pathway along Yosemite Creek (map p 63) from the highway, this concept is strongly supported but **only** if an adequate vegetated buffer of local native plants is provided between the path and creek edge. This should not be “landscaped” in a traditional European sense.

Civic precinct p72

The redevelopment of BMCC headquarters (Action 11) is supported but the following considerations must be considered in the design:

- Incorporating green and sustainable building design. The Society supports reuse and re-purpose of the existing building rather than a knock down and rebuild;
- Equally prioritising community needs and Council business needs. This includes ensuring adequate community meeting places and rooms, and facilities and office space for community not for profits. How the community space will be used once completed needs to be incorporated in the design to allow for separate entry and

after hours community access without requiring need for 'security services' or special passes. Many existing Council community meeting rooms do not readily allow people to come and go during the booked meeting time or during after hours. Community meeting rooms and facilities also need to be designed to ensure there is plentiful natural light and ventilation. Lastly, the community facilities in the new civic centre should be financially accessible to community groups, and hiring fees should be priced accordingly;

- The design of the new civic centre should allow for its repurposing as an emergency evacuation centre when required.

The Society strongly supports Action 12 ie a better link across the highway between civic precinct and the town centre, particularly for pedestrians and cyclists. Consideration of a pedestrian tunnel under the highway (similar to the tunnel at Lawson) should be pursued as opposed to a bridge over the highway which will have accessibility issues as well as being visually intrusive.

In relation to Katoomba Creek west of Freeland Ave, the Society strongly advocates for improvements in the treatment of stormwater and pollution from the Highway. Significant regeneration work needs to be undertaken along the length to at least North Street where there is evidence of degradation from inadequate treatment of highway storm water. The RMS should be required to provide adequate stormwater, sediment and pollution control from the highway.

Inclusion of waterway between Trow and West St

Most of the headwaters of Katoomba Creek are located in the Northern Investigation Area (NIA) and have been commented on above. However there is another significant tributary whose headwaters are just west of the Investigation Area which ought be considered. It rises below the railway line between Trow Ave and West Street and then flows through part of the NIA. Consideration needs to be given to providing better protective buffers to this important watercourse which flows directly to Blue Gum Forest on the Grose River (via Govetts Creek). The 1998 Commission of Inquiry Report strongly recommended the retention and rehabilitation of watercourse buffers.

Town Centre Investigation Area

Key initiatives – inclusion of public domain infrastructure initiative pp82-83 and p104

The Society believes the public domain infrastructure throughout the town centre such as seating, signage, lighting, public art etc should be revitalised and enhanced and should be seen as an opportunity to promote an environmental and sustainability message with an emphasis on World Heritage values. When the community and visitors enter Katoomba and move through the town centre they should be made keenly aware, through public domain infrastructure, that the town is situated in and surrounded by a World Heritage area. This strategy should be included at pp82-83.

Civic Arcade p98 and p107

The Society supports revitalisation of the Civic Arcade, including the establishment of the visitor centre and eco-hub but with the following comments:

The visitor centre, as highlighted above, must have an emphasis on not only visitor information on what to do in the Blue Mountains but the importance of the area in terms of its World Heritage values. Environmental education including minimal impact bushwalking must form part of the suite of information provided at any new visitor centre. There should also be consideration of the National Parks and Wildlife Service (NPWS) having a specific presence in any new Katoomba visitor centre given NPWS visitor information and services are limited to Blackheath.

It is unclear in the Master Plan what the proposed eco-hub will consist of and include. If the eco-hub proposal is to include spaces and offices for environmentally focused community groups, the Society comments in regard to any civic centre apply here: any community facilities or offices must be fit for purpose and financially accessible.

Kingsford Smith Park p92 and p106

The Society supports the proposals to reactivate and enhance the park noting it is an underutilised site with topographic and access challenges, as well as heritage and environmental values. Given the widespread presence of groundwater evident on the surface, consideration needs to be given its landform and whether it had been a hanging swamp and for what duration. values. Given these limitations, careful consideration needs to be made of the costs of any major enhancements in the park against the potential benefits and outcomes.

Pyror Place p100 and p108

There is a complete lack of outdoor eating and relaxation areas in Katoomba, apart from outdoor café seating or limited footpath seating adjacent to Hominy Bakery and the Carrington Hotel. An attractive outdoor urban park in Katoomba is strongly supported by the Society, vegetated with local native plants. The proposal for this type of park is supported at Pyror Place. The Katoomba urban centre (unlike Springwood, Leura, Lawson and Glenbrook) does not have a children's play space. The Society believes a children's playground should be incorporated as part of the proposed Pyror Place park, with a strong environmental theme to the play equipment (eg inclusion of native flora and fauna themed play equipment), with play equipment for a variety of ages. Consideration should also be given to expanding the park beyond its current proposed footprint. A well designed children's playground is also an asset to the visitor economy.

Review of Council owned operational land

There is an opportunity as part of the Master Plan for Council to review the status of Council owned land in terms of its designation as operational or community land. Council owns a number of important land parcels within the Master Plan investigation areas, including the town centre. Some of these lands would be more appropriately designated as community land rather than operational. The Master Plan process is the ideal opportunity to review all Council owned land to ensure it is correctly identified as community or operational land.

In terms of the town centre investigation area, the Society is very keen to see the reclassification, from operational to community, of the three Council owned blocks of land in the Katoomba Industrial Area, south Katoomba, at 25 Kanimbla Street and 52 and 56 Govett Street Katoomba. The blocks have environmental values as they are covered in swamp and are unsuitable for development or other operational uses and should be reclassified as community land and managed as a bushland reserve.

Southern Investigation Area

Links to other planning processes

As mentioned above it is unclear how the Katoomba Master Plan links and co-ordinates with other important strategic planning processes currently underway. These other key strategic planning processes are especially relevant to the Southern Investigation Area and include:

- Revised Blue Mountains National Park Plan of Management
- BMCC Southern Escarpment Scenic Master Plan (noting this is mentioned on p119)
- Revised BMWHA Strategic Plan

How all these plans are linked, what overlaps if any exist and whether the actions identified in the Katoomba Master Plan are dependent on these other strategic planning processes being completed, should be included.

Clairvaux site

Clairvaux is a key site in Katoomba with an important history, having been a government-run children's home established in the late 1960s. In view of its current importance to the community and its historical significance, the Society is firmly of the view that the Clairvaux site should remain in public ownership as a community resource.

In addition, the Society is concerned that if the site is sold there is a high likelihood that it will be earmarked for more intensive development. The Society notes that this site is situated on a ridgeline, very close to an escarpment that overlooks a World Heritage listed national park. The Society submits that intensive development so close to the escarpment is inappropriate, noting that stormwater and other run-off drains into the surrounding World Heritage Area. Governments at all levels have an obligation to protect the region's World Heritage values from the adverse impacts of urban development on the ridgetops.

The Society is aware that the Blue Mountains City Council has also voiced its concern over the proposed eviction of three important community non-government organisations from the Clairvaux site.

The Society believes the Katoomba Master Plan is an opportunity to provide some clear strategic statements in terms of future uses or future redevelopment of the Clairvaux site – including any uses which are inappropriate on environmental grounds—and set clear expectations in terms of environmental considerations and constraints.

Echo Point p118 and p127

Development of a site specific precinct plan for this site is supported. As mentioned on p119, co-ordination with the NPWS will be fundamental in terms of the future development and enhancement of this site. The fact the site has complex tenure (Council, NPWS and private), resolving how the site can be strategically planned for and managed holistically will be key.

While the Master Plan states Council will work closely with NPWS to ensure co-ordination and mutually beneficial outcomes (p119) it is not stated how this will be achieved. For example, will there be a high level working group, with Council, NPWS, community and business

representatives, established on an ongoing basis as part of the precinct plan process to guide development and management of the site?

Any future plans for Echo Point should include enhancement of the environmental and Aboriginal heritage education opportunities for the site, including interpretative signage and interpretative talks and walking tours.

Visitor parking and transport needs at Echo Point, as well as other key access points along the southern escarpment, are key issues for residents. Opportunities to enhance public transport from Katoomba and Leura town centres to key access points along the southern escarpment are strongly supported including small bus services, time limited parking, e-bike hire and the consideration of identifying pedestrian only/no parking areas.

Review of land use controls in the Recreation and Tourism Precinct p120 and p127

The Society is concerned with the intent of the review of the land use controls (p121) within the tourism and recreation precinct. The Society does not support the increased adoption in this area of intensive tourism zones (as previously proposed in the tourism study undertaken during the development of LEP 2015), which would allow increased tourism development. The area is already intensively developed and further intensive tourism development is not environmentally sustainable or desirable from a visitor experience perspective. It needs to be made clear that any review of planning controls must be undertaken with the over riding goal of conserving the environment, including World Heritage values, and be consistent with the environmental and ecological sustainability constraints of the area.

Expansion of the Grand Clifftop Walk

Currently the Grand Cliff Top walk ends at Scenic World. There is a huge opportunity to extend the walk beyond Scenic World to include lookouts adjacent to Cliff Drive as well as expanding the walk to key sites such as Ngula Bulgarabang Regional Park. Establishing a walking track adjacent to Cliff Drive would also solve the issue of unsafe pedestrian access along Cliff Drive, and make accessible under utilised lookouts and vantage points along this road.

The Society understands that the NPWS priority at the moment is to complete this walk as proposed ending at Scenic World. However the Master Plan process provides an opportunity to further expand this initiative and provide a world class walk past Scenic World which encompasses all of the southern escarpment.

Former Katoomba Golf Course p124 and p126

The Society supports a site specific precinct plan for this critical publicly owned site. The Society appreciates the opportunity to have a representative on the community reference group developing the precinct plan. It is essential this site stays in public ownership, and public use of the site is enhanced consistent with its environmental values. The use of the site for educational and research purposes related to the BMWHA and Council's Planetary Health program, as well as for offices for public agencies such as NPWS, is also supported. The site is totally unsuitable for intensive private residential development, or intensive hotel or other tourism development.

The Society supports establishing greater walking connections between the Katoomba Golf Course site and other bushland areas along the southern escarpment areas (p125).

Thank you once again for the opportunity to make comment on this important planning document.

Yours sincerely



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