



# Blue Mountains Conservation Society Inc

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**Nature Conservation Saves for Tomorrow**

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## **Submission: Development Application X133/2026 Part redevelopment of Wentworth Falls Golf Club for seniors housing**

The Blue Mountains Conservation Society is a community volunteer organisation with over 900 members, which has been in existence for over 60 years. The Society's aim is to help conserve the natural environment of the Blue Mountains and to increase awareness of the natural environment in general. The Blue Mountains Conservation Society would like to make a submission in relation to *Development Application X133/2026 - redevelopment of Wentworth Falls Golf Club for seniors housing* currently on Public Exhibition. We note the development application will not be considered by Council but will instead be considered by a Planning Panel.

It is important to note that the Blue Mountains is exceeding its new housing target, as set by the NSW Government, in terms of new residential development approvals. The Society believes the Blue Mountains Local Environmental Plan 2015 (BMLEP) provides for the sufficient expansion of new housing, including high and medium density housing, while also protecting the internationally recognised environmental values of the Blue Mountains. The Society therefore supports new housing developments which are environmentally sustainable and are located and built consistent with the current zoning and environmental protection provisions of the BMLEP.

The Society, however, does not believe the redevelopment of the Wentworth Falls golf course for seniors housing meets the requirements of the BMLEP and therefore opposes the development for the following reasons.

### **Inconsistency with the strategic intent and aims of the Blue Mountains Local Environmental Plan 2025 (BMLEP)**

The development involves 63 seniors housing units on land within the Wentworth Falls Golf Course. The current zoning of the land under the BMLEP is Private Recreation RE2. The seniors housing medium density residential development proposed on the site

is prohibited in the RE2 zone and is only permissible through the operation of the NSW Government's State Environmental Planning Policy (NSW Housing SEPP).

The BMLEP 2025 has been developed over many years with considerable community input. Consideration of where future medium and high intensity residential areas would occur was paramount in developing the BMLEP, taking into account that the Blue Mountains is surrounded by World Heritage listed national parks, and that residential development occurs along the ridgelines increasing risks such as bushfire. Given that the current BMLEP zoning prohibits the development, the Society is extremely concerned that this medium density housing is occurring on land deemed unsuitable under the BMLEP for this type of intense development.

The development is therefore contrary to the strategic planning intent of the BMLEP and we would argue is not consistent with the Aims of the BMLEP (Clause 1.2), specifically the following aims

...

*(b) to provide a clear framework for the development of land that is consistent with, and promotes the principles and practices of, ecologically sustainable development.*

...

*d) to ensure that development does not result in adverse impacts on the values of the Greater Blue Mountains World Heritage Area.*

...

*(g) to preserve and enhance watercourses, groundwater, riparian habitats, wetlands and water quality within the Blue Mountains, the Hawkesbury-Nepean River catchment and Sydney's drinking water catchments.*

*(h) to prescribe limits to urban development having regard to the potential impacts of development on the natural environment and the provision, capacity and management of infrastructure*

The development is inappropriately sited within an area of single dwellings on reasonably large lots, is not sited near regular public transport or facilities such as shops and is sited outside of areas within the BMLEP identified for medium density development. The area is zoned RE2 and has not been developed historically as a residential area but is used as a golf course, specifically due to the flood risk as it is located in the headwaters of Jamison Creek.

The development is within the Jamison Creek catchment which flows into the World Heritage Area. The Society believes (see below) that the environmental assessment of the development does not fully assess the potential impacts, including an increase in water flows and a decrease in water quality, into the World Heritage area. Jamison Creek is also within the Sydney drinking water catchment which also requires the development to have a neutral or beneficial effect on water quality.

### **Inconsistency with RE2 Private Recreation Zone Objectives**

The RE2 Zone objectives under the BMLEP include the following:

- *To enable land to be used for private open space or recreational purposes.*
- *To provide a range of recreational settings and activities and compatible land uses.*

- *To protect and enhance the natural environment for recreational purposes.*
- *To encourage the development of land in a manner that meets the private recreational needs of the community.*

The development proposed, while retaining the majority of the golf course, will mean land currently available to the public for recreation will essentially be privatised by being developed into seniors housing. It is hard to see how seniors housing “provides a range of recreational settings and activities” or “meets the private recreational needs of the community”. The development as proposed therefore does not meet the zone objectives for the RE2 zone. While it could be argued that the development will provide the golf club with an income stream and therefore will contribute to the golf club’s ongoing economic viability, thereby ensuring private recreation opportunities, there is no guarantee the golf club will become economically viable on an ongoing basis even if the development proceeds. In addition, what is being assessed under the BMLEP is the environmental impacts of the development itself - i.e. the seniors housing and the golf course reconfiguration – not the golf club’s economic viability and its ability to continue to provide private recreation on the remainder of the golf course not impacted by the development.

### **Flood impacts – inconsistency with Clause 5.21 BMLEP**

Clause 5.21 of the BMLEP requires that development consent must not be granted to development on land considered flood prone unless the development

...  
*(b) will not adversely affect flood behaviour in a way that results in detrimental increases in the potential flood affectation of other development or properties,*  
*and*

....  
*(e) will not adversely affect the environment or cause avoidable erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses.*

### **Assessment of flood risk**

The Society is deeply concerned that the proposed development is not consistent with the above provisions of the BMLEP. Large areas of the Wentworth Falls Golf Course are currently impacted by flooding and significant areas of the golf course are mapped as flood prone via the Jamison Creek Flood Study. Some residential areas and roads surrounding the golf course also experience flooding in heavy rain events. The hydrology of the golf course is complex and is one of the reasons why the area has not historically been developed for residential use. Any changes in land use of areas within the golf course, especially an increase in hard surfaces resulting in increased stormwater and runoff, has the high potential to exacerbate flooding on the golf course as well as surrounding existing residential areas and roads.

The Flood Assessment Impact Report provided as part of the environmental assessment for the development states (p16) that:

*The flood assessment concludes that the proposed development would not have adverse flood impacts external to the site boundaries. Any minor localised*

*increases in flood levels observed along Beatty and Waratah Roads are considered negligible and do not pose a flood risk. The assessment suggests that overall, the development is expected to maintain existing flood conditions, with no significant change in flood behaviour in the vicinity of the site, and the flood hazard during the 1% AEP event is expected to remain consistent with existing conditions.*

The Flood Assessment Impact Report is based on the Jamison Creek Flood Study, Floodplain Risk Management Study and Plan (Cardno Willing, 2005) commissioned by Blue Mountains City Council. The Flood Assessment Impact Report is highly technical and relies on input data, some of which differs from that used in the Jamison Creek Flood Study, Floodplain Risk Management Study and Plan (p11), to model the flood risk of the proposed development on existing surrounding residential areas and roads. Given the existing significant flood risks associated with the site and the complex hydrology, it is essential that the consent authority, in this case the Planning Panel, be satisfied that the requirements of Clause 5.21 of the BMLEP can be met. The Society therefore urges that an independent technical review be undertaken of the data and modelling used by the developer in its Flood Assessment Impact Report to ensure that its conclusions are correct. It is important to note that the risks from flooding are further exacerbated given the potential residents of the proposed senior living development have increased vulnerability due to age.

### **Assessment of stormwater quantity flows**

The Stormwater Management Strategy Report provides a Stormwater Quantity Assessment (5, p.12). The DRAINS hydrology model was used to ensure that the developed conditions stormwater discharge is no greater than the existing conditions flow at the site.

The DRAINS hydrology model is well known to be sensitive to small variations in data input i.e. very small differences in data input can result in vastly different modelling results. The Stormwater Management Strategy Report does not specify the data that was fed into the DRAINS model. Presumably Australian Rainfall and Runoff (ARR) guidelines were utilised, presumably APR 2019, using Bureau of Meteorology (BOM) data. However, this data is now seven years old. Was the 2024 updated version used, as developed by the federal Department of Climate Change, Energy, the Environment and Water?

The impacts of climate change are producing more intense periods of rainfall and resultant hard surface, gravity fed stormwater surges in the Blue Mountains. The proposed development is connected via sealed (hard surface) roads and stormwater pipes to Wentworth Falls Lake and a substantial weir and spillway. Accordingly, there is a concern that the proposed development could contribute to weir spillway flows, if the DRAINS hydrology modelling proves to be inaccurate or becomes outdated due to current and future variations in climate and data. Increased spillway flows are likely to have detrimental environmental impacts on sensitive ecological communities locate below the weir (see below).

## **Environmental impacts – inconsistency with Clause 6.1(2) and 6.1(6) BMLEP**

Clause 6.1 (2) of the BMLEP states development consent must not be granted for development that may have an adverse impact on environmentally sensitive land unless the consent authority is satisfied that

...

*(b) the development will be managed to protect the natural environment and maintain the ecological integrity and environmental significance of the Blue Mountains, and*

*(c) the water quality, watercourses, groundwater quality, riparian habitats and wetlands ... will be preserved and, if possible, enhanced*

Environmentally sensitive land in the BMLEP is defined as including land that is a watercourse and land that is within 40 metres of the top of the bank of a watercourse. The grassland channel that traverses the site would be classified as a watercourse under the LEP 2015.

Clause 6.1(6) of the BMLEP states that development consent must not be granted for development unless the consent authority is satisfied that the development can be designed, sited and managed to avoid any adverse environmental impact on any of the following—

...

*(b) rare species of flora,*

...

*(e) watercourses or wetlands*

The Society believes that the development as currently designed and sited will have irreversible negative impacts on water flows and water quality as the land is within the headwaters of Jamison Creek. This in turn will negatively impact the endangered Dwarf Mountain Pine located at Wentworth Falls which is fed by Jamison Creek, as well as the threatened Blue Mountains Swamps located south of Waratah Road and along and fed by Jamison Creek. The Society argues the development therefore fails to meet the requirements of Clause 6.1(2) and (6) of the BMLEP.

The development will involve removal of 82 individual trees and one segment of remnant bushland of 60 trees (Tree Removal Plan p3). The extent of tree removal is required to enable the development of the seniors housing as well as the reconfiguration of Holes 1, 11, 12, 14, 16, 17 and 18 of the golf course. Replacement plantings including species selection and planting locations will prioritise course amenity, aesthetic enhancement, playability considerations and maintenance of the existing landscape, and will comprise planting of both native and exotic species appropriate to the mid-upper Blue Mountains setting (Tree Removal Plan p3). The replacement planting strategy will therefore be focused on golf course amenity outcomes rather than environmental outcomes.

There is very little information in the assessment documentation provided for the development in terms of what works are proposed in relation to reconfiguration of Holes 1, 11, 12, 14, 16, 17, and 18 of the golf course, with the environmental assessment largely focused on the impacts of the residential component of the development. The environmental impact assessment for the development therefore does not appear to have assessed the impact of the golf course reconfiguration on the headwaters of

Jamison Creek. This includes but is not limited to the impacts of tree removal and replanting, landscape modifications required for the reconfiguration of the golf course such as earthworks, soil removal, importing of fill, the increased use of fertiliser in order to establish fairways and greens, and how sedimentation from removal of vegetation and earthworks will be managed. It is especially disappointing that the planting of new vegetation will prioritise golf course amenity over environmental outcomes, with non-natives being included in the replanting plan.

The Dwarf Mountain Pine is a highly endangered native flora species, listed under the *Biodiversity Conservation Act 2016*, which only grows within the spray of waterfalls along the southern escarpment. Its range is very limited and it grows in niche ecological sites, making it extremely vulnerable if changes in either water quality (from an increase in sediments and fertiliser or other chemical use in the catchments of the waterfalls where it lives) or water quantity (from changes in water flows from increased hard surfaces in the catchments of the waterfalls where it lives or from hydrological changes upstream). The Dwarf Mountain Pine found at Wentworth Falls has recently been identified by researchers at the Royal Botanic Gardens at Mt Tomah as being genetically distinct from other populations along the southern escarpment, which further emphasises the ecological importance of this population. The Statement of Environmental Effects does not address the impacts of the development on the Dwarf Mountain Pine, including the golf course re-configuration, both during construction and on completion. This includes the 'test' required under Section 7.3 of the *Biodiversity Conservation Act 2016* to determine whether the proposed development is likely to significantly impact the Dwarf Mountain Pine.

The Statement of Environmental Effects identifies one threatened flora species, the Needle Geebung (*Persoonia acerosa*), which is listed as Vulnerable under the NSW *Biodiversity Conservation Act 2016*, as being found in remnant bushland on the site in three locations - two alongside Blaxland Road and one alongside Darwin Avenue (p32). The Statement argues that as no clearing is proposed in this remnant vegetation that a significance test in terms of the Needle Geebung as per Section 7.3 of the *Biodiversity Conservation Act 2016* is not required. However, as highlighted above the documentation of the development does not provide much detail or assessment of the environmental impacts arising from the proposed golf course reconfiguration including earthworks, replanting, soil removal and new soil deposition, dust and the increased use of fertiliser. It is therefore hard to assess what impacts these works would have on the Needle Geebung found in the remnant bushland within the golf course and the Society argues that a significance test in terms of the Needle Geebung, as per Section 7.3 of the *Biodiversity Conservation Act 2016*, is in fact required.

The Statement of Environmental Effects also does not consider the possible impacts that the proposed development will have on the extensive *Blue Mountains Swamps* communities (a state and federally listed threatened ecological community) located close to the proposed development south of Waratah Road, below the Wentworth Falls Lake weir and spillway, and along Jamison Creek south of the A32-GWH, in terms of stormwater erosive impacts. These swamps are currently subject to highly damaging, erosive stormwater flows. Any increase in proposed development stormwater flows and/or weir spillway flows will only worsen this situation (see above comments on the Assessment of stormwater quantity flows).

Thank you for the opportunity to comment on this development. If you have any queries in regard to this development, please contact me on [president@bluemountains.org.au](mailto:president@bluemountains.org.au).

Yours sincerely

A handwritten signature in black ink that reads "Annette Sartor". The script is cursive and elegant, with the first letters of each name being capitalized and prominent.

Annette Sartor  
President  
Blue Mountains Conservation Society