



Blue Mountains Conservation Society Inc

ABN 38 686 119 087

PO Box 29 Wentworth Falls NSW 2782

Phone: (02) 4757 1872

E-Mail: bmcs@bluemountains.org.au Web Site: www.bluemountains.org.au

Nature Conservation Saves for Tomorrow

16 April 2014

Mr Robert Greenwood
General Manager
Blue Mountains City Council
Locked Bag 1005
Katoomba NSW 2780

Dear Mr Greenwood

Subject: Proposed Bunning's Store at 48 Megalong St, Katoomba – Ref X/824/2013

The Blue Mountains Conservation Society is a community based volunteer organisation with nearly 900 members whose goal is to promote the conservation of the environment in the Greater Blue Mountains area. I am writing to you in regards to the proposed Bunning's Store at 48 Megalong St, Katoomba – Ref X/824/2013.

Background

The proposed Bunning's development is located within the Leura Falls Creek Catchment. Since February 2012 the Leura Falls Creek Catchment Working Party has worked closely with the Blue Mountains City Council and National Parks and Wildlife Service to develop a whole local catchment strategy and catchment action plan for the Catchment. The Strategy aims to develop an integrated approach to restoration actions, making connections across the Leura Falls Creek Catchment landscape and establishing a more coordinated approach to improving and maintaining the health of the catchment.

The Strategy includes targets, priorities and actions for a whole of catchment approach, as well as priorities and actions specific to ten identified zones within the catchment. One of these zones is the light industrial area in the top of the catchment, where the proposed Bunning's development is located. This area poses a significant environmental threat to the health of the natural bushland and waterways in the catchment. The possible development of the area has been a concern to the local Bushcare group operating in Leura Park since its inception in 2000. In 2009 the Leura Falls Creek Catchment Working Party wrote to Council voicing concerns about the sale of the proposed development site. The matters raised at the time included the threats posed by the development of flood liable lands, the issues of cut and fill to raise areas leaving steep embankments, and the subsequent erosion to the creek and downstream degradation through sediment and the spread of weeds.

We also note that Council at its meeting on 21 February 2012 resolved to make the Leura Falls Creek a priority catchment for its Environmental Restoration and Community Engagement programs. Leura Falls Creek is also a tributary of the Coxs River, which flows into Warragamba Dam, Sydney's drinking water supply.

Development Application for the proposed Bunnings Store

The Society has significant concerns about the proposed Bunnings development relating both to the impact on the immediate environment and the impacts on the creek and catchment as a whole. Noting the concerns raised previously with Council by the Leura Falls Creek Catchment Working Party, including the need for effective environmental management of this part of the catchment, the Society shares the view of the Working Party that the development, as presently proposed, cannot be accommodated on the site without unacceptable environmental impacts.

The Society has the following concerns:

- The area of land available for development is extremely limited, when considering the restrictions imposed by the land zoning, the riparian protection area and the flood liable area. The scale and nature of the development proposed is inconsistent with these controls.
- There are significant environmental limitations on most, if not all, of the land. In particular we are concerned about the extent to which it will be necessary to modify the site and elevate structures, as well as the impact these actions will have on the surrounding environment.
- In the documentation which accompanies the DA it is clear that major site works are contemplated including possible excavation of the whole area proposed for development, removal of this material from site and replacement with crushed rock. The possibility of driving piles to support some structures to safeguard against damage from flood is also considered. The low lying nature of the site has played an important role in the drainage of the surrounding area and functioned in part as a swamp. This makes this area intrinsically unsuitable for such a proposal, and the land modifications are excessive and carry with them significant threats to the local environment.
- The suggestion that structures adjoining the creek line be elevated to allow for storm events appears to be quite unworkable. The support structure would itself provide a trap for debris under storm conditions and the overhang from the buildings would make it extremely difficult, if not impossible, to successfully establish vegetation in that part of the riparian protection area.
- The nature of the proposal will turn almost all of the site into an impervious paved or roofed area, will generate substantial runoff, which must also flow to the creek. The quality of the runoff from the nursery area is of particular concern as it is likely to be nutrient rich from irrigating and feeding the pot plants. Whilst a range of filtration and other measures to deal with runoff are canvassed in the documentation, there are also concerns about future maintenance to keep these facilities effective and accommodating these measures on-site so that they are not located in the riparian protection area.

In conclusion we would strongly urge Council to reject the present proposal and encourage the preparation of a more modest concept, using less of the site and therefore providing the opportunity to effectively manage the environmental impacts of the development on-site.

If you have any queries in regard to this submission please contact, Alan Page, President on ph 4784 1704 or email president@bluemountains.org.au.

We look forward to an early response on this important issue.

Yours sincerely

A handwritten signature in black ink, appearing to be 'AP', written in a cursive style.

Alan Page
President
Blue Mountains Conservation Society

cc All Councillors