

Blue Mountains Conservation Society Inc

ABN 38 686 119 087

PO Box 29 Wentworth Falls NSW 2782

Phone: 0490 419 779

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

Nature Conservation Saves for Tomorrow

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Department of Planning, Housing and Infrastructure

Lodged online

Dear Minister,

Exhibition – Proposed changes to Community Participation Plan

I am writing to you on behalf of the Blue Mountains Conservation Society. The Blue Mountains Conservation Society (the Society) is a community-based volunteer organisation with approximately 900 members. Our mission is to help protect, conserve and advocate for the natural environment of the Greater Blue Mountains. In fulfilling its mission, the Society advocates for the protection of the Greater Blue Mountains World Heritage Area.

The Society is deeply concerned about the proposed reduction from 28 to 14 days in the public exhibition period for State Significant Development (SSD) applications for certain residential SSD projects.

Details of major developments are complex and its repercussions far reaching, especially in highly environmentally sensitive areas such as the Blue Mountains. It takes a considerable amount of time to study the applicable documents and put together a response. Site specific issues are not identified by generic industry-specific SEARS and a reduced exhibition period does not give the public much time to thoroughly scrutinise the EIS and identify any missing relevant local or site-specific issues or inconsistencies.

Surely it is much more important to encourage well-considered responses from those affected by the development and to ensure the delivery of a quality project which meets local environmental standards than be focussed on accelerating the delivery of housing projects. The shorter time frame of 14 days makes it more difficult to meet the objectives of the Community Participation Plan, such as provision of formal feedback described on page 10, as well as discussion between stakeholders, identification of community concerns and use of local knowledge. Local community members in many cases are able to identify significant issues associated with a development application that the consenting authority is not in a position to detect.

A residential development application would normally be a much smaller development than a SSD and may only have minimal impacts on the local community in comparison to a SSD. Much more time is required to study the plans and make an informed comment on the proposed development if it is designated SSD. Surely then the exhibition period should reflect the potential impact of the project. This proposed change to the exhibition period could be seen as a means of government discounting the concerns of the public.

An exhibition period of 14 days only allows two weekends for a working member of the public to carry out the extensive work required to make informed comments on a SSD proposal. This discourages community input as many people who would be greatly affected by the proposal would face conflicting priorities with their work/life balance and would not be able to invest the necessary time into examining the EIS and writing a valuable submission. For

these reasons, the proposed shorter timeframe of 14 days for public exhibition may make it very difficult to fulfil the intent of the Environmental Planning and Assessment Act 1979, Part 2, Division 2.6, 2.23 to provide meaningful opportunities for community participation that is representative of the community, and appropriate for the significance and likely impact of proposed developments.

In view of all the above considerations, the Society strongly recommends that the minimum exhibition should remain at 28 days. Thank you for the opportunity to comment on this important matter.

Yours sincerely,

Mrs Annette Cam

President

Blue Mountains Conservation Society

president@bluemountains.org.au