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

9 September 2026

Paul Anzellotti
Blue Mountains City Council
2-6 Civic Place
KATOOMBA NSW 2780001

Via email: council@bmcc.nsw.gov.au

OBJECTION TO DEVELOPMENT APPLICATION DA X/896/2026 — 2–6 FALLS ROAD, WENTWORTH FALLS

Dear Mr Anzellotti,

The Blue Mountains Conservation Society Inc. (BMCS) is a community-based volunteer organisation with more than 900 members. Its mission is to protect, conserve and advocate for the natural environment of the Greater Blue Mountains.

BMCS makes this submission in relation to Development Application DA X/896/2026, 2–6 Falls Road, Wentworth Falls, involving demolition of the former bowling club and construction of a new restaurant with associated parking and drive-through facility ("the proposal").

BMCS objects to the proposal on the following grounds. Our principal concern is its potential to add further hydrological and pollution pressures to the Jamison Creek catchment, a waterway already recognised as environmentally significant and vulnerable to urban stormwater impacts.

1. Jamison Creek is a high-priority and vulnerable catchment

Over recent decades, Jamison Creek and its catchment have experienced significant natural and human-induced disturbances. Council, National Parks, WaterNSW, community organisations and volunteers have subsequently invested substantial resources, including many hundreds of hours of volunteer labour, in rehabilitating and strengthening both the built environment, including bridges and walking infrastructure, and the natural environment, including the creek and its association with flora and fauna ecological systems.

Research undertaken by Blue Mountains City Council officers and collaborating researchers identifies Jamison Creek as a high-priority sub catchment for stormwater management because of its environmental, cultural and social values and the continuing threats posed by urban runoff (St Lawrence et al., 2021)[1]. Monitoring between 2008 and 2020 recorded ongoing disturbance–recovery cycles associated with pollution, drought and major flooding.

The vulnerability of Jamison Creek was dramatically demonstrated by the 2012 crayfish kill. More than 1,000 Giant Spiny Crayfish (*Euastacus spinifer*) were found dead along approximately two kilometres of Jamison Creek after the pesticide bifenthrin entered the creek through a conventional stormwater system and had significant impact on the wider aquatic macroinvertebrate community. This incident provides evidence that contaminants originating within the urban catchment can be transported through stormwater infrastructure and cause severe ecological damage well beyond their point of origin (St Lawrence et al., 2014)[2].

Whilst the Jamison Catchment Streets to Creeks Project (2015–2019)[3], supported by WaterNSW, introduced measures designed to remove pollutants and increase groundwater recharge following the pesticide pollution, importantly, St Lawrence et al. (2021) concluded that such measures do not, on their own, constitute a whole-of-catchment solution.

Research into the recovery of Jamison Creek identified unaffected tributaries and inputs of high-quality groundwater via Blue Mountains Swamps as factors believed to have assisted ecological recovery (St Lawrence et al., 2014). That is, swamps, tributaries and hydrological processes all contribute to the creek's water quality and ecological resilience. Indeed St. Lawrence et.al., (2014) emphasise the importance of holistic water-sensitive approaches, including reducing the extent of hard surfaces directly contributing stormwater runoff to the creek.

2. Stormwater, hydrological change and ongoing operational risks

BMCS acknowledges that the application includes stormwater-management measures, however, the submitted water-management material indicates that the existing three pipes at the south-eastern low point of the site are to be retained and that runoff will continue to be directed towards Jamison Creek. Any development that increases hard surfaces, vehicle activity or reliance upon engineered drainage within this catchment warrants scrutiny, not only in relation to impacts on the creek channel itself, but also in relation to the hydrological processes and connected swamp environments that support it.

[1] St Lawrence, A., McCormack, R., Wright, I., Blackwood, A., Mahony, E., Benson, A., Smith, G., & Fitzgerald, G. (2021). Waterway health and stormwater management at Jamison Creek, Blue Mountains. In *Proceedings of the 10th Australian Stream Management Conference* (pp. 627–636). River Basin Management Society

[2] St Lawrence, A., Wright, I. A., McCormack, R. B., Day, C., Smith, G., & Crane, B. (2014). Bifenthrin pesticide contamination: Impacts and recovery at Jamison Creek, Wentworth Falls. In *Proceedings of the 7th Australian Stream Management Conference: Catchment to Coast* (pp. 558–567). River Basin Management Society.

[3] Blue Mountains City Council. (2019). *Jamison catchment streets to creeks project*. Local Government NSW.

i. Increased impervious surfaces

BMCS is concerned about the conversion of permeable ground to roads, parking areas, driveways, roofs and other hard surfaces. Impervious surfaces reduce the amount of rainfall that can infiltrate into soils and increase surface runoff into stormwater infrastructure. This can alter both the quantity and timing of water moving through the landscape, reducing infiltration and shallow subsurface flows, while producing faster and more concentrated runoff following rainfall.

This is particularly significant in the Blue Mountains, where swamp communities can depend upon sustained soil saturation, seepage and shallow groundwater flows. As noted above, research following the 2012 Jamison Creek contamination identified inputs of high-quality groundwater via Blue Mountains Swamps as one of the factors believed to have assisted the creek's ecological recovery (St Lawrence et al., 2014).

BMCS is therefore concerned that increased impervious surfaces, together with substantial filling, soil compaction, retaining structures and subsoil drainage, could alter the hydrological processes supporting nearby swamp vegetation and ultimately Jamison Creek. Blue Mountains swamps are a hallmark ecological feature of the Greater Blue Mountains landscape and contribute to the ecological integrity and resilience of its waterways. Indeed, Blue Mountains swamps are directly relevant to both natural criteria under which the Greater Blue Mountains Area (GBMA) was inscribed on the World Heritage List in 2000.

UNESCO[4] specifically recognises localised swamps and wetlands as part of the diversity of habitats underpinning Criterion (ix), which relates to the region's outstanding ecological and evolutionary processes, while these distinctive habitats also contribute to Criterion (x) through their role in supporting the region's exceptional biodiversity. Protecting swamp hydrology—including infiltration, saturated soils, seepage and shallow groundwater—is therefore important for maintaining the interconnected ecological processes and habitat diversity characteristic of the Greater Blue Mountains landscape.

ii. Concrete infrastructure and water quality

The proposal also involves substantial concrete infrastructure and Purdy and Wright (2019)[5] found that exposure of a pristine Blue Mountains Upland Swamp to concrete, rapidly and significantly altered its chemistry including increases in pH and electrical conductivity, and increased concentrations of bicarbonate, calcium, sulphate and a number of metals. The potential for runoff to interact with concrete retaining structures and other infrastructure before entering the receiving drainage system warrants careful consideration in the context of a sensitive Blue Mountains waterway. In addition, this potential impact should not be considered in isolation, but cumulatively with the other pollutant sources associated with the proposed development.

---

[4] UNESCO World Heritage Centre. (n.d.). *Greater Blue Mountains Area*. UNESCO.

[5] Purdy, K., & Wright, I. A. (2019). Impact of concrete on riparian ecosystems. *IOP Conference Series: Earth and Environmental Science, 344*, 012022.

iii. Vehicle-derived pollutants, litter and waste

The proposed restaurant, drive-through and parking areas would introduce additional potential sources of pollution as runoff from trafficked areas can carry tyre particles, brake dust, hydrocarbons, sediment and litter. Outdoor customer and parking areas may also generate food and packaging waste capable of being mobilised during rainfall; risks that are particularly significant in view of the catchment's documented history of damage from contaminants conveyed through stormwater infrastructure.

3. Cumulative impacts and the need for a precautionary approach

The environmental implications of the proposal should not be assessed as a series of isolated components.

The consent authority should consider the cumulative effect of:

- increased impervious and trafficked surfaces,
- substantial filling, soil compaction and retaining structures,
- altered surface and subsurface drainage pathways,
- increased reliance upon engineered stormwater infrastructure,
- concrete infrastructure,
- vehicle-derived pollutants,
- food and packaging waste and litter, and
- the long-term operation and maintenance of stormwater-treatment systems.

These pressures would occur within a catchment with a documented history of ecological disturbance arising from urban stormwater. Given the catastrophic 2012 pollution event and the substantial public and community investment subsequently made in restoring and protecting Jamison Creek, BMCS considers that a precautionary approach is warranted.

BMCS is also concerned about the long-term reliability of pollution-control measures. Protection of a sensitive receiving environment should not depend solely upon treatment devices, maintenance regimes and operational practices continuing to perform effectively over the entire life of the development. Irrespective of conditions of consent, it is reasonably foreseeable over the life of the development that equipment may fail, drains may become blocked, maintenance may be inadequate, extreme rainfall may overwhelm systems, or human error or non-compliance may occur.

The critical issue is therefore, not simply whether the proposed pollution controls can operate effectively under ideal conditions, but what the environmental consequences would be when they do not. In a catchment with a direct stormwater connection to Jamison Creek and a documented history of catastrophic ecological damage from a single pollution incident, BMCS considers that this represents an unacceptable environmental risk.

4. Land-use context and the Greater Blue Mountains setting

BMCS is also concerned that the nature and intensity of the proposed development are inconsistent with the environmental and recreational context of this sensitive site. The land is zoned RE2 Private Recreation and is immediately associated with Wilson Park and the Jamison Creek catchment, close to the Charles Darwin Walk, and forms part of the broader landscape setting of the Greater Blue Mountains World Heritage Area.

This is not an isolated urban commercial site. It occupies a location where recreational open space, bushland, waterways, walking tracks and natural landscapes collectively contribute to the environmental character and visitor experience of Wentworth Falls. The introduction of an intensive restaurant and drive-through operation, with associated traffic, parking, hard surfaces, lighting, signage, waste and extended operating hours, therefore needs to be assessed in the context of these surrounding environmental and recreational values, rather than solely in terms of impacts within the development boundary.

BMCS is particularly concerned that the proposal could increase the intensity and urbanisation of land use at an environmentally sensitive interface between the Wentworth Falls urban area and the adjoining natural landscape, and incrementally diminish the landscape, ecological and environmental values associated with the wider Greater Blue Mountains setting.

Conclusion

For these reasons, the Blue Mountains Conservation Society objects to DA-X/896/2026 and requests that the development application be refused.

Yours sincerely,

[redacted]

Annette Sartor
President
Blue Mountains Conservation Society Inc.
president@bluemountains.org.au