

Wentworth Falls Chamber of Commerce Draft Submission on BMCC Draft LEP 2013

Dear Sir/madam

The following submission is made on behalf of the Wentworth Falls Chamber of Commerce and specifically relates to the village and residential areas that are serviced by the village of Wentworth Falls.

In summary, the planning instruments, in particular proposed lot sizes and zonings, do not meet the objectives of the Draft LEP because they fail to provide adequate residential housing opportunities within safe walking or cycling distance from the commercial heart in the village. This leads to the following consequences:

- **Increased likelihood that residents will rely on their cars and shop elsewhere**
- **Deterioration of village shops and infrastructure as there is no financial incentive to maintain the existing heritage shops in good order and/or to replace existing unsympathetic developments with more appropriate structures**
- **Creation of lot sizes under 'R6 Living Conservation' that significantly limits potential for subdivision in existing 'built up' areas. It is ironic that the identified 'character' streets of Wentworth Falls contain block sizes as little as 700 sq metres now prohibited by current and proposed future LEPs.**
- **A lack of provision of business and tourist development opportunities which will stymie investment opportunities and severely limit the potential for employment creation in the Blue Mountains**

It is proposed that the exemptions sought by BMCC to the standard LEP instrument do not provide for sustainable outcomes and act in a contrary manner towards achieving longterm environmental, social and economic sustainable outcomes in the Blue Mountains.

DLEP2013 provided an opportunity for Council to reinvigorate the potential for development or renewal of attractive and sustainable shops and houses in Wentworth Falls and to encourage boutique tourist developments that the market now demands. Instead it offers more of the same. The increasing numbers of empty shops and/or poorly maintained shops in the villages and the reduction in overnight tourist stays should be 'food for thought'. Further, new housing developments are forced to the peripheral areas where infrastructure is limited and the threat of fire proneness is greater as land close to village centres is locked up in 1200 sq metre blocks under Council's proposed 6R 'Living Conservation' exemption

The Chamber recommends that Council reconsider lot sizes and zonings and be more pro-active in consulting with the community particularly those involved in business and tourism and, implement the recommendations of the Stafford Report (Oct 2011) to foster business and tourism opportunities in the Blue Mountains LGA.

Details of these concerns are described below.

The proposed planning instruments for Wentworth Falls do not meet the Aims of the Plan (Section 1.2) as described below.

Item 2b 'To provide a clear framework for development of land that is consistent with and promotes the principles and practices of ecologically sustainable development'

The railway station and village centre are located on the north side of the highway. There is a pedestrian crossing, but no overhead bridge between the north and south side. There have been a number of accidents but there are no proposals to put in any safe pedestrian access between the north and south side.

The zoning of residential land on the north side of the Great Western highway that is close to the village and located on bus routes is almost entirely R6 'residential character conservation' or one of the environmental zonings. The minimum block sizes are 1200 sq metres and do not allow for seniors residential developments.

It is acknowledged that a small area of medium density occurs within a currently treed area east of the Grammar school more than 200 metres from the village via sloping footpaths adjacent to the not very attractive Great Western Hwy. A further medium density area lies to the northern end of Sinclair Cres some 2.3Km from the village. This is not sustainable in terms of accessibility.

It is also noted that one of the precinct objectives for Wentworth Falls village (Section 7.9) is to accommodate residents in 'shop-top' dwellings. We agree with the rationale to *promote housing choice, incorporate high levels of residential amenity and encourage passive surveillance. However, very few of the shops (less than 10) would have the ability to incorporate top shop housing and some of these will also have to satisfy their heritage needs that will limit their usefulness for this purpose. Where will these residents park their cars? Where will they hang their washing?*

On the south side of the highway a large area is zoned low density residential with block sizes of 720 sq metres and the zoning allows seniors residential. However seniors, on foot, must make the dangerous crossing of the Great Western Highway to access the railway station and the shops. This will only encourage them to use their cars (if they can drive) and take themselves to other shopping precincts.

For these reasons the principles of 'sustainable development' are not met by the zoning and lot size proposals in DLEP 2013.

Item 2 (c) To meet the needs of residents, visitors and the business community through provision of an appropriate balance of land uses and built forms.

The current and proposed dominance of large block sizes close to village and bus routes is 'unbalanced'. These blocks only meet the need of persons with a love of gardens and the financial resources to keep these maintained. The cost of maintenance can become prohibitive as people fall on hard times, retire or age. Very little satisfactory alternative accommodation exists within Wentworth Falls and even less in close proximity to public transport and shops (see comments above). This will force these residents to other areas and reduce business potential in the village.

The current proposals for Wentworth Falls village appear to prohibit arcades or parking courtyards in favour of street front shops. Whilst this is a worthy aim it is difficult to know how this will work given that parking areas will be removed. Furthermore, stopping arcade development, makes no sense for a village trying to *'encourage development that is sympathetic to and complements the adjoining heritage areas* - arcades are practical (think new arcades in Leura) - provide shelter against unpleasant weather and will allow access to Plantation Street. They can be beautiful (think the Strand Arcade in Sydney)!

Item 2 (e) To identify and conserve the distinct Aboriginal and European cultural heritage of the built forms and landscapes of the Blue Mountains

The precinct objectives for Wentworth Falls village rightly aim to 'maintain the established village character'. However in practice, to maintain character requires the presence of people actively supporting the shops and sitting in cafes and restaurants. If the village cannot be supported by its local residents and tourists it risks becoming just another heritage precinct that has seen better days. The provision of housing opportunities within a comfortable walking distance of the village and being able to develop boutique accommodation facilities (perhaps with 10-20 guests) is what the tourist market now demands. Wentworth Falls has a large number of large character buildings (that may not be heritage listed) on large blocks that could form the basis of a boutique tourist facility or provide opportunities for closer development.

A successful commercial village will also encourage developers to spend more money creating attractive new shops to replace the existing unsympathetic buildings that were constructed in the 1970s and 1980s

1.2 (g) To prescribe limits to urban development having regard to impacts of development on the natural environment, capacity and management of infrastructure.

By not providing adequate provision for medium density living in close proximity to the village without having to cross or walk adjacent to the noisy Great Western Highway the DLEP is encouraging the use of cars instead of walking and public transport. This is not a sustainable policy environmentally, socially or economically.

j) To promote provision of accessible, diverse and affordable housing options to cater for the changing housing needs of the community

As described above the current land zonings and large block size requirements that dominate the useable residential land close to the village do **little** to promote accessible, diverse or affordable housing options. The likely impact of the existing and proposed draft LEP is to force new developments away from established residential areas, because of limited subdivision of 1200 sq metre blocks, to more peripheral areas which are fire prone and lack infrastructure.

l) To provide sustainable employment opportunities and strengthen the local economic base encouraging a range of enterprises including tourism that respond to lifestyle choices emerging markets and changes in technology

The Draft LEP for Wentworth Falls does nothing to strengthen the economic base of Wentworth Falls. In fact it is likely to result in further deterioration of village shops by indirectly encouraging

future residents to take to their cars to bigger centres in the mountains. As far as we can see the zonings essentially maintain the poor planning decisions that were made in earlier times. There is no indication that emerging markets have been considered!

Fresh thinking is required that should include denser development within an attractive walk or bus/train ride to the village and the encouragement of boutique tourist facilities. Issues such as where cars can be parked in the village once the parking bays go need to be resolved. There is nothing wrong with arcades – although we acknowledge there have been poor developments in the past.

Why must B and Bs only be 6 persons or 3 rooms? Some existing houses are very large and on large blocks? Why for example aren't the numbers consistent to that proposed for unregulated holiday lets that allow 8 people? The LEP must allow for unique circumstances –which are many in the Blue Mountains. Tourism and hospitality provide employment particularly casual and unskilled jobs – hence these low impact developments should be encouraged without having to comply with arbitrarily set numbers or 'owner only' operation restrictions.

o) To integrate development with transport systems and promote safe and sustainable access opportunities, including public transport initiatives, walking and cycling.

The proposals for Wentworth Falls village do not achieve this. Large block development close to villages ensures most people have to use their cars. The pathways between seniors development areas and the village are unsafe. Proposed medium density blocks are further from the village via relatively unattractive walking paths than the restrictive R6 land zonings.

In conclusion, the Draft LEP does not promote sustainability of environmental outcomes, social outcomes or economic outcomes.

The Chamber recommends that the exemptions to the Standard Instrument that the Council has applied for be denied as this Draft LEP is far too restrictive in the promotion of business and tourist developments and is found not to comply with sustainability principles.