

WENTWORTH FALLS
Chamber of Commerce and Community (Inc.)

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DRAFT LOCAL STRATEGIC PLANNING STATEMENT SUBMISSION

- **The aims set out in this document are:**
 - **Sustainable Living and enhancement and revitalized town centres providing greater housing choice and walkability.**

Blue Mountains 2040: Living Sustainably Draft Local Strategic Planning Statement does not address these aims.

The fact that in BMCC LGA, 92% of housing consists of detached dwellings on large block sizes which is sustained by LEP 2015 exacerbates this situation.

LEP 2015

- 1) Ignores aged and affordable housing
- 2) Ignores concentration of population with walking distance of towns and villages to support local businesses with 1200m² blocks to the edge of villages
- 3) prohibiting infill development with 1200m² block sizes and promoting development of peripheral blocks
- 4) ignores the consolidation of urban areas utilising existing infrastructure

Revitalisation of town centres will not in itself achieve these aims. Nor indeed will the availability of secondary dwellings in R2 zones.

Without significant changes to land use zones abutting the towns and villages to expand R3 medium density to areas within 800 metres of the town and village centres, there can be no assurance that the aged can age within their communities and that the less fortunate socioeconomic groups can find affordable accommodation within their community.

Further, given that the major housing challenge is that (as referred to on page 21), by 2036 approximately, 1 in 4 residents will be over 65 and over 60% of households will be individuals or couples living alone with no children, there can be no assurance that these people can be accommodated.

The only concession in the document to these challenges, is an inadequate response of secondary dwellings confined to 60m² in R2 zones where the primary dwelling is limited to 180m². How many R2 blocks are greenfield blocks yet to be developed? How many R2 zoned blocks already have dwellings larger than 180m² which then precludes a secondary dwelling at 60m²?

The housing study indicated that in a stratified random sample across all age groups, That 75% of respondents indicated a preference for town houses within walking distance of towns and villages across the mountains.

Where is this reflected in the document? This would at least be a start in addressing the major challenge of provision of aged and affordable housing for the future. However, LEP 2015 has limited R3 zones which are not encumbered by heritage precincts, tree

preservation orders or are in the form of community lands owned by the state or Council which stymies any such initiative of town house developments with walking distance of towns and villages.

- **As stated in the document: one of the priorities is to describe how the unique values and characteristics of the Blue Mountains will be protected, to ensure our distinctive lifestyle and sense of place is retained.**

Whilst it is important to maintain the 'character' of the mountains we should be definitive as to what this means in terms of 'sense of place'. "Character' determination is highly subjective. The urban areas of the mountains are defined by gardens and streetscapes.

In Wentworth Falls, Blaxland road residences are identified as one of these 'character' areas under R6 or Living Conservation. These are dwellings which have been built since the 1960s after the 1957 fires. They are mainly on small subdivisions. They have achieved this 'character' by gardens on small blocks and street plantings by members of the community. These are not characteristic of 'R6 Living Conservation' but maintain 'character of the mountains'. Gardens do not have to be on large blocks. A 600m² block is adequate to maintain a garden. These areas need to be facilitated by streetscape plantings and maintenance thereof on the part of the community or Council. In BMCC many residents take responsibility for the streetscape and it is these street plantings which characterise the 'character of the mountains'.

These street plantings that define the 'character' of the mountains as seen along Blaxland Road Wentworth Falls together with pockets of heritage buildings. We do not need overarching planning designating 1200m² blocks which people in the longer term cannot maintain. The character of the mountains can also be enhanced with transport corridor plantings and along tourist routes.

These 1200m² blocks limit any potential infill development close to towns and villages.

- **Providing sustainable transport and access**

LEP 2015, in which the largest residential land use category is "Living Conservation on 1200m² blocks and limits activities beyond residential" **mitigates against** the promotion of all the principles identified below:

- concentration of residential development in areas accessible to local transport nodes;
- integrating residential and non-residential land uses
- containing the extent of urban development;
- promotion of sustainable access including public transport, walking and cycling;
- and
- improving access to housing and public buildings for all people.

Furthermore, there is no evidence in the Draft Local Planning Document that identifies changes to the LEP that will achieve these outcomes.

- **The Draft Local Strategic Planning Statement identifies the following future population and housing demand trends:**

By 2036 approximately, 1 in 4 residents will be over 65

By 2036 over 60% of households will be individuals or couples living alone with no children

92% free standing houses 8% Medium density (townhouses and units)

Nowhere in the Draft Local Strategic Planning Statement is it identified how these future demands are to be met beyond reference to secondary dwellings.

Secondary dwellings are limited to R2 zones wherein the secondary dwelling is 60m². This means that on a 600m² block the main dwelling must be limited to 180m² to permit the secondary dwelling. Further, the secondary dwelling remains as part of the one title. These secondary dwellings are for rental accommodation only.

The trends identified above require a mix of mix of town house and medium density units to satisfy the demands of up to 60% of the population by 2036. Where is the evidence in the Draft Local Strategic Planning Document where demand for housing indicated in these future trends will be met?

- **Local Planning Priorities**

Short Term

Exemption from the Low-Rise Medium Density Housing Code in State Environmental Planning Policy (Exempt and Complying Codes) 2008, to ensure appropriate local stormwater management controls are maintained and continue to protect the receiving environment of the UNESCO World Heritage National Park.

This would seem inappropriate as with the use of BASIX and detention tanks required under a medium density DCP and the environmental benefits of replacement of potable water within the building and garden watering, greater sustainability could be achieved relative to R6 and R2 land use zones. Further, less discharge potentially would be released to stormwater. It is maintained that the Low-Rise Medium Density Housing Code in State Environmental Planning Policy (Exempt and Complying Codes) 2008 should be applied to assist with the achievement of housing targets and diversity associated with future trends to 2036.

Medium and Long Term

Nowhere is there mention in these planning priorities the need to alter LEP 2015 to provide for infill development within walking distance (800 metres) of the towns and villages. This is required to permit townhouse and low-rise medium density development to satisfy housing demand for the future indicated trends to 2036. This is a major failure on the part of this document as there is no possibility without such amendments to the LEP 2015 that these requirements for housing choice and affordability will be met in the short, medium and long terms.

- **incorporation of our residential character conservation zone (the Living-Conservation zone) into our Local Environmental Plan 2015.**

This is contrary to trends in population projections to 2036 and does not permit ecological, economic and socially sustainable development. The zoning should be classified as R1 under the Standard Instrument to allow greater flexibility of land use to better cater for future needs. These 'character' areas in close proximity to towns (within 800 metres) need to be rezoned R3 or R2 to facilitate the type of housing needs projected for 2036.

- **Meeting the diverse housing needs of the community**

An overemphasis on secondary dwellings and insufficient on rezoning for medium density to provide for town houses and duplexes and associated planning controls to maintain character. A process must be identified in this document to achieve these outcomes when considerable constraints exist within LEP 2015.

Note that seniors housing **must** be within walking distance of town centres. No industrial areas are in Wentworth Falls for the provision of aged housing and given the constraints imposed in the LEP 2015 are we to assume that there will be no aged housing provided in Wentworth Falls? So, how do Wentworth Falls aged residents age within their community.

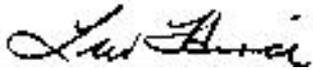
Given that we have lifts at the rail station we are eminently suited for aged access to rail facilities and ample flat land exists along railway parade, Blaxland Road and Sinclair Crescent for aged accommodation were it not for a constraining LEP. Note that housing and block sizes in these areas do not conform to Council's R6 character zones.

- **Master Plans in the Towns and Villages to satisfy future housing demands**

The sentiments expressed suggest that Master Plans will incorporate provision for future housing needs in close proximity to the towns and villages. However, there are significant constraints acting to prevent such outcomes. Notably the LEP 2015 is a significant hindrance whereby for the most part, in the case of Wentworth Falls 1200m² blocks under R6 border the business zone. Furthermore, Master Plans are confined to the business zone hence there is very limited capacity to satisfy future housing demands. Coupled with this is the fact that half the village in Wentworth Falls is a Heritage Precinct. All these constraints indicate that there will be little or no additional housing stock generated from Town and Village Master Plans.

Summary

In essence the document is limited in identifying how these future demands for housing to 2036 are to be met in the short, medium- and long-term scenarios. The LEP 2015 is a constraining factor in the achievement of the future housing demand given the population and demographic trends outlined to 2036. Unless there is a significant revision to LEP 2015 to provide greater possibilities for town house and low-rise medium density and an associated DCP to maintain 'character' there will not be the opportunity for the aged to age in their community. There will not be sufficient provision of affordable accommodation for couples, single parent families and singles. These deficiencies need to be addressed in this document if it is to achieve its stated outcomes.



Lew Hird

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