

Appendix A:

Blue Mountains City Council Submission on the Explanation of Intended Effect: Changes to create low – and mid- rise housing, NSW Department of Planning and Environment, 27 March 2024



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1 Executive summary

The blanket approach to increasing the density and height of housing across the Six Cities Region, with no regard to local context or adopted strategic planning policy, proposed in the *Explanation of Intended Effects: Changes to Create low-and mid-rise housing* (EoIE) is grossly inappropriate and would not achieve the intended outcomes in the Blue Mountains LGA. The proposed increased density in highly bushfire prone areas, can only be described as reckless in the face of widely acknowledged increased bushfire risk as a result of climate change.

Blue Mountains City Council is committed to providing locally appropriate housing and acknowledges the widespread housing crisis across NSW and indeed Australia. However, under the current proposal, the increase in housing supply that could be achieved in the Blue Mountains under the proposed changes would make a negligible contribution to the overall housing supply targets for greater Sydney. However, it would result in significant, adverse impacts from increased stormwater runoff into the World Heritage Area and Sydney's Drinking Water Catchment and detract from the heritage and character of the towns and villages that are integral to the local visitor economy. This is in addition to increasing the risk to life and property through attempts to house more people in the most bushfire location in NSW.

The Blue Mountains LGA is a unique and special part of the Greater Sydney and the wider Six Cities Region. The unique circumstances of the LGA are recognised by its designation as a Metropolitan Rural Area and Protected Area in the Greater Sydney Regional Plan. It consists of a string of small towns, villages and localities, spread along the Great Western Highway and Bells Line of Road; and surrounded by steep bushland which forms the Blue Mountains World Heritage Area. While the towns along the Great Western Highway are located on an intercity railway line, services are limited and do not provide a viable public transport option for most of the population.

The Blue Mountains is also one of, if not the most, bushfire prone areas of Australia. It is particularly concerning that there is no consideration of bushfire risk in the EoIE despite the proposal to significantly increase densities in bushfire prone areas. To house more people in areas at risk from bushfire is reckless and dangerous.

To rely on the small, scattered towns and villages of the Blue Mountains to provide the form and density of housing envisaged in the EoIE, would result in outcomes which are completely inconsistent with the aims of the EoIE document which are to provide well located housing, close to efficient public transport, employment, services and amenities. Instead, as outlined in this submission, it will create car dependent satellite commuter towns, remote from employment opportunities, shops and services.

The very climate resilience sought by the EoIE will be eroded by the increased impacts of urbanisation that would result from the indiscriminate application of the proposed changes across the Six Cities Region. In the Blue Mountains this would have specific impacts on the Sydney Water Catchment and World Heritage Area.

The value of the Blue Mountains LGA to the region lies in its natural systems, acting as the lungs and water supply catchment for the Greater Sydney Region, as well as providing unparalleled recreational opportunities. This value is recognised in the Greater Sydney Regional Plan and Western Sydney District Plan. An increase in urban density within the Blue Mountains LGA and associated reduction in pervious areas, would have significant downstream impacts for stormwater runoff into the Blue Mountains World Heritage Area and Sydney Drinking Water Catchment, a water catchment – the primary water supply for the Sydney Metropolitan Area.

The Blue Mountains LGA is not a suitable place to accommodate Sydney's population growth with its tourist based economy reliant on the natural environment and the leafy, low density and heritage character of its towns and villages, the bushfire risk which is projected to significantly increase due to climate change, and the sensitive natural environment of the Blue Mountains World Heritage area and Sydney Drinking Water Catchment.

As referenced above, Blue Mountains City Council is supportive of the need to increase housing availability across the Greater Sydney Region in an appropriate way, and is committed to meeting its housing targets. Council's current housing targets (approved by the Department) are based on the accommodation of local growth, while protecting this unique and sensitive environment for the benefit of all. Council is also exploring options for increasing affordable housing and is open to working to explore additional housing options outside of the EoIE framework, using its longstanding fine grained strategic planning approach, to ensure new development is suitable to the sensitive environment, bushfire risk, tourist based economy and infrastructure limitations which exist in the Blue Mountains LGA.

There must be greater consideration of the unique characteristics of a locality, rather than applying a one size fits all planning approach to the entire Six Cities Region. The EoIE and subsequent information sessions run by the Department, suggest that heritage, environmental, and natural disaster impacts will continue to be considered because local controls will continue to apply. This suggestion fails to acknowledge that these issues need to be considered at the strategic planning stage. Local controls will not be able to address issue arising from development at a significantly greater scale and density than is appropriate for an area. To suggest that issues normally dealt with at the planning proposal (strategic stage) will now be dealt with at development assessment is not reasonable. This is not the place to consider fundamental strategic planning issue that will create uncertainty and angst for applicants and the community. This goes against established town planning principles. There are many alternate options which could be explored at the local and regional level to address housing supply, and we ask that the state government genuinely engage with local government to collaborate on these solutions.

The assumptions on which the EoIE is based apply to metropolitan Sydney, not the Blue Mountains LGA, and proceeding as proposed in the EoIE, risks not only the safety and wellbeing of local residents, but the water security and environmental health of the entire Sydney Metropolitan Area; as well as threatening the international tourist market that is the Blue Mountains. In the Blue Mountains LGA, the level of environmental, economic and social impact of this one size fits all mandated changes, greatly outweighs the extent to which the LGA can contribute to Sydney's Housing Growth.

1.1 Key recommendations and response to proposal

Council submits that as a City within a World Heritage, with the unique characteristics outlined in this submission, particularly the high bushfire risk, that the proposed housing changes in the EoIE are completely inappropriate and should not apply to the Blue Mountains. The application of the proposed reforms need to be refined and tightened to only apply where intended, in well located metropolitan areas.

Individual recommendations are included against each section of the EoIE, and in summary, Council recommends that:

- The specific constraints and values of individual centres and localities be taken into consideration. In particular that due strategic consideration be given to natural disaster risk such as bushfire, and that those areas subject to these risks be excluded from the application of blanket uplift and density increase as currently proposed in the EoIE.
- A more targeted application of the *Station and Town Centre Precincts* definition to identify metropolitan locations as the focus of the EoIE provisions. A streamlined definition clearly excluding E2 and E1 zones in Metropolitan Rural Areas and train stations exclusively served by intercity lines.
- The proposed changes to Dual Occupancy densities across in R2 Low Density Residential zones should only be applied to metropolitan Sydney, excluding areas within the Metropolitan Rural Area and/or where there would be significant environmental impact or increased risk from natural disaster. Specifically, that the Blue Mountains be excluded from the application of these changes in acknowledgement of the impact of the sensitive World Heritage National Park receiving environment and the increased densification in areas at risk from bushfire that would result from the proposed changes.
- In addition to the recommended changes to the proposal, Council also requests that the draft SEPP to enact the EoIE be publicly exhibited before being made, to give Councils and the community the opportunity to comment on the detailed legislation and changes made in response to the current public exhibition.

2 Fundamental Concerns

2.1 Disconnect between stated intent of the EoIE and potential outcomes in the Blue Mountains

The documents underpinning the EoIE promote increasing development in places where people want to live, close to services and employment and connected by great public transport. These underpinning assumptions relate to inner metropolitan areas which are markedly different to the Blue Mountains LGA. As summarised below, the stated intent of the housing changes would not be achieved in the Blue Mountains and would result in outcomes contrary to the stated intent, creating dormitory suburbs with substantial bushfire risk and adverse environmental impacts.

Stated intent of EoIE and Underpinning Documents	Reality of proposal for Blue Mountains
Respond to housing crisis	<p>There is no social or affordable housing component in the proposal.</p> <p>The additional height and floor space will only increase development and land speculation, not affordability.</p>
Development 5-10km of Sydney CBD; not urban fringe	<p>The Blue Mountains is located outside of metropolitan Sydney beyond the urban fringe, designated as Metropolitan Rural Area (MRA) in the Western Parkland City District Plan.</p>
Located near public transport, employment and services	<p>Blue Mountains villages are only served by hourly train services on an intercity line with limited alternative public transport</p> <p>High level of car dependency due to small villages with dispersed settlement and service pattern and to limited public transport.</p>
Lower Infrastructure costs	<p>Current infrastructure is inadequate for increased density.</p> <p>The proposal in the EoIE to disperse development across a broad area means that adequate infrastructure will not be able to be planned or funded.</p> <p>Higher infrastructure costs at urban fringe and beyond.</p>
Climate Resilient Communities	<p>Increasing densities in area of highest bushfire risk in Sydney</p> <p>Increased stormwater runoff to Sydney Drinking Water Catchment and World Heritage Area</p> <p>Impacting climate resilience</p> <p>Increasing car dependency by increasing densities in areas within infrequent public transport service</p>

2.2 Disregard for local strategic context

There is no strategic justification presented for the changes proposed in the EoIE. The current housing crisis and need for increased housing supply is acknowledged, and Blue Mountains City Council is open to participating in a solution which appropriately considers the local context. However, the proposed reforms do not reference current approved housing targets, where these are being achieved, and where supply can and should be increased in a strategic manner to respond to identified need.

As outlined in the previous section, there is no affordable or social housing component within the proposed reforms, or even consideration of a contribution toward the future supply of affordable or social housing in the proposed changes. The proposal will result in uplift to the value of land, fuelling land speculation and increasing development potential without improving housing affordability.

The blanket changes do not respond to adopted strategic direction at a State or Local level, and as presented in the following sections are inconsistent with, and undermine, robust place based strategic planning developed in collaboration between levels of Government in consultation with the community.

2.2.1 Regional and Subregional planning context- Metropolitan Rural Areas classification

The Greater Sydney Region Plan and Western City District Plan recognise the important and different role areas like the Blue Mountains play for Greater Sydney. This is captured by the Metropolitan Rural Area classification under the Greater Sydney Region Plan. In the case of the Blue Mountains, maintaining and managing the impacts of urban development on biodiversity and environmentally sensitive areas is vital to providing a drinking water supply for the population of Sydney, and recreation space that serves Greater Sydney.

That Greater Sydney Region Plan states that:

- *Urban development is not consistent with the values of the Metropolitan Rural Area.*
- *Greater Sydney has sufficient land to deliver its housing needs within the current boundary of the Urban Area, including existing Growth Areas and urban investigation areas associated with the development of the Western Sydney Airport (refer to Figure 51). This eliminates the need for the Urban Area to expand into the Metropolitan Rural Area.*
- *Restricting urban development in the Metropolitan Rural Area will help manage its environmental, social and economic values, help to reduce land speculation, and increase biodiversity from offsets in Growth Areas and existing urban areas.*
- *While from time to time there may be need for additional land for urban development, future regional plans will identify if additional areas of land in the Metropolitan Rural Area are needed.*

The recognition that Greater Sydney's growth should not be accommodated in Metropolitan Rural Areas, and specifically the Blue Mountains is a longstanding principle, predating the Greater Sydney Plan by over 20 years. Such an approach was expressed in correspondence from the Department to Council of 30 December 1999, in which the Director of Sydney Region West stated that:

My view is that the Blue Mountains is a unique local government area with sensitive areas of environmental significance and on the fringe of the Sydney metropolitan area. It therefore should not be expected to accommodate metropolitan growth pressures. Planning for the area should have regard to the housing requirements of the population of the Mountains and provide as far as possible for this, having regard to the area's environmental limitations.

The underpinning documentation on which the changes proposed in the EoIE are based, all identify that housing growth can be and should be achieved in inner to middle ring areas, close to jobs, services and transport, and explicitly seek to avoid development on the fringe areas and beyond. There have been no strategic studies that have identified that urban growth needs to extend beyond the urban area into Metropolitan Rural Areas on the fringes of Metropolitan Sydney.

The comparatively small contribution the small towns and villages of the Blue Mountains LGA could make to solving Sydney's housing crisis are far outweighed by the disadvantages of its high bushfire risk, remote location from jobs and services, its poor public transport options, high infrastructure costs and the impact of the proposal on the Blue Mountains World Heritage Area and Sydney Drinking Water Catchment, as well as the adverse impacts on the tourist economy.

Similarly, other Metropolitan Rural Areas make unique and important contributions to the health and economy of the wider region, and quite rightly contribute little to housing supply. These benefits should not be overlooked by the broad brushed approach of Sydney Metropolitan focused planning strategies being applied such areas.

Recommendation: The proposed changes in the EoIE should not apply beyond metropolitan areas and large regional cities. Its application should be excluded in designated Metropolitan Rural Areas.

2.2.2 Blue Mountains Local planning context

Planning for population growth and infrastructure in the Blue Mountains is unlike other areas within the Six Cities Region. Our unique location in a World Heritage National Park carries significant stewardship responsibilities, resulting in land use constraints and limits on population growth, which are incorporated into Council's local planning controls – and are also recognised in the Greater Sydney Regional Plan.

World Heritage Area

The local planning framework in the Blue Mountains is underpinned by our outstanding natural setting and context, as one of only two cities in the world located within a World Heritage Area. With this unique context comes a stewardship responsibility to manage the impacts of the urban environment on the World Heritage Area. The commitment to ensuring management of stormwater runoff and potential environmental impacts was integral to the World Heritage Listing.

Place based planning approach

The Blue Mountains local policy context is supported by decades of fine-grained spatial planning. This framework has been tested and reinforced over many years, most recently through the Local Strategic Planning Statement – *Blue Mountains 2040 Living Sustainably*, aligned with the themes and priority actions of the Western City District Plan and Greater Sydney Regional Plan.

Our location on the edge of the largest metropolitan city in Australia and our role as an international visitor destination, have significant implications. This is recognised in Council's Local Strategic Planning Statement, which acknowledges the economic role of tourism in the future of the Blue Mountains. This statement places particular emphasis on the need for sustainable destination management and the associated infrastructure needs within the city.

The Blue Mountains Local Environmental Plan (LEP) 2015 as the principal local planning document in the Blue Mountains, built upon the long held planning framework of the preceding LEP 1991 and the place-based framework within LEP 2005. This is all underpinned by Management Plan 2002 (EMP

2002) that was the basis of LEP 2005. Supported by strong underlying physical constraints mapping including vegetation, creek locations and slope, this extensive body of work established key planning principles that continue to apply through Council's Local Strategic Planning Statement.

Constraints based approach to planning and land use zoning

The planning framework of the Blue Mountains is based on extensive mapping of underlying constraints. This constraint mapping informs land use zoning and protected areas in Local Environmental Plan (LEP) 2015. Some of the key constraints are bushfire, significant vegetation, riparian lands connecting urban areas to the Blue Mountains World Heritage Area, and steep slopes.

Constraints mapping is overlaid to inform land use zoning. Based on constraints, those areas unsuitable for development have been established. Suitable zoning of the remaining land was then determined and also the fine grained development standards applied on a place based basis across the LGA.

2.3 Unsuitability of the Blue Mountains for substantial uplift

Blue Mountains Council has a comprehensive and established fine grained set of planning controls, based on long term strategic studies, which respond to the significant constraints in the locality as well as its unique world heritage surrounds and tourism based economy.

Council is meeting its State agreed housing targets approved through the Local Housing Strategy and remains committed to providing sufficient housing diversity and affordable housing to meet the needs of the local population. This approach was endorsed by the State Government through Local Strategic Planning Statements.

The one size fits all approach proposed in the EoIE, with no strategic underpinning, abandons this detailed and well researched planning regime. It will result in development of a scale completely incompatible with the unique and sensitive nature of the Blue Mountains LGA, and create impacts which are vastly disproportionate to any potential contribution to Sydney's Housing supply.

The following sections outline the particular impacts to the Blue Mountains, which demonstrate the unsuitability of such significant, blanket increases in density.

2.3.1 Bushfire Risk

The broad brush changes to permissibility, height and density proposed under the EoIE bypass the usual checks and balances which are fundamental to strategic land use planning at a local level. These include the Ministerial direction on bushfire risk, and the provisions of *Planning for Bush Fire Protection 2019* (PBP 2019) which require consideration of bush fire risk up front as part of any strategic planning proposal by Local Government.

Cumulative Impact

The bushfire risk has not lessened despite the State government planning to override local controls, and nor should the responsibility to adequately assess bushfire risk as part of any decision-making process to apply such widespread strategic planning changes.

Every bushfire inquiry in the last 20 years has identified the importance of considering bushfire risk in strategic land use planning schemes and processes. Recommendation 19.3 – of the 2020 Commonwealth Royal Commission into National Disaster Arrangements was titled *Mandatory consideration of natural disaster risk in land use planning* and recommended that:

State, territory and local governments should be required to consider present and future natural disaster risk when making land-use planning decisions for new developments.

Recommendation 27 of the NSW Bushfire Inquiry into the 2019-2020 Bushfires was:

That Government commit to shifting to a strategic approach to planning for bush fire and develop a new NSW Bush Fire Policy similar to the NSW Flood Prone Land Policy in order to accommodate changing climate conditions and the increasing likelihood of catastrophic bush fire conditions; to build greater resilience into both existing and future communities; and to decrease costs associated with recovery and rebuilding.

The key message has been not to put more people in areas at high bushfire risk. Yet the EoIE ignores such key findings, introducing planning controls to facilitate widespread population increases, without any detailed consideration of risk as outlined below.

It is essential that the cumulative impact of proposed widespread increases in population density be properly considered with regard to risk to life arising from limited evacuation routes in the Blue Mountains, the extent of current and future bushfire impacts on areas where increased density is proposed, the availability of firefighting water supply, additional construction costs arising from bushfire requirements (further reducing affordability), and the potential for widespread displacement of larger communities following catastrophic bushfire impact.

Overriding Local Planning Controls

Blue Mountains current planning controls have been carefully developed in response to the local environmental conditions. They take into account the bushfire risk to communities, allowing for forms of development and a level of population density suitable for a setting characterised by ridge top development in small, isolated towns and villages, all of which are surrounded by bushland. The view of the Department, expressed in various media releases, that bushfire risk does not have to be considered at this stage as local planning controls will continue to apply to developments; is at best an over-simplification of the process and is simply untrue for the Blue Mountains LGA. As detailed, key local planning controls respond to the bush fire prone nature of the LGA, including permissibility, height, lot sizes and building density. These are the controls that will be overridden and will not continue to apply under the proposal in the EoIE.

Further, while PBP 2019 might apply on a case by case basis to development applications, its provisions don't take into account the cumulative impact of multiple developments on water supply, emergency evacuation, firefighting access to narrow spine road developments, or the impact of climate change. For example, the current bushfire prone land designations only apply to areas within 100m of the bush. It is recognised that even under current modelled bushfire conditions, ember attack may be experienced well beyond this distance, and buildings destroyed 350 metres away from the bush. With the Blue Mountains linear development pattern, there are few places that are not within 350m of bushland and at risk under current conditions, at distances where bushfire planning controls do not currently apply.

Lack of Evacuation Routes

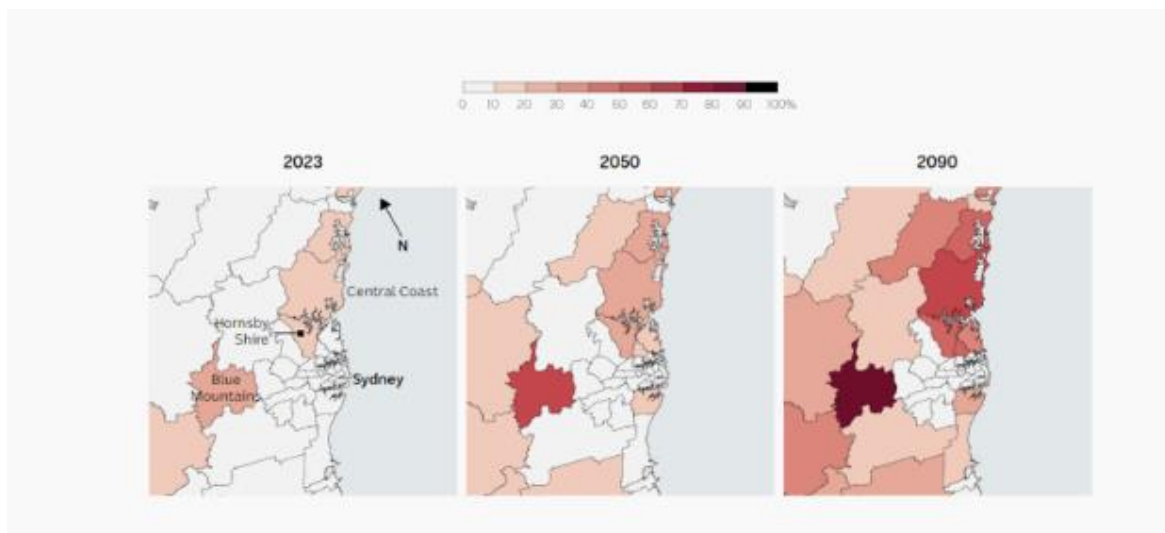
A critical bushfire consideration at strategic planning stage is the ability of residents to evacuate safely during a bushfire emergency. The Blue Mountains LGA consists of a series of isolated ridge top towns and villages, surrounded by bushland. Development has spread on narrow spine roads out from the highway and railway lines, and from most locations the only safe evacuation route is to return the Great Western Highway. As is frequently demonstrated, it only takes one accident in the wrong

location to block the highway in both directions, potentially blocking the only escape route for visitors and residents alike as there are stretches of the Great Western Highway where there is no alternate back road route.

The increase in population resulting from proposals contained in the EoIE (both within a *Station or Town Centre Precinct*, or in remaining R2 areas through the proposed dual occupancy controls) would exacerbate evacuation difficulties. Such a high level of potential risk needs to be fully investigated as part of any changes to the scale and density of development in high-risk areas such as the Blue Mountains. The risks are from cumulative impacts and cannot be adequately assessed on a case-by-case basis at DA stage.

Responding to Climate Change

The impacts of climate change, predicted to result in more frequent and extreme fire behaviour must be considered. One such estimate, provided from the National Bushfire Resilience Rating app, launched in October 2023, shows an increase in properties in the Blue Mountains LGA at high bush fire risk increasing from 26% today, to 60-70% by 2050 and nearly 90% in 2090, as illustrated in the diagram below.



Source: Finity Consulting Modelling in ABC news report of 23/10/2023

It is notable in the above figure, that the areas which the EoIE identifies as the target for increasing population – namely the inner and middle ring suburbs around the Sydney CBD- are those areas not identified as being at bushfire risk either now or in the future. This simple illustration provides an obvious example of the need for strategic consideration before applying such significant housing changes, to ensure local environmental conditions are appropriately assessed.

Increasing population in the Blue Mountains LGA, without considering this risk is contrary to every principle of public safety and good planning. Recent catastrophic fires have shown the potential for large areas and whole communities to be impacted by fire resulting in large scale displacement and rebuild. The potential scale of such impacts would only be increased by the proposal to increase densities within bushfire prone areas.

Impact on Affordability (Lack of Infrastructure Cost Savings)

The Department’s supporting documentation identifies a range of infrastructure cost savings by increasing urban density in the inner-middle ring. This does not hold true in the Blue Mountains.

Bushfire construction standards can result in construction costs of up to three times the price of a dwelling which is not bushfire prone, depending on the level of risk. With the expected increase in at-risk locations across the Blue Mountains LGA, real questions arise about the cost effectiveness of the proposed EoIE approach in the LGA, in terms of building and rebuilding after bushfires. In addition, concerns exist regarding the longer-term ability for home owners to access affordable insurance as the number of climate related events increase.

On bushfire grounds alone, the extent and location of any increase in population in the Blue Mountains LGA cannot be achieved through a one size fits all approach proposed in the EoIE.

Recommendation: Amend the proposed reforms to provide a fine grained approach based on current known housing targets, which responds to current and future bushfire risk as required by Local Planning Direction 4.3 Planning for Bushfire Protection, issued by the Minister for Planning to under section 9.1(2) of the Environmental Planning and Assessment Act 1979, in line with the findings of the 2020 Commonwealth Royal Commission into National Disaster Arrangements and the NSW Bushfire Inquiry into the 2019-2020 Bushfires.

2.3.2 Infrastructure Provision

The urban area of the Blue Mountains LGA consists of a string of 27 small towns, villages and localities mainly spread along the Great Western Highway and railway line, over a distance exceeding 100km. To accommodate the growth around railway stations and within local centres proposed in the EoIE, significant augmentation and duplication of infrastructure would be required. This would result in the Blue Mountains, an LGA with a relatively low population of 80,000 people, having to fund a greater infrastructure program than larger population inner City Councils because the proposed uplift would be spread over a much broader area due to the length of the LGA and the number small towns and villages that would be impacted, and the limited capacity of existing infrastructure.

Water, Sewer and Electricity

Urban areas of the Blue Mountains are dominated by low density residential environments, and both water and sewer services face significant limitations. For example, Sydney Water has recently advised that there are no further sewer connections available in Mount Victoria, and that other areas within the Priority Sewage Program are reaching capacity. Water supply also relies in recharging of water storage tanks servicing the existing villages. Substantial expansion of settlement would require significant augmentation of the available water storage capacity. This has implications not only for the day-to-day water supply, but for the availability of water for bushfire suppression.

The current Sydney Water development plans for both sewer and water services are focussed on metropolitan Sydney and the new airport growth areas. There are no plans to augment services within the Blue Mountains LGA.

Endeavour Energy has also recently advised of electricity supply and connection issues in the Blue Mountains, with these issues expected to arise more frequently, as much of the electricity infrastructure in the Blue Mountains overhead and aging.

Stormwater

Approximately half of the urban area within the Blue Mountains (southern side of the Great Western Highway) drains into the Sydney Drinking Water Catchment. Runoff from the City as a whole, flows into the sensitive receiving environment of the Greater Blue Mountains World Heritage National Park.

Stormwater treatment is therefore fundamental to the management of urban land within the Blue Mountains and is primarily addressed through local planning controls for on-site infiltration and treatment. The current large minimum lot sizes and lower residential densities are an important part of this strategy, allowing sufficient pervious area and stormwater treatment to minimise the impact of stormwater on the surrounding sensitive receiving environments.

The proposed significantly smaller lot sizes for dual occupancy, manor houses and terraces houses, combined with higher FSR and lower landscape standard will result in substantially less pervious area, resulting in the potential for significant adverse environmental impacts within the Blue Mountains and its receiving environments.

This is of particular concern for the dual occupancy controls with their application far beyond the station and town centre precincts. In this dispersed settlement context of the Blue Mountains, the EoIE proposal does not focus increased residential development into a few small areas but would result in increased density and stormwater impacts throughout most of the towns and villages. With such widespread potential changes, it will not be possible to fund or construct the necessary public stormwater management facilities or pay for their maintenance. The stormwater treatment works required could not be met by the current levy, which would also need to fund a significant increase in council services across the city.

Infrastructure planning

Council's long held strategic planning approach has established a hierarchy of towns and villages, which is underpinned by local statutory planning controls; providing services accordingly.

The EoIE overrides this hierarchy, allowing increased residential development in small, poorly serviced towns based solely on the presence of an intercity railway station. The current s7.12 infrastructure contributions plan focuses on the provision of community services to the towns and villages and levies 1% of development costs. This or any other current funding source, could not cater for the scale of infrastructure improvement required as a result of these reforms.

This is not an acceptable or well-considered planning approach, and we call on the Department to reconsider the blanket approach applied to these housing reforms.

Recommendation: Based on current knowledge (and no additional planned State infrastructure), there is inadequate infrastructure with the Blue Mountains to accommodate uplift beyond that already planned. Therefore, the Blue Mountains LGA must be excluded from the proposed reforms, based on the lack of capacity in available infrastructure.

2.3.3 Existing permissibility and calibrated development standards

Council has maintained a broad approach to the permissibility of Residential Flat Buildings and Shop Top Housing, both permitted in the E1 Local Centre, E2 Commercial Centre, and R1 General Residential zones. Residential Flat Buildings are also permitted in the R3 Medium Density Residential zones. However, permissibility is carefully implemented in conjunction with site specific height and density controls in a locally appropriate, place-based approach.

The proposal to uniformly apply non-refusal standards to residential flat buildings and shop top housing in all zones where they are currently permitted (within *station and town centre precincts*), or proposed to be permitted under the EoIE, disregards the finely calibrated precinct based development standards which have been put in place to facilitate these types of housing, balanced against the constraints of the local government area.

In addition to the impacts on town centre zones, the one size fits all approach assumes that there has been a uniform reason for the application of the land use zones prescribed under the Standard Instrument. In many cases, existing place-based land use zones within Blue Mountains LEP 2005 were shoe-horned into the available standard template zones and zone objectives added under LEP 2015 to ensure a locally appropriate outcome. Extensive local provisions are included in Blue Mountains LEP 2015, which work to support this.

The proposal set out within the EoIE appears to ignore these fundamentals and accepted approaches in the NSW planning system, assuming that the application of all zones across all areas within the Six Cities Region have been indiscriminately applied, without being tailored to meet local conditions. This is simply not the case.

Recommendation: The planning reforms must respond to the local application of land use zones, and the local context.

2.3.4 Environment

Council's LEP and DCP contain detailed environmental controls, which appropriately respond to the unique and environmentally sensitive location of the City of the Blue Mountains within a World Heritage Area and within the Sydney Drinking Water Catchment.

These controls work with the carefully crafted place based controls on development permissibility, and density, seeking to ensure that development does not adversely impact on the sensitive receiving environment of the Sydney Drinking Water Catchment and World Heritage Area.

The development densities proposed in the EoIE are entirely incompatible with this sensitive environment. A nebulous statement regarding the continued application of local environmental controls where not inconsistent with the proposed changes, ignores the fact that the Blue Mountains LEP firstly uses place based land use and density controls to manage environmental impact on this unique environment. The damage will already be done through non refusal standards resulting in higher density development and increased hard surfaces, leading to reduced groundwater infiltration and more polluted runoff. Council's environmental standards, requiring a neutral or beneficial impact on stormwater from development, if *inconsistent with the new provisions*, will likely not be able to be applied.

It is also unclear how the provisions of the EoIE will interact with stormwater requirements for the Sydney Drinking Water Catchment under the Biodiversity SEPP.

The Codes SEPP already allows for medium density development which bypasses the Biodiversity SEPP provisions in relation to requiring a Neutral or Beneficial Effect on stormwater runoff into the Sydney Drinking Water Catchment. The proposed changes and likely further extended use of the Codes SEPP to facilitate development, will increasingly bypass these important provisions.

As outlined above, these impacts cannot be managed by existing infrastructure. Such a dramatic increase in development potential without first understanding the environmental impacts in the unique and sensitive environment that is the Blue Mountains is unconscionable and contrary to the stated intent of the EoIE, to create climate resilient communities. This is another significant reason why the Blue Mountains LGA should be excluded from the designation of *Station and Town Centre Precincts*, and further, that the widespread dual occupancy changes in the R2 zone, as discussed further in this submission, should not occur in the Blue Mountains LGA.

2.3.4.1 *Landscape and pervious area impacts*

Of particular concern with the proposed changes under the EoIE is that the increased density is also accompanied by landscaping specifications in the form of a minimum deep soil planting 'target' and tree planting requirements. However it is not clear whether in the event of any inconsistency, the proposed deep soil planting target will replace local landscaping and pervious area controls.

Under the Blue Mountains DCP, deep soil planting areas are a subset of a broader minimum pervious area requirement. If the EoIE deep soil standards override the pervious area requirements in the DCP, there would be a significant reduction in the minimum pervious area required for these types of development, increasing stormwater runoff. Further, minimum lot sizes for subdivision of 450m² reduce the area available for treatment of stormwater within the site. For example, under Council's 40% pervious area control, and minimum lot size for dual occupancy development of 1000m², a pervious area of 450m² must be retained. At the intended minimum lot size of 450m² for dual occupancy under the EoIE, only 202m² of pervious area is required, if Council's controls are applied.

Further, if development is pursued under the Codes SEPP, the landscaped area provisions under the Code for lots ranging in area from 450m² up to 1000m² result in smaller pervious areas. For example, under the current Codes SEPP provisions for dual occupancy, 125m² of landscaped area is required, whereas Council requires 180m² of pervious area. The lot size where these requirements equalise is 1000m², which is Council's proposed minimum lot size under LEP 2015 Amendment 16A. While there are differences in definitions of pervious area, compared to landscaped area, the area available for infiltration and management of stormwater on a site is considered equivalent under each definition. Further, it is unclear whether the lower deep soil planting targets will replace the landscaped area controls in the Codes SEPP, or augment the landscaped area controls, specifying a minimum deep soil zone to be provided within the landscaped area. If they replace the landscaped area controls, there will be a further reduction in pervious area. For example, at a 450m² minimum lot size, 90m² of deep soil planting is required under the EoIE, while the Codes SEPP currently requires 125m² of landscaped area.

In addition, the landscaping standards proposed for all forms of development require applying minimum tree canopy cover targets, starting at 15% for smaller lots and increasing to 30% depending on lot size and development type. However, in bushfire prone areas, Planning for Bushfire Protection 2019 sets a maximum of 15% canopy cover for asset protection zones (inner protection areas) and this requirement is applied to the management of vegetation for all developments in bushfire prone lands. As over 40% of the potentially affected lands are currently identified as bushfire prone, the tree canopy targets set by the EoIE will not be met. More houses on smaller lots under this policy will result in the loss of even more canopy than anticipated due to the bushfire requirements requiring an APZ around each dwelling in bushfire prone lands.

2.3.5 **Heritage**

Most towns and surrounding areas in the Blue Mountains are rich in heritage, containing many heritage items and extensive heritage conservation areas. These areas have been listed for more than two decades and as outlined elsewhere in this submission, heritage items and heritage conservation areas are fundamental to the character of the Blue Mountains, and that character is a key tourist drawcard.

Council's controls balance heritage conservation with the need for future development of a scale and character compatible with the environment and risk profile of the Mountains.

The EoIE states that '*local heritage and environmental controls will continue to apply to the extent that they are not inconsistent with the new provisions*'. No detail is provided as to what this means in practice and to what extent is it envisaged that local controls would continue to apply. It is difficult to envisage how 6 storey high density development can be consistent and compatible with predominantly single story heritage items, and heritage conservation areas. This must be addressed at a strategic level and not pushed to the development assessment stage, resulting in case by case debates, creating significant uncertainty for developers and angst for the community.

Council's current planning controls have been developed strategically to work within the heritage values of the area and should not be overridden by blanket controls that create significant uplift and change in built form, with no regard to heritage or the built character of an area.

Recommendation: The proposed reforms do not apply in heritage conservation areas or to heritage items (local or state listed).

2.3.6 Impact on Visitor Economy

The Blue Mountains is a domestic and international visitor destination. This is in part due to the surrounding natural environment, but also because of the character and atmosphere of the towns and villages. Council's planning framework responds to the importance of the visitor economy, ensuring that tourism uses are facilitated, and that the qualities and character which attract visitors is maintained and enhanced.

The uplift in residential density proposed in the EoIE would impact the very character and atmosphere that attracts visitors, adversely affecting the local economy and viability of towns and villages that rely on tourist trade.

In particular, the application of the R1 General Residential Zone in Blue Mountains Council is intended to provide more than just higher density housing around urban centres. Instead, it largely replaces the previous Village Tourist Zone under LEP 2005, which allowed for the continuation of the tradition of tourist uses within residential zones that were prohibited under the standard instrument in other residential zones. In addition to tourist uses, the R1 zones in the Blue Mountains also have a significant heritage value, containing a large number of heritage listed guest houses and public buildings.

Residential flat buildings are a permitted use in the R1 zone under Blue Mountains LEP 2015, alongside a range of tourism uses. However, this permissibility works in conjunction with height, density, and precinct controls in the LEP, and DCP based pervious area and landscaping controls and precinct design requirements.

Given that the Blue Mountains LGA is linear and narrow, the majority of these areas are generally within 800m of a railway station and/or E1 zoned local centres, and therefore would be designated under the proposed reforms as *Station and Town Centre Precincts*, with non-refusal standards allowing residential flat buildings of 4-6 storeys.

Such an outcome is completely out of character with all towns and villages in the Blue Mountains, including tourist localities, surrounded by low density development and bushland. For example, below is an image of Blackheath. The proposed reforms would locate 6 storey development within at Blackheath there would be potential for 6 storey residential flat buildings to be located 700 metres from the station, isolated from the town centre by low density residential development.

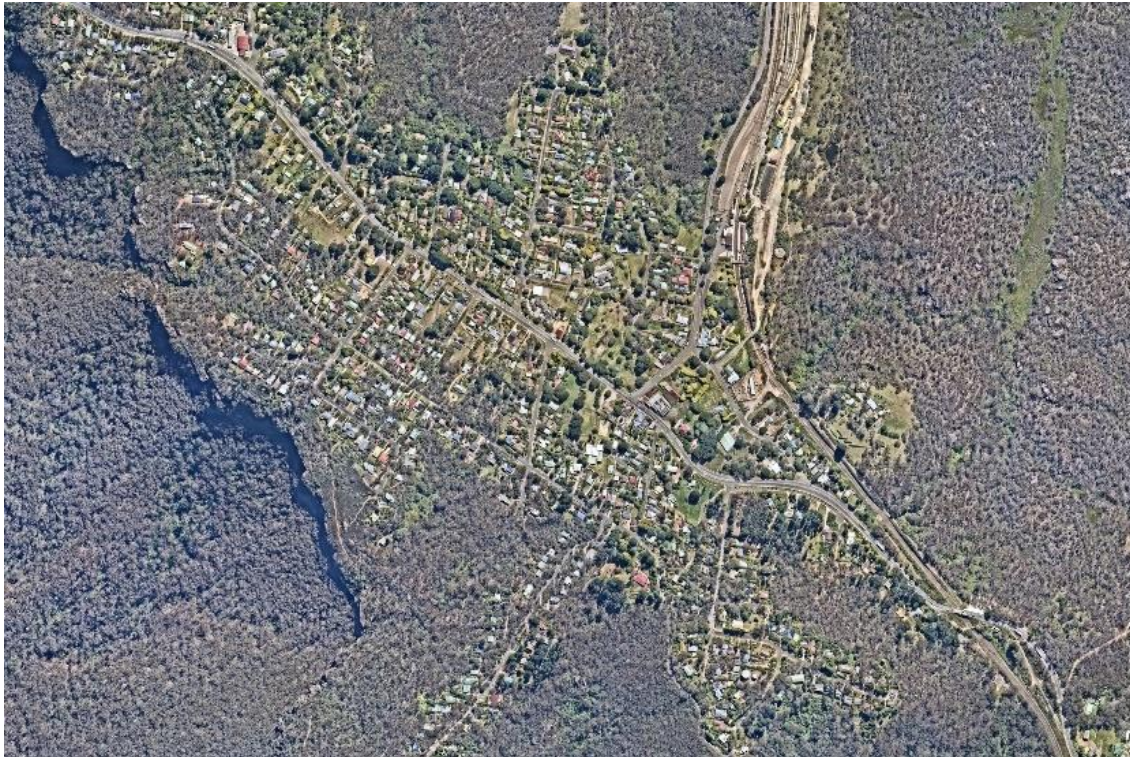


Aerial image of Blackheath



Blackheath village centre

Similarly at Mount Victoria, six storey residential flat development would be permitted in the R1 zone within 400m of the railway station. This would fundamentally and adversely alter the character of this small village, with no supporting services or infrastructure.



Aerial of Mount Victoria



Street view of Mount Victoria

These changes would not only impact village qualities and character which are central to the visitor economy but would also challenge the viability of tourism uses in a sector already challenged economically, by providing much greater floor space and height to residential development. The proposed changes applying in these areas would in effect sterilise them from future tourism uses, changing them from mixed residential and tourism precincts into straight residential precincts.

Recommendation: That the planning reforms exclude small local centres and those which primarily serve a tourist function.

3 Response to components of proposal

3.1 Station and Town Precinct Criteria

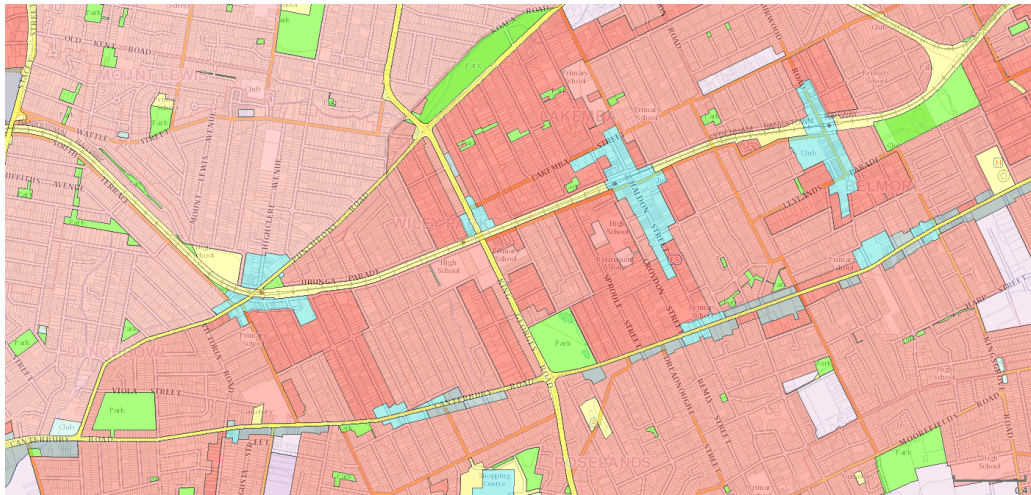
The following sections outline how the proposed criteria for designating *Station and Town Centre Precincts* around any railway station or town centres will result in entirely inappropriate outcomes within the Blue Mountains and must be reconsidered. The assumptions which guide the criteria may apply to metropolitan Sydney, but the land use zoning pattern, scale of development and availability of public transport in the Blue Mountains LGA differs greatly from these areas. These differences have been consistently recognised and understood by the Department of Planning for many decades and reinforced within the Region and District Plans and our local planning scheme, including confirmation at the state level that the entire Blue Mountains Local Government Area is designated as Metropolitan Rural Area.

It is therefore Council's position that within the sparse and dispersed settlement pattern of the Blue Mountains, the simple presence of an intercity train station, providing a one hourly service (and which may or may not be co-located with the town centre), should not trigger the designation of a *Station or Town Centre Precinct*.

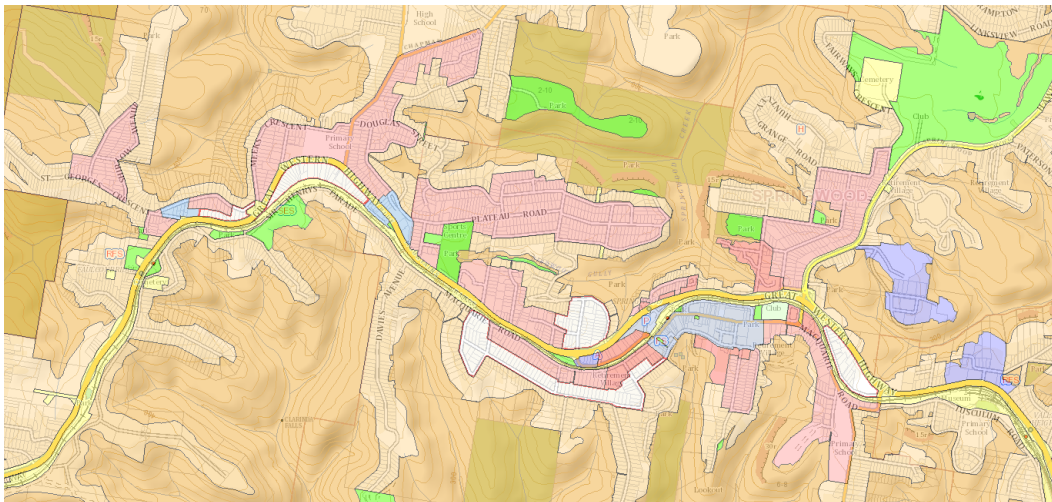
Further, the current definition of a station or town centre precinct includes any land zoned E1 or E2, without consideration of the locality or level of public transport services. While the EIoE suggests there is scope for Councils to provide feedback on whether E1 centres are suitable for inclusion, there is no such scope for reconsideration of including precincts around individual railway stations or E2 Commercial Centres on a case-by-case basis.

In areas like the Blue Mountains these zones have necessarily been applied due to the limited suite of zones available in the standard instrument, and these zones therefore apply to small village centres that are very different to town centres in metropolitan areas.

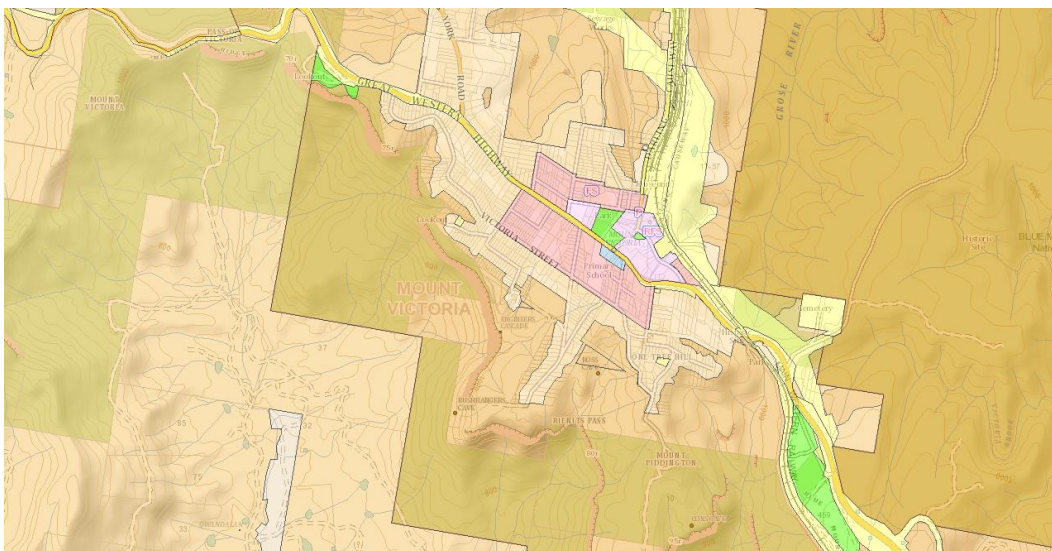
Figures 1 and 2 illustrate the significant difference in the settlement pattern of the Blue Mountains and metropolitan Sydney, comparing areas such as Belmore or Sutherland with Springwood, Mount Victoria, and Katoomba. The villages in the Blue Mountains are separated by bushland, with small centres surrounded by environmentally sensitive areas, and low-density residential zones ringing close to railway stations. This is fundamentally different to the widespread pattern of R2 and R3 land around Sydney train lines and Metro stations.



Belmore Roseland, Punchbowl and Wiley Park

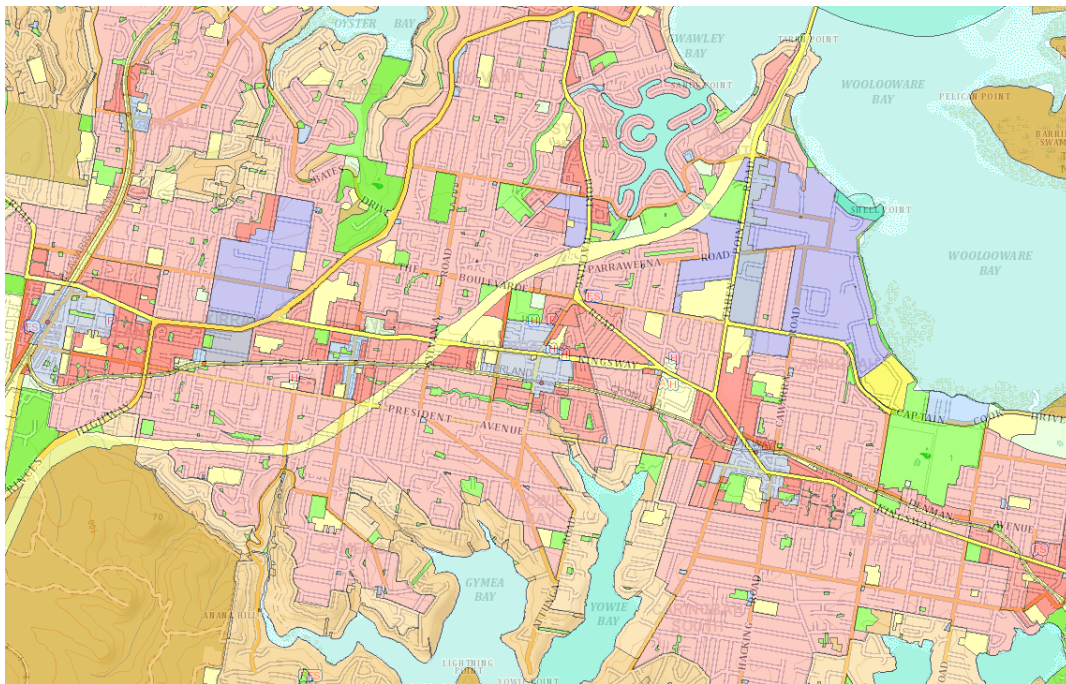


Springwood and Falconbridge

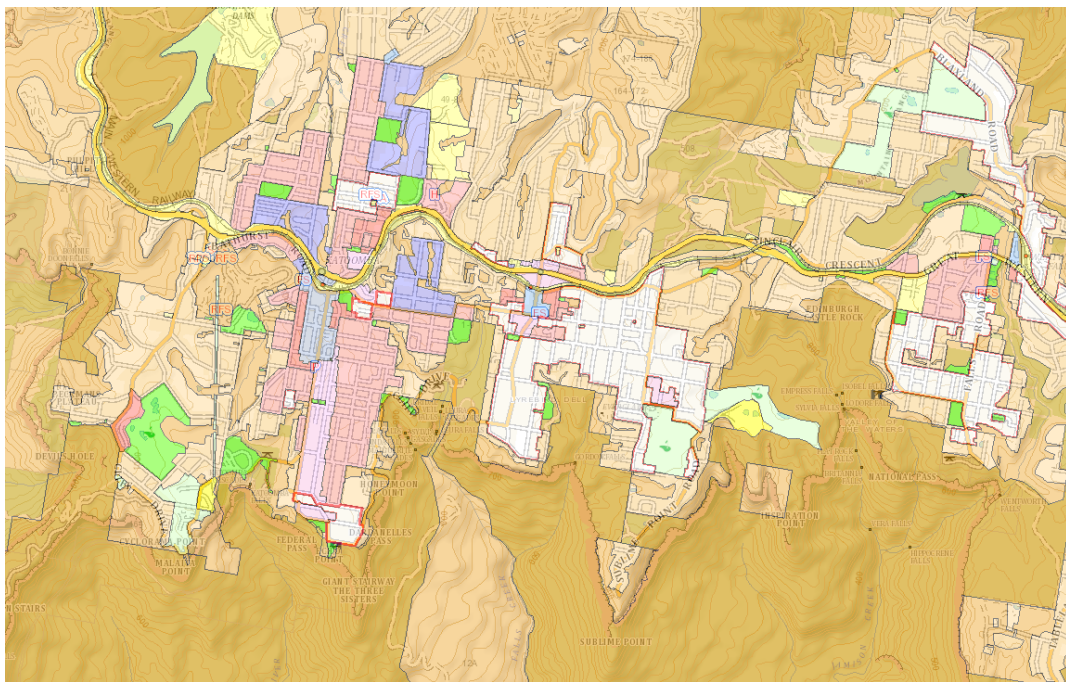


Mount Victoria

Figure 1: Comparison of land use zoning patterns of middle metropolitan location and Blue Mountains LGA



Kirrawee, Miranda and Cronulla



Katoomba, Leura and Wentworth Falls

Figure 2: Comparison of residentially zoned land use patterns in a coastal metropolitan area and Blue Mountains City Council Mountains LGA

The individual components of the proposed *Station and Town Centre* designation and their incompatibility with the Blue Mountains LGA are detailed below. Questions also arise regarding the practical application of the *station and town centre precincts*, including:

- What criteria will be used to identify properties within walking distance. For example, will walking routes which cross highways or railway lines need to measure the route to include safe crossing points such as signalised intersections and the presence of pedestrian footpaths to access stations and town centres? These are major impediments to safe pedestrian access in the Blue Mountains LGA. Is walking distance measured from the outer most point of a town centre zone?
- Will precincts be formally identified in the SEPP, and if so, who will be responsible for accurately identifying locations that are within 400 and 800m of station and town centre precincts?
- If precincts are not designated up front, how will they be identified? Will there be protracted arguments at DA stage as to whether fringe properties are in or out of the precinct, as has been the case with seniors housing provisions?

3.1.1 Designation of Railway Stations as Town and Centre Precincts

The EoIE proposes to designate *station and town centre precincts* around railway stations with even the smallest area of residentially zoned land within 800m of the station, without any regard to the service frequency or distance from services and employment of the railway station.

The EoIE assumes that the settlement near any railway station in the Six Cities Region will provide for a well connected public transport system, providing easily accessible links to existing well serviced town centres and infrastructure. However, this vision is based on a metropolitan transport network, with frequent train services. This is not the case in the Blue Mountains LGA, which is served by an intercity rail network, with a service frequency at most stations of 1 train per hour. By comparison most metropolitan heavy rail train stations have a service frequency of 1 train every 15 minutes.

In addition, the limited Blue Mountains train services are not augmented by an extensive or frequent bus service between towns and villages. For example, Winmalee which is an E1 Town Centre remote from the train station has only one to two hourly bus services as outlined previously. The limited alternative public transport to augment the infrequent train services means that the majority of residents rely on private vehicles to travel between the towns and villages to access the full range of day to day services or employment.

In terms of employment, Blue Mountains residents often travel far greater distances to work than residents of the Sydney Metropolitan Area. In the 2016 census 40.23% of Blue Mountains residents travelled over 30km to work each day, with the largest cohort (21%) travelling 50-100km to work. By comparison, in the Greater Sydney Region, only 13.43% travelled over 30km to work; with the greatest cohort (24.3%) travelling only 10-20km to work. In the Blue Mountains 86.6% of workers travelled to work in a car, compared to 79.38% for Greater Sydney (2016 census). Unlike metropolitan Sydney where bus services are more available, only 0.63% of Blue Mountains residents used a bus to get to work, while 7.36% of Greater Sydney residents used a bus, (both figures including various multi modal transport options of bus, train and car).

Many small towns served by a railway station have few local services. For example, Mount Victoria has a railway station, but few shops. In the EI zone, there is a very small general store, a taxidermist and a design studio with limited opening hours and a web-based sales focus. The tourist based R1 zone

between the town centre and station contains visitor accommodation and two coffee shops serving locals and tourists. While there is residentially zoned land within 800m walk of the train station, the limited commercial services, as well as sewer and water infrastructure limitations, and bushfire risk, make this an unsuitable location for residential development of the density and scale proposed in the EoIE.

An additional example is the township of Bullaburra, served by a train station, but with no town centre, and only a limited area of R2 zoned land which is all bush fire prone, some 700m walking distance from the train station. Evacuation from the R2 zoned land is problematic, with the train line preventing direct access to the Great Western Highway and requiring a drive through the bushfire interface to reach the egress points. The remainder of the land surrounding and immediately adjoining the train station is zoned E4 Environmental Living. Yet the presence of a train station and tiny portion of R2 zoned land, means this locality would automatically be designated a *Station and Town Precinct*.

These examples are only two of many from the Blue Mountains, of towns which have a train station, but limited residential zoned land, and small town centres that would not meet the criteria for inclusion of an E1 Local Centre as a *Station and Town Centre Precinct*. Yet the presence of a train station would automatically designate these inappropriate locations as such.

Therefore, in the Blue Mountains LGA, designating “well located stations and town centres” on the basis of a railway station alone as proposed in the EoIE, does not achieve the intent of the EoIE to provide well located housing, served by great public transport and close to services and employment, cannot be achieved at that location. To the contrary, it will result in poorly serviced dormitory suburbs adversely, inappropriately scaled for the surrounding environment.

3.1.2 E1 Town Centres

The EoIE provides for the designation of land around E1 town centres as *Station and Town Precincts*, whether or not they are associated with good public transport availability. As outlined above, no E1 Local Centres in the Blue Mountains LGA have public transport service levels anywhere near the Sydney Metropolitan standards envisaged in the EoIE.

The EoIE does provide some discretion, requiring that the E1 Local Centres provide for the full range of day to day services for residents, including full line supermarkets, cafes and restaurants, and asks Council for feedback on appropriate E1 Local Centres for inclusion.

Council has reviewed the potential designation of the *Station and Town Centre Precinct* to all E1 Town Centres. Based on this review, Council advises that none of Council’s E1 Local Centres are considered suitable, for the reasons summarised below. A more detailed assessment of the “suitability” of all centres in the Blue Mountains is attached to this submission.

Until the 2022 State government-initiated employment lands changes condensed the number of town centre zones available in a standard instrument LEP, the majority of E1 town centre settlements in the Blue Mountains were designated as Neighbourhood Centres, providing limited neighbourhood shops and facilities. The combining of local and neighbourhood centres into a single E1 Town Centre zone should be considered in the proposed changes to ensure that small neighbourhoods are not misused to create isolated pockets of density.

While now zoned E1 Town Centre, these small villages still provide a limited range and size of neighbourhood shops, which don’t sustain the needs of the population. Many are also remote from railway stations and poorly served by public transport. Further, the Great Western Highway and railway

line bisect many of these towns and villages, limiting access points to the highway during an emergency.

The larger E1 town centres such as Blackheath, Leura, Wentworth Falls and Glenbrook are also key tourist towns. They have a broader range of cafes and specialty shops, however, these larger offerings are principally focused on serving the tourist trade. None of these villages have full line supermarkets. In the 5 years prior to the Covid 19 Pandemic (2015-2019), an average of 4 million people visited the Blue Mountains each year; while the resident population has remained stable at around 79,000 residents. The mix of shops and services in these towns including cafes, restaurants, antique shops, art galleries and homewares/lifestyle shops favour the tourist market and do not provide for the range of daily goods and services of residents.

The quaint, heritage character of these tourist villages is part of the tourist attraction to the Blue Mountains, with E1 zoned land and surrounding residentially zoned fringes of these villages containing a range of heritage items in addition to complementary heritage conservation areas. These heritage values play an essential role in preserving the village character which is a key element of the tourist economy of the Blue Mountains. These villages also have significant bushfire risk and access issues, which make intensification of development to the scale proposed in the EoIE inappropriate.

The only Zone E1 Local Centre in the Blue Mountains with a full line supermarket is Winmalee, located to the north of Springwood. However, this centre is remote from public transport, located some 6.4 km from the nearest train station at Springwood. Outside of the morning peak, Winmalee is served only by an hourly bus service from Springwood. On Sundays and public holidays bus services are 2 hourly. In addition, Winmalee is an area of high bushfire risk, with a single spine road, and ridge top development surrounded by bushland. The area was heavily impacted by the 2013 bush fires which destroyed and damaged over 200 dwellings in the locality. In this isolated ridge top town there is land zoned R2 Low Density Residential within 800m of the E1 zoned land (259 lots of which 152 are bushfire prone) that would be subject to the introduction of medium density housing types under the proposed changes in addition to the increased density that would be allowed in the centre itself. This isolated bushfire prone centre is not suitable for the increase in residential population that could result from the provisions proposed in the EoIE.

3.1.3 E2 Town Centres

The EoIE designates all E2 Town Centres within the Six Cities Region as *Station and Town Centre Precincts*. No discretion is proposed in the document to review this designation.

There are three town centres zoned E2 Commercial Centre within the Blue Mountains LGA, which are Katoomba, Springwood and Blaxland. None of the towns within the Blue Mountains are designated as regional centres. The closest regional centres are Penrith or Bathurst, which are both over 100km drive for residents of the upper Mountains.

While they are the larger sized centres within the Blue Mountains, the scale and character of the three Blue Mountains E2 Commercial Centres are unlike other E2 Commercial Centres in the Sydney Metropolitan area.

Blue Mountains Council does not support the designation of any of the E2 Town Centres as *Station and Town Centre Precincts*, which would allow the proposed permissibility and non refusal standards to apply in circumstances where they are clearly inappropriate, as detailed in the following sub-sections.

3.1.3.1 Katoomba

Katoomba is the highest order centre in the Blue Mountains LGA, home to the Council Chambers, the Blue Mountains Memorial Hospital and Court House. Katoomba is also identified as a Strategic Centre under the Greater Sydney Regional Plan and Western City District Plan. The plan identifies Katoomba that is unique as a strategic centre, designated as such not because of its scale, but due to its tourist role.

Katoomba is the premier tourist destination in the Blue Mountains, attracting international tourists as well as visitors from the Sydney Region and Australia wide. Its heritage character is a key component of the tourist experience and associated economic vitality of the town. Development densities and heights have been carefully considered to retain the character of the locality, both within the town centre and along the key tourist routes to the southern escarpment, where a mix of low density residential development and tourist accommodation prevails, ensuring that development does not detract from the surrounding natural environment or heritage character of the town. In the case of Katoomba, preservation of the character of the locality is essential to the economic prosperity of this tourist oriented town.

Council's recently adopted Katoomba Masterplan and Affordable Housing review have identified precincts for further investigation for the provision of additional housing within the E2 and R3 zones adjoining the town centre, however, for the reasons outlined above, realisation of this potential requires careful site specific planning, rather than the arbitrary application of the proposed *Station and Town Centre Precinct* provisions. Of critical concern is the potential for uplift to be achieved via the Codes SEPP for townhouses, manor houses and dual occupancy, overriding Councils economically justified character controls and environmental controls such as stormwater detention and treatment. Stormwater from Katoomba flows directly into the World Heritage Area and the Sydney Drinking Water Catchment.

In addition, the wider residential area and fringes of the Katoomba township are bushfire prone and subject to heavy tourist visitation and associated traffic, particularly over the summer months when both tourist visitation and bushfire season coincides. Access to and from Katoomba Town Centre is problematic, with the railway line inhibiting access and traffic flows favouring highway traffic. At peak tourist visitation times, long delays are experienced entering and leaving the town centre. While in the longer term, options are being pursued to improve this situation, both current and future transport links are based on serving the current projected resident population and tourists; not the higher residential densities and populations proposed under the EoIE.

No part of the Katoomba Town Centre is further than 350 metres from land currently identified as bushfire prone land, which is the accepted distance within which properties would be impacted from ember attack from a bushfire.

Assessing and addressing the cumulative impact of increased development potential on the bushfire risk, including evacuation of residents and visitors from Katoomba is essential before such a widespread increase in housing density is applied. A strategic bushfire assessment, a requirement under Planning for Bushfire Protection, was undertaken as part of the Katoomba Masterplan. No such strategic bushfire assessment or even cursory consideration of bushfire risk has been done as part of the proposed changes. Automatic designation of Katoomba as a *Station and Town Centre Precinct* and application of the proposed permissibility and non refusible development standards, and increase population density, without consideration of the life safety, economic and environmental effects on this iconic tourist town is completely inappropriate.

3.1.3.2 Springwood

Springwood Town Centre is zoned E2 Commercial Centre and under the EoIE proposal would automatically be designated as a *Station and Town Centre Precinct*. Although zoning permits it, the town does not currently have a full line supermarket. The E2 town centre is primarily located to the south of the railway line, with a small extension north of the railway station largely occupied by railway parking.

Bushfire prone land currently encroaches into the town centre to the southern side of Macquarie Road from adjacent bushland reserves and from the north into the railway station commuter carpark. The R2 and R3 zoned land adjoining the southern and northern sides of the town centre also adjoins bushland and is bushfire prone. Only a small area of residential land to the west of the town, bisected by the railway line and highway, plus a small portion of George Street to the north east, being located outside of the bushfire prone land, but overall, 94% of R3 zoned land and 63% of the R2 zoned within 800m of the town centre is bushfire prone.

In addition, access to Winmalee is gained via Springwood Town Centre, causing traffic congestion along the Great Western Highway in the afternoon peak period. The RMS has advised that this traffic is already impacting the flow of the Great Western Highway. Additional car dependent development as would result from the proposals in the EoIE will only add to this problem.

Further, for the reasons outlined above, the capacity of this town centre and surrounding Residential zones to accommodate the extent of uplift envisaged under the EoIE is considered unacceptable in such a fire prone location, which is also a key link in the evacuation routes from Winmalee and the surrounding areas. The proximity of this locality to bushland areas, and the resultant environmental impact of increased density and impervious areas also needs further investigation as outlined in the infrastructure section, prior to any planning decision to increase residential development capacity.

3.1.3.3 Blaxland Town Centre

Blaxland is the other town centre located within the E2 Commercial Centre zone. The town centre currently has a large, but not full line supermarket and a range of specialty shops. LEP 2015 does not currently permit a full line supermarket in Blaxland.

The Blaxland town centre is the subject of a master plan adopted in 2018, which is currently under review. The Masterplan review has identified potential for increased height and density in the E2 zone, however not to the extent proposed in the EoIE.

The residential areas to the south of the E2 zone and railway station include R3 and R2 zoned land, which directly adjoins bushland and is bushfire prone. A small portion of the western side of the E2 zone and part of Hope Street within that zone is also identified as bushfire prone, making increased residential development on the southern and western side of the town centre undesirable and impractical given the setback requirements applicable to such developments under Planning for Bushfire Protection 2019. Areas to the east and north east of the town centre are zoned R3 and R2 and located outside of bushfire prone land. However, the railway line presents a barrier to evacuation of this area, which also delivers traffic into Blaxland from East Blaxland, Mount Riverview and Penrith and is a major evacuation route.

While there is some potential for increased residential density in this centre associated with the delivery of public benefit and infrastructure upgrades, as proposed through the Blaxland Masterplan, once again, the sensitive surrounding environment, bushfire and evacuation risk, as well as infrastructure capacity considerations, mean that the significant blanket uplift proposed under the one size fits all approach of EoIE is inappropriate.

3.1.4 Proposed new station and town centre precinct definition

To address the issues identified above, it is proposed that a revised definition is provided for the town centre and station precincts that appropriately captures the nuance in how standardised planning controls are utilised and the capacity for growth across the Six Cities.

An alternative definition would include parameters for suburbs within the Six Cities that would be excluded from the Station and town centre precincts based on availability of service, infrastructure provisions and environmental constraints. The following definition is provided as an example.

- Within the Six Cities Region excluding suburbs constrained by the following factors
 - Served only by intercity train services; or
 - Limited access to frequently needed goods and services; or
 - Adjoining or within a national park; or
 - High proportion of bushfire prone land and bushland interface; or
 - Limited infrastructure including no planned improvements to Sydney water services; or
 - Located within a drinking water catchment.

Under these new proposed definitions, it is clear that no location train station, E1 zone or E2 zone within the Blue Mountains could be considered as an appropriate location for provisions associated with the station and town centre precincts. The EoIE definition takes a reductive approach to planning controls by broadly asserting that all train stations E1 and E2 zones are well located areas, close to services and public transport. Refining the definition to clearly exclude E2 and E1 zones in Metropolitan Rural Areas and train stations exclusively served by intercity lines would ensure that the intent of the document is achieved appropriately.

3.2 Dual Occupancy Provisions of the EoIE

Significant concern is raised with the other aspect of the proposed changes to expand the permissibility of dual occupancies through reduced minimum lot sizes, and to increase dual occupancy floor space and height across all R2 Low Density Residential areas throughout Greater Sydney (or potentially the Six Cities Region as quoted at the 31 January 2024 Department Webinar).

These proposed changes again fail to consider bushfire risk or take into account the impacts on tree canopy and pervious area, which has the particular impact in the Blue Mountains of increasing stormwater runoff into the World Heritage Area and Sydney's Drinking Water Catchment.

The proposed changes will not deliver housing diversity as they allow for larger dual occupancies. This simply allows for more large houses, just on smaller lots. This fails to improve housing choice or affordability, at the expense of the environmental impacts and without concern for the potential increased population in bushfire prone areas. The proposed increase in dual occupancy size and density are not appropriate in the Blue Mountains

The Blue Mountains LEP 2015 permits dual occupancy development in the following zones:

- R1 General Residential
- R2 Low Density Residential
- R3 Medium Density Residential
- Zone E1 Local Centre
- Zone E2 Commercial Centre
- Some E4 General Industrial Zones, that were our former Light Industry zones (which contain a mix of residential and light industrial uses), as an additional permitted use.

In addition to permissibility, Council has employed a fine grained approach to the establishment of planning controls, height and FSR controls varying across the LGA, based on an assessment of the character and land use patterns of the location, the bushfire risk, environmental and heritage qualities of the area. These controls extend to the consideration of appropriate development standards for dual occupancy in the Blue Mountains.

Minimum lot sizes are also carefully calibrated to ensure, that population density is appropriate to the bushfire risk and that stormwater impacts can be managed on site, as well as achieving the other key planning principles outlined previously in this document. A minimum lot size for dual occupancy development of 1000m² is proposed as part of draft LEP 2015 Amendment 16A to allow for reasonable development potential while addressing these key considerations.

However, the proposed changes detailed in the EoIE would override this proposed provision, reducing the minimum lot size for a dual occupancy development to 450m² in any location. The fine grained FSR and height controls would also be set aside, allowing a density and height of development that is completely out of character with the lower density surrounds. The statement in the EoIE, that the proposed standards can fit within the character of existing low density area, may apply to Sydney Metropolitan localities, but is an incorrect assumption in the Blue Mountains LGA. The lower density character of its residential areas is not just a community preference, but an essential component in managing the adverse impacts of development on the surrounding environment.

Many of the R2 areas are already designated as bushfire prone land and those dwellings located beyond the designated bush fire prone area are also subject to ember attack, even under current conditions. As outlined in the bushfire section, most residential areas are also difficult to evacuate in the event of a bushfire, due to the ridge top development pattern providing single spine road access points to many locations, and the railway line and highway creating further barriers to evacuation via the Great Western Highway. In addition, the spine road development pattern means that lower density C3 and C4 zones beyond the R2 land also have to evacuate through the same routes. Any increase in population density in the R2 zones, places more people at risk from bushfire, both within the development, and by increased congestion for those residential areas beyond the R2 zone.

The 450m² minimum lot size proposed for dual occupancy development wherever it is permitted, means that almost every residential lot within the R2 zone will be available for such development. While not all opportunities will be taken up, this does represent a significant potential for increased future population density in high bush fire risk areas throughout the Blue Mountains LGA.

4 Conclusion

As a City within a World Heritage Area, with the unique characteristics outlined in this submission, particularly the high bushfire risk, the proposed housing changes in the EoIE are completely inappropriate and should not apply to any town centre or station precinct or broader low density residential areas within the Blue Mountains LGA. The application of the proposed reforms needs to be refined and tightened to only apply where intended, in well located metropolitan areas.

To address the issues identified within this submission, it is proposed that a revised definition is provided for the town centre and station precincts that appropriately captures the nuance in how standardised planning controls are utilised and the capacity for growth across the Six Cities.

The EoIE definition takes a reductive approach to planning controls by broadly asserting that all train stations E1 and E2 zones are well located areas, close to services and public transport. An alternative definition would include parameters for suburbs within the Six Cities that would be excluded from the Station and town centre precincts based on availability of service, infrastructure provisions and environmental constraints. The following definition is provided as an example.

Within the Six Cities Region, suburbs impacted by the following factors would be excluded:

- High proportion of bushfire prone land and bushland interface, or
- Limited infrastructure including no planned improvements to Sydney water services, or
- Located within a drinking water catchment, or
- Adjoining or within a National Park, or
- Served only by intercity train services; or
- Limited access to frequently needed goods and services

Under such parameters, no train station, or E1 zone or E2 zone within the Blue Mountains could be considered as an appropriate location for provisions associated with the station and town centre precincts. Refining the definition to clearly exclude E2 and E1 zones in Metropolitan Rural Areas and train stations exclusively served only by intercity lines would ensure that the intent of the document is achieved appropriately.

As well as strengthening the definition of Station and Town Centre Precincts, the proposed changes to Dual Occupancy densities in R2 Low Density Residential zones should only be applied to metropolitan Sydney, excluding areas within the Metropolitan Rural Area and/or where there would be significant environmental impact or increased risk from natural disaster. Specifically, that the Blue Mountains be excluded from the application of these changes in acknowledgement of the impact of the sensitive World Heritage Area receiving environment and the increased risk from bushfire that would result from the proposed changes.

In addition to the recommended changes to the proposal, Council also request that draft SEPP to enact the EoIE be publicly exhibited before being made, to give Councils and the community the opportunity to comment on the detailed legislation and changes made in response to the current public exhibition.

In summary, Blue Mountains City Council recommends that the specific constraints and values of individual centres and localities be central to the decision on where and how planning reforms are applied. Particularly, that due strategic consideration be given to natural disaster risk such as bushfire, and that those areas subject to these risks be excluded from the application of blanket uplift and density increase proposed under the housing reforms.

Blue Mountains City Council understands the extent of the housing crisis in NSW and the issues raised in this submission do not suggest that we are not willing to be part of the solution. At the local level, significant strategic work has been undertaken in recent years to understand housing requirements, provide for housing diversity in the Blue Mountains and respond to the needs of our community in a locally appropriate way, based on our unique environmental setting. We ask that the Department recognise the benefit of this local strategic context and work with Council to achieve an appropriate housing response.

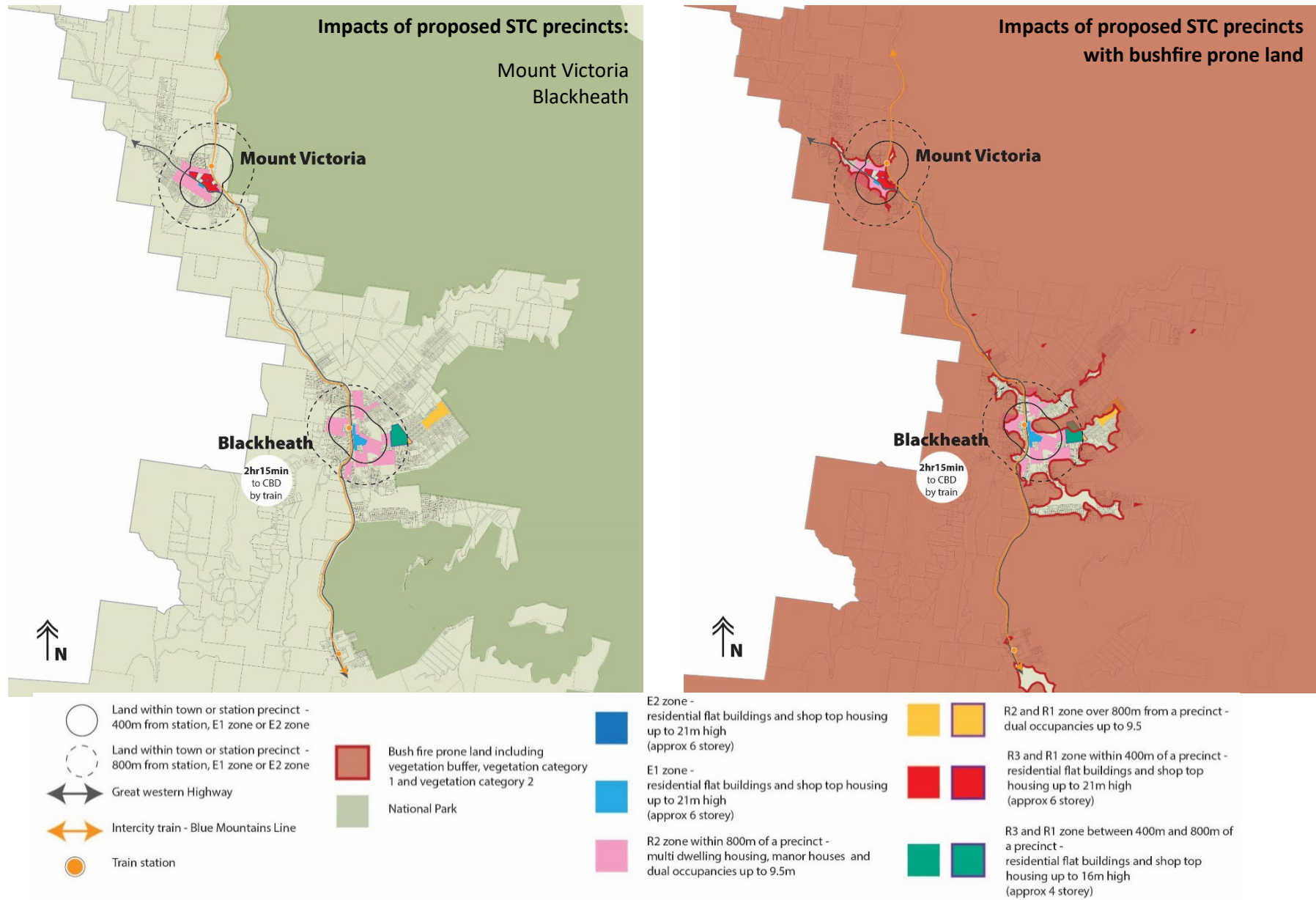
Attachment 1: Assessment of Blue Mountains Towns and Villages

Attachment 1: Assessment of Blue Mountains Towns and Villages

Town or Village & function	Station and Town Centre Precinct Elements		Constraints				Suitability	
			Bushfire*	Infrastructure	Heritage	Retail Services	Trains	Summary
Mount Victoria <i>Small tourist village</i> Refer image 1	Centre Zone	E1	Mapped bushfire prone land within proposed STC precinct	Sewer at capacity Water supply limitations	Proposed STC precinct areas predominantly heritage items and HCA	Small convenience store Limited tourist oriented retail/café offering E1 other shops include a taxidermist & design based internet focussed business	Hourly to two hourly outside of peak commute times	Not suitable for STC Precinct designation: <ul style="list-style-type: none"> • Bushfire Risk • Inadequate infrastructure and public transport • Tourism economy based on R1 tourist zone & heritage. • Tourist gateway to Blue Mountains from West.
	Train Station	Y	All proposed STC precinct within 350m ember attack zone	No planned water or sewer upgrades				
	R1 within 800m of STC	Y	History of fire impact and house loss	Limited stormwater infrastructure				
	R2 or R3 within 800m of STC	Y	GW Hwy major evacuation route					
Blackheath <i>Tourist Town</i> Refer image 1	Centre Zone	E1	Mapped Bushfire prone land within proposed STC precinct	Sewer capacity constraints Water supply limitations	Proposed STC precinct areas predominantly heritage items and HCA	No full line supermarket Tourist oriented retail/café offerings	Hourly to two hourly outside of peak commute times No express trains	Not suitable for STC Precinct designation: <ul style="list-style-type: none"> • Bushfire Risk • Inadequate infrastructure and public transport • Tourism gateway to Blue Mountains National Park. • Significant heritage, with character of town and surrounds a key element of tourism.
	Train Station	Y	All proposed STC precinct within 350m ember attack zone	No planned water or sewer upgrades				
	R1 within 800m of STC	Y	Railway line level crossing and tourist traffic a significant evacuation barrier	Limited stormwater infrastructure				
	R2 or R3 within 800m of STC	Y						

*The bushfire constraints have been addressed based on the individual circumstances of each location. These are in addition to the broader bushfire concerns experienced across the entirety of the Blue Mountains LGA and should be considered in addition to the issues raised in the submission.

Image 1: Impacts of proposed STC precincts – Mount Victoria and Blackheath

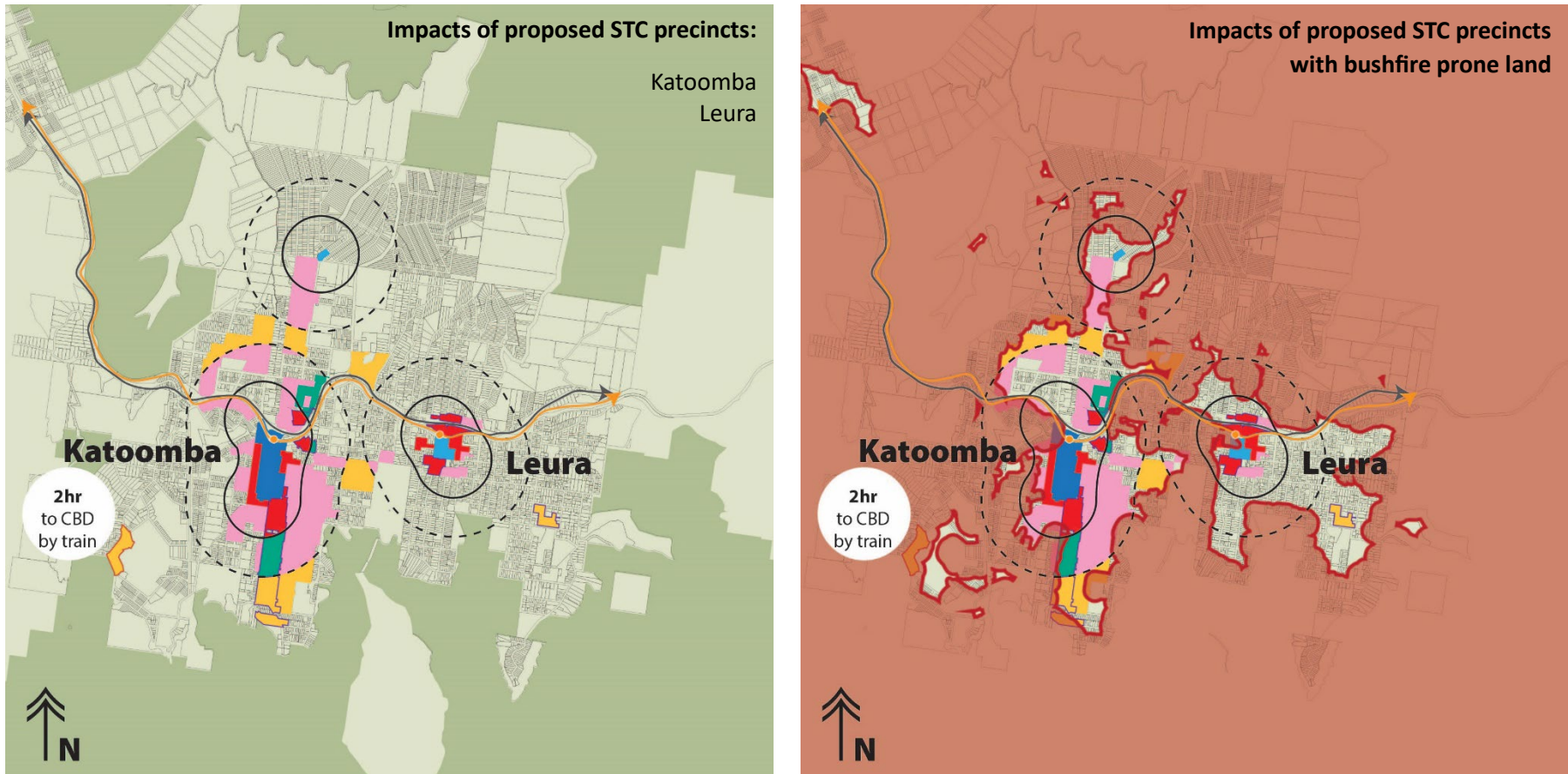


Town or Village & function	Station and Town Centre Precinct Elements		Constraints				Suitability	
			Bushfire*	Infrastructure	Heritage	Retail Services	Trains	Summary
Katoomba <i>Tourist Oriented Strategic Centre</i> <i>International tourist destination</i> Refer Image 2	Centre Zone	E2	Mapped Bushfire prone land within proposed STC precinct	Water supply limitations Sewer capacity unknown	Proposed STC precinct areas predominantly heritage items and HCA	3 full line supermarkets Tourist oriented retail/cafe offerings	2 trains/hour morning and evening, 1 train/hour daytime 2hr travel time on train to the CBD. 100km from CBD	Not suitable for STC Precinct designation, for a full summary of the issues raised refer to the submission.
	Train Station	Y	All proposed STC precinct within 350m ember attack zone	No planned water or sewer upgrades				
	R1 within 800m of STC	Y	Railway line, town entry point and tourist traffic a significant evacuation barrier	Limited stormwater infrastructure				
	R2 or R3 within 800m of STC	Y						
Katoomba Minni Ha Ha Shops <i>Small Neighbourhood</i> Refer Image 2	Centre Zone	E1	Mapped Bushfire prone land within proposed STC precinct	Water supply limitations Sewer capacity unknown	NA	No supermarket, small café only	NA - 2.2km from train station	Not suitable for STC Precinct designation: <ul style="list-style-type: none"> • Bushfire Risk • Inadequate infrastructure and public transport • No appropriate shops or services
	Train Station	N	All proposed precinct within 350m ember attack zone	No planned water or sewer upgrades				
	R1 within 800m of STC	N	Bushfire prone evacuation routes to GW Hwy	Limited stormwater infrastructure				
	R2 or R3 within 800m of STC	Y						

Town or Village & function	Station and Town Centre Precinct Elements		Constraints				Suitability	
			Bushfire*	Infrastructure	Heritage	Retail Services	Trains	Summary
Leura <i>Tourist Town</i> Refer Image 2	Centre Zone	E1	Mapped Bushfire prone land within proposed STC precinct	Water supply limitations Sewer capacity unknown	Proposed STC precinct areas predominantly heritage items and HCA	No full line supermarket Tourist oriented retail/café offerings	Hourly train outside of peak commute times	Not suitable for STC Precinct designation: <ul style="list-style-type: none"> • Bushfire Risk • Inadequate infrastructure and public transport • Tourist village, with attraction based on heritage character of village and surrounds.
	Train Station	Y	All proposed precinct within 350m ember attack zone	No planned water or sewer upgrades				
	R1 within 800m of STC	Y	Highway access point and tourist traffic a significant evacuation barrier	Limited stormwater infrastructure				
	R2 or R3 within 800m of STC	Y						

*The bushfire constraints have been addressed based on the individual circumstances of each location. These are in addition to the broader bushfire concerns experienced across the entirety of the Blue Mountains LGA and should be considered in addition to the issues raised in the submission.

Image 2: Impacts of proposed STC precincts – Katoomba and Leura



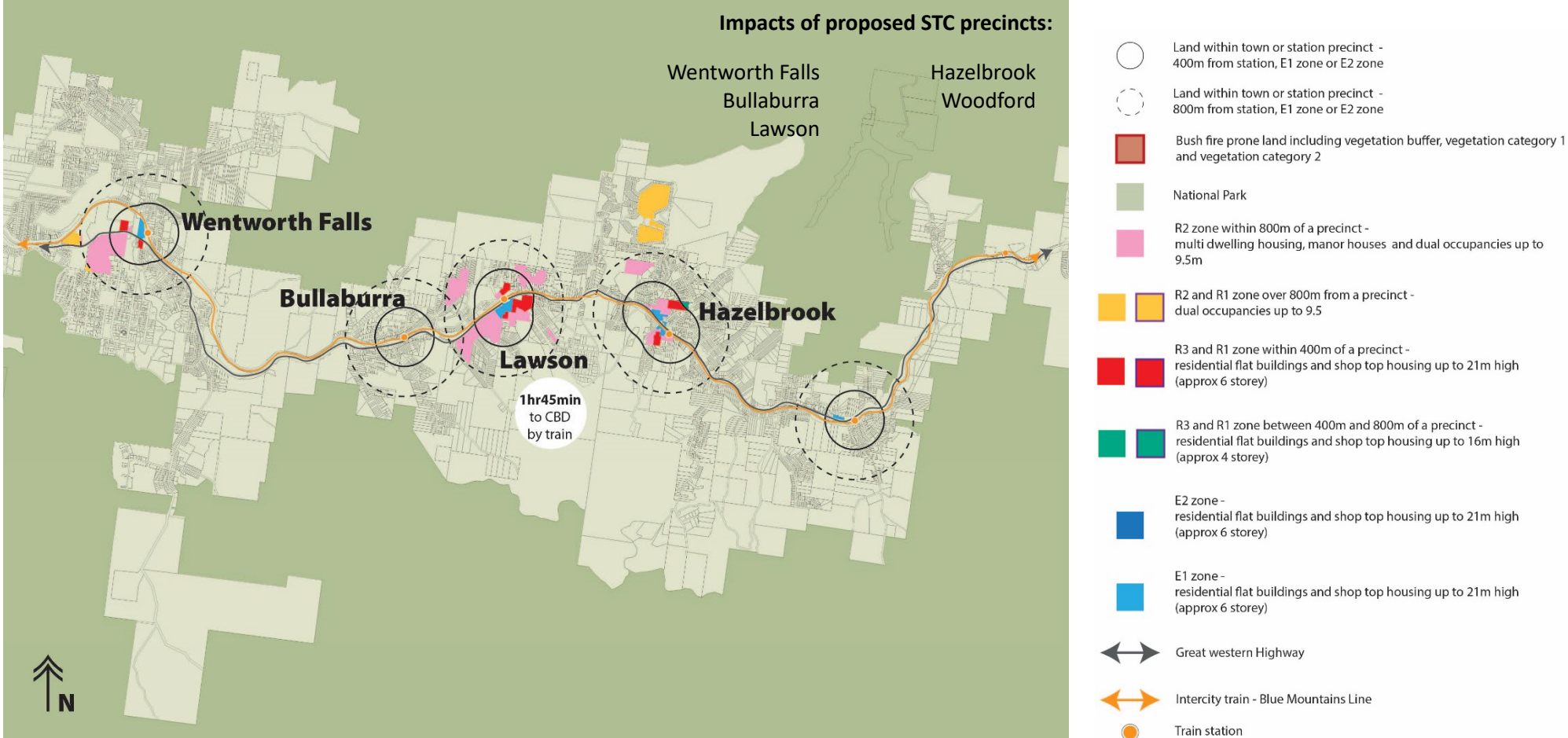
Town or Village & function	Station and Town Centre Precinct Elements		Constraints				Suitability	
			Bushfire*	Infrastructure	Heritage	Retail Services	Trains	Summary
Wentworth Falls <i>Tourist Village</i> Refer Image 3	Centre Zone	E1	Entire proposed STC precinct is bushfire prone Proposed STC precinct is also key evacuation route for outlying houses in Wentworth Falls, Bullaburra and NP tourists.	Water supply limitations Sewer capacity unknown No planned water or sewer upgrades Limited stormwater infrastructure	E1 zone southern end is HCA. Contains heritage items and period housing areas adjoining proposed STC precinct	No full line supermarket Tourist oriented retail/café offerings	Hourly train outside of peak commute times	Not suitable for STC Precinct designation: <ul style="list-style-type: none"> • Bushfire Risk • Inadequate infrastructure and public transport • Tourism gateway to Blue Mountains National Park.
	Train Station	Y						
	R1 within 800m of STC	Y						
	R2 or R3 within 800m of STC	Y						
Bullaburra <i>Small Village</i> Refer Image 3	Centre Zone	N	Entire proposed STC precinct is bushfire prone Railway line prevents direct evacuation to GW Hwy Evacuation routes are bushfire prone	Water supply limitations Sewer capacity unknown No planned water or sewer upgrades Limited stormwater infrastructure	NA	NA - No economic zone or neighbourhood shops	Hourly train outside of peak commute times	Not suitable for STC Precinct designation: <ul style="list-style-type: none"> • No town centre & R2 700m from station • Bushfire Risk • Inadequate infrastructure and public transport
	Train Station	Y						
	R1 within 800m of STC	N						
	R2 or R3 within 800m of STC	Y						

Town or Village & function	Station and Town Centre Precinct Elements		Constraints				Suitability	
			Bushfire*	Infrastructure	Heritage	Retail Services	Trains	Summary
Lawson <i>Local Town</i> Refer Image 3	Centre Zone	E1	Mapped Bushfire prone land within proposed STC precinct	Water supply limitations	Proposed STC precinct areas outside of the E1 zone have a number of heritage items and HCAs	No full line supermarket	Hourly train outside of peak commute times	Not suitable for STC Precinct designation: <ul style="list-style-type: none"> • Bushfire Risk • Inadequate infrastructure and public transport • Recently renewed town centre, reflective of village scale and surrounding heritage areas.
	Train Station	Y	All proposed precinct within 350m ember attack zone	Sewer capacity unknown		Neighbourhood shops and services only		
	R1 within 800m of STC	N	Single evacuation point from northern side to GW Highway	No planned water or sewer upgrades		Recent town centre rebuild		
	R2 or R3 within 800m of STC	Y		Limited stormwater infrastructure				
Hazelbrook <i>Local Town</i> Refer Image 3	Centre Zone	E1	Mapped Bushfire prone land within proposed STC precinct	Water supply limitations	None on northern side of railway line	No full line supermarket	Hourly train outside of peak commute times	Not suitable for STC Precinct designation: <ul style="list-style-type: none"> • Bushfire Risk • Inadequate infrastructure and public transport • Limited shops and services • Fragmented zoning pattern within 800m of STC.
	Train Station	Y	All proposed precinct within 350m ember attack zone	Sewer capacity unknown		Neighbourhood shops on northern side of highway		
	R1 within 800m of STC	N		No planned water or sewer upgrades				
	R2 or R3 within 800m of STC	Y		Limited stormwater infrastructure				

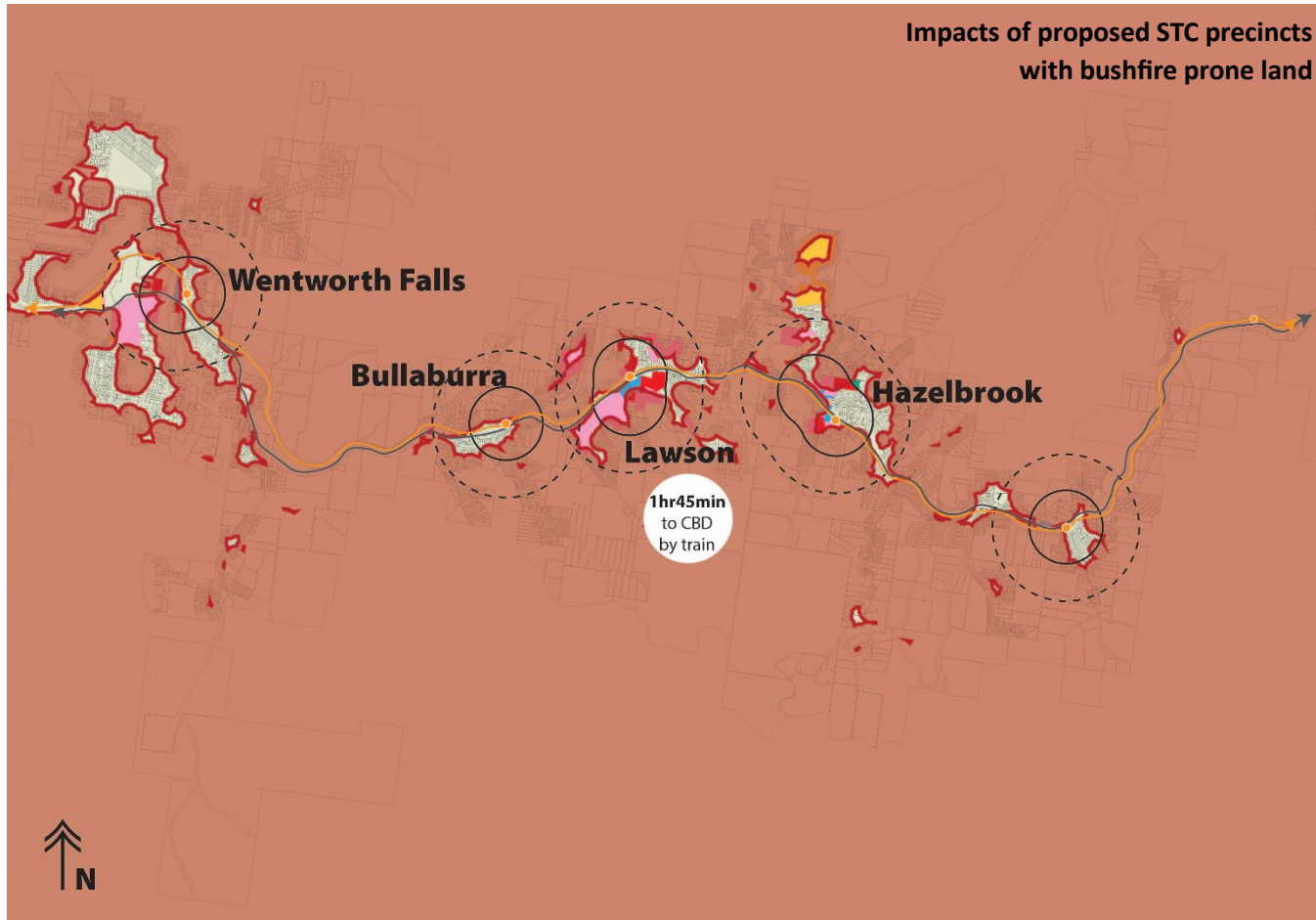
Town or Village & function	Station and Town Centre Precinct Elements		Constraints				Suitability	
			Bushfire*	Infrastructure	Heritage	Retail Services	Trains	Summary
Hazelbrook Railway Parade <i>Small Neighbourhood</i> Refer Image 3	Centre Zone	E1	Mapped Bushfire prone land within proposed STC precinct	Water supply limitations Sewer capacity unknown	E1 zone HCA and heritage items, surrounding precinct areas also contain HCA and some heritage items	No supermarket Neighbourhood shops limited to as antiques, yoga, café and professional suite	Hourly train outside of peak commute times	Not suitable for STC Precinct designation: <ul style="list-style-type: none"> • Bushfire Risk • Inadequate infrastructure and public transport • by railway line and GW Hwy.
	Train Station	Y	All proposed precinct within 350m ember attack zone	No planned water or sewer upgrades				
	R1 within 800m of STC	N	Railway line prevents direct access to GW Hwy Bushfire prone evacuation routes	Limited stormwater infrastructure				
	R2 or R3 within 800m of STC	Y						
Woodford <i>Small Village</i> Refer Image 3	Centre Zone	E1	Entire Proposed STC Precinct is bushfire prone	Water supply limitations Sewer capacity unknown	Heritage item adjoining E1 zone	No supermarket or neighbourhood shops (2 only)	Hourly train outside of peak commute times	Not suitable for STC Precinct designation: <ul style="list-style-type: none"> • Bushfire Risk • Inadequate infrastructure and public transport • Small E1 zone, with no surrounding R zoned land.
	Train Station	Y		No planned water or sewer upgrades				
	R1 within 800m of STC	N		Limited stormwater infrastructure				
	R2 or R3 within 800m of STC	N						

*The bushfire constraints have been addressed based on the individual circumstances of each location. These are in addition to the broader bushfire concerns experienced across the entirety of the Blue Mountains LGA and should be considered in addition to the issues raised in the submission.

Image 3: Impacts of proposed STC precincts – Wentworth Falls, Bullaburra, Lawson, and Hazelbrook



Impacts of proposed STC precincts with bushfire prone land



-  Land within town or station precinct - 400m from station, E1 zone or E2 zone
-  Land within town or station precinct - 800m from station, E1 zone or E2 zone
-  Bush fire prone land including vegetation buffer, vegetation category 1 and vegetation category 2
-  National Park
-  R2 zone within 800m of a precinct - multi dwelling housing, manor houses and dual occupancies up to 9.5m
-  R2 and R1 zone over 800m from a precinct - dual occupancies up to 9.5
-  R3 and R1 zone within 400m of a precinct - residential flat buildings and shop top housing up to 21m high (approx 6 storey)
-  R3 and R1 zone between 400m and 800m of a precinct - residential flat buildings and shop top housing up to 16m high (approx 4 storey)
-  E2 zone - residential flat buildings and shop top housing up to 21m high (approx 6 storey)
-  E1 zone - residential flat buildings and shop top housing up to 21m high (approx 6 storey)
-  Great western Highway
-  Intercity train - Blue Mountains Line
-  Train station

Town or Village & function	Station and Town Centre Precinct Elements		Constraints				Suitability	
			Bushfire*	Infrastructure	Heritage	Retail Services	Trains	Summary
Falconbridge <i>Local Town</i> Refer Image 4	Centre Zone	E1	Mapped Bushfire prone land within proposed STC precinct	Water supply limitations Sewer capacity unknown	NA	No supermarket Neighbourhood shops only	NA - 1.8km from train station	Not suitable for STC Precinct designation: <ul style="list-style-type: none"> • Bushfire Risk • Inadequate infrastructure and public transport • Limited E1 zone bisected by 4 lane highway, and isolated from station.
	Train Station	N	All proposed precinct within 350m ember attack zone	No planned water or sewer upgrades				
	R1 within 800m of STC	N		Limited stormwater infrastructure				
	R2 or R3 within 800m of STC	Y R2						
Falconbridge train station	E1	Mapped Bushfire prone land within proposed STC precinct		Water supply limitations Sewer capacity unknown				Some Heritage Items in proposed STC precinct
<i>Small Neighbourhood</i> Refer Image 4	Centre Zone	E1	All proposed precinct within 350m ember attack zone	No planned water or sewer upgrades				Not suitable for STC Precinct designation: <ul style="list-style-type: none"> • Bushfire Risk • Inadequate infrastructure and public transport • Small E1 zone, isolated from local town centre.
	Train Station	Y		Limited stormwater infrastructure				
	R1 within 800m of STC	N		Key evacuation route for dwellings to north and south of GW Hwy				
	R2 or R3 within 800m of STC	Y R2						

Town or Village & function	Station and Town Centre Precinct Elements		Constraints				Suitability	
			Bushfire*	Infrastructure	Heritage	Retail Services	Trains	Summary
Springwood <i>Town Centre</i> Refer Image 4	Centre Zone	E2	Mapped Bushfire prone land within proposed STC precinct, including E2 land along main street All proposed precinct within 350m ember attack zone Key evacuation route for areas south of the highway and from Winmalee area on northern side	Water supply limitations Sewer capacity unknown No planned water or sewer upgrades Limited stormwater infrastructure	Some heritage items and HCAs in proposed STC precinct	No full line supermarket Neighbourhood shops and services Nearest full line supermarket is Winmalee	2 trains/hour morning and evening, 1 train/hour daytime 1hr 20min travel time on train to the CBD. 72km from CBD	Not suitable for STC Precinct designation, for a full summary of the issues raised refer to the submission.
	Train Station	Y						
	R1 within 800m of STC	N						
	R2 or R3 within 800m of STC	Y						
Winmalee <i>Town Centre</i> Refer Image 4	Centre Zone	E1	Mapped Bushfire prone land within proposed STC precinct. All proposed precinct within 350m ember attack zone Single evacuation route which is bushfire prone History of significant house loss 2013 bushfires	Water supply limitations Sewer capacity unknown No planned water or sewer upgrades Limited stormwater infrastructure	Some heritage items, built form and landscape in E1 zone	Full line supermarket and local shopping centre	NA - 6.5km from train station	Not suitable for STC Precinct designation: <ul style="list-style-type: none"> • Bushfire Risk • Inadequate infrastructure and public transport • Ridge top development with single egress spine road to Springwood.
	Train Station	N						
	R1 within 800m of STC	N						
	R2 or R3 within 800m of STC	Y						

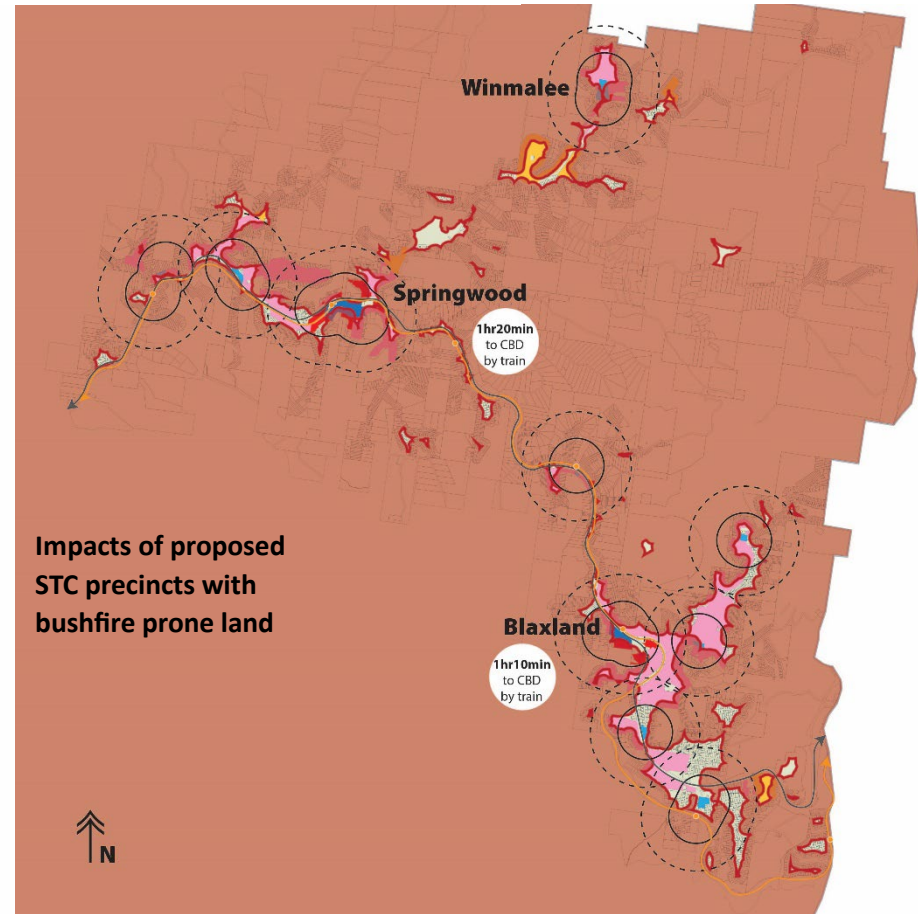
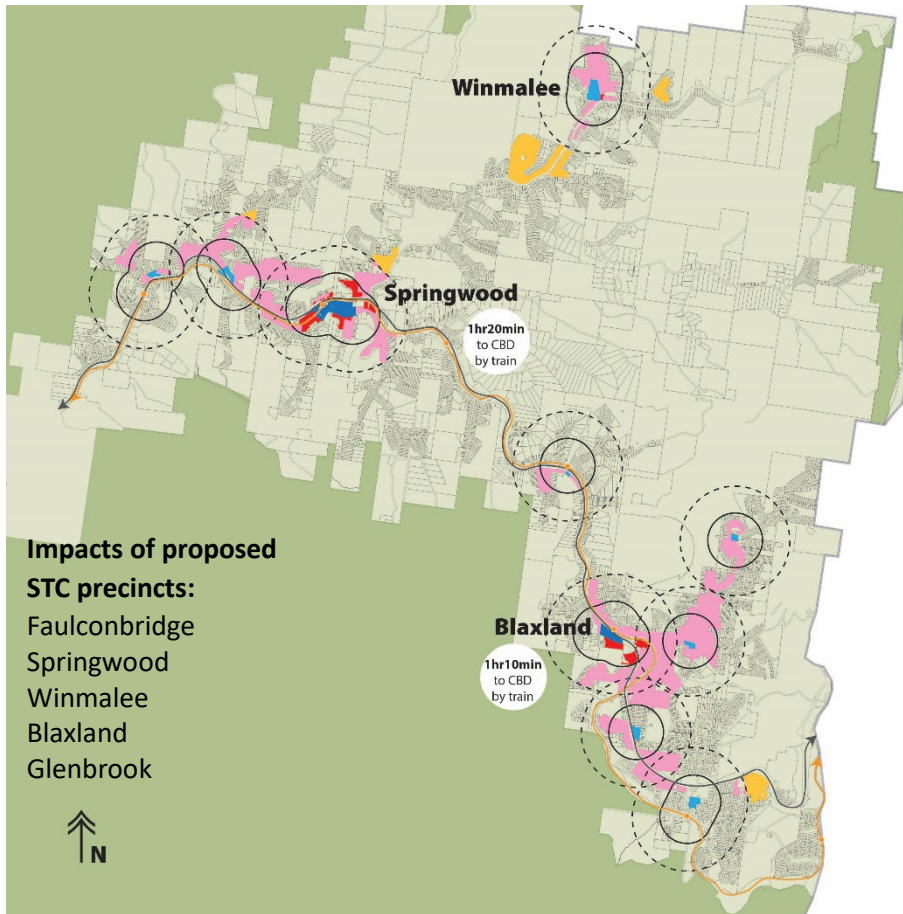
Town or Village & function	Station and Town Centre Precinct Elements		Constraints				Suitability	
			Bushfire*	Infrastructure	Heritage	Retail Services	Trains	Summary
Warrimoo <i>Small Village</i> Refer Image 4	Centre Zone	E1	Entire Proposed STC Precinct is bushfire prone	Water supply limitations Sewer capacity unknown No planned water or sewer upgrades Limited stormwater infrastructure	Railway station is the only heritage item	Convenience Store only with minimal neighbourhood shops (3 total)	Hourly train outside of peak commute times	Not suitable for STC Precinct designation: <ul style="list-style-type: none"> • Bushfire Risk • Inadequate infrastructure and public transport • Small E1 zone with minimal shops
	Train Station	Y						
	R1 within 800m of STC	N						
	R2 or R3 within 800m of STC	Y R2						
Blaxland <i>Town Centre</i> Refer Image 4	Centre Zone	E2	Mapped Bushfire prone land within proposed STC precinct. All proposed precinct within 350m ember attack zone Key evacuation route from East Blaxland and Mount Riverview with the railway line a significant evacuation barrier	Water supply limitations Sewer capacity unknown No planned water or sewer upgrades Limited stormwater infrastructure	Heritage items in proposed STC precinct outside of E2 zone	No full line Supermarket Nearest full line supermarket Penrith or Emu Plains Neighbourhood shops and services only	2 trains/hour morning and evening, 1 train/hour daytime 1hr 10min travel time on train to the CBD. 64km from CBD	Not suitable for STC Precinct designation, for a full summary of the issues raised refer to the submission.
	Train Station	Y						
	R1 within 800m of STC	N						
	R2 or R3 within 800m of STC	Y						

Town or Village & function	Station and Town Centre Precinct Elements		Constraints				Suitability	
			Bushfire*	Infrastructure	Heritage	Retail Services	Trains	Summary
Rusden Road – East Blaxland <i>Small Neighbourhood</i> Refer Image 4	Centre Zone	E1	Mapped Bushfire prone land within proposed STC precinct.	Water supply limitations Sewer capacity unknown	NA	No full line supermarket Limited neighbourhood shops only	NA – 1.1km from train station	Not suitable for STC Precinct designation: <ul style="list-style-type: none"> • Bushfire Risk • Inadequate infrastructure and public transport • Small E1 zone, isolated from nearest town centre and railway station
	Train Station	N	All proposed precinct within 350m ember attack zone	No planned water or sewer upgrades				
	R1 within 800m of STC	N	Bushfire prone evacuation routes which also serve Mount Riverview	Limited stormwater infrastructure				
	R2 or R3 within 800m of STC	Y R2						
Brooklands Village Blaxland <i>Small Neighbourhood</i> Refer Image 4	Centre Zone	E1	Mapped Bushfire prone land within proposed STC precinct.	Water supply limitations Sewer capacity unknown	NA	Convenience Store and limited neighbourhood shops	NA – 1.7km from train station	Not suitable for STC Precinct designation: <ul style="list-style-type: none"> • Bushfire Risk • Inadequate infrastructure and public transport • Small E1 zone, with minimal shops, remote from nearest town centre and railway station
	Train Station	N	All proposed precinct within 350m ember attack zone	No planned water or sewer upgrades				
	R1 within 800m of STC	N		Limited stormwater infrastructure				
	R2 or R3 within 800m of STC	Y R2						

Town or Village & function	Station and Town Centre Precinct Elements		Constraints				Suitability
			Bushfire*	Infrastructure	Heritage	Retail Services	Trains
Mount Riverview <i>Small Neighbourhood</i> Refer Image 4	Centre Zone	E1	Mapped Bushfire prone land within proposed STC precinct.	Water supply limitations Sewer capacity unknown	NA	Convenience store and small café only.	NA - 4.5km from train station Not suitable for STC Precinct designation: <ul style="list-style-type: none"> • Bushfire Risk • Inadequate infrastructure and public transport Small E1 zone, with minimal shops, remote from nearest town centre and railway station
	Train Station	N	All proposed precinct within 350m ember attack zone	No planned water or sewer upgrades			
	R1 within 800m of STC	N		Limited stormwater infrastructure			
	R2 or R3 within 800m of STC	Y R2					
Glenbrook <i>Tourist Village</i> Refer Image 4	Centre Zone	E1		Mapped Bushfire prone land within proposed STC precinct.			Water supply limitations Sewer capacity unknown
Train Station	Y	All proposed precinct within 350m ember attack zone	No planned water or sewer upgrades				
R1 within 800m of STC	N	Key evacuation route from bushfire prone residential areas to south of town centre and Lapstone	Limited stormwater infrastructure				
R2 or R3 within 800m of STC	Y R2						

*The bushfire constraints have been addressed based on the individual circumstances of each location. These are in addition to the broader bushfire concerns experienced across the entirety of the Blue Mountains LGA and should be considered in addition to the issues raised in the submission.

Image 4: Impacts of proposed STC precincts – Falconbridge, Springwood, Winmalee, Blaxland, and Glenbrook



Impacts of proposed STC precincts:
 Falconbridge
 Springwood
 Winmalee
 Blaxland
 Glenbrook

Impacts of proposed STC precincts with bushfire prone land

- Land within town or station precinct - 400m from station, E1 zone or E2 zone
- Land within town or station precinct - 800m from station, E1 zone or E2 zone
- Great western Highway
- Intercity train - Blue Mountains Line
- Train station

- Bush fire prone land including vegetation buffer, vegetation category 1 and vegetation category 2
- National Park

- E2 zone - residential flat buildings and shop top housing up to 21m high (approx 6 storey)
- E1 zone - residential flat buildings and shop top housing up to 21m high (approx 6 storey)
- R2 zone within 800m of a precinct - multi dwelling housing, manor houses and dual occupancies up to 9.5m

- R2 and R1 zone over 800m from a precinct - dual occupancies up to 9.5
- R3 and R1 zone within 400m of a precinct - residential flat buildings and shop top housing up to 21m high (approx 6 storey)
- R3 and R1 zone between 400m and 800m of a precinct - residential flat buildings and shop top housing up to 16m high (approx 4 storey)