



Enclosures

Period Housing Conversion
(enclosure 2)

Meeting: 18 September, 2018

SUBMISSION REVIEW – Period Housing Conversion 2018

SUPPORT

Sub no.	Issues raised in the submission	Response	Recommendations
2	<ul style="list-style-type: none"> • Submitter has lived in Katoomba for 27 years and is very happy to be incorporated into a heritage protection zone. Submitter notes the importance of protecting architectural connections to early history for current and future generations. • Submitter provided further information on their own dwelling. 	<ul style="list-style-type: none"> • The support for the protection of heritage values is noted and appreciated. • Further research into the submitter's house and its historical associations may lead to further historical detail which could be used to update the heritage inventory sheet for the heritage conservation area at a future date. 	Review of property for further historical information is recommended at a future date.
13	<ul style="list-style-type: none"> • Submission is in agreement with the schedule and its heritage recognition of buildings in Lawson. Legal protection of the town's heritage is of the utmost importance. • Submitter raises issues around faced management and use of shops in heritage buildings in Douglass Square. 	<ul style="list-style-type: none"> • The support for the protection of heritage values in Lawson is noted and appreciated. • The Staples Store is privately owned. Council has worked wherever possible with owners of the building to encourage the restoration and reconstruction of former façade elements in any future development application for the site, and will continue to do so. 	No recommendations.
14	<ul style="list-style-type: none"> • Submitter fully supports the approach of the conversion as it will provide greater protection of the numerous heritage qualities identified in the 2018 Conroy study, which is a comprehensive and thorough review of the Katoomba South area and quantifies the reasons why Katoomba South must be protected. 	<ul style="list-style-type: none"> • The support for the protection of heritage values is noted and appreciated. 	No recommendations.

20	<ul style="list-style-type: none"> • Submitter supports the continued heritage listing of buildings and precincts in Lawson. Those that have had the interiors removed, such as the Staples Store and the Blue Mountains Hotel should be required to have an update. The Mechanics Institute, Lyttletons and the Map of Australia are important landmarks and deserve their heritage listings unchanged. • Submitter supports the proposed HCA Lawson Nature Reserves Link, as it links heritage and environmental conservation. However the link should include additional areas based on environmental values. • The proposed HCA preserves the significance of Honour Gardens, the only one in the Blue Mountains, so will probably be meaningful to locals who lost family in the wars. • The history of housing in the Mountains is also honoured in this proposed Hays Link. • Whilst the point is made that more research is needed, it is a start, and historically north and south, although now divided by the road rail corridor, had more in common. • The shop facades of the Staples Store need attention. • Submitter agrees with the sections from the Hays Link HCA inventory sheet that link the history of the Blue Mountains in terms of settlement, indigenous and European, but also the significant vegetation that has earned World Heritage Listing. 	<ul style="list-style-type: none"> • The support for the protection of heritage values is noted and appreciated. • Council is not requiring the reinstatement of removed fabric as part of this conversion. Reconstruction of removed elements is a matter that can be considered at development application stage as part of any approval. Internal reconstruction of interiors can be difficult due to lack of documentary evidence, altered internal layouts (such as at the Blue Mountain Hotel), and the state exemptions for internal fabric of heritage items which only require consent for alterations to structural internal elements. • The current conversion process does not include consideration of the inclusion of additional areas; however there will be opportunities in the future to review the boundaries of conservation areas. The public will be invited to make submissions as part of any future planning proposal and public consultation process to extend existing areas. • The Staples Store is privately owned. Council has worked wherever possible with owners of the building to encourage the restoration and reconstruction of former façade elements in any future development application for the site, and will continue to do so. 	<p>No recommendations at this stage. Further historical research into the Lawson HCA is recommended.</p>
----	--	--	---

		<ul style="list-style-type: none"> • The support for a wider understanding and recognition of heritage values that relate landscapes (natural environments) with cultural values is noted and appreciated. • It is recommended that further historical research into Lawson is carried out in the future, not only to consolidate the various historical elements (important families, important buildings, important scenic, environmental and cultural values and so on), but also to update the history of the town to include the significant changes and challenges that have changed the character and nature of the town since the Highway upgrade. 	
22	<ul style="list-style-type: none"> • Submitter welcomes the conversion from period home to heritage protection. Own house was purchased due to its character and character is intended to be preserved. • Concern that Council applies reasonableness in considering applications for changes that improve liveability and retain the overall character. Believes property owners should not be unreasonably restricted over and above other community members. 	<ul style="list-style-type: none"> • The support for the protection of heritage values is noted and appreciated. • There would be no requirement to preserve older kitchens and bathrooms, for example. These types of upgrade are reasonable and required for amenity and current standards of living. These works are generally exempt from the need for development consent from Council. • There will be some restrictions in order to preserve character. This could relate to the need to provide new forms that are sympathetic in alterations and additions, for example. This may relate to the angle of roof pitch, choice of traditional materials, or retention of single-storey heights to 	No recommendations.

		<p>conserve characteristic single-storey roof forms, for example.</p> <ul style="list-style-type: none"> • Restrictions generally would not be directly related to liveability, but rather on keeping original fabric, particularly where visible from the street. • These types of character and fabric restrictions provide a wider community benefit by preserving the streetscape character of our older village housing areas. 	
25	<ul style="list-style-type: none"> • The Blue Mountains Branch of the National Trust is generally supportive of the new heritage conservation areas. • The Branch acknowledges that a number of properties are impacted by the Department of Planning and Environment's ongoing consideration of the proposed R6 zone, and the Branch congratulates Council on pursuing this classification for inclusion in the LEP. • The Branch appreciates the opportunity for consultation on this important part of the planning framework for heritage conservation in the Blue Mountains. 	<ul style="list-style-type: none"> • The support for the protection of heritage values is noted and appreciated. 	No recommendations.

SUPPORT – REFINEMENTS REQUESTED

Sub no.	Issues raised in the submission	Response	Recommendations
4	<ul style="list-style-type: none"> • Submitter supports the move to place Neate Park, the park's statue and the surrounding streets under 	<ul style="list-style-type: none"> • The support for the protection of heritage values is noted and appreciated. 	The heritage inventory sheet for Lookout Hill

	<p>draft heritage conservation area classification (Lookout Hill HCA).</p> <ul style="list-style-type: none"> • The statue is in need of some restoration since it was placed there in 1976. • There is a misspelling of the sculptor's name in the inventory sheet which should be rectified. 	<ul style="list-style-type: none"> • Correspondence with the submitter has led to the provision of historical information to Council that has been reviewed. The inventory sheet has been corrected and updated as relevant. • A discussion with Council's parks staff regarding the condition of the statue will occur with the intention of scheduling any necessary maintenance and repair works. 	<p>HCA will be corrected and updated as relevant.</p>
23	<ul style="list-style-type: none"> • Submitter supports the proposal to convert Period Housing properties to HCAs, including their house in South Katoomba. However submitter has a number of concerns. • The exemption in Clause 4.3A of the LEP should be deleted, and no buildings should be built in the HCAs that are higher than the existing 6.5m building height. The proposal to allow buildings up to 8m tall in HCAs is strongly rejected. The current maximum of 6.5m should be retained. Further, the 8m height limit should not be allowed on one side of the street in an HCA as both sides contribute to the character of the streetscape. • Concern that the contributory mapping is not entirely accurate and with how that process will be taken forward, particularly around non-contributory notation • Raised issues regarding demolition and gave a recent example of a building • Concern around cumulative inappropriate infill development over time. • Concern that consultation was inadequate. 	<ul style="list-style-type: none"> • The support for the protection of heritage values is noted and appreciated. • The deletion of the 6.5m maximum height limit has been reconsidered following the public exhibition period. It is considered important to retain this lower height limit, reflective of an existing and desired maximum of single-story heights within the area (with minimal exceptions in parts of South Katoomba). • Clause 4.3A, which allows a flexibility in applying the 6.5m height limit in Period Housing Areas if it can be established that the surrounding area has a two-storey character, is proposed to be retained, with amendments which refer to certain residential zones within Heritage Conservation Areas. Note this is an exceptions clause, and particular conditions are required to be met by the clause for it to be activated. 	<p>Amend the planning proposal to retain the 6.5m maximum of height of buildings.</p>

		<ul style="list-style-type: none"> • This outcome is a measured approach to the retention of existing provisions around flexibility, and will operate in conjunction with the retention of the 6.5m maximum height for the new Heritage Conservation Areas. • It is not always possible to create heritage conservation areas that cover both sides of a street if both sides do not have the same historic, aesthetic and representative values. • The contributory mapping is for information only at this stage. It does not form part of the current proposal. The findings of the report will be peer-reviewed and put to public exhibition prior to any adoption of this information. All property owners will be advised and comment sought. • The concerns that an 'uncharacteristic' listing could lead to inappropriate infill development is noted. As noted above, the contributions mapping will need to be peer reviewed and community consultation carried out. The existing DCP controls will be enhanced to improve change management within heritage conservation areas, and form part of the community consultation. • To clarify the concerns around demolition, in a draft HCA or HCA a development application is required for demolition. This involves notification of neighbours and a 	
--	--	--	--

		<p>Council assessment. This is a higher level of protection than currently accorded to Period Housing Areas under the Exempt and Complying SEPP.</p> <ul style="list-style-type: none"> • The reason for the demolition example referred to was that it was located outside the Period Housing Area. All Period Housing Areas are currently fully protected against demolition by their status as draft heritage conservation areas. • Consultation was beyond the requirements set out by the Department of Planning and Environment, which required 28 days consultation. Council provided six weeks of public exhibition, and accepted a number of late submissions. Detailed fact sheets were prepared and sent to all enquirers. Council staff were available for face-to-face and over-the-phone personal contact as part of the six-week consultation, and continue to answer resident enquiries. 	
--	--	--	--

REFINEMENTS REQUESTED

Sub no.	Issues raised in the submission	Response	Recommendations
18	<ul style="list-style-type: none"> • Are the maps of the proposed areas in addition to the deferred areas in Leura? These areas should also be shown on LA105 and LA106. 	<ul style="list-style-type: none"> • Deferred lots due to Amendment 2 (the proposed R6 zone) were not shown, as deferred lots are not part of the proposal, and it was considered that showing them would be confusing. These deferred lots remain 	No recommendations.

	<ul style="list-style-type: none"> • Suggest that a property at Hartley Esplanade, appears as an anomaly and should not be in an HCA. • Many houses on the west side of East View Avenue, Leura would be uncharacteristic and this street should be reviewed. 	<p>protected under LEP 2005 Period Housing provisions.</p> <ul style="list-style-type: none"> • The submission provides no reasons, heritage or otherwise, for proposing the exclusion of the property mentioned at Hartley Esplanade. This property is part of a wider area of Period Housing under LEP 2005. Generally, where an area or street has significance, individual properties cannot be excluded from the area as they are located within a wider context of heritage significance. Their contributions can be assessed when contributions values are identified or when development is proposed. • All Period Housing Areas have been assessed by Council's consultant in 2014 and recently 2017. This area of the proposed Leura North HCA was not recommended for exclusion. Further work on the contributions values will be carried out prior to any DCP mapping of contributions being added. 	
15	This submission provides various corrections about the proposed Glenbrook HCA. These corrections relate to properties in Hunt Street, street names, shop owner details, historic chronicle of uses, and modification dates. A 'mud map' to explain details is also included with the submission.	The information in the inventory sheet has been reviewed, and the Glenbrook HCA heritage inventory sheet updated.	It is recommended that the information be reviewed and the Glenbrook HCA inventory sheet be updated as relevant.
27	<ul style="list-style-type: none"> • Some properties in Blackheath have heritage significance which warrants further assessment, and which fall outside of the proposed HCA. 	<ul style="list-style-type: none"> • The property in Blackheath mentioned by the submitter is currently Period Housing under LEP 2005 and is deferred from the current proposal, therefore it remains protected under 	No recommendations.

	<p><i>[Property identified and various historical details suggested].</i> This needs to be resolved.</p> <ul style="list-style-type: none"> • Neale Street is worthy of heritage research and protection. <i>[Various historical details suggested].</i> Further research should be undertaken and those parts of Neale Street be given HCA protection. • The streetscapes left of Buti Street facing The Gully and in Walgett Street are of heritage streetscape value comparable with other areas such as South Lawson and yet have no listing. • Concern that the map provided does not reflect the current map. There is no Cardiff Street, and no development here. • There are good examples of heritage in Darley Street and this stretch of Darley Street is worthy of HCA listing. • Concern that new HCAs have no context in their newly created environment. • Believe there is a lack of historical research • Concern with Hays being used in the name of the new HCA. • Concerns with the age of heritage studies that have been relied on for this process • Believes there is a need for a comprehensive thematic history of the LGA to be done by competent persons, also that heritage assessments are not being done by qualified people • <i>[Various changes suggested to historical details in the Katoomba heritage inventory sheet suggested.]</i> Believes the form should be adjusted 	<p>LEP 2005 Period Housing provisions. Any further historical detail confirmed by documentary evidence is welcome if submitted to Council.</p> <ul style="list-style-type: none"> • A significant portion of Neale Street is existing Period Housing and is covered by the current proposal to become part of the South Katoomba HCA, with extensions to the existing areas recommended in the 2018 study. Any further historical detail confirmed by documentary evidence is welcome if submitted to Council. • It is not clear exactly which properties are being referred to regarding Buti Street and Walgett Street. All properties in Walgett Street west of Buti Street have existing protections as Period Housing and are proposed to become a new HCA, the Norths Estate HCA. Many properties with rear frontages to Walgett Street east of Buti Street are heritage items, but are listed under their address of Bathurst Road or Cascade Street. It is noted that Walgett Street east of Buti Street is an unmade road. Any further historical detail confirmed by documentary evidence is welcome if submitted to Council. • Cardiff Street reflects a paper subdivision. It is noted on maps of the area including Council's mapping but has never been constructed. This is a common convention. 	
--	---	--	--

	<p>to better reflect the history of the LGA, raising issues around interpretation.</p> <ul style="list-style-type: none"> • Submitter offer services to help revise the draft heritage inventory forms. 	<ul style="list-style-type: none"> • This stretch of Darley Street is proposed to be included in the extensions to the existing areas recommended in the 2018 study. • It is not clear as to the submitter's concerns regarding Lawson. One new HCA is proposed. It is unclear what is meant by a 'newly-created environment'. A small area of existing Period Housing near Honour Avenue on the south side is proposed to be converted to a new HCA. Due to large areas of deferred Period Housing and existing but deferred heritage conservation areas in North Lawson, the exhibition maps do not show the full extent of existing heritage and Period Housing protections in Lawson. • The proposal to convert existing Period Housing to heritage conservation areas is backed by two extensive studies by a well-qualified and well-known heritage consultant with many years' experience at a local and state level. There is extensive historical research of a very high quality. It is not correct that there is a 'lack of historical research'. • The intention of the naming of the Lawson HCA after Joseph Hays is in recognition of the positive impacts he had upon the town of Lawson in environmentalism, town development, and the setting aside of land for public reserves. The submission raises some very broad issues regarding social values which are beyond the scope of this 	
--	--	---	--

		<p>submission review and the proposed HCA listing.</p> <ul style="list-style-type: none"> • Council has carried two out recent studies, in 2014 and 2018 which support the current proposal. The new reports provide updated information and assessment relevant to the topic of the current studies, which is the values assessment of the proposed heritage conservation areas. The use of older studies as background and supporting material is a typical practice when preparing new reports. • Early reports commissioned by Council in 1983 (Blue Mountains Heritage Study by Croft and Associates with Meredith Walker) and a comprehensive group of reports c.2000-2005 (various authors, to support the preparation of LEP 2005) provide excellent foundation documents with strong historical sections and comprehensive historic maps. • The 1983 'Croft Study' includes an excellent thematic review. • There are many different published histories of the Blue Mountains available. Some such as Pictorial Memories Blue Mountains by John Low are widely known and respected publications. • Recently in 2016 Council commissioned a report on The Western Road to provide a linking framework for heritage in the Blue Mountains via a history of the Highway. • Concerns regarding quality of heritage assessment are unsubstantiated. Providing 	
--	--	--	--

		<p>further consideration is beyond the scope of this submission review.</p> <ul style="list-style-type: none"> • The suggested changes to the Katoomba heritage inventory sheet historical detail section are noted. However, as pointed out by the submission, inconsistencies are based on an interpretation of the evidence; therefore a highly detailed consideration of factual interpretation is beyond the scope of the submission review. The heritage inventory sheet does state up front that the historical notes are a 'summary only and do not represent a comprehensive history, etc.' The preparation of heritage material and history-writing is an ongoing process. The heritage inventory sheets in their current form are comprehensive and well-researched. At this stage the historical notes in the heritage inventory sheet are considered fit for their purpose and may be subject to future review and updating in due course. 	
--	--	--	--

OBJECT – REFINEMENTS REQUESTED

Sub no.	Issues raised in the submission	Response	Recommendations
6	<ul style="list-style-type: none"> • Submitter states that 92 Camp Street should not be included within the heritage conservation area, as it is 40 year old single-storey house with a recent second storey on top. 	<ul style="list-style-type: none"> • The request to exempt this property from the heritage conservation area has been considered. • Consideration included aesthetic and representative values assessment. 	<p>It is recommended that the subject property at 92 Camp Street be</p>

	<ul style="list-style-type: none"> • Submitter states the property, including the house, is no longer in original condition. 	<ul style="list-style-type: none"> • A definitive factor in the consideration of whether to exclude a property is the ability of any property within the proposed area to be technically capable of being excluded. Only properties on a corner or a protruding edge are capable of being excluded from an area. This would only be considered if that property was also considered uncharacteristic. • The property at 92 Camp Street has been visually assessed and it can be confirmed that it does not have representative or aesthetic heritage values that would make it contributory to the heritage conservation area. Therefore it is considered uncharacteristic based on an assessment from Council's heritage staff following the submission. • This is confirmed by our 2018 study which denotes the contribution as uncharacteristic. • In terms of the technicalities, the property is located on a corner of the existing Period Housing Area, thus it would be technically possible to excise the lot from the proposed heritage conservation area by exclusion. • Removing this particular lot from the proposed HCA would not adversely impact upon the heritage values of the area. • It is noted, however, that if any future expansion of the heritage conservation area occurs, as per the 2018 study recommendations, this lot would again be incorporated into a larger heritage 	<p>excluded from the proposed HCA. It is recommended that the IN2 Light Industrial-zoned land where also draft HCA in North Katoomba be subject to a future review.</p>
--	---	---	--

		conservation area from which it would not be possible to exclude it. It would remain as an uncharacteristic element within the area.	
7	<ul style="list-style-type: none"> • Submitter objects to their property being proposed for inclusion in a new heritage conservation area. • Submitter believes a heritage listed house is harder to sell in the future due to standing covenants, there is a drop in property values due to restrictions, any alterations will become more costly and must be conducted by an authorised heritage builder, conformation of colours is encouraged, costly building reports are required, there are lengthy delays in approval times, no outstanding structures are to visible from the street ie. carport, air-conditioning units. • Submitter is concerned there are some exemptions in the letter concerning areas in Leura, Hazelbrook, Springwood and Glenbrook. • Submitter states the property is in a zone that borders an industrial estate so there is no relevance of giving it a heritage listing. 	<ul style="list-style-type: none"> • The request to exempt this property from the heritage conservation area has been considered. The property is 42 Lovel Street Katoomba. • Consideration included aesthetic and representative values assessment. • A definitive factor in the consideration of whether to exclude a property is the ability of any property within the proposed area to be technically capable of being excluded. Only properties on a corner or that protrude from an edge are capable of being excluded from an area. This would only be considered if that property was also considered uncharacteristic. • The subject property is a Federation weatherboard dwelling and is assessed as having strong contributory values. • This is confirmed by the 2018 study which indicates it makes a positive contribution to the area. • Therefore the building requires protections under the heritage conservation area. Even if exclusion were possible it is not appropriate. • In response to the submission detail regarding negative impacts of the proposal: property values are subject to a complex range of factors, and it is noted that properties within HCA can attract higher 	<p>It is recommended that the subject property remain included within the HCA.</p> <p>It is recommended that the IN2 Light Industrial-zoned land where also draft HCA in South Katoomba be subject to a future review.</p>

		<p>resale values because of the protections provided for neighbourhood character; the cost of alterations is generally due to scope and specifications not heritage values per se particularly within conservation areas as opposed to heritage items; there is no such thing as an 'authorised heritage builder'; there is no requirement to 'conform' in colour schemes however a sympathetic approach to colour is encouraged; Council does not anticipate lengthy delays in approval times; and new structures can be visible from the street depending on their nature.</p> <ul style="list-style-type: none"> • Council is preparing a proforma Heritage Impact Statement template to assist property owners in compiling relevant heritage information for a development application for straightforward applications. • The properties in Leura, Hazelbrook, Springwood and Glenbrook are not exemptions. These properties are being removed as a recommendation of the 2018 study. The consultant reviewed each property through extensive field work and made recommendations to remove 39 properties. The 2018 study includes a methodology that underpins the recommendations to exclude these properties. • The location of the property bordering an industrial zone does not reduce the contributions and significance of the properties fronting that street. Small villages 	
--	--	---	--

		historically often have differing land uses in close proximity. The Light Industrial IN2 zoning however is noted, and will be the subject of further review in the future.	
8	<ul style="list-style-type: none"> • Submitter's house is included in the proposed heritage zone change, and submitter requests exemption from the rezoning. The property is at 10A Murri Street, Katoomba. • Submitter states the house is of poor overall standard. • Submitter would like to renovate or rebuild the home and is concerned about heritage listing putting undesirable implications / restrictions on the home that has no apparent heritage value. • Submitter believes an information sheet should be available on the implications for renovating and rebuilding • The submitter recognises the value of the area, and they would be willing to rebuild in keeping with the style of the area but do not want additional heritage restrictions placed on home. 	<ul style="list-style-type: none"> • Fact sheets were sent to the submitter who indicated the fact sheets had answered many concerns. • The request to exempt this property from the heritage conservation area has been considered. • A definitive factor in the consideration of whether to exclude a property is the ability of any property within the proposed area to be technically capable of being excluded. Only properties on a corner or protruding edge are capable of being excluded from an area. This would only be considered if that property was also considered uncharacteristic. • The subject property is within the boundary of the proposed Norths Estate heritage conservation area. Technically, exclusion is not possible. • Despite the heritage conservation area provisions, there remains ample opportunity to repair and substantially rebuild a house in poor condition. This could occur through a development application (for example if structural works are proposed, or an increased footprint) or by using the relevant state exemptions and heritage minor works applications to carry out maintenance and repair works. Many types of maintenance 	It is recommended that the subject property remain included within the HCA.

		works are exempt in heritage conservation areas, and many others could be quickly approved via the heritage minor works clause. Further detail is included in the fact sheet 'Developing in a Heritage Conservation Area'.	
11	<ul style="list-style-type: none"> • Submitter provided information that No. 98 Macquarie Road, Springwood is not currently included in the existing Macquarie Road Conservation Precinct as per a recommendation of Council (attached to submission). • Submitter states the battleaxe property should not be included in the new HCA as it does not meet the criteria for Period Housing or heritage and is not of significance. Submitter states the property is uncharacteristic and does not contribute visually to the heritage conservation area. • However the submitter does not object to the access handle being included in the Heritage Precinct. 	<ul style="list-style-type: none"> • The submission provides documentation from Amendment 1 to LEP 2005, and Council's review of submissions, regarding HCA SP056 Macquarie Road Conservation Area. The documentation indicates that 98 Macquarie Road was specifically removed from the proposed Macquarie Road HCA in 2005 by a Council recommendation following a submission review. • This review agrees with the exclusion of 98 Macquarie Road from the proposed heritage conservation area, for several reasons. The site has been previously assessed for inclusion as part of an existing HCA, and determined not to be required to be included. The property is a battleaxe block with an uncharacteristic building. The property is not visible from the road. • In terms of the technicalities, the property is technically able to be removed from the proposed heritage conservation area as it is located on a peripheral and protruding edge, such that the boundary can be satisfactorily redrawn to exclude the property. 	It is recommended that the subject property at 98 Macquarie Road be excluded from the proposed HCA.

		<ul style="list-style-type: none"> • The exclusion of the property will have no adverse impacts upon the proposed heritage conservation area. • There will be no future impacts on this property, as no recommendations have been made for any future expansion of the existing heritage conservation area. 	
12	<ul style="list-style-type: none"> • Submitter notes that Council proposes to include nos. 82 Macquarie Road, Springwood, and no. 84 Macquarie Road access handle into the heritage conservation area. • Submitter states that No. 82 is a vacant block of land with no trees on it, and no. 84 access handle is a concrete driveway only a few years old. • Submitter states that No. 86 was the most easterly building built by the Lawson family and is not visible from the street. • Submitter claims that No. 82 and the concrete driveway to no. 84 have no historical significance. • Submitter recommends that the vacant land should be aligned with the character of Aquinas Court and the transition to the car yard and Repco or any R3 development on those sites. • Submitter proposes that the eastern boundary should end at no. 86 Macquarie Road Springwood, as the vacant land and concrete driveway do not satisfy the criteria for heritage. 	<ul style="list-style-type: none"> • The submission is not relevant to the current proposal. • The properties at no. 82 Macquarie Road, Springwood, and the access handle to no. 84 Macquarie Road are in an existing heritage conservation area. • Council is not reviewing or proposing changes to properties within existing heritage conservation areas as part of this proposal. • No. 82 Macquarie Road is also in a Period Housing area; this attribute of the property will be deleted, but its existing heritage status will remain. • The access handle to no. 84 Macquarie Road is already in the existing HCA but is not Period Housing. No change is proposed to this access handle. • A review of existing heritage conservation areas will be programmed to occur at a future date. • However, it is noted that there are existing Period Housing lots east of no. 82 Macquarie Road which are part of the current proposal, and will be converted to heritage conservation area by joining the existing 	No recommendations.

		Macquarie Road East HCA. No. 82 will be located within the middle of the expanded HCA. Thus an exclusion in the future is technically unfeasible, as the lots are located in the middle of the expanded HCA.	
17	<ul style="list-style-type: none"> • Submitter objects to the proposal to include property at 211 Great Western Highway, Katoomba in a new heritage conservation area. • Submitter references a recent demolition and queries the process for such • Submitter states that other heritage properties along the GWH in Katoomba are not listed for HCA conversion. • Submitter states that their house and the extensions are not in good condition and do not belong to the time period pre-1946. Also raised concerns about depreciation. • Submitter has concerns with consistency of approach and believe some property owners and areas [<i>details provided</i>] may have received favourable consideration, as well as some areas being listed in higher density zones • Submitter requests an exemption of property from the HCA based on the above 	<ul style="list-style-type: none"> • The property referred to as being demolished was done by the RMS in the time frame between Period Housing Areas being transferred into LEP 2015, and the commencement of the draft HCA status that applies since July 2018. The demolition was approved as complying development under the provisions of the Demolition Code of the Codes SEPP. • Any new building or development proposed in a draft HCA will require a development application to be submitted to Council. Any new development would be subject to the Council's planning provisions and will be assessed under the heritage conservation area provisions. • In regard to particular surrounding land and the properties mentioned in the submission, the current proposal is to convert existing Period Housing Areas only to heritage conservation areas. The lots mentioned fall outside the current proposal. However, the 2018 study has made recommendations for an expansion of some areas and the identified properties fall within the proposed expanded area. Council may progress these in the future. 	<p>It is recommended that the subject property remain included within the HCA.</p> <p>It is recommended that the R3 Medium Density-zoned land in North Katoomba where also draft HCA be subject to a future review.</p>

		<ul style="list-style-type: none"> • The date of construction of a property within a draft heritage conservation area is no longer a determinative indicator of heritage value. The 1946 date was previously applied to provide a notional guide to distinguish between Inter-War and Post-War housing, however styles are known to continue across notional style cut-off dates particularly in the Mountains. The subject building has clear contributions values as assessed by Council's heritage staff following the submission, including curved brickwork and leadlight glass bays to both sides of the primary façade, and a traditional tiled and pitched roof. The heritage conservation area study uses a broader set of assessment criteria to determine contributions values. These criteria are set by the NSW Heritage Council. The 2018 study preliminary findings indicate the property as making a positive contribution. • The proposal is a clear conversion of areas currently listed as Period Housing since 2005; this is reflected by comparing the existing and proposed mapping. The two consultant studies and their recommendations were the basis for any inclusions and exclusions. • The depreciation of value is beyond the scope of this proposal and depends upon many other factors. 	
--	--	--	--

		<ul style="list-style-type: none"> • It is acknowledged that the public exhibition process has raised some concerns about land in Katoomba that is zoned R3 Medium Density Housing or IN2 Light Industrial that is also currently Period Housing and proposed to be converted to heritage conservation areas. These zonings allow a certain type of development that may not sit comfortably with the retention of a modest dwelling. Outcomes are dependent on many other factors; however, this issue is worthy of a future review. 	
24	<ul style="list-style-type: none"> • Submitter objects to the inclusion of property at 22 Craigend Street, Leura, based on nature of garden and current dwelling. Issues around tree removal were also raised. 	<ul style="list-style-type: none"> • The request to exempt this property from the heritage conservation area has been considered. • A definitive factor in the consideration of whether to exclude a property is the ability of any property within the proposed area to be technically capable of being excluded. Only properties on a corner or protruding edge are capable of being excluded from an area. This would only be considered if that property was also considered uncharacteristic. • The subject property is within the boundary of the proposed South Leura heritage conservation area. Technically, exclusion is not possible. • Despite the heritage conservation area provisions, there remains ample opportunity to develop the site. The proposed heritage conservation area does not preclude a new 	<p>It is recommended that the subject property remain included within the HCA.</p>

		<p>dwelling or necessary modifications to the landscape of the site to allow a new dwelling.</p> <ul style="list-style-type: none"> • This could occur through a development application (for example for a new dwelling or significant works to the existing dwelling) or by using the relevant exemptions and minor works applications to carry out maintenance and repair works. Trees can be removed through the Tree Permit process. • Many types of maintenance works are exempt in heritage conservation areas, and many others could be quickly approved via the heritage minor works clause. 	
26	<ul style="list-style-type: none"> • <i>This submission includes four separate documents from the submitter. Submissions 26(a) – 26(c) are from the submitter regarding properties at 29-41 Honour Avenue (5 vacant lots), and 26 Waratah Street and 43 Honour Avenue, all in Lawson. Submission 26(d) is an expert heritage opinion commissioned by the submitter that supports the objections contained within the other three submissions. These submissions have been considered as a group as all are commissioned or prepared by the same owner and relate to seven adjacent lots in Lawson under two related ownerships.</i> • Submission 26(a): Primary submission from property owner. Submission questions the justification in the planning proposal and considers the heritage conservation area proposal unjustified. The submission refers to the expert opinion in Submission 26(d) that the lots 	<ul style="list-style-type: none"> • This submission response deals with two primary issues. The first issue relates to the heritage value of the lots. The second issue is the suitability of the sites for medium-density housing zoning. These two issues are the most important issues raised by the submission group. These are dealt with separately below. • The site was inspected on 15 August 2018. The seven lots were inspected as well as development, character and site characteristics in the vicinity of the subject sites. • <i>Heritage values of the seven lots:</i> • (1) The lots were inscribed within the boundaries of the Lawson Village layout, a design adopted in 1881, providing the earliest evidence of their historical significance as part of the original Village of Lawson. They 	<p>It is recommended that the subject properties remain included within the HCA. Further historical research into the Lawson HCA is recommended.</p>

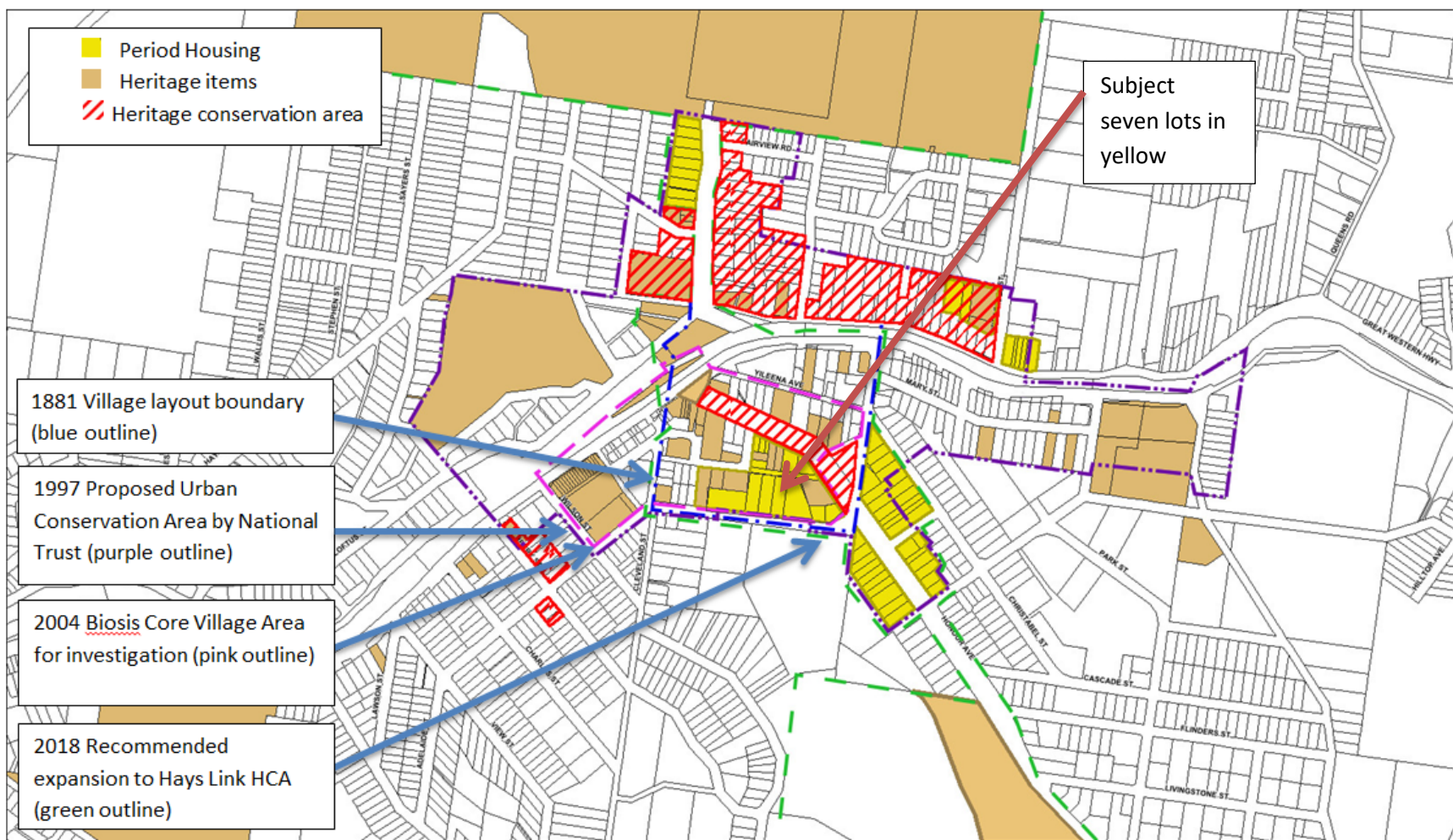
	<p>do not warrant inclusion in the new HCA. The submission suggests the Council study consultant has made an error, and that because of this, mountains residents will be deprived of affordable housing. The submission suggests a peer review of the Council's study to be carried out by a heritage expert appointed by the DPE. The submission refers to the Urbis submission 26(d) for support.</p> <ul style="list-style-type: none"> • Submission 26(b): Further submission from property owner on 26 Waratah Street and 43 Honour Avenue Lawson, which include a dwelling on each lot. The submission makes various heritage arguments about streetscape, historical ownership, and importance of Hays to argue that these two lots should not be included. The submission refers to the Urbis submission 26(d) for support. • Submission 26(c): Further submission from property owner on the five adjacent vacant lots at 29-41 Honour Avenue, Lawson. The submission makes various heritage arguments about streetscape, historical ownership, and importance of Hays to argue that these five vacant lots should not be included. The submission refers to the Urbis submission 26(d) for support. • Submission 26(d): Commissioned heritage expert opinion (Urbis) on heritage value of seven lots. The submission compares the Hays Link HCA with the Ian Jack Review of the National Trust proposed boundary, seeking to establish that the lots were excluded by the Jack study. The 	<p>comprise a large portion of Section 2 of the two original village sections.</p> <ul style="list-style-type: none"> • (2) All seven lots were included in the National Trust proposed Urban Conservation Area. • (3) Ian Jack reviewed the proposed HCA boundary in 2003 (boundary proposed by the National Trust) as an 'Urban Conservation Area'. This term has become superseded as heritage practice has developed by the term 'heritage conservation area', which can refer to a broader scope of values beyond the 'urban'. The lots were not specifically included for a new HCA by the Ian Jack study, which proposed small discrete areas for new HCAs at a time when Lawson had no HCAs and was under significant change due to the Highway. The exclusion was general, not specific. The Jack study did not analyse view lines or refer to the original 1881 village layout. The Jack review did not investigate Hays, did not consider environmental or landscape values or the relationship of the township to the wider setting of the water catchment system and its historical associations. • The lots were included in the Section 3 – Core Village Area – of the Biosis report ('Lawson Township Heritage Project: Section 3 Heritage Assessment and Impact Statement, Core Village Area', by Oona Nicolson and Paul Davies, February 2004). 	
--	---	--	--

	<p>submission seeks to discredit the heritage significance of Hays and claim lack of relationship between the sites and Hays. The submission questions the significance of the lots, and states there are no criteria or argument for their inclusion, including a lack of analysis of view lines, and that they do not form part of the visual catchment of the new HCA. The submission states that the sites do not have a historical relationship to Honour Avenue and Benang Street. The submission states the sites have potential to be developed at higher density as they are larger, vacant and close to the town centre.</p>	<p>This area was specified by Council for investigation.</p> <ul style="list-style-type: none"> • The lots were then included in the Period Housing Areas of 2005 as being lots of significance. • The lots were recommended for inclusion in the new proposed heritage conservation areas in the 2014 report, which assessed HCAs as cultural landscapes. • The lots were assessed again in 2018 and recommended for inclusion, based on fieldwork study. The lots were given a contributory value in the assessment of individual contributions. • The 2014 and 2018 studies confirm that the lots meet the NSW Heritage Council criteria for heritage conservation areas. • Refer to the included map which overlays the 1881 original village layout, National Trust recommended area, Biosis investigation area and 2014/2018 recommended expanded area. The lots are included in each layer of area investigated and recommended for inclusion, the only exception being the 2003 Jack study. • The lots have been again reconsidered following a site visit from Council staff in August 2018. • Lots within the proposed HCA do not need to have been owned by Hays to positively contribute to the HCA. Hays' name in the title of the HCA has a broader significance in 	
--	--	--	--

		<p>terms of a key association in the creation of the Lawson village environment.</p> <ul style="list-style-type: none"> • The lots are historically associated with David Wilson, who owned lots 14, 15, 17, 18, and 19, and built Fontainebleau [Biosis:2004]. Wilson was a brickmaker and used the bricks from his own kiln to build the residence. He owned a brick kiln in the Willoughby/Gore Hill area, Wilsons Brick and Tile Works which operated successfully from the 1890s until 1930. [http://www.willoughbydhs.org.au/] Wilson remained the owner of Fontainebleau until 1930 [heritage listing for Fontainebleau on OEH website]. • The lots have historical, historical associational, and some aesthetic significance. • The two dwelling houses requested for exclusion appear on the 1943 aerial mapping on SIX maps, which was part of the assessment in the 2014 study. • The 2014 report gives them contributory values as 'intact in their form'. The site visit confirmed they appear to retain their integrity and make a positive contribution. • It is considered the two dwellings are traditional dwellings and important fabric to retain despite only partial views from Honour Avenue. They are very visible from the north end of Waratah Street. • It is considered the five vacant lots have heritage significance under the categories 	
--	--	--	--

		<p>noted above, and make a significant contribution to the landscape values of the conservation area. They are highly visible from ridge points in various directions. They currently have a cleared appearance which gives them a rural village aesthetic, and also contains exotic mature trees. They are part of the visual catchment of the conservation area.</p> <ul style="list-style-type: none"> • A similar existing HCA, Central Mount Victoria Urban Conservation Area is the best village HCA for comparisons due to density and traditional spatial qualities. The Mount Victoria HCA also contains vacant lots close to the village centre eg. Harley Avenue, Great Western Highway. • Vacant lots close to town centres are a typical pattern as evidenced in many of the heritage inventory sheets, for Lawson and other HCAs. • Note the currently proposed HCA represents only part of the HCA conversion process as other sections further down Honour Avenue to the south are on deferred land. • <i>Medium-density housing potential:</i> These lots were assessed for their potential for medium-density (Village-Housing) zoning as part of the preparation of LEP 2005. It was found the lots did not meet the zoning criteria for medium-density housing, and have not been zoned for medium-density housing. 	
--	--	---	--

		<ul style="list-style-type: none"> • The land is not suitable for other permitted uses of a higher density, such as Seniors Housing (permitted in the current land zoning of the lots). Suitability for Seniors Housing requires a number of criteria to be satisfied, such as maximum land slope of 1:16 with short distances of 1:12. The subject lots have a slope assessed as 1:6 which makes them likely to be ineligible for Seniors Housing. • The lots are zoned R2 Low Density Residential. • The land is at the head of Lawson Creek and subject to environmental constraints relating to riparian zones, reducing the potential for higher density development. Another submission has recommended that land that borders this site to the west also be included in a future expanded heritage conservation area for South Lawson because of its environmental and cultural values. This is not being investigated at this time. 	
--	--	--	--



COMMENT

Sub no.	Issues raised in the submission	Response	Recommendations
1	<ul style="list-style-type: none"> • Submitter states there is an inconsistency between the report and map for the Westbourne Ave HCA, Wentworth Falls around the presence of 70s cottages in the middle of the listed area 	<ul style="list-style-type: none"> • The mapping provided with the exhibition material did not show existing conservation areas, so did not show the existing heritage conservation area in Westbourne Avenue, WF073, which includes the eastern cottages. • The 70s houses in the middle are included in the conservation area as they are located within an area that has a high concentration of contributory properties. The 70s houses may be inconsistent with the area's values but may still be located within the boundaries of the proposed area. • It is quite typical particularly in larger areas that some properties get incorporated into a larger area although they do not share the overall values. It is not technically feasible to exclude or exempt these properties as they are within a defined area with discrete boundaries. They are usually the result of infill development that occurred before the area was recognised as having heritage value and protections put in place. • The 2018 Contributory Mapping Study provides preliminary mapping for the two 70s properties as 'inconsistent'. • The reason for attributing categories of significance and contributions of individual properties is to guide future development 	<p>No recommendations.</p>

		<p>within a heritage conservation area and ensure that significance is retained. Properties of inconsistent values within the area may be able to be changed or developed to a greater degree if new work provides a better fit with the area's values.</p> <ul style="list-style-type: none"> • Work on Council's Development Control Plan is programmed to update provisions that reflect the differing contributions with heritage conservation areas. This work will be subject to public exhibition for comment before contributions are confirmed. 	
3	<ul style="list-style-type: none"> • Submitter queries the need to classify their property as it is a red brick house built in the 60s with no garden of any consequence. Submitter also queries the inclusion of the houses on either side also. 	<ul style="list-style-type: none"> • Some properties within a heritage conservation area are later infill development which may not exhibit the characteristic values of the heritage conservation area, but are incorporated into a wider area that does have overall heritage significance. • It is quite typical particularly in larger areas that some properties get incorporated into a larger area although they do not share the overall values. It is not technically feasible to exclude or exempt these properties as they are within a defined area with discrete boundaries. They are usually the result of infill development that occurred before the area was recognised as having heritage value and protections put in place. • The 2018 Contributory Mapping Study provides preliminary mapping for the subject property as 'inconsistent'. Those to either side 	<p>No recommendations.</p>

		<p>were also either of inconsistent or neutral value.</p> <ul style="list-style-type: none"> • The reason for attributing categories of significance and contributions to individual properties is to guide future development within a heritage conservation area and ensure that significance is retained. Properties of inconsistent values within the area may be able to be changed or developed to a greater degree if new work provides a better fit with the area's values. • Work on Council's Development Control Plan is programmed to update provisions that reflect the differing contributions with heritage conservation areas. This work will be subject to public exhibition for comment before contributions are confirmed. 	
5	<ul style="list-style-type: none"> • Submitter seeking clarification on detail of the changes. 	<ul style="list-style-type: none"> • This submission was a general enquiry. The fact sheets prepared during the exhibition were sent to the submitter. 	No recommendations.
9	<ul style="list-style-type: none"> • Submitter has concerns around maintenance of HCAs into the future. Suggests basic information on such could be provided by Council 	<ul style="list-style-type: none"> • Council has no jurisdiction to enforce basic maintenance and repair of locally significant items or within heritage conservation areas. In terms of heritage-listed properties, only properties listed on the State Heritage Register are required to be kept by their owners to a 'minimum standard of maintenance and repair' which is enforced by the NSW Heritage Council. For locally-listed heritage items and heritage conservation areas, Council has no similar ability to enforce minimum standards. 	It is recommended that Council consider the creation and circulation of guidelines for maintenance of properties in heritage conservation areas at a future date.

		<ul style="list-style-type: none"> • Council is concerned that heritage-significant buildings are maintained and preserved for future generations, and works with property owners when the opportunity arises to advise and assist wherever possible. • The idea of providing information on basic maintenance is a positive suggestion, and could be pursued further by Council, by creating guidelines and / or fact sheets to distribute to property owners. 	
10	<ul style="list-style-type: none"> • Submitter queries the intent of the proposal and requested information in simple common-day language? 	<ul style="list-style-type: none"> • This submission was a general enquiry. The fact sheets prepared during the exhibition were sent to the submitter. The submitter responded by email that the fact sheets had answered his questions. 	No recommendations.
16	<ul style="list-style-type: none"> • Submitter believes there is a lack of detail on the implications for listing. • Submitter asks if the planning proposal will be revised on the basis of feedback during public exhibition 	<ul style="list-style-type: none"> • The fact sheets prepared during the exhibition were sent to the submitter. The fact sheets respond directly to the majority of questions raised in the submission. • The planning proposal has been revised on the basis of the submission review as relevant. 	No recommendations.
19	<ul style="list-style-type: none"> • Submitter states changes are difficult to understand • Submitter has concern that HCAs are a higher level of controls than Period Housing Areas. • Submitter feels such a change is not supported in the Planning Proposal • Submitter has concerns with delays arising to development in order to address HCA issues and impact on processing time at Council 	<ul style="list-style-type: none"> • Fact sheets have been prepared and provided to all enquirers and will be sent to all affected property owners. • It is a common perception that Period Housing Areas are less restrictive than heritage conservation areas as the submitter suggests. However, on balance, the overall intentions are the same: to protect the area against demolition of buildings, and to control incremental changes to character when infill 	No recommendations.

		<p>development and alterations and additions occur. As always, good development outcomes depend on many factors, particularly the commitment of the owner and the skills of any consultants and the assessing officer.</p> <ul style="list-style-type: none"> • To have control over demolition, it is necessary to be excluded from the complying development's Demolition Code. Heritage conservation areas are excluded from the demolition code. This is the primary mechanism for ensuring that a certain level of control over change within heritage conservation areas is possible, to retain heritage values. • A property within a heritage conservation area is then excluded from certain other exempt and complying development under the state government's Exempt and Complying Development Codes. • Some complying development will not be permitted in heritage conservation areas, for example, secondary dwellings. Instead a development application will be required. • Some exempt development rules are more restrictive within a heritage conservation area. For example, a proposed new deck at the frontage of a dwelling in a heritage conservation area requires a development application. • To achieve one of the primary intentions of the policy translation, of protecting buildings 	
--	--	--	--

		<p>within heritage conservation areas from demolition, it is necessary to make the conversion to heritage conservation areas. This is the only mechanism whereby Council can be involved in assessing the merit of a demolition application.</p> <ul style="list-style-type: none"> • A heritage management document, as identified in the model heritage provisions of the Standard Instrument, typically refers to either a Heritage Impact Statement or a Conservation Management Plan. A Conservation Management Plan is generally only required for substantial properties that are heritage items and must be prepared by a professional heritage consultant or specialist. • Most applications within heritage conservation areas would require only a concise Heritage Impact Statement. Most applications are for various types of additions to the rear of the property or ancillary development. For this type of development, a Heritage Impact Statement would not require a professional level of research, analysis and heritage assessment. The heritage inventory sheet for the heritage conservation area will be available and should be used to assess values. Assessment would focus on the aesthetic heritage values, particularly those features and characteristics visible from the street. The main concerns are ensuring that the bulk, form and height of additions are 	
--	--	---	--

		<p>sympathetic to the existing building and the streetscape.</p> <ul style="list-style-type: none"> • Council is preparing a template Heritage Impact Statement that will be able to be filled out by some homeowners, draftspeople, architects and other non-heritage specialists. This will remove any onerous requirements to have a heritage report prepared by a heritage specialist, when the scope of the change does not warrant a full consultant report. • Council is considering its resourcing requirements to ensure that heritage properties and applications are able to be appropriately assessed and within required timeframes. 	
21	<ul style="list-style-type: none"> • Submitter states that all property owners within proposed HCAs should be notified by post to indicate the constraints regarding future development. • Submitter believes that all property owners should have the right to an invited submission by post and a right to opt out of inclusion. • Submitter raises issues around HCAs in R3 areas. 	<ul style="list-style-type: none"> • All property owners affected by the proposed conversion were sent a notification letter inviting them to make a submission. All property owners who contacted Council were sent fact sheets explaining the changes. The fact sheets were also uploaded to Council's Have Your Say website. • Opting out by an individual lot basis is not possible, as the proposal is to create 'areas' with defined boundaries. This is the heritage industry recognised practice based on a methodology of establishing the heritage significance of an area with shared characteristics. It is not feasible or logical to remove individual properties from their overall heritage context within the area (if owners 'opted out'). This would create an arbitrary 	<p>It is recommended that the R3 Medium Density-zoned land in North Katoomba where also draft HCA be subject to a future review.</p>

		<p>patchwork of 'in' and 'out' properties that does not reflect heritage values and makes a consistent approach to development impossible. Opting out by owners of contributory properties would lead to those properties being open to demolition, which is against the intent of the proposal. Individual decisions by owners about whether to opt out or opt in leads to arbitrary decision-making and poorly applied policy perpetuating unfair and inconsistent decision-making.</p> <ul style="list-style-type: none"> • The methodology for heritage conservation areas establishes that individual properties can be identified for their contributions by mapping included in a DCP. This method ensures that restrictions on retention of original fabric and the degree of appropriate change are consistent with the level of heritage significance of each lot. If no mapping of contributions is available, heritage significance values form part of the development application assessment process. <p><i>Discussion on R3 zoning</i></p> <ul style="list-style-type: none"> • The Blue Mountains has relatively little land zoned R3 due to various environmental constraints. Land zoned R3 was created as part of LEP 2005 originally zoned as Village-Housing and was intended to be close to town centres, subsequently identified as special precincts in Schedule 1 of LEP 2005. There is little nexus therefore between Period Housing 	
--	--	--	--

		<p>and the R3 zoned land, as Period Housing was generally located beyond the town centre area and mostly zoned Village-Tourist (now R1) or Living – General (now R2). There are areas of R3 in Blackheath, Katoomba, Leura, Wentworth Falls, Lawson, Hazelbrook, and Springwood. Almost all R3 zoned lots are unaffected by Period Housing except for 19 lots in Katoomba in the Dora Street and Great Western Highway area, and two lots in Grose Street, Leura. The two lots in Leura are of neutral or uncharacteristic contributions according to the 2108 Conroy study therefore the conflict between conservation requirements and development potential is minimised. The North Katoomba area, in the Dora Street and Great Western Highway area, has 19 lots which are existing Period Housing and are also zoned R3. These lots are all proposed to be converted to HCAs. Most of the lots have been identified in the 2018 Conroy study as contributory to the proposed heritage conservation area.</p> <ul style="list-style-type: none"> • It is acknowledged that these conflicts require a review of the zoning affecting these lots. • The presence of a heritage conservation area does not negate the permissibility to carry out medium-density development per se, particularly for those lots within the HCA that may not be contributory. The building height maximum is 8m, suggesting a maximum height of two storeys. 	
--	--	---	--

28	<ul style="list-style-type: none"> • Submitter's property is affected by the proposal. • Submitter has concern that when planning authorities place heritage conservation areas over areas that the long term result will be poorer design outcomes, including imitation heritage aspects. 	<ul style="list-style-type: none"> • The size of a heritage conservation area depends on the historic pattern of development and includes such things as the original village layout or early subdivision sales. In the case of Blackheath, a large town was laid out as an atypical example of the standard Government village layout according to Crown Plan principles (refer to the heritage inventory sheet for the Blackheath Village HCA). • There is not a clear nexus between the heritage quality of buildings within a heritage conservation area and the development outcomes produced for that area. Buildings are only one aspect of a heritage conservation area. The overall quality of the existing buildings, streetscapes and landscapes must be sufficient to meet the heritage criteria for significance and create a 'sense of place' for that area. It is common that some properties within the area will not meet the criteria and may be assessed as either of neutral or partial significance or of no significance and therefore uncharacteristic or inconsistent. Once the overall heritage values are established, development controls are typically established that guide the preservation of those values when development occurs. The controls such as found in the Council's Development Control Plan (DCP) provide guidelines to support the type of development that Council determines 	<p>No recommendations.</p>
----	--	---	-----------------------------------

		<p>will lead to the best possible outcome for the heritage conservation area. Refer to Part D1 Heritage.</p> <ul style="list-style-type: none"> • Council actively discourages the application of decorative or other superficial details to denote 'heritage' when development occurs. Rather, the requirement is for a considered response to the values. Good contemporary design that responds to the forms, scale, materials and character of the area is required. Council's DCP in Part B3 Character and Design states that infill development should 'demonstrate a high quality contemporary design response where respect for and sympathy with surrounding development can be demonstrated' (p.56) and that 'historic detailing is not to be imitated', rather infill development should reference floor levels, solid to void ratios of elevations, fenestration patterns etc. (p.57). In Part D2 Heritage, it states that 'Infill development is to be sympathetic to existing buildings in siting, scale, form and proportion without imitating historic detailing' (p.270). • The 2018 study was part of Council's work to ensure that individual contributions can be mapped, making clear to Council and owners where properties are considered to make a significant heritage contribution and where there are lesser or no contributions. This is standard heritage practice for identifying and 	
--	--	---	--

		<p>managing conservation areas, particularly larger areas.</p> <ul style="list-style-type: none"> • A lot with a fibro house may be considered to make a contribution to a heritage conservation area, whether due to an established garden setting, the forms and materials of the house or the scale of the dwelling. These values represent certain aspects of the past that the community may value. Other factors such as condition and integrity also play a role in considering the degree of appropriate change. 	
--	--	---	--