



# Blue Mountains Conservation Society Inc

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1 September 2024

By email to: [council@bmcc.nsw.gov.au](mailto:council@bmcc.nsw.gov.au)

## Re: Draft AFFORDABLE HOUSING POLICY

To whom it may concern,

The Blue Mountains Conservation Society (the Society) is a community-based volunteer organization with over 800 members. Its mission is to help conserve the natural environment of the Greater Blue Mountains and to increase awareness of the natural environment in general.

The Society commends Council on this thorough and highly informative document.

### 1. Increased Supply

The Society agrees with BMCC that increased supply of housing in the private market will not lead to more affordable housing (p17), and that a multitude of factors need to be addressed.

### 2. Affordable housing provided by Private Sector

There is concern about two mechanisms identified to provide incentives to the private sector to provide affordable housing: viz Voluntary Planning Agreements and Rezoning. Both involve variations to the Local Environment Plan 2015 which could potentially weaken environmental safeguards by allowing for increased density.

While it is possible that there may be opportunities for small concessions without further environmental harm, it is critical that these mechanisms are not **continually used** because the “affordable housing” once provided has disappeared into luxurious or empty investment properties. Any affordable housing provided must be guaranteed in perpetuity by ironclad monitoring and enforcement mechanisms.

Voluntary Planning Agreements provide better guarantees to ensure affordable housing is in perpetuity, where it involves transfer of ownership to Council. However, where greater densities are permitted in exchange for affordable housing which will remain under the control of the private sector, there do not appear to be any robust mechanisms which will ensure affordable housing is guaranteed in perpetuity.

This requirement as a Condition of Consent does not provide that guarantee - Council does not and is never likely to have the resources to monitor all the consent conditions of all developments regularly, if ever. Enforcement by future councils can also not be guaranteed, particularly if they become dominated by councillors who own multiple investment properties (as is the case of Federal and probably NSW parliamentarians).

**If affordable housing is not guaranteed in perpetuity, there will be a never ending cycle of these demands for increased density, and the subsequent erosion of environmental safeguards.**

The likelihood of private sector supplied affordable housing in perpetuity is highly unlikely. Even if this requirement were on the title deed, what individuals or agencies would have the resources to rectify the situation by taking legal action?

Community or publicly controlled Affordable Housing approaches offer more opportunities to ensure this, such as Community Land Trusts located on council owned land.

**Recommendation:** that Council supports community led affordable housing initiatives that have in-perpetuity guarantees.

### 3. Vacant dwellings & apartments in Blue Mountains

The draft policy does not address the potential to redirect currently vacant houses into affordable housing. There are homes lying vacant whilst there is a demand to build more. This is surely a conservation concern about waste as well as pressure to “develop” more of this fragile landscape (and cause harm).

The 2021 Census revealed that in this LGA 10.5% of private dwellings were unoccupied (higher than the NSW average of 9.4%).

Significantly higher vacancy rates occur in the upper Mountains - Blackheath/Mount Wilson has 26% unoccupied dwellings while Katoomba/Leura/Wentworth Falls has 18% (as compared to Springwood/Winnalee at 6%). Given the strong tourism focus in this area, use for short-term rental accommodation is likely to be a contributor to these unoccupied dwelling rates.

The two major situations giving rise to the high vacancy rate appear to be:

- dominance of short-term rentals with high vacancy rates particularly mid-week
- multiple home ownership by some who visit their ‘mountain home’ rarely, if ever.

The 2016 study of social and affordable housing for the Blue Mountains revealed that in 2016, the unmet demand for social and affordable housing was for **2,253 households/ dwellings**. This compares with the 4,140 dwellings which were unoccupied in the Blue Mountains LGA in 2021 census. Whilst the dates do not coincide it is indicative that the number of unoccupied dwellings could equal or exceed the demand.

So is the need for more buildings or is the need for changes in financing structures?

The Society recognises that the council does not have the power to change legislation or taxation structures, but urges council to be an advocate for such changes to reduce vacancy rates, actively working with the local government associations.

**Recommendation:** that council advocates for changes to state and federal legislation to address high vacancy rates.

#### **4. Adaptive Re-use of Heritage buildings**

Many heritage buildings are deteriorating either due to wilful neglect or a genuine problem of finding adequate restoration finance. The rules around heritage buildings need to be urgently reviewed and altered to promote the repurposing of these buildings, some of which may be suitable for affordable housing.

#### **5. Use of Unformed Roads**

There are a number of unformed roads which could be considered as 'vacant' land, and may be considered as public land potentially available for affordable housing. Whilst not currently zoned, a significant number of these have environmental constraints that would qualify them for environmental protection zoning (C 2) and hence disqualify development. A comprehensive assessment would need to be undertaken prior to any consideration of this land for housing.

#### **6. Design Issues**

The Goals and Principles outlined in section 2.1 need to include more specific design principles around sustainability.

High priority should be given to design features that assist with ongoing affordability: viz energy, thermal and water efficiency. It is important that such considerations keep building as well as household running costs to a reasonable level. Basic passive solar design is heavily reliant on siting, good insulation and ventilation, and if possible, also thermal mass. There is no need for more complex systems that increase up-front costs and require occupants to have a good understand of their functioning.

Consideration needs to be given to materials used and embodied energy. Also simple features such as planning for clotheslines rather than reliance on driers, should be included.

Thank you for the opportunity to contribute to the development of this important policy. Please do not hesitate to contact me at [bmcs@bluemountains.org.au](mailto:bmcs@bluemountains.org.au) for clarification of any points raised.

Yours sincerely



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