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Photo: Paul Vale

Draft Blue Mountains Local Environmental Plan 2013

Analysis of Submissions

September 2014

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Executive summary

The Blue Mountains Conservation Society (BMCS) analysed 573 of the 595 submissions to DLEP 2013. Our objectives were to gauge the effectiveness of the Society's public engagement and information campaign, and to gauge community support for DLEP 2013.

The effectiveness of the Blue Mountains Conservation Society's campaign is apparent in the number of BMCS-related submissions to DLEP 2013, the number of hits on the BMCS website and the number of new members joining during and just after the exhibition period:

- Of the 573 submissions analysed, 39% were on BMCS form letters or prepared email. Another 13.5% drew on BMCS information sheets and submission-writing guides. Together, this means that some 53% of the submissions analysed were BMCS-related and supported the Society's position on DLEP 2013.
- There was a spike in the number of hits on the BMCS website at the height of the campaign in February 2014, with an average of 210 different visitors a day.
- There was a spike of 24 new members in March 2014.

Community support for DLEP 2013 is apparent in the number of submissions supporting the DLEP 2013 as exhibited or with amendments (primarily to strengthen environmental protections):

- 65.5% of the submissions analysed supported the DLEP 2013 as exhibited or with amendments.
- 32% either objected to DLEP 2013 or rejected it entirely.
- 2.5% did not indicate support, objection or rejection.

Breakdown of support by stakeholder group and geographical location of submitters:

- The vast majority of submissions (around 84%) were from individual residents or landholders.
- The vast majority of these submissions (71%) supported DLEP 2013.
- The vast majority (almost 90%) of submissions from community groups supported DLEP 2013.
- The vast majority (almost 95%) of submissions from the business, tourism and property development sectors objected to DLEP 2013.
- Villages from/about which there were large number of submissions with a high percentage of support—Blackheath, Katoomba and Springwood—already have a high level of community-based environmental activity e.g. Bushcare groups.
- Lower levels of support for DLEP 2013 were found in submissions from/about larger villages—Leura, Wentworth Falls, Lawson, Hazelbrook and Blaxland—where there is a struggle over the future character of the village, particularly residential and commercial development around the town centres.
- There was no support for DLEP 2013 in submissions from the Megalong Valley, an area traditionally resistant to environmental controls on agricultural activity.

Background

The Blue Mountains Draft Local Environmental Plan 2013 (DLEP) was on public exhibition for 13 weeks from 4th December 2013 to 5th March 2014. This was less than ideal timing, coming so soon after the devastating bushfires of October 2013 and coinciding with the Christmas/New Year and school holidays. The initially proposed 2 month exhibition period was manifestly inadequate in these circumstances, especially for a plan of the scale and complexity required to protect the surrounding World Heritage national parks from the impacts of development in the city. Following ongoing lobbying by the Blue Mountains City Council, the Blue Mountains Conservation Society (BMCS) and local media, the NSW government finally agreed to a 3 month exhibition period.

Compared with the development of LEP 2005, community consultation at the drafting stage of DLEP 2013 was perfunctory and attenuated. This was partly due to pressure on Council to ‘fast-track’ completion of the new LEP in Standard Instrument format (SILEP) before the proposed new state-wide planning regime was in place (anticipated to be by late 2013). However, the new planning legislation did not pass the upper house of the NSW parliament intact and is currently in abeyance. The limited community consultation at the drafting stage also reflected the minimal change approach adopted by Council. The development of DLEP 2013 was essentially an exercise in translating the existing Blue Mountains LEPs 1991 and 2005 into the SILEP format which mandates much of the content. For these reasons there was little or no scope for community involvement in the drafting of DLEP 2013. Given these circumstances, the BMCS was concerned that the community would not be adequately consulted on the new LEP for the Blue Mountains.

Further, throughout 2012 and 2013 Council meeting business papers reported that the Department of Planning and Infrastructure was resistant to including critical environmental protection provisions from LEPs 1991 and 2005 in the new Blue Mountains LEP. These included protection for unmapped significant vegetation and high level stormwater management provisions protecting waterways and swamps, Sydney’s drinking water and the World Heritage Area from the effects of development on the ridgetops. It was also clear that the definition, principles and practices of Ecologically Sustainable Development, as defined in LEP 2005, would likely not be retained as an Aim of DLEP 2013. The BMCS was therefore concerned that the new LEP for the Blue Mountains would see a downgrading of the environmental protections.

Concerned by these developments, in early 2013 the Landuse Subcommittee of BMCS embarked on a public information campaign. The aim was to engage the community in the DLEP 2013 process, and to encourage community support for carrying forward and strengthening the current regime of environmental protections into the new LEP for the Blue Mountains. The BMCS held a very successful public meeting in May 2013 with speakers from the BMCS, Blue Mountains City Council and the Blue Mountains World Heritage Institute. We also engaged a campaign co-ordinator on a limited, part-time basis and developed a public communications strategy. During this time, the BMCS also wrote letters to and sometimes met relevant state and federal MPs (management of the World Heritage Area being a joint state and federal responsibility). We relayed our concerns to them about the potential downgrading of environmental protection and supported Council’s position at the time that the Blue Mountains Local Government Area should be exempt from a SILEP, given its unique circumstances. When the state government rejected that argument and directed Council to proceed with drafting a SILEP, the BMCS supported Council’s position that Australia’s international obligations under the World Heritage Convention—to protect, conserve and rehabilitate the Greater Blue

Mountains World Heritage Area—demanded some flexibility in the application of a SILEP.

Throughout 2013, in difficult and protracted negotiations, Council won major concessions from then Planning Minister, Brad Hazzard, and the Department of Planning and Infrastructure about what could be included in the exhibited DLEP 2013. These inclusions, such as high level stormwater management and a Schedule of Significant Vegetation, largely satisfied Council's requirements. However, most notably, the definition, principles and practices of Environmentally Sustainable Development from LEP 2005 would not be carried forward into the new plan. During this time, the BMCS also petitioned MPs and Minister Hazzard for a 3 month public exhibition period and, along with Council following the October 2013 bushfires, requested a deferral of the public exhibition until 2014. This request was not granted.

When DLEP 2013 went on public exhibition on 4th December 2013 the BMCS undertook a detailed analysis. We strongly supported the DLEP, but in our submission recommended amendments to retain and strengthen environmental protections. On the basis of this analysis and recommendations, the BMCS Landuse Subcommittee produced a series of information sheets, submission-writing guides and pro-forma submission letters. These materials were distributed to members and the public via the BMCS's website, street and market stalls, public meetings and workshops, and at presentations to community groups. But the busy lead-up to Christmas followed by the school holidays meant that serious campaigning did not start until the Australia Day weekend, the traditional end of the school holidays. In effect, this left us with 6 weeks for our public information and engagement campaign before the deadline for submissions on March 5th 2014.

The BMCS's objectives during the public exhibition were to inform members and the public and maximise community support for DLEP 2013 (and for the BMCS's recommended amendments), and to encourage the community to make submissions. It is not surprising that, in the face of little or no community consultation at the drafting stage, 'fast-tracking' of the process under duress, very difficult circumstances for the Blue Mountains community and the less-than-ideal timing of the public exhibition, the total number of submissions received was 595 (compared to 1405 for LEP 2005). Engaging the community in strategic planning is notoriously difficult at any time. That there were this many submissions in such adverse circumstances demonstrates how much the Blue Mountains community cares about protecting our unique natural environment.

The Blue Mountains City Council published all the publicly available submissions on their 'Have Your Say' website in mid-April 2014. This report presents the BMCS's analysis of the submissions.

Scope and objectives of analysis

The purpose of this analysis is to:

- Gauge the effectiveness of the Blue Mountains Conservation Society's public information and engagement campaign.
- Gauge the Blue Mountains community's support for DLEP 2013.

Of the 595 submissions lodged on DLEP 2013, 5 were withheld from public view by request of the submitters. Also not included in our analysis are submissions from public agencies (NSW government departments and Authorities, and adjacent Councils). This left us with 573 submissions for analysis.

Methodology

When the public submissions were posted on the Blue Mountains City Council's website in mid-April 2014, BMCS Landuse Subcommittee members downloaded them, viewed them, identified the address of the submitter (if not redacted on request of the submitter) and the stakeholder group. We then gave each submission an individual file name.

The stakeholder groups we identified were:

- Individuals (residents or landholders).
- Community organizations (including Bushcare/Landcare/Swampcare, community centres, environmental, historical, heritage and garden groups).
- Business (small business and tourist accommodation owners, Chambers of Commerce etc).
- Property and tourist developers (large tourist operators and property development companies, and their representative organizations).
- Blue Mountains City Council departments and services.
- Church and religious organizations (mainly concerned with matters of property and church operations).

We then organised these stakeholder group submissions by village—the village of the individual submitter or organization, or the village that the submission related to. These we refer to as 'village-based submissions'. The few submissions which had identifying information such as addresses redacted were obviously excluded from this village-based geographical categorisation and placed in a separate category, as were submissions from groups covering all of the Blue Mountains and submissions from outside the Blue Mountains.

The village-based submissions were then sent out to BMCS members who had volunteered to read and enter data about the submissions from or about their village. Information about each submission was entered on to a prepared Excel spreadsheet. The information that the volunteers were asked to enter onto the spreadsheet was:

- **The stakeholder group** (as defined above).
- **The mode of submission.** The categories here were: BMCS’s pro-forma submissions (the ‘blank’ fill-in-yourself letter, ‘resident’ or ‘visitor’ form letter or prepared email), short letter, detailed submission or Council online web service. We also noted the submissions that were not on BMCS pro-formas but had clearly drawn on the BMCS’s public information materials. These could be identified through obvious copying-and-pasting from BMCS information sheets and submission-writing guides, or through use of identical wording and recommendations.
- **The recommendation of the submission.** These recommendations were categorised as: support the DLEP as written (with no amendments requested); support the DLEP with amendments; oppose the DLEP (whether changes were requested or not) or reject it outright. The data entry volunteers also noted if the submitter requested a re-exhibition of the DLEP if major changes were made post-exhibition.
- **The key environmental issues** raised in the submission e.g. site specific concerns about a block of land etc. These issues were not recorded if the submitter used a BMCS pro-forma as the content of these was known. However, issues raised on the BMCS ‘fill-in-yourself’ letters were recorded.
- **Comments.** The data entry volunteers were encouraged to add their own comments to the spreadsheet but guidelines were also provided. Comments could include identifying the basis of any objection or rejection, the name of the specific group or organization who made the submission (but not the names of individuals), and whether the submission warranted further analysis.

The categories above were specifically defined in a ‘glossary’ sent to the data entry volunteers, and the completed spreadsheets were reviewed by the spreadsheet designers to ensure consistency of data entry. Information about the non-village based submissions was entered on to a prepared spreadsheet by other volunteers. The individual spreadsheets were then compiled into a master spreadsheet.

Data entry for the first 3 categories above was set up to enable a simple tally of entries. That way we could get a count of total submissions, a count of submissions on the BMCS form letters/email, a count of submissions clearly using BMCS materials, a count of submissions supporting or objecting to DLEP 2013 (as we defined it—see below). This approach also helped us cross-check against Council’s figures.

Gauging the effectiveness of BMCS’s public information and engagement campaign

To gauge the effectiveness of the BMCS’s campaign, we tallied together the number of submissions lodged on the BMCS’s form letters and prepared email, and the number of submissions that clearly used BMCS material in part or almost wholly.

We also considered the number of visitations to the Society’s website during the peak of the campaign in February 2014 and the number of new members the Society received during the same period.

Gauging community support for DLEP 2013

To gauge the community's support for the DLEP 2013 we tallied together the categories 'support as written' and 'support with amendments'. These are defined below:

- **'Support as written'** refers to submissions that supported DLEP 2013 without recommending any amendments. Many of the BMCS's 'fill-in-yourself' form letters are counted here, if they did not contain any recommended amendments (the letter was prefaced by a statement of general support for the DLEP 2013). This category also included submissions which supported DLEP 2013 without any requested amendments but were clearly unrelated to the BMCS.
- **'Support with amendments'** refers to submissions that supported DLEP 2013 but recommended amendments. The BMCS resident and visitor form letters, prepared email and submissions that drew on BMCS materials all contained requests for amendments to strengthen environmental protections, so the vast majority of this category is comprised of these submissions. However, this category also includes submissions that were highly supportive of DLEP 2103 and requested amendments—again, primarily to strengthen environmental protections— but did not draw on BMCS materials.

The category of **'object or reject'** comprised submissions that either objected to DLEP 2013 or rejected it entirely. Most of these submissions were from individual landholders objecting to the zoning or environmental protection provisions on their blocks (and sometimes requesting changes), or from submitters (individuals or groups) who rejected DLEP 2013 altogether.

Effectiveness of BMCS campaign

The table below summarises the BMCS's DLEP 2013 public information and engagement campaign activities during the exhibition period:

Strategy	Activity	No.
BMCS public information and submission materials	• Information sheets	3
	• submission-writing guides	2
	• BMCS blank (fill-in-yourself) letter	1
	• 'Resident' and 'visitor' pro-forma letters	2
	• BMCS prepared email	1
The Society's website and Facebook page	<ul style="list-style-type: none"> • Created a DLEP 2013 webpage on the Society's website containing public information and submission materials for download • Posted regular updates on the Society's website and Facebook page • Prepared a facility on the BMCS website where residents could click on a box and send an automated email to Council on the DLEP 	
BMCS newsletter <i>Hut News</i> and member and supporter email updates	<ul style="list-style-type: none"> • Regular updates on DLEP 2013 in <i>Hut News</i> • Campaign emails regularly sent to members and campaign database 	3
Weekly media releases to <i>Blue Mountains Gazette</i>	BMCS initiated DLEP 2013-related stories throughout February and March	4
Radio interviews	Interviews on Shirley Lewis's <i>Global TV Show</i> on Radio Blue Mountains	2
Street and market stalls	Held at Glenbrook, Springwood, Hazelbrook, Wentworth Falls, Leura and Blackheath	10
Submission workshops	Workshop for Bushcare volunteers, Springwood	1
Presentations by invitation	• Presentations to various community organizations	6
	• Presentation on DLEP 2013 at the Society's new members night	1
Meetings with Council	• Meeting with Council staff to outline the BMCS's issues of concern with DLEP 2103	1
	• Meeting with Councilors to outline issues of concern	1
Public meeting	Public meeting held on February 16 at Mid-Mountains Community Centre, Lawson. Just under 100 people attended	1
Advertising	Sponsored a "Last chance to have your say" advertisement in the <i>Blue Mountains Gazette</i>	1
Formal submission	<ul style="list-style-type: none"> • Prepared detailed submission on DLEP 2013, including liaison with key local people on specific village/site issues • Assisted in preparing submissions lodged by the peak environmental groups including the Nature Conservation Council and National Parks Association 	1

These extensive campaign activities were only possible through a mammoth effort by our campaign co-ordinator, BMCS Landuse Committee, members and supporters.

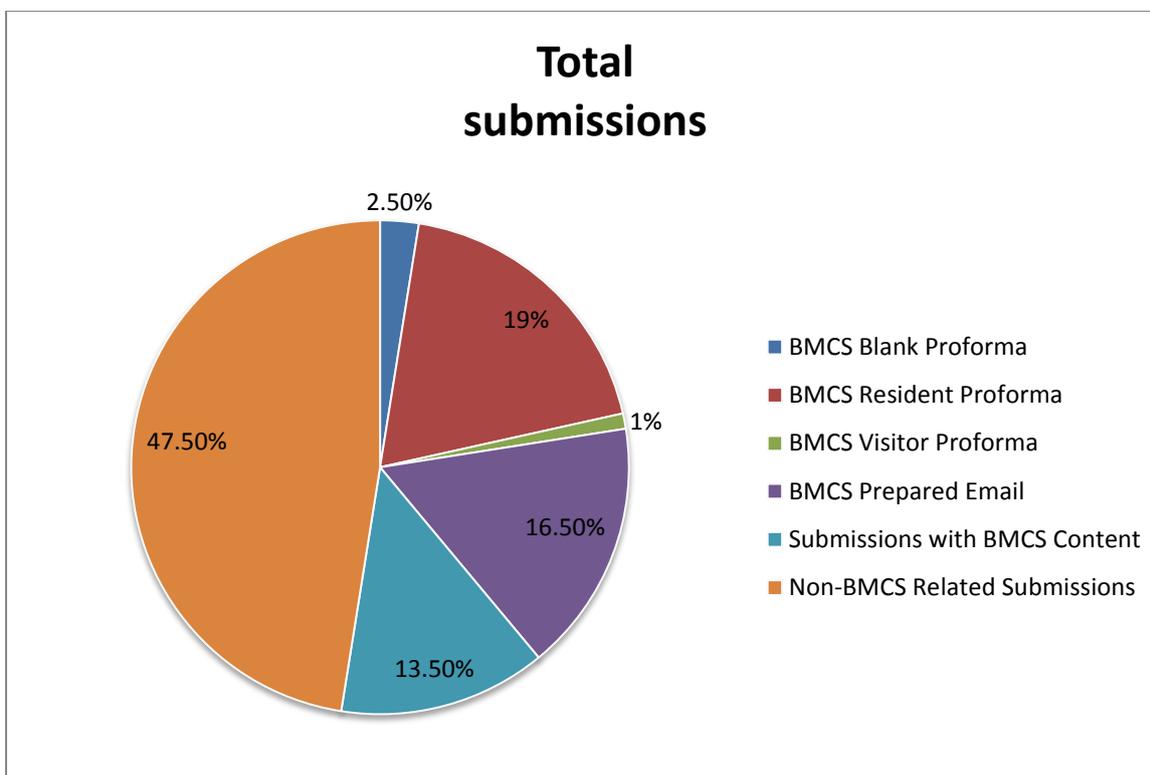
The effectiveness of the Society’s public information and engagement campaign was gauged by the number of BMCS-related submissions, the number of hits on the BMCS website during the exhibition period, and the growth in BMCS membership.

Number of BMCS-related submissions

The number of BMCS-related submissions out of the total 573 submissions is presented in the table below:

Number of BMCS blank ‘fill-in-yourself’ form letters	Number of BMCS resident form letters	Number of BMCS visitor form letters	Number of BMCS prepared emails	Number of submissions that drew on BMCS materials	Total number of BMCS-related submissions
16	108	5	96	79	304/573

The number of BMCS-related submissions as a proportion of the total number of submissions analysed is shown in the chart below:



Around 39% (225) of the 573 submissions analysed used the BMCS form letters or prepared email, and another 13.5% (79) of submissions used BMCS materials almost wholly or in part. This means that around 53% (304) of the submissions analysed supported the Society’s position on DLEP 2013.

It is sometimes argued that pro-forma letters/emails should not hold as much weight as an independent submission prepared by an individual or group. However, the Blue Mountains City Council counted BMCS form letters and prepared emails as individual submissions and did not regard them as of less value. The BMCS’s view is that, given the less than ideal circumstances of the drafting and exhibition of DLEP 2013, the number of submissions using BMCS form letters, email and materials clearly reflects how much the Blue

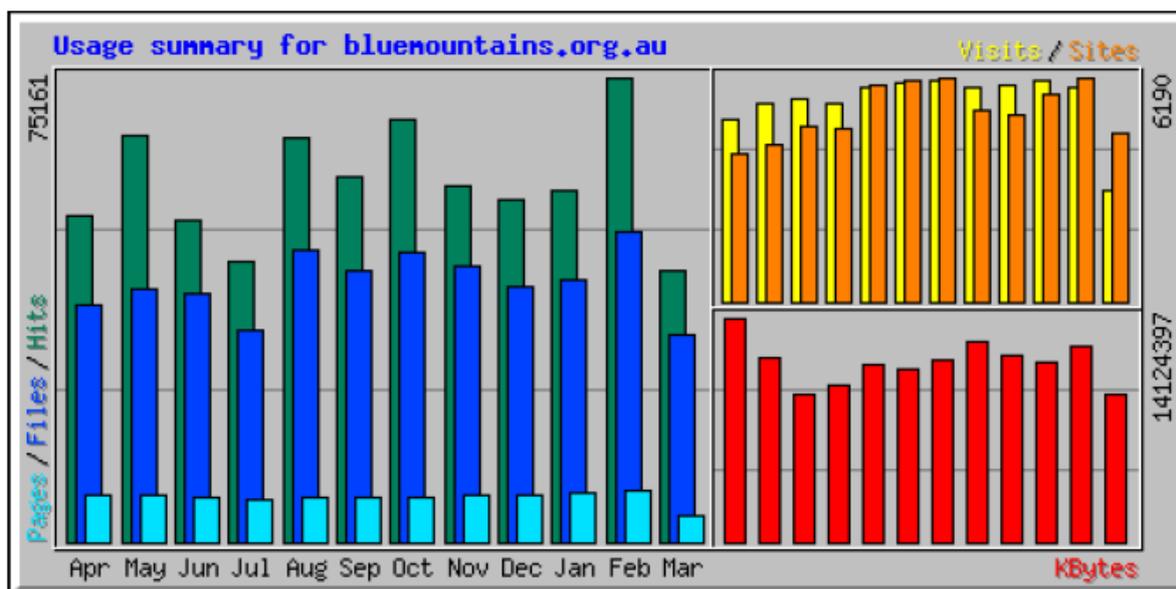
Mountains community cares about our unique environment.

Number of hits on BMCS website

The Blue Mountains Conservation Society's website manager, Alan Page, provided these 'website stats':

- February 2014 was our biggest month ever in terms of the number of 'discrete' visitors.
- There was an average of 210 different visitors each day.

These statistics are presented in the graph below:



This increase in website traffic was mainly due to the DLEP campaign which was at its height in February. It is gratifying that BMCS members and the general public sought the Society's opinion on DLEP 2013 and consulted the BMCS website for information and guidance on writing submissions.

Growth in BMCS membership

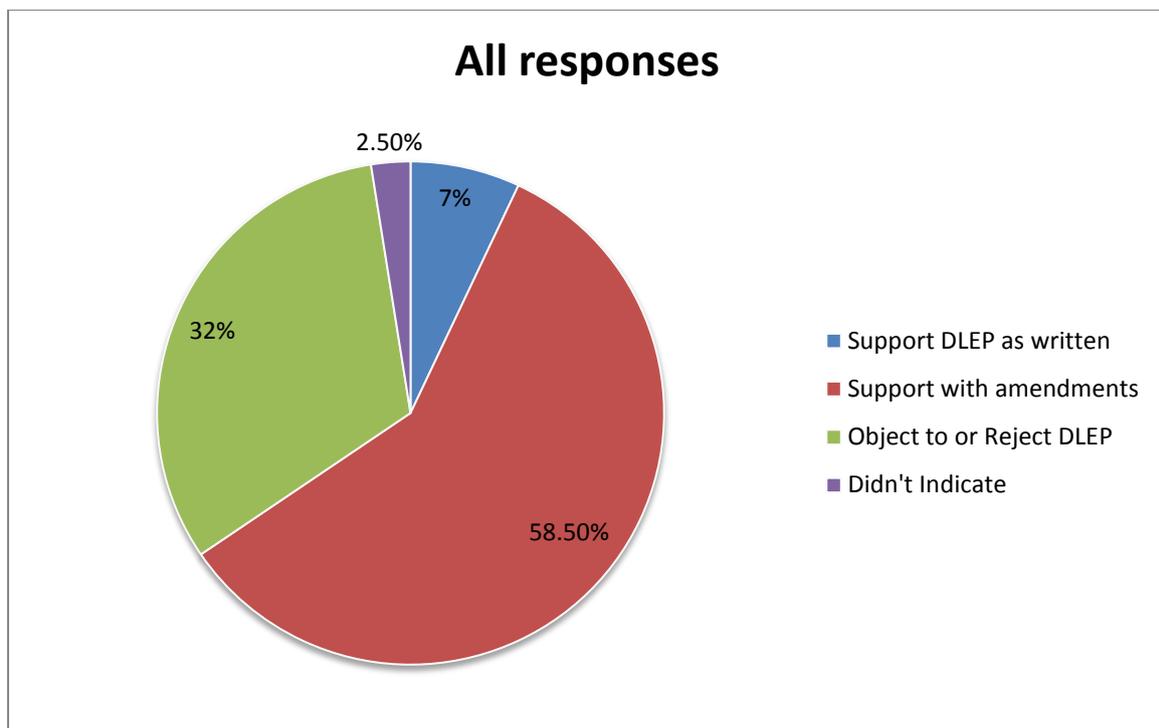
Another way to gauge the effectiveness of BMCS's campaign is through the growth in membership during and just after the exhibition period, following the BMCS's public information campaign. The street and market stalls, public meetings and presentations, workshops and media campaign during the exhibition period significantly raised the Society's public profile. This resulted in a spike in new members: 24 in March 2014 (reported in *Hut News*, April 2014).

Conclusion

The number of BMCS-related submissions, the spike in the number of hits on the BMCS website and in new members shows the effectiveness of BMCS's DLEP 2013 campaign and justifies the Society's considerable investment of time, energy, money and other resources in the campaign.

Community support for DLEP 2013

Overall community support for DLEP 2013 was gauged by tallying together the categories 'support as written' and 'support with amendments'. Support for DLEP 2013 as a percentage of all the submissions analysed is shown in the chart below:



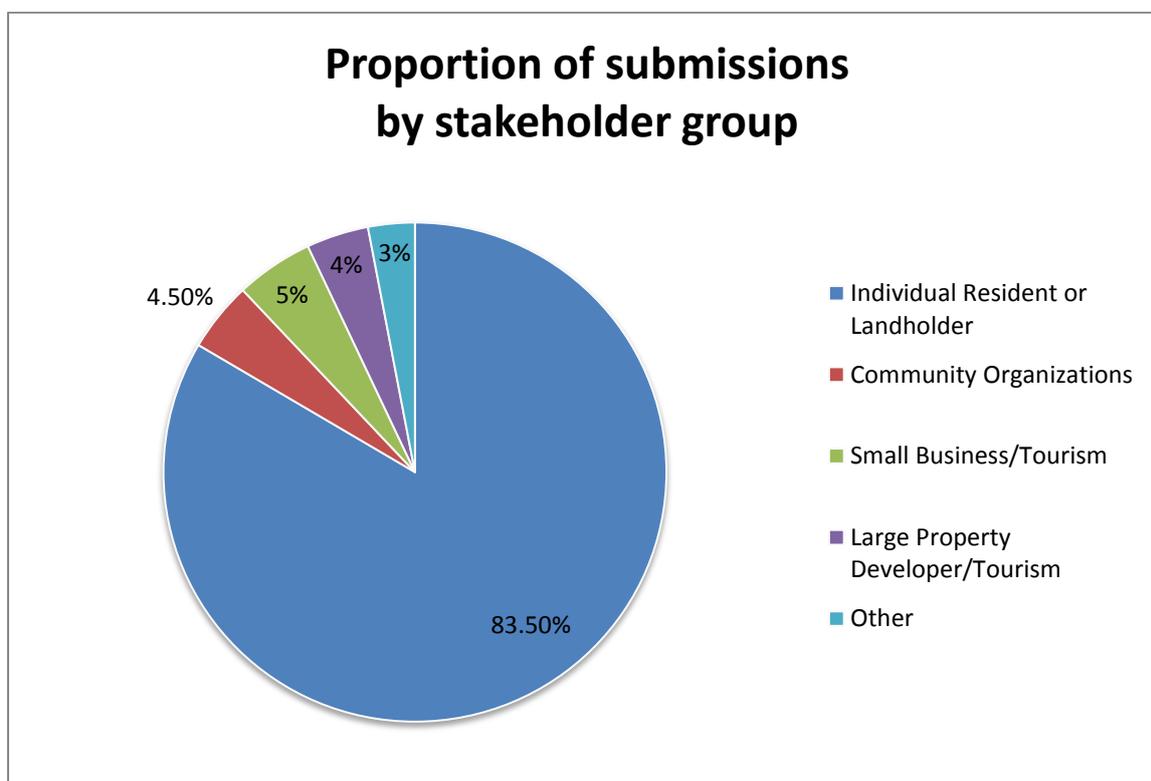
The Blue Mountains community overwhelmingly supports DLEP 2013. Of the 573 submissions analysed, almost 66% (374) supported the DLEP 2013 either as exhibited or with amendments. 32% (185) of submissions either objected to DLEP 2013 (with or without requesting changes) or rejected it entirely. Most objectors were individual landholders unhappy with the zoning or environmental protection provisions applying to their land which restricted subdivision or development. These objectors most often requested a rezoning and/or the lifting of development constraints on their property. Other objections to DLEP 2013 came from the business, tourism and property development sectors. The remaining 2.5% of submissions did not indicate support, objection or rejection.

32.5% (186) of the submissions analysed requested a re-exhibition of DLEP 2013 should major changes be made following the public exhibition.

Support by selected stakeholder group

In this section we report on support of DLEP 2013 by stakeholder group in the submissions analysed.

First, the **proportion of submissions from all stakeholder groups** is shown in the chart below:



Support for DLEP 2013 by selected stakeholder groups is shown on the following table:

Selected stakeholder group and number of submissions	Support DLEP as written	Support DLEP with amendments	TOTAL SUPPORT FOR DLEP	TOTAL OBJECT OR REJECT DLEP
All submissions analysed N=573	39	335	374/573 (65.5%)	185/573 (32%)
Individual resident or landholder N=478	33	307	340/478 (71%)	127/478 (26.5%)
Community group/organization (Bushcare/Landcare/Swampcare, environmental, community, historical, heritage, garden). N=29	4	22	26/29 (89.5%)	2/29 (7%)
Business, tourism and property development sectors and representative organizations. N=55	1 (+ 2 requests for status quo)	0	1/55 (1.8%)	52/55 (94.5%)

Note: some submissions did not indicate either support or objection to DLEP 2013 so totals do not amount to 100%.

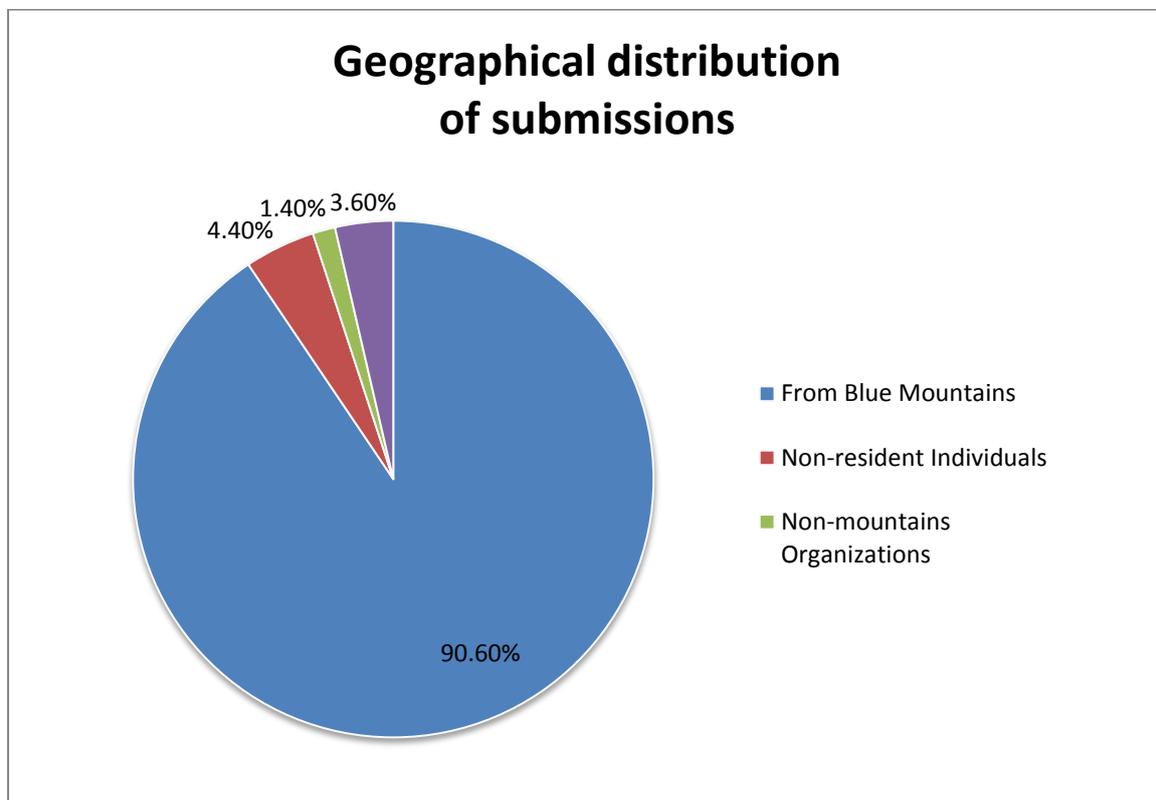
The overwhelming majority (83.5%) of the submissions analysed came from individual residents or landholders. The vast majority (71%) of these supported DLEP 2013. 45% of submissions from individuals were on the BMCS pro-forma letters or prepared email, and another 13% were individual submissions which used BMCS material either almost wholly or in part. This means that 58% of the submissions from individual residents or landholders supported the Society’s position on DLEP 2013. Most objections to DLEP 2013 by individual landholders related to zoning and other controls applying to their land which limited development e.g. subdivision.

Almost 90% of submissions from community organizations supported DLEP 2013 while almost 95% of submissions from the business, tourism and property development sectors were opposed to it. The business, tourism and property development sectors essentially objected to the limits placed on development in DLEP 2013, particularly in relation to restrictions on commercial and medium-density residential development around the village centres, and limited opportunities to develop medium to large tourist resorts etc.

Support by geographical distribution

In this section we report on support for DLEP 2013 in the village-based submissions: submissions from individuals, associations, businesses or groups (e.g. Bushcare) that are based in particular villages, or submissions that relate to land or development in that village.

First, a chart of the geographical distribution of all the submissions analysed:



The following table presents support or objection to DLEP 2013 by village, meaning the village of the submitter (individual or organization) or village that the submission relates to e.g. submission by a non-resident of the village who owns land in that village. Other categories included below are submissions from individuals whose name and address were redacted ('address not identified'), submissions from organizations covering the whole Blue Mountains, submissions from visitors or non-mountains residents and from organizations outside the Blue Mountains.

Village	Number of submissions (Total = 573)	Support as written	Support & amend	TOTAL SUPPORT	Object or reject
UPPER MOUNTAINS					
The Mounts	3		1	1 (33.3%)	2 (66.6%)
Mt Victoria	14	8	4	12 (86%)	2 (14%)
Megalong Valley	10	0	0	0%	10 (100%)
Blackheath	50	5	40	45 (90%)	5 (10%)
Medlow Bath*	6	0	2	2 (33.3%)	2 (33.3%)
Katoomba*	82	8	48	56 (68%)	22 (27%)
Leura	48	4	23	27 (56%)	21 (44%)
Wentworth Falls*	52	1	26	27 (52%)	22 (42%)
MID MOUNTAINS					
Bullaburra*	8		4	4 (50%)	3 (37.5%)
Lawson*	39	1	12	13 (33.3%)	22 (56.5%)
Hazelbrook	20	1	11	12 (60%)	8 (40%)
Woodford	20		12	12 (60%)	8 (40%)
Linden	7		6	6 (86%)	1 (14%)
LOWER MOUNTAINS					
Faulconbridge*	18	2	7	9 (50%)	7 (39%)
Springwood	44	3	30	33 (75%)	11 (25%)
Winmalee	9		8	8 (89%)	1 (11%)
Yellow Rock	12		3	3 (25%)	9 (75%)
Hawkesbury Heights	2		2	2 (100%)	
Valley Heights	2		1	1 (50%)	1 (50%)
Warrimoo	13		11	11 (84.5%)	2 (15.5%)
Blaxland	22		13	13 (59%)	9 (41%)
Mt Riverview	6		6	6 (100%)	0
Glenbrook	20	2	15	17 (85%)	3 (15%)
Lapstone	2		2	2 (100%)	0
Cross-mountains groups (environment, garden, community, heritage, history, business and tourism)*	13	1	6	7 (54%)	5 (38.5%). Objections come from business and tourism sectors
Non-mountains residents or visitors to mountains	22	1	21	22 (100%)	None. Note: Non-resident landholders are included in village count
Non-mountains groups (environment, heritage, developer, tourism, other)	8		5	5 (62.5%)	3 (37.5%). Objections from developer & tourism peak bodies
Address not identified (individuals)*	21	4	11	15 (71.5%)	4 (19%), mainly objecting to zoning

*indicates that this category included submissions which did not indicate either support or objection, so total of support plus object/reject does not add up to 100%

There is a range of support for DLEP 2013 in submissions from or relating to the Blue Mountains villages—from 0% to 100%.

Several villages from/about which there were a relatively large number of submissions, with a high percentage in support of DLEP 2013—Blackheath, Katoomba and Springwood—already have a high level of community-based environmental activity e.g. Bushcare, Landcare, Swampcare and creek catchment groups. These groups and some of their individual members lodged submissions supporting DLEP 2013 (often with recommended amendments), and made specific recommendations about their own Bushcare/Landcare etc site. Other submitters from these areas who supported DLEP 2013 used BMCS materials or made their own independent submissions.

Apart from Blackheath, extremely high levels of support (up to 100% in some cases) for DLEP 2013 were evident in villages from which there were a small (or smaller) number of submissions—Mt Victoria, Linden, Winmalee, Hawkesbury Heights, Warrimoo, Mt Riverview, Glenbrook and Lapstone. In many cases, this level of support can be attributed to the efforts of highly active local residents who encouraged their supportive neighbours to lodge submissions. Many of these submissions were on BMCS pro-forma letters or prepared email, or drew on BMCS material.

Lower levels of support for DLEP 2013 were found in submissions from/about villages where some landholders or developers wish to subdivide or develop their land contrary to the provisions of DLEP 2013. In larger villages like Leura, Wentworth Falls, Lawson, Hazelbrook and Blaxland, this lower support for DLEP 2013 (though still above 50% except for Lawson) mainly reflects the struggle over the future character of these villages. Chambers of Commerce and some landholders objected to the restrictions on commercial and higher density residential development around the town centres and requested changes to the plan.

In submissions from Megalong Valley—an area traditionally resistant to environmental controls on agricultural activity—there was no support for DLEP 2013.

Concluding remarks

The Blue Mountains Local Government Area is unique. It is surrounded by the Greater Blue Mountains World Heritage Area (GBMWhA), a system of national parks of high biodiversity and scenic value. Australia has international obligations under the World Heritage Convention to protect, conserve and rehabilitate the GBMWhA. Incompatible and poorly regulated land use on adjoining lands is identified in the *GBMWhA Strategic Plan 2009* as a major threat to the ongoing viability of the GBMWhA's World Heritage values. It is therefore essential that any Local Environmental Plan for the Blue Mountains, consistent with the *GBMWhA Strategic Plan 2009*, properly manages this risk and minimizes the impacts of land use in the city on the biodiversity and scenic values of the GBMWhA. The Blue Mountains Conservation Society believes that DLEP 2013 largely achieves this.

The overwhelming public response in support of DLEP 2013 shows that the Blue Mountains community cares about our unique environment and wants a Local Environmental Plan which has environmental outcomes as its primary objective. The Blue Mountains Conservation Society is proud to have taken a leadership role in engaging the community in the DLEP 2013 process through providing information and encouraging residents and landholders to lodge submissions. That there was such a relatively high number of submissions in difficult circumstances, the majority of which supported the Society's position, also demonstrates the impact that a well organised community-based campaign can have.