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Ref: HOG13/56338

Mr Roger Bailey General Manager Lithgow City Council PO Box 19 Lithgow NSW 2790

Re: Public Exhibition Draft Lithgow Local Environmental Plan 2013

Dear Mr Bailey,

I refer to Council's public exhibition of the Lithgow draft Local Environmental Plan 2013 (LLEP2013). The Land and Housing Corporation (LAHC) welcomes the opportunity to provide input into the formulation of councils' local strategies and plans, particularly in local government areas in which we own assets. In making this submission Council should be made aware that social housing assets are owned by the LAHC and managed by Housing NSW. This submission represents the interests of LAHC.

LAHC is a large provider of housing within the Lithgow LGA, owning approximately 546 dwellings. The majority of these assets are located in Bowenfels also commonly known as "Lithgow Estate". LAHC's consolidated and contiguous holdings can provide opportunities for renewal and redevelopment which can improve urban areas. Renewal and redevelopment of assets also enables LAHC to improve the standard of housing it provides, realign it to better meet the needs if its clients and where appropriate introduce a greater mix of private and social housing.

Lithgow Local Environmental Plan 2013

LAHC supports the preparation of the Draft LLEP2013, being based on the findings of the *Lithgow Land Use Strategy 2010*. Specifically, LAHC supports the majority of its assets being zoned R1 General Residential in and around the Lithgow Town Centre as this zoning provides flexible development options for the renewal and re-alignment of housing types to suit the changing needs of social housing clients. The R2 Low Density Residential zone for the surrounding towns, including Portland, Wallerawang and South Bowenfels is considered appropriate given the existing character, density and level of accessibility.

Notwithstanding the above, LAHC does not support the minimum lot sizes prescribed for Lithgow Estate. A significant portion of the assets (108) owned by LAHC on the estate are positioned on lots with an area less than 600m^2 , averaging around 450m^2 . Similarly, approximately 50 cottages, within the estate, are located on superlots, being multiple dwellings positioned on single titles.

If the superlots were to be subdivided to enable sale of properties for example, many of the resultant titles would not achieve the minimum lot size. This reduces the options for future management of housing assets on the estate and could have significant cost impacts.

Given the existing character and built form of this area it is requested that Council review the minimum lot size proposed for the Lithgow Estate. LAHC considers 400m² to be consistent with the current pattern of development.

Should you have any queries regarding this submission, please contact Lindsay Dunstan, A/Manager, Urban Planning, Portfolio on 8753 8242.

Yours sincerely,

Linda Blinkhorn, Director Portfolio 13.8.13