

25 February 2022

The General Manager
Blayney Shire Council
PO Box 62
Blayney NSW 2799

By email: council@blayney.nsw.gov.au

Dear Mr Wilcox,

**National Trust Submission on the proposed fifty-three (53) lot Torrens Title subdivision of Lot 101 DP872388,
1279 Millthorpe Road, Millthorpe (DA146/2021)**

The National Trust of Australia (NSW) is that state's oldest and most respected heritage organisation, supported by 18,000 members state-wide. We thank Blayney shire Council for the opportunity to make this submission relating to the proposed residential development north of the village of Millthorpe and for granting an extension.

The area proposed for residential subdivision is located within a heritage conservation area (listed with both the National Trust and Blayney Council, and contains an individually listed heritage item on the Blayney Shire LEP 2012 as Item No. 273, a bluestone cottage. There are additional heritage items in the immediate vicinity of the proposed subdivision, including St Canice's Catholic Church and St Mark's Anglican Church, Redmond Oval and the Millthorpe General Cemetery.

We understand that the land in question has been identified by Blayney Shire Council for many years as an important residential growth area. We do, however, have concerns regarding the impact of the proposed design on the character of Millthorpe, the response of the proposed design to the adjacent Conservation Area and its surrounding rural landscape. This letter outlines our position and concerns in more detail.

Significance of Millthorpe Conservation Area and heritage items

The proposed residential subdivision is located adjacent to the National trust listed Millthorpe Conservation Area and within Blayney Shire Council's LEP listing of the Millthorpe Conservation Area (which is larger than the National Trust listed area).

The National Trust Millthorpe Conservation Area is described as follows:

The village is picturesque with the element of surprise as Millthorpe cannot be assessed or overlooked from any one vantage point. The layout has blended well with the natural surroundings and the ridges are undeveloped with important strategically located groups of trees and plantings established for farming.

The scale is remarkable, both in the relationship of the surrounding hills to the developed area of the village & in the scale of the buildings to street. The unusually narrow streets and range of subdivisions give Millthorpe an intimate atmosphere.



Image 1: Illustrates Millthorpe's picturesque qualities and its siting within a rural setting (image courtesy of <https://www.stayz.com.au/d/19503/millthorpe>).

Millthorpe's street layout to the north of Victoria Street has developed from a historic grid comprising just three east-west streets and three north-south cross streets, giving the village a distinctive layout and character.

Within the proposed subdivision is a heritage item listed on the Blayney LEP's heritage schedule and on the National Trust Register. The Millthorpe & District Historical Society identify this cottage as the oldest house within the village, with a construction date circa 1866-67 and note it is in excellent, near-original condition. The cottage forms part of a group of rural buildings that includes iron sheds and important built rural heritage structures that demonstrate the agricultural use of the land across more than a century. The Historical Society believe that the cottage and associated buildings are the only surviving rural-residential structures in Millthorpe Village that can provide a high level of aesthetic integrity and insight into the earliest non-Indigenous cultural and agricultural life of the village.

The Cottage's heritage value is expressed in the project's Statement of Heritage Impact as:

The residence is of high significant in its context as one of the earlier dwellings in Millthorpe, dating back to the late 1800's in the earlier years of accommodation construction in the town for private purposes.

The cottage is currently set in an open rural landscape with expansive views to the north, northwest and north east.



Image 2: Heritage listed cottage as viewed from Park Street, looking west toward the proposed subdivision site (Image courtesy of Statement of Heritage Impact – 1279 Millthorpe Road, Millthorpe, Report prepared by Patsy Moppett Town Planner and Heritage Consultant, November 2021).



The Proposed Subdivision

The proposed development consists of the subdivision of Lot 101 DP872388 Park Street (1279 Millthorpe Road), Millthorpe into residential lots of approximately 700-900sqm each in area under a staged process comprising 4 land releases. The land is some 14.63ha in area and is located on the northern edge of the village of Millthorpe.



Image 3: Illustrates 1279 Millthorpe Road, Millthorpe, existing site.

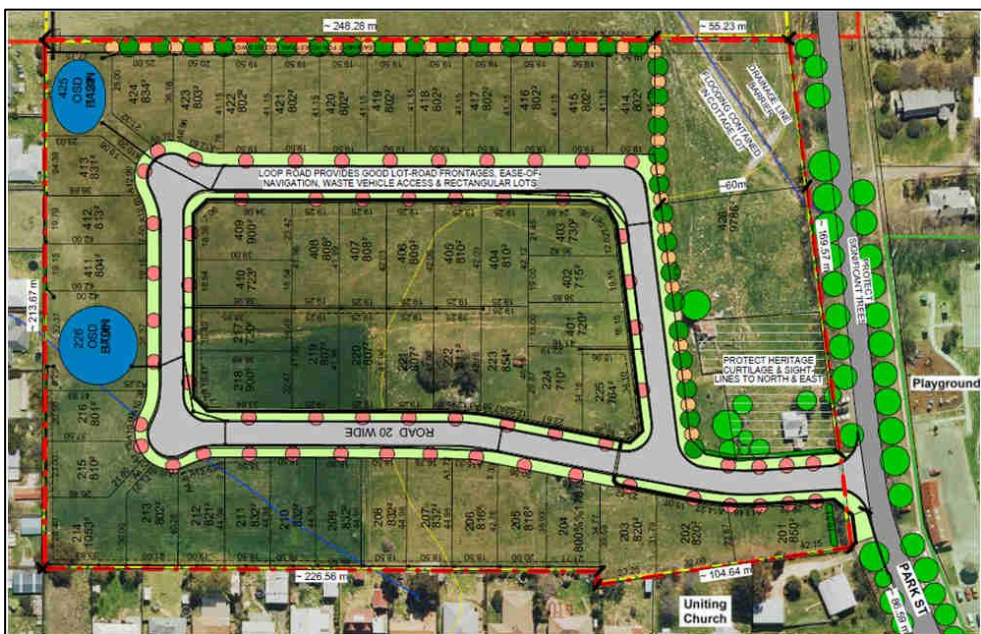


Image 4: 1279 Millthorpe Road, Millthorpe, proposed plan of subdivision.

The proposed subdivision layout comprises an exterior ring road of residential lots with a rectangular central area of residential lots. The heritage listed cottage is maintained on a long rectangular block of approximately one hectare in size, on the eastern side of the site.



Our concerns

The Trust has the following concerns regarding the proposed subdivision.

Impact on setting and views

One of the Development Control Plan's stated objectives is "to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views" and the LEP has a stated objective "to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views" (BLEP 2012 5.10 (1)(b)).

The proposed subdivision plan is inconsistent with these planning instruments, to the significance of the setting and the existing historic layout of the village, and does not respond to the documented and recognised heritage value of the overall village and its rural setting. The addition of 53 residential will have substantial impact if not designed to complement the existing historic character and layout of Millthorpe.

In particular, we note that the Statement of Heritage Impact (SOHI) for the project states:

The importance of the open nature of the surrounding countryside providing a setting for the town cannot be over emphasized It is critical that the existing landscape features of plantings and sight lines not be compromised by any further development of the town, particularly along Millthorpe Road.

The Trust fully supports this recommendation, however, the proposed plan does not appear to respond to this importance and design accordingly. Any future development should be consistent with the existing historical grid-type layout to the north of the village centre and should minimise the visual impactor existing views from the village to the rural hills.

We share the concerns noted in the SOHI, that the staged nature of the subdivision without any site specific design guidelines or controls is likely to lead to uncontrolled subdivision, a further loss of heritage integrity and haphazard development over time, impacting upon views both into and from the heritage precinct. We recommend that Council develop site specific development controls (a site specific DCP) to ensure the best outcomes for the protection of Millthorpe's cultural heritage significance and setting, and for those of the Cottage.

Impact on the Bluestone Cottage

We note that the Bluestone Cottage will be maintained on a lot of approximately one hectare, to ensure its rural setting is maintained, which we are in support of. However, the proposed cottage lot is long and narrow, which although maintaining the views from the cottage directly to the north, does not preserve its expansive rural views to the north west and north east.

Indeed, the planting of proposed trees along the eastern edge of the new residential area, between the road and the cottage's lot, while screening the residential development from view will create a further visual barrier and impact the once expansive rural views that contribute to the cottage's significance.

The SOHI points out that the proximity of the residential subdivision's proposed access road to the significant bluestone cottage is significant, being as little as 50m. Vehicle movement along that road may create vibration affecting the structural integrity of the dwelling. The Trust notes that this proximity will further erode the rural setting of the Cottage.

We recommend that the proponent investigate an alternate primary access to the site to minimise this impact, and an expansion of the Cottage's lot to the north-west, to ensure its viewshed remains intact.

Summary

New residential housing for this area of Millthorpe has been identified as a priority for some time, to assist the region's growing population. What is at question here however, is the impact such a development will have on the long-identified and, until now, well-protected historic character of Millthorpe (including its rural setting



and views to and from the village). The proposed design as it stands does not comply with the planning controls (including the DCP and LEP) that have been developed to protect the existing heritage character and setting of Millthorpe. Serious consideration should be given to re-designing the concept so that it aligns and responds to Council's planning instrument and is sympathetic and responsive to the heritage value of the Village and heritage sites within it, whilst still delivering the desired outcome.

Please do not hesitate to contact us should you wish to discuss this submission in more detail.

Yours sincerely,

Jane Alexander
Manager, Advocacy