



## **Blayney Shire Council**

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Department of Planning and Environment  
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Dear Ashley,

**Re: Draft Central West and Orana Regional Plan submission.**

Council refers to the exhibition of the Draft Central West and Orana Regional Plan.

Council would like to specifically acknowledge and thank staff within the Department of Planning and Environment (DoPE), Western Region Office for their effort and contribution over the past 2 years preparing this plan. Council would also like to thank DoPE staff for visiting Blayney on 12 April 2016 to present the draft plan to Council.

The plan is significantly important for the future of the entire region. Council, through the CENTROC group of councils has undertaken a large amount of work on the Central West component of the draft plan.

It is paramount the input from Councils, CENTROC and DoPE Western Region office that have prepared the draft plan and additionally any comments from exhibition are given the consideration and respect deserved and not overridden in Sydney when the final plan is being considered. If major changes are made to the draft plan that at a minimum the CENTROC group of Councils is consulted prior to the plan being finalised.

Council would like to make the following comments on the draft plan and hopes they are considered during preparation of the final plan.

### **General**

Council would like to reiterate the significant importance of the Blayney-Demondrille Railway Line (BDR) as a key strategic piece of transportation freight infrastructure that can assist the Central West and Orana region and NSW Government in delivering goals; 1, 2 and 3 of the Draft Central West and Orana Regional Plan.

## Vision

- P14 – Figure 4: Regional Assets Map.  
BDR should be shown on this map. BDR is a key strategic piece of transportation freight infrastructure. Even though the line is not currently active it remains an asset of the region.  
The regions proximity south is now as important as it is East to Sydney. In this regard proximity to Canberra Airport and distance to the Hume Highway should be shown (as should distance and times to locations marked with red arrows in this map).

Council considers all mapping throughout the plan should be revised prior to the plan being finalised.

- P17 – Infrastructure coordination - *“The NSW Government will use the final Plan and annual monitoring to advise infrastructure agencies about the timing of new developments” & “Opportunities for private sector delivery of infrastructure will also be explored to support growth” & “The NSW Government will continue to work with State Infrastructure providers to plan and deliver infrastructure that responds to place and community needs across regional NSW”.*  
The above-mentioned quotes from the plan indicate the plan is focusing on retrospective data assessment to identify the infrastructure needs of the region.  
The final plan needs to be a forward thinking and proactive document that also identifies and maps opportunities that would be created, if infrastructure projects were undertaken.  
There is significant opportunity for both; industry and residential growth that could occur throughout the region if key pieces of infrastructure such as BDR and Bells Line Expressway (BLE) are undertaken.  
Potential infrastructure such as these and others must be identified (even mapped) to ensure a forward thinking plan that could create unprecedented opportunities for the region.

## Goal 1 – A growing and diverse regional economy

- P21 – Action 1.1.1  
The Central Tablelands Livestock Exchange (CTLX) is located at Carcoar and not mentioned like Forbes and Dubbo.  
CTLX opened in 2008 and currently handles in excess of 600,000 sheep and 190,000 cattle annually. This facility should be identified in the plan like Forbes and Dubbo as CTLX is a key piece of regional agricultural infrastructure.  
*“Councils will need to identify local planning impediments”.* Whilst this is a reactive undertaking seeking to identify known constraints, a proactive approach also needs to be undertaken to strategically

identify each LGA's strengths, not weaknesses to attract new investment and diversification to the region.

Example, Blayney is a strategic agricultural and food manufacturing precinct in the future because of; the Central Tablelands Livestock Exchange, Sealink freezer facilities, two rail sidings and potential guaranteed water supply for agriculture (if Regis Resources pipe water from Centennial Coal mines in Lithgow). This needs to be identified so that if investor is looking to undertake an agricultural development in the future, that they are even aware of Blayney's as a possible location due to its agricultural linkages.

- P23 – Action 1.2.1 - Cadia Gold Mine is located within the Blayney LGA not Orange City LGA. The plan should reference Blayney, not Orange.
- P28 – The current wording of the first paragraph of direction 1.5 *“Regional cities and regional centres are expected to have the highest take-up of commercial and industrial employment land, primarily focused in CBDs and zoned industrial areas”* is not supported by Council.
  - It is agreed that the regional cities and centres are likely to have the highest take up of commercial employment land, however not necessarily industrial lands.
  - Blayney is a township that has, several significant advantages over the regions cities and centres industrial employment growth.  
It should not be stated that regional cities and centres will have the majority of the take up of industrial employment lands when there are towns in the region that have existing infrastructure better placed for industrial employment growth.
- P28 – Action 1.5.1 – Council supports the three proposed NSW Government actions.  
In development of the industrial land development program for the region consideration of existing infrastructure that is in place and existing linkages to industries must be considered. Infrastructure duplication in close proximity throughout the region should be minimised.

## **Goal 2 – A region with strong freight transport and utility infrastructure networks that support economic growth**

- P32/33 – If the inland rail is shown so should the BDR and BLE. These two projects are particularly important infrastructure projects that; will respectively; be reactivated and constructed at some point.

Their location should be shown within the plan so that potential future investors are aware of the potential projects.

- P35 – BDR. Blayney Council, along with; Cowra, Young, Harden, and Weddin Shires wish to highlight the significant; financial, social, and economic benefits of the re-opening of the BDR railway line, and also the strategic importance of freight corridors.

Removing heavy vehicles off our congested roads; better access to and from Sydney markets and ports for country producers; safer transport; reduced energy use and pollution; and less congestion on the Sydney-Blue Mountains line are just some of the benefits of the BDR.

The strategic significance of the line re-routing rail freight from the Sydney train commuter network and providing a link directly into Port Kembla and Port Botany, a link that would be enhanced with the completion of the much-anticipated Maldon Dombarton link cannot be emphasised enough.

Blayney-Demondrille Railway Line must remain a priority under goal 2 of the Central West and Orana Regional Plan if the Central West is to make freight transportation more efficient and sustainable.

The BDR is not only significantly important for existing industries, it more importantly will attract new investment for the region.

- P37 – Freight Network Improvements Map.
  - The map shows Blayney having; 3 Existing Intermodal Terminals and 1 Proposed Intermodal Terminal. Please note Blayney only has 2 Existing Intermodal Terminals (the proposed one was completed in 2014).
  - The purple road highlighted as a “Road Safety, Flooding or Capacity Issue” is incorrectly highlighted near Blayney and Orange.
  - The purple highlight should identify the route of; Mid-Western Highway to Cadia Mine onto Orange and additionally highlight the route of; Cadia Mine to Millthorpe onto Vittoria. Please see enclosed map for clarification.
  - This map does not identify the BDR. As stated above the importance of BDR to the region cannot be underestimated and must be included in this map.

- P38 – Action 2.1.4 – Investigation of new opportunities should not take place without an assessment and consideration of existing intermodal terminal and rail freight facilities.

Blayney has two intermodal facilities which are currently underutilised, duplication of this infrastructure elsewhere, particularly if in close proximity to Blayney without considering the existing facilities would be a significant waste of money.

- P40 – Action 2.2.1 – Water and Waste
  - There appears to be a focus on water but no mention of Sewerage Treatment Plants (STP) or Waste Facilities (WF) including; Landfills, Resource Recovery Centres, Recycling Centres and Organic Processing Facilities, etc.
  - Waste Facilities are significant pieces of infrastructure and capacity should be considered from a regional perspective. Limited capacity at either a STP or WF could prevent employment or residential expansion for a village, town, centre or city.
  - Often STP and WF often are also susceptible to Land Use Conflict and potential issues with Environmental Impact (pollution, leachate, air pollution etc).
  - NetWaste would be able to provide significant contribution and assistance in collaborating data on WF capacity throughout the region.

NetWaste is a voluntary regional waste group formed in 1995 to provide collaborative approaches to waste and resource management. Covering almost 40% of the state, benefits are delivered to 27 member councils in regional NSW (predominantly those councils within the Central West and Orana Regional Plan).

Individual Councils would be required to supply information on STP capacity.

**Goal 3 – A region that protects and enhances its productive agricultural land, natural resources and environmental assets**

- P48 – Action 3.1.1 – Council is supportive of Agricultural Land mapping that considers biophysical, infrastructure and key socio economic factors.
- It is hoped that this mapping will identify key strategic agricultural precincts and opportunities for the region.
- Blayney is a strategic agricultural and food manufacturing precinct in the future because of; the Central Tablelands Livestock Exchange, Sealink freezer facilities, two rail sidings and potential of a guaranteed water supply for agriculture (if Regis pipe water from Centennial Coal mines in Lithgow). This must be identified for potential future investment in the agriculture and food manufacturing sectors.
- P49 – Action 3.2.1 – The identification of mineral and energy resource lands is supported.
- Additionally, it would be beneficial to audit why mineral and energy projects are not proceeding to be undertaken.
- Example: Regis Resources are held up on preparing a Development Application including detailed Environmental Impact Statement for a

Gold Mine at Blayney because they cannot secure a guaranteed 8ML per day supply of water to operate the mine.

Having this information mapped or even listed is important as economic opportunities could result from another industry within the region potentially solving another industries' issue.

Regis Resources and Centennial Coal are investigating the feasibility of piping water from Centennial Coal at Wallerawang near Lithgow to Blayney (approx. 55 kms). Centennial Coal recently obtained a 15 year extension at its Springvale Coal mine and water was a highly topical issue during the DA assessment.

If the Regis constraint was known prior to the lodgement of the Springvale extension the two companies with government assistance may have been able to install the 55km pipeline and create a significant economic opportunity for the region, whilst also addressing a significant issue raised through the DA process.

- P62 – The water Act requires review to ensure that properties under a certain size are not able to extract water without a water license. Additionally, it should be legislated so that bores are not to be allowed within rural residential properties or within 100m of a residential effluent disposal system.

#### **Goal 4 – Strong communities and liveable places that cater for the region's changing population**

- The plan makes a distinction between “regional cities” and “regional centres” (see appendix A, although this appendix is not referred to anywhere in the Plan itself). Each are large commercial, retail and service centres serving the surrounding region and with higher order infrastructure, such as daily air services. The difference is mainly in size (cities >30,000; centres >10,000)

All other population centres are grouped together under the expression “towns and villages” and otherwise undifferentiated

For planning purposes there is a need to distinguish between these two, as they have quite different characteristics and will have different needs over the next 20 years. In fact, there is more of a need to distinguish between towns and villages as there is to distinguish between regional cities and regional centres.

Towns would have the following characteristics:

- availability of daily needs such as supermarket/groceries; bakery; fuel; post office
- commercial businesses, such as real estate, pharmacy, newsagency

- tourism facilities such as cafes, hotels, motels, visitors centres
- general medical practice; basic hospital/emergency services
- sporting facilities
- public schools (primary and/or secondary)
- transport access to regional centres

Villages would have none, or only occasionally some, of the above features. They would typically rely on the local town for their basic daily requirements and consist of:

- Groupings of houses in few streets, providing a sense of community
- Often population drift leaving behind historical and heritage features warranting preservation
- Some public facilities such as a hall, showground and/or churches

Whilst it is the services provided, not the population, which is the basic distinction, villages would tend to support a population of a few hundred to 1,000, with towns larger than this, up to 10,000 residents (which the draft plan says is the typical size of a regional centre).

The importance of the distinction is that towns will need to continue to strengthen as service centres for everyday requirements of the town itself and its immediate surrounds, including residents of nearby villages and localities, rural/residential developments and rural properties. Revitalisation of their town centres will be needed over time. They will also provide alternative housing options to the main regional cities and regional centres, including niches of affordable housing.

If distinctions are to be made for planning purposes between population centres, the 3 categories should be:

- Regional Centres;
- Towns; and
- Villages

and not

- Regional Cities;
- Regional Centres; and
- Towns and villages

As a result, ACTION 4.1.2 should be divided into 2 separate actions: one focussed on towns and the other focussed on villages.

- Is there a disparity on the growth figures stated in P73 and p77 respectfully?
  - P73 states both Central West and Orana regions will grow by 18,750,
  - P77 says number of residents living in and around regional cities will grow by 23,250,

- Not sure how the entire region (which includes regional cities) can only grow by only 18,750 yet regional cities are predicted to grow by 23,250?
- P77 – Action 4.1.1 – *“The NSW Government will work with: Dubbo, Bathurst and Orange City Councils”*.  
 The NSW Government should not just work with Dubbo, Bathurst and Orange City Councils but also regional centres, towns and villages. Those outside regional cities can provide valuable input into the best way to support and shape regional cities. Blayney and Millthorpe are strategically placed between the two regional cities of Orange and Bathurst and can provide input for the betterment of the region and these cities.  
 If regional cities are to function as a regional epicentre, then regional centres, towns and villages all need to have input into the strategic growth of regional cities.
- P77 – Action 4.1.2 - Council does not agree wholly with the broad statement *“Towns and villages are more vulnerable to the effects of demographic and economic change than larger cities and towns due to their size and sometimes isolated locations”*.  
 Not all towns and villages are isolated and vulnerable. Blayney's strength is its strategic positioning between the regional cities of Orange and Bathurst and close proximity to Cowra.
- P83 – action 4.3.2  
 A regional strategic plan for seniors housing is required for the region. Not all elderly persons must be located right next door to a hospital and therefore, not all seniors housing must or should be located in Bathurst, Orange or Dubbo because they are regional medical precincts.  
 In Blayney's case it is only 30 mins from both Orange and Bathurst and 45 mins to Cowra which could easily house seniors from those locations and still be close enough to family.
- P84 – Action 4.3.4 - Investigation should also take place on the potential for reducing the minimum lot size (MLS) for unsewered large lot residential development to below 2 hectares.  
 Advancement in effluent disposal systems should allow for the consideration in the reduction in standard MLS of 2ha to even say 1 ha. The standard 2 ha is a nothing size that has been around for 30 years, is too small for livestock, yet too large to maintain and is potentially wasting land already fragmented in some circumstances



## Other

- P89 – Appendix A should include a classification of the regions towns and villages.
- The plan needs to clearly articulate who is organising what, who is to be involved and what date an action is to be undertaken.  
A matrix of priority actions as an appendix is recommended (similar to the matrix contained at the rear of the DoPE document “*Guidance for merged councils on planning functions*” dated May 2016).
- Land Use conflict is repeated several times throughout the 4 sections of the plan. Guidelines from the state on appropriate buffer distances for all types of development would be an asset to reduce Land Use Conflict and ensure consistent principles are being applied throughout the state.

## Conclusion

It does appear the focus of the draft plan is on; Bathurst, Orange and Dubbo. Whilst the region’s centres, towns and villages are acknowledged within the plan, the value and input in which these locations can contribute to the growth of the entire region including regional cities does not appear to have the same priority within the plan as regional cities do.

Blayney’s close proximity to Bathurst, Orange and Cowra, with significant existing industrial infrastructure, vacant industrial land and existing ties to industries including; food manufacturing, food storage and agriculture make it an opportunity for the region and yet appears to not have the same level of priority within the plan because it is considered a town.

Should you require further information regarding this matter please do not hesitate to contact me on (02) 6368 2104.

Yours faithfully



Mark Dicker

**Director Planning & Environmental Services**