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4 July 2016

Director Regions - Western
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Dear Sir/Madam,

**DRAFT CENTRAL WEST AND ORANA REGIONAL PLAN
SUBMISSION BY CABONNE COUNCIL**

Cabonne Council is in support of the preparation of a regional plan to establish land use and economic vision for the central west region of NSW. The council also continues to strongly support the work of the Department's Western Region office, in particular the work of the Western Regional office to develop the draft regional plan in consultation with local government.

Council has reviewed the draft plan and is generally in support of the document. The following specific comments are provided in respect of the draft plan content:

Overall comment

It is noted that the Central West and Orana Regional Plan addresses a wide geographic area that accommodates a diversity of economic activities and associated land uses relative to location, presence of existing infrastructure, and influenced by geography. It is also noted that while generalised comments are made by council in relation its review of the draft plan, that some focus of the following comments will be based upon Cabonne's location within the regional context.

It has been of particular value that Centroc, as a pilot JO, has facilitated the Centroc Planner's forum in association with the Department. This has been a valuable network for gathering informed local and regional land use planning information for reference during the drafting of the plan. Cabonne Council strongly encourages that the Centroc Planners forum be maintained as a reference group during the implementation of the regional plan.

The draft regional plan outlines a 20-year plan with vision, goals and actions. It provides directions and commitments for State government. The responsibilities for local government are not as clearly articulated as to how outcomes are to be achieved. The inclusion of draft principles such as those included in *Table 1: Draft principles for industrial land identification* provides land use planning context that can be practically applied. It is suggested that principles be provided to all key actions identified in the regional plan to assist in implementation strategies.

The draft plan conveys a sense that regional economic development has in the past been constrained by land use planning. From local government experience it is often not zoning or land use planning that provides an imposition – rather it may be a discord between economic rationale or linked to broader state government policy. For example, zoning land for a future education facility can have little benefit to a community if state policy on education delivery does not support the investment in the facility (such as reduction in provision of TAFE campus delivery across rural communities).

By providing detail in the regional plan such as inclusion of planning principles there is greater certainty for sound strategic planning at local government level as well as addressing State government objectives and commitments.

Cabonne Council supports local plans being consistent with the regional plan.

Draft Plan Goals 1 to 4

Goal 1 – a growing and diverse regional economy

Council supports the directions and actions identified under this goal, particularly in relation to developing agribusiness and managing the region's mining and energy resources.

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

Council supports the directions and actions identified under this goal. Whilst the region plan tends to highlight the contributions of regional towns and centres to the overall economic growth of the region, the significance of industrial clusters such as exist at Manildra should also be recognised. The location of Manildra Flour Mills, MSM Milling, and rail container depot at Manildra, with access to rail and road networks makes this location worthy of inclusion as a freight network node (Figure 10 makes no reference to the road / rail intermodal terminal at Manildra – or the significance of the two mills to the region).

Action 2.1.2 needs to consider wider impact – being pinch point to freight movement that occur outside the region yet affect the freight movements within the region such as freight movement over the Blue Mountains (road and rail pinch points). Commitments to enhance the service delivery of infrastructure surrounding transport are unlikely to be achieved at local government level and requires regional and state commitment to ensure progress in these important areas of delivery.

Action 2.1.4 to investigate opportunities for new intermodal terminals and rail freight facilities has impact both within the region and outside it, and may require identified land to be protected through Local Environmental Plan mechanisms.

Action 2.2.1 water and waste – this action does not acknowledge the significant benefit and achievements of Netwaste and its participating local government councils in the delivery of cost effective waste service across the region.

Water security references may also benefit from updated information relating to the sub region drought proofing pipeline programs currently programed for the Blayney and Cabonne areas linking and enhancing capacity of infrastructure of Central Tablelands Water and Orange City Council.

Goal 3 – a region that protects and enhances its productive agricultural land, natural resources and heritage assets

Council supports the directions and actions identified under this goal, in particular the Action 3.1.2 for establishment of a strategic framework to protect productive vales of agricultural land. Goal 3 has significant recourse for Cabonne Council for sound strategic planning to maintain sustainable agriculture, protect natural resources and biodiversity, and to accommodate mineral resource recovery.

Figure 12 does not provide a meaningful level of information relating to agricultural land mapping. It may be that the detailed level of BSAL mapping is to be provided through other sources of mapping, including perhaps additional LEP mapping layers. The accuracy of the mapped irrigation areas is also questioned.

Action 3.1.2 would be enhanced by provision of planning principles to assist local government with strategic and land use planning to achieve the desired outcomes of the plan. Principles regarding rural land dwelling permissibility, minimum lot sizes, boundary adjustments and guidance on managing the interface between competing land uses within an agricultural area would be of value to local government.

Figures 12 and 15 highlight the potential for land use, environmental and resource conflict when high quality agricultural land mapping is overlaid with the mineral resource map. There does not appear to be an action that protects agricultural land from mining activity, particularly land that may be of national significance for food and fibre production. Climate change predictions only increase the national importance for key agricultural land to be retained for such use.

It is agreed that to enable regional centres and cities to expand, some agricultural land will be lost. Urban growth should not be unduly constrained, but should be responsive to a range of strategic criteria that balances the requirement for urban expansion with the agricultural productivity of the surrounding area to identify growth corridors/urban release areas.

Figure 17 does not reference the expanse of limestone karst that is found particularly in the central west. The Borenore Caves Reserve is not referenced, nor the environmentally sensitive Cliefton caves and nearby Belubula River system (incorporating a thermal spring). Also of note would be the internationally significant fish fossil deposit located near Canowindra.

Figure 17 does not reference any key European heritage sites such as the nation's first gold rush site at Ophir.

Direction 3.6 refers to protection of people, property and environment from natural hazards. Emphasis is placed by Action 3.6.1 upon flood mapping, however based upon Cabonne Council's geographical location - bushfire mapping, karst mapping and Naturally Occurring Asbestos (NOA) mapping are also important considerations for strategic planning purposes.

Current mapping of bushfire prone land needs to be updated, while karst mapping is limited to geological maps. Location of caverns and caves, or presence of fossil deposits is largely unavailable information for strategic planning purposes. The release last year of revised geological mapping of NOA has impact for land use planning within the Cabonne, Blayney, Orange and Bathurst local government areas. The introduction of low, moderate and high risk NOA landscapes, dealing with geology down to 10m deep, provides a new level of hazard assessment that is required to be factored into land use planning.

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

Council is in support of the directions and actions identified under this goal, noting that the region's smaller towns and villages have an integral place in the provision of lifestyle and housing choices to support its residents. While regional cities and centres have well documented attractions and extensive service provision, the importance of the smaller hierarchy of towns and villages should not be dismissed as they play a significant role in providing housing and smaller scale services to the local and surrounding rural community. There is also an increasing market for large lot residential or lifestyle lots that appeal to a certain part of the market sector who choose not to live in the suburban space, preferring instead to commute between urban based employment and a semi-rural or village style residential base.

Housing choice, and housing for seniors has been raised as ongoing regional issues. The existing SEPPs and land use zoning currently permit affordable housing or seniors living developments in a broad range of areas, however the potential identified in the regional plan for councils to develop or operate such facilities is unlikely to be economically feasible for rural based councils. Investment by non - government and not for profit organisations in towns and villages, often smaller scale facilities, is potentially linked more to a project's economic feasibility and associated development costs than to land use zoning strategies.

The regional plan may benefit by expanding the reference hierarchy of the region's cities, town and villages to more readily distinguish the population demographics of those places. The draft plan identifies Bathurst, Orange and Dubbo as regional cities, with Mudgee, Lithgow and Parkes as regional centres. The remainder of the region's towns and villages are then grouped together for mapping representation (a black dot on the map), making it impossible for the reader to gain insight into the population demographics of the whole of the region. It is suggested that adopting a colour gradient for the identification of the range of towns and villages, based on the population of the centre, be introduced into the mapping.

Action 4.3.3 – council would value guidelines being developed to assist in managing seasonal workers, particularly guidelines to address accommodation for backpacker itinerant fruit pickers. It is noted however that the flux of backpacker numbers tends to vary and is linked to international travel trends (and safety) as well as Australian regulations relating to work visas and taxable income.

While some on-farm temporary accommodation is provided in the region, there has been in recent years an increase of backpackers visiting the region over the summer months seeking free camping opportunities.

Council supports the State's commitment to development for guidelines for accommodation needs generated by the mining construction and operation phases. Council also supports Action 4.3.4 and *Table 2: Draft settlement planning principles*.

Mapping Comments

As outlined above, the draft plan may better reflect the hierarchy of the region's cities, towns, villages and localities by recognizing more succinctly the existing tiers of settlements. While Bathurst, Orange and Dubbo may be regional cities, and Mudgee, Lithgow and Parkes identified as regional centres, the draft regional plan (in particular the associated maps) does not articulate the tiered hierarchy of the regions towns and villages. It is suggested that by at least differentiating the towns and villages based by population would provide a more comprehensive account to the reader of the region's demographics and inter relations. Simply this may be achieved by colour coding the mapping black dots that currently represent the location of various towns and villages and even localities.

The base maps are selective in the road corridors either shown and not shown, and in the town / village names included or not included. The level of detail varies throughout the mapping. The inclusion of localities such as Mullion Creek (situated on the rail corridor north of the city of Orange) does not enhance the reader's understanding of the demography of the region. Likewise, while staying with the Cabonne Council example, the exclusion from the mapping of villages such as Cudal removes information that such a village exists at an integral RMS Main Road intersection (being the location of the intersection of main roads south through Canowindra to Cowra or west through Eugowra to Forbes and Parkes).

Council reiterates its support for the development of a regional plan and welcomes opportunity to have been involved in the process of developing the draft plan. It is hoped that through Centroc and the already strong relationship with the Department's Western Region office, that local government will continue to be represented during the plan implementation process by the continuation of the Centroc Planner's forum.

Council thanks the Department for the opportunity to comment on the draft Central West and Orana Regional Plan. Should you wish to discuss the above matter further please do not hesitate to contact the undersigned at council's Environmental Services Department on 6392 3247 during business hours.

Yours faithfully,



HJ Nicholls
DIRECTOR ENVIRONMENTAL SERVICES