

**Blayney Shire Council**

Council Office 91 Adelaide Street, Blayney Postal Address PO Box 62, Blayney NSW 2799
Telephone (02) 6368 2104
Email council@blayney.nsw.gov.au Web www.blayney.nsw.gov.au
ABN 47 619 651 511

12 December 2018

Our Reference: IL/41717

Alison Frame
Deputy Secretary Policy and Strategy
NSW Department of Planning and Environment

Dear Alison,

Department of Planning and Environment's draft Community Participation Plan

Council refers to public exhibition of the Department of Planning and Environment's draft Community Participation Plan. Council would like to make the following comments for consideration;

1. Community Participation Plan

It is acknowledged in section 3.2 on page 13 the time periods listed for the various applications in table 4 of page 13 are minimum's only and can be extended based on scale and nature of the proposal.

However, in this regard, it may be prudent to include for clarity triggers which could enable extended exhibition time periods, i.e if a Council asks for an extended period when SEARs are sort or if a Council requests such and extension prior to lodgement of the application.

It is not our intent to increase the minimum exhibition for all developments (as this would be counterproductive and inefficient) but enable trigger points so Council (including on behalf of the community) could seek a longer exhibition period for larger impacting developments (particularly designated development, such as a mine).

28 days is simply too short of exhibition period for a large development (particularly designated development, such as a mine). It is noted in Table 4 on page 13; Draft Regional Strategic Plans get 45 days, the community are going to care more about a mine in their LGA, rather than the regional plans.

The exhibition period for any development, in particular State Significant Development is critically important to ensure the integrity of the assessment process. 28 days is to short and often the community feel DPE (state significant assessments are based in Sydney as well) are simply seeking to tick the box on exhibition, rather than genuinely wanting to know the local community's concerns on a proposed development.

28 days is often too short for community members (and Council staff) to essentially drop everything, read and interpret detailed Environmental Impact Statements (often hundreds of pages long and containing expert scientific advice which we do not see every day). Everyone then has to find time to also write a submission. For community members (most who work) it potentially only leaves 8 non work days to read the EIS and prepare a submission.

2. Submissions from outside the applicable Local Government Area

Consideration needs to be given in the Community Participation Plan (or another plan), that a weighting be given to (or even dismissal of) submissions lodged from; outside the LGA or outside the surrounding region (adjoining LGAs to that of the proposed development) in which a development is proposed.

It is becoming more apparent, on larger developments that; interstate, national and international 'anti groups' based outside NSW and even Australia which are politically opposed to certain types of development (mines and wind farms instantly spring to mind) are becoming more organised and coordinated in opposing large scale developments during the assessment process, getting members to lodge numerous submissions to trigger an Independent Planning Commission referral.

When a large number of submissions are received on a development, it gives the perception more people are against a proposed development, than may actually be the case. It also redirects DPE attention away from the important local issues of the proposed development and bring politics into the assessment process.

Should you require further information regarding this matter please contact me on (02) 6368 2104.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Mark Dicker', with a stylized, flowing script.

Mark Dicker

Director Planning & Environmental Services