

Investments

9 September 2010

Director General
NSW Department of Planning
GPO Box 39
SYDNEY NSW 2001

Australian Unity
Funds Management Limited
ABN 60 071 497 115
AFS Licence No. 234454

Australian Unity Property Limited
ABN 58 079 538 499
AFS Licence No. 234455

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SUBMISSION TO APPLICATION MP 10_0021 Bloomfield Concept Plan - Exhibition

Dear Sir,

Australian Unity Funds Management Limited (AUFM) is the Responsible Entity for the Australian Unity Healthcare Property Trust (AUHPT) that owns land known as Lot 1 in Deposited Plan 549856 at Bloomfield (the old 'drive-in' site). The title to the property is held in the name of Perpetual Nominees Limited (PERPETUAL). Perpetual is the custodian of the AUHPT and holds the title to the land, under instruction from AUFM.

The Australian Unity land is:

- shown uncoloured on the 'Preliminary Concept Plan' attached to the "Preliminary letter requesting DGRs.pdf" on the Department website;
- shown on the above Plan on Forest Road opposite the sites marked "Public Hospital (under construction)" and "Existing Public Hospital".

The 'Preliminary Concept Plan' is the subject of application MP10_0021, which is on public exhibition until 27 September 2010.

Although not objecting to the proposal, Australian Unity is concerned about its potential impact on Forest Road: in terms of traffic volume, speed and intersection pressures.

It is acknowledged that Appendix 6 (Bloomfield Transport and Accessibility Impact Assessment) in the exhibited documents addresses some of these issues and proposes intersection treatments and some road widening of Forest Road in the vicinity of certain intersections. Nevertheless, Australian Unity believes the matters are of sufficient concern to justify a meeting between the relevant parties and authorities to determine the significance of the concerns and consider the proposed remedies.

Such a meeting will assist Australian Unity in determining whether its concerns are addressed adequately.

We look forward to your advice in due course.

Yours faithfully,
Australian Unity Funds Management Limited



Chris Smith
Portfolio Manager – Healthcare Property

Copy to

Mr David Waddell
Director Development Services
Orange City Council



This proposed development, on prime agricultural land, is an incremental waste of a national asset, that will be desperately needed by coming generations.

The proposal should be deferred for up to 10 years, to allow North Orange infill to proceed towards completion. Council should, meanwhile, be allowed to consider and develop a plan for Orange city beyond 2020.

Road access, from the southern distributor roundabout to the Cadia turn-off should be upgraded.

Site open space is sub-optimal at <9% and should be increased to a minimum of 15%.

A community area with recreation and meeting facilities is required in addition to parkland.

Street and lot design should be such as to encourage solar passive housing.

There should be a height limitation on vegetation plantings, both on lots and streetscape. Thus facilitating solar passive house construction.

Double-storied dwellings to be confined to a designated area of the site to minimise solar access problems.

Solar HWS to be mandated.

BASIX computer model to be modified to increase bias to double glazed windows.

The BASIX target scores for energy and water to be separately assessed for pass/fail.

Name: Brian Phillips

Organisation: Environmentally concerned citizens of Orange

Address:

"Kurrafalls" 505 Bowan Park Road

Lidster 2800

IP Address: cpe-203-51-10-124.ins6.clt.bigpond.net.au - 203.51.10.124

Submission for Job: #3790 Bloomfield Concept Plan

https://majorprojects.onhiive.com/index.pl?action=view_job&id=3790

Site: #1752 DPI Land at Bloomfield

https://majorprojects.onhiive.com/index.pl?action=view_site&id=1752

Megan Fu

P: 02 9228 6531

E: megan.fu@planning.nsw.gov.au

This needs much better planning and consideration of the fact Orange has only very recently returned from a serious water shortage, this development could potentially have a serious negative effect on Orange's long-term future

Name: James McKay

Address:

15 Nile St
Orange 2800

IP Address: cpe-58-170-2-217.lns5.ken.bigpond.net.au - 58.170.2.217

Submission for Job: #3790 Bloomfield Concept Plan

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Megan Fu

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I wish to lodge my objections against the proposed developmnet at Forest Rd, Bloomfield, Orange -- on land currently owned by the State Government at Orange Agricultural Institute.

As a long term resident of Orange (30 years) I find it incredible that the State Government can step in and propose a development on land in south Orange when the City Council has a priority for development in the north. Orange is not big enough for two major developments and the long term palns of Council should be the priority rather than the Government deciding what the City needs (and has a financial interest in the development through the saale of the land).

I consider any development of prime agricultural land south of Orange inappropriate and should not proceed.

John Seaman h2xjy6

Name: John Seaman

Organisation: Orange resident

Address:

12 Summer St

ORANGE NSW 2800

IP Address: 60-240-189-81.static.tpgi.com.au - 60.240.189.81

Submission for Job: #3790 Bloomfield Concept Plan

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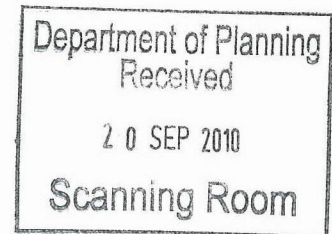
Please address all correspondence to the Secretary:
PO Box 90 Orange NSW 2800



OUR REFERENCE:
56/10/13
CDP.JHA

14 September 2010

Mr D. Cavallo
Assistant Director
Government Land & Social Projects
NSW Government Planning
G.P.O. Box 39
SYDNEY NSW 2001



Dear Daniel,

**RE: ENVIRONMENTAL ASSESSMENT FOR BLOOMFIELD CONCEPT PLAN,
FOREST & RIFLE RANGE ROADS, BLOOMFIELD (MP 10_0021)**

Thank you for your correspondence relating to the proposed development on Forest Road Orange. This correspondence was tabled at the Board Meeting held on Monday 30 August 2010.

Our concern is there seems to have been no consideration for the traffic flow for the corner of Park Drive and Forest Road.

Park Drive is the main thoroughfare for the Orange Ex-Services' Country Club and sporting facilities.

During peak times, particularly in the afternoon and weekends, traffic flow in and out of this intersection is quite high and with the significant increase in traffic flow, this intersection may present many safety concerns.

Yours faithfully,

Cameron Provost ACCM
Chief Executive Officer

Public Objection:
Bloomfield concept plan objection
Louise Harcombe

There has been no community consultation in the development of the concept plan. The design put forward by the Dept Planning is antiquated and does not in any way follow the design principles of sustainable development. Environmental and social issues have been disregarded in favor of the economic benefit to the State Government, particularly Dept I&I.

Australia's *National Strategy for Ecologically Sustainable Development* (1992) defines ecologically sustainable development as: 'using, conserving and enhancing the community's resources so that ecological processes, on which life depends, are maintained, and the total quality of life, now and in the future, can be increased'. (www.environment.gov.au)

This development proposal does not follow the principles of ecologically sustainable development espoused by the federal government. State Govt justifications for this development are based on erroneous and deceptive information and statements.

The high density plan does not take into account the differing community needs in this suburb development, that would be of greater social value. No consideration has been given to independent living and assisted living development for the aged. With the current aging population, a mature age residential development would be a more appropriate development consideration in this hospital precinct.

There has also been no consideration for short term accommodation availability to service the major hospital development, or such services as crisis accommodation for people in need. The provision of such social services are of greater value to the people of New South Wales than the individual benefit obtained from a private residence.

The concept plan contains restrictive single occupancy housing estate design. This existing design in North Orange and countless other cities contains ugly "dog-box" design dwellings in rows. A highly regarded architect Glenn Murcutt recently condemned such development within North Orange as short sighted and ugly, creating a middle class slum. The existing Bloomfield plan will duplicate this unattractive, over-development. The minimal open space present on the edge of the city will destroy the semi-rural amenity of the area, as well as damage the environmental, recreational and educational value of the locality.

The concept plan cuts the DII research facility in half. The structures remain at one end of the site, disconnected from the remaining open woodland and lake environment, located at the northern end of the site. The possible use for agriculture is greatly reduced through noise from stock in a residential area, chemical use in orchard trials and routine agricultural activities. There are also the security and safety issues for both residents and DII. This development will destroy the DII's capacity to undertake effective agricultural research. The suggested 5m buffer between the DII and residences is obscene in its inadequacy.

This development also utilizes prime agricultural land, which is highly desirable and occurs in close proximity to the water catchment for the City of Orange. Less agriculturally valuable land is located on the northern side of Orange, where the council is encouraging urban land release and residential development.

The concept plan does not provide adequate open space for recreational and conservation. The narrow 40 meter wide riparian corridor is dangerously inadequate to service the proposed hard surface of 550 residences. This area will become an open storm water drain, and not achieve the proposed open space described in the plan. This design also lacks vital linkages in vegetation and open space with the surrounding reserves that would enhance both the passive recreation and conservation values of the site.

No consideration has been given to the existing 132Kv power line present along the western boundary of the proposal. The potential health hazards are significant for residents living in close proximity, and although this matter was canvassed in the Dept Lands Land Assessment, has been notably disregarded in this report.

The increase in size of the commercial proposal from 1200m² to 3500m² has been inappropriately justified by the inclusion of the Glenroi residential estate to provide potential customer base that is necessary for the size of the development. There is no evidence this development is sustainable and will service Glenroi residents. There are indications this development will remove custom from existing business, creating financial hardship on local businesses. Arguments have already been raised that there may be up to 30% loss in CBD business. Similar commercial businesses established to service satellite residential suburbs have failed, such as Glenroi, which now lies derelict, and Alpine Stores, where shop turnover is very high. There is not a large enough population base in the city to service another major commercial outlet.

The impact on the storm water from this development on the headwaters of Blackman's swamp Creek and associated impacts on the storm water drainage through the centre of the city of Orange have not been sufficiently investigated with a high possibility of adverse impacts during a high rainfall event.

Existing rainfall event analysis utilized by planning agencies is grossly outdated, and has been previously recommended by the CSIRO for urgent review due to the extreme climatic conditions that are becoming more common. There has been no visible planning to accommodate the drainage line and swamp landscape that exists on the western boundary of the site, which are also spring fed, and flow into the substantial dam within the northern section of the DII land. Substantial flooding issues will occur with this inadequate site plan.

Minimal consideration has been given to the access to the residential and hospital precinct. The existing overpass bridge at Piesley Street will receive a great increase in usage from the hospital without the added congestion from a residential suburb. This bridge is difficult to negotiate, and will pose a serious hazard for medical transport in addition to standard urban usage. Secondary access along Sharpes Road and Huntley Road do not generally provide direct access to the CBD, and so are likely to remain secondary access routes.

No consideration has been made by DII on the infrastructure and services required for the development of a new residential suburb. The OCC is directing it's resources towards services in north Orange. The resources required to provide adequate and safe access to the suburb by way of redevelopment of the Piesley Street bridge, provision of water availability for this 550 residence development has not been considered. Further provision for public transport, access to schools, and adequate resourcing of such schools has also been neglected.

The strain placed on the financial resources of Orange City Council for the provision of public services for this development when council's priority is towards north Orange has been disregarded in the concept plan.

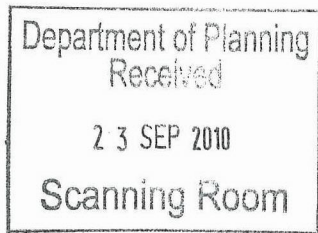
I look forward to receiving a reply from you with regards to my objections to this proposal.

Regards



Louise Harcombe
48 Icely Road
Orange NSW 2800
Louise.harcombe@yahoo.com.au
Ph: 63613564/0427743724
22 September 2010.

Major Projects Assessment,
Department of Planning,
GPO Box 39
Sydney NSW 2001



BLOOMFIELD CONCEPT PLAN
App. No – MP 10_0021

Attention: The Director, Government Land and Social Projects.

20th September 2010

Dear Sir

I wish to lodge my objection to the 'parcel of land at the Orange Research Station', being sold off by the Government for shops and housing.

This is not the Government's to sell it was bought by the Potato Growers Association for research and I can't remember when. Then was taken over by the Department of Agriculture and used for other research purposes. The block is very fertile land, and will be a shame to see it go under tar and cement. Many times the D.P.I holds information days and amazed at the attendance judging by the vehicles. The block is surrounded by farmland and this will be affected by housing as the right to farm is disappearing. There are watercourses, many beautiful eucalyptus trees and wildlife. It appears this Government doesn't hold Agriculture in very high regard, a menial industry to them!!!

In the early 1970's the Bathurst/Orange Development Corporation was formed and input by many organizations and groups was sort. My husband worked on this project as he was a Potato/Fruit Inspector with the Dept. of Agriculture. It had been agreed the development of Orange would head North leaving the fertile ground to the south and west for agricultural use.

Another huge concern is Peisley Street and Forest Road. The road surfaces of this street/road are terrible even when dry. I have lived in around Orange since coming here in 1950 and for the last 31 years I have travelled these roads to town. Since Cadia Mine restarted in the early 1990's it has become a nightmare to travel. One has to make sure when leaving the CBD that Peisley Street is entered by a roundabout otherwise it is extremely difficult to enter the street by a right hand turn, especially when school goes in and out, Electrolux the mine changes shifts and to add to the dilemma the new hospital.

The overhead bridge at East Forks is a disaster waiting to happen. My daughter and I nearly ended up under a semi trailer one morning and had to reverse back down Forest

road to let it pass, (luckily no one was behind). So now I stop when seeing a big truck that's if one sees it in time since that stupid foot bridge was put in, on which I have seen very few people using it (except for a good pigeon roost). Why isn't the old railway hostel pulled down and a proper overhead bridge constructed????

The Sharpes Road, Huntley Road intersection is stupid, WHY! wasn't the proposed roundabout constructed??? More slip roads will be needed to the Cadia Road turn off.

Has any Government official been to the Sports Ground especially on a Saturday morning?

There are massive wide loads that come through this area. New roads will have to be built to cater for all this extra traffic.

I hope the Council and other bodies are able to stop this stupid idea, will detract from the peaceful surroundings for the hospital, (since it was not a well thought out place to put it). Orange has a Head of Office for Agriculture, a useful Research Station, and a Tafe Collage next door, why isn't this used to complement each other? As it appears the Agricultural College has disappeared.

As for the proposed shopping complex, there are enough empty shops in the CBD at present. For the housing doesn't anyone in the planning department know these houses are going to be constructed next to very high voltage powerlines. Overall the hospital should have been left where it is or erected on the other side of town where the university students didn't have to travel so far to the hospital for studies. All I can see is that it will be a never ending of 50kms getting closer and closer to us. Just hope that there isn't a major accident and there is no access to the hospital as all roads are blocked.

I am annoyed that governments think they can ride roughshod over communities.

I do not want my name and address made available please.

Yours faithfully

Attention: The Director, Government Land and Social
Projects
plan_comment@planning.nsw.gov.au

PARKWOOD ORCHARD Pty Ltd
90 Hawke Lane
ORANGE NSW 2800
23/09/10
apple51@bigpond.com
0428650170

Re Bloomfield Concept Plan

Application No	MP 10_0021
Location	Forest and Rifle Range Roads, Bloomfield
Proponent	State Property Authority
Council Area	Orange City Council

The Director
Government Land and Social Projects

Dear Sir

I would like to draw to your attention my strong objection to the proposed Bloomfield Concept Plan, involving high density residential development.

Our family has been involved in horticulture and farming on the property PARKWOOD for the last sixty years. As a result, a substantial business has grown and diversified. It has provided employment for various contractors and casual workers.

As you can see on the attached map, the proposed residential development is situated along the majority of PARKWOOD's boundary which is separated by only a 20 – 30 metre corridor controlled by the Orange City Council.

PARKWOOD's land is currently used for cattle and crop production, and with the possibility of high density residential development so close to our boundary, we see this as curtailing our established farming practices such as weed and pest control, irrigation and late night/early morning haymaking activities.

Another concern is our irrigation dams, licensed under NSW Water, which are adjoining the proposed development. The irrigation pump and shed sits only metres away from the proposed housing and the 60 HP electric pump is audible in the near vicinity. As most of our irrigation takes place at night, my concern is that this practice will be severely curtailed or stopped altogether.

In the last three years I have trialled 23 acres of lucerne to assess its viability. In that time I have established markets for this product and am currently baling lucerne to meet buyers' requirements. We are also preparing another 20 acres for sowing lucerne for next season, with another 15 acres planned for the following year.

Last season I was able to take four cuts from the 24 acres, although one cut was spoilt by rainfall. Three cuts yielded an income of \$21 000. The income will increase proportionally as more lucerne is sown.

It is here I must stress that 3 to 5 cuts of lucerne in a season is only achievable with irrigation. To only take 2 cuts in a season would prove to be non-viable financially.

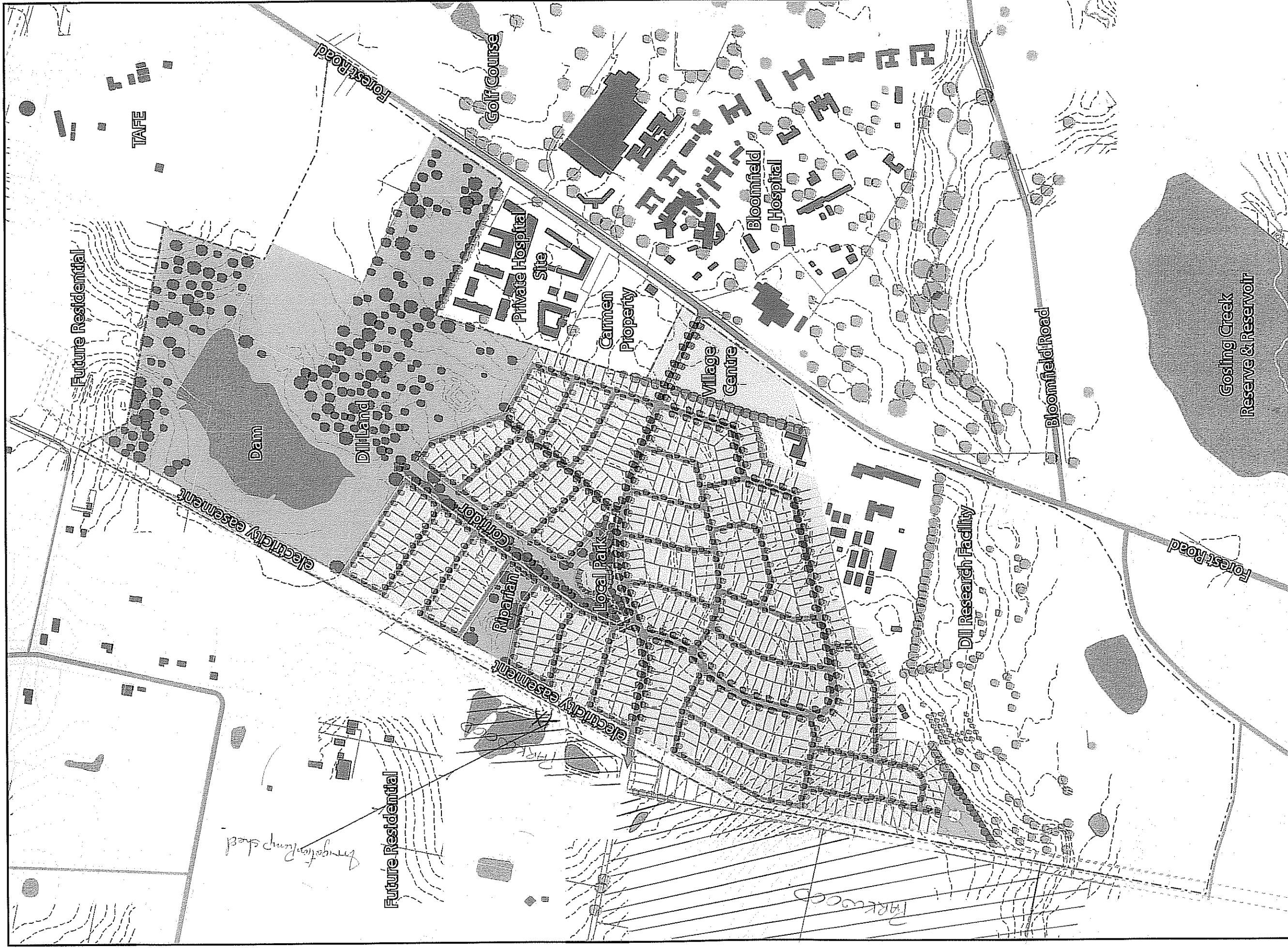
I have already made considerable investment in plant, including conditioning mower, hay rake, boom spray unit and transportable irrigation.

I am advised that Orange City Council will shortly be producing a new LEP for South Orange. In discussion with the Planning Department, I have been able to establish that re-zoning of PARKWOOD from rural to residential would be unlikely for 15 to 20 years.

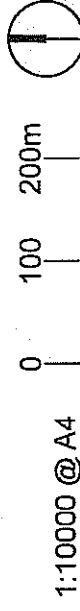
Given the impact of both the Bloomfield Concept Plan and the LEP, this may result in our being in the difficult position of not being able to utilise our property to anywhere near its potential, leaving us financially disadvantaged with an unviable farm.

Yours sincerely

David A Hawke
Owner/Manager
PARKWOOD ORCHARD Pty Ltd
apple51@bigpond.com
0428650170



South Orange DII Site
CONCEPT PLAN



26 September 2010

Department of Planning,
Information Centre,
23-33 Bridge Street,
Sydney NSW 2000

Dear Sir/Madam

**Ref: Application Number: MP10_0021
Bloomfield Concept Plan, Orange**

I object to the rezoning of the Agricultural Research Institute land for residential and retail development. With the ever increasing population pressures on society today it is more important than ever to continue agricultural research. Agricultural research should be expanding as the need for food increases as a result of the biggest problem facing society today – population growth. **This proposal will take away 70 hectares of prime agricultural land to increase Orange's population by 550 more families (possibly 2,000 more people) – it does not make sense.** Orange residents do not want their country town turned into a highly populated city. The Central Western Daily recently undertook a survey and found that **“asked if Orange needed a bigger population, 72 per cent of 511 respondents said no”**. The goal should be for **sustainable growth**. Already the growth of Orange has seen problems with; water shortage, traffic congestion, and increased crime. It will make Orange less attractive as a tourist destination and **reduce the quality of life for existing residents**. Forest Road already has a high traffic flow with Cadia mine workers and contractors travelling on this road daily.

The worst case scenario would be to turn this land into an urban (jungle) area like north Orange and lose the green vegetated areas that we all like to see around our beautiful city of Orange. I know this area would have economic value to the State Government and Council, but this would not be in the best interest for the community and the environment. Council and government should be thinking about the long term good of the community, not about quick profits. **We don't want the south of Orange to be a sea of houses jammed in like in the north.** Any future development in Orange should continue to the north, and **leave the unspoilt south for agriculture/recreation and medical/hospital related business.**

Can Orange really sustain such a high population increase that Council is pushing for. One concern is the impact the extra 550 families will have on **water supply**. All new houses should include a water tank and under no circumstances should they be permitted bore water licences.

My other concerns about the South Orange Concept Plan include:

- The new housing development would have a **visual impact on south Orange which would lose its attractive rural feel.**
- The design has not allowed for a **sufficient buffer distance around drainage lines.**
- The developers have not included in their design of this large housing estate – **areas set aside for community use**, such as the required playing areas and facilities for the additional 93 plus families.
- **Loss of prime agricultural research land and subsequent job losses** as a result of scaling back of valuable research.
- **Strain on water supplies and sewerage infrastructure at the cost to council rate payers.**
- **Restrictions on neighbouring orchard growers and land use conflict.**
- Problem with unrestrained **dogs attacking nearby farming stock.**
- Design lacks open spaces for such a high number of houses in one development. **The design resembles a “dog box” suburb of western Sydney not suitable for a country town.**
- **High traffic impact** and strain on Forest Road intersection.
- Plan has no **cycle-ways or footpaths.**
- Lacks sustainable living and comfortable housing principles. **550 houses are a lot of house to be crammed in with no open spaces**, except for one small area to the north.

This area to the south of Orange is of great value and benefit to the people of Orange and should be used in a smart way for present and future generations. This area should be used for recreational/ rural agricultural uses along with the expansion of **TAFE or medical related facilities** such as the much needed **Ronald McDonald House** – housing and support for families with sick children, or a Tresillian Family Care Centre. Such facilities would benefit the community. These areas should **not be used for residential housing** this would be such a waste to the community and would destroy the attractiveness of South Orange. I am passionate about our beautiful leafy green city of Orange, please, please leave this type of development to North Orange where the damage is already done.

Yours sincerely

SUBMISSION RE: BLOOMFIELD CONCEPT PLAN

APPLICATION NO.MP10_0021

Forest Road, Bloomfield, Orange

Access: This proposed development is located along Forest Road which is the only access to it. Forest Road is currently the only access to a TAFE site, Orange Agricultural Institute, the new Orange Base Hospital, Ex-Services recreation complex, linen cleaning business and Bloomfield. It is the main access road for workers going to the expanding Cadia Mine. This road is a single carriage way in each direction and is already very busy. It is essential that traffic on it be kept at reasonable levels so access to the hospital is not compromised. For the report to suggest a 550 housing estate plus a large shopping centre ?will not be a significant impact on existing infrastructure such as the road network? is farcical. It must have a significant impact, especially as Orange City Council does not have any planned development in the area for the foreseeable future. Council is developing infrastructure to the north of Orange.

Forest Road continues north into Orange across the railway line which is a dangerous U-shaped bridge which is not suitable for heavy traffic. The report indicates Orange City Council has planned a Southern Distributor Road which may pass north of the proposed Development. Council does not have final plans for this Distributor, no money allocated to build it and no dates have been set for its construction, so if it is to be built it is quite some years off. The Council is in the process of building the Northern Distributor which will be finished in late 2011 meaning its resources are already stretched. Council has built the Northern Distributor because that is where it has concentrated new developments, both residential and industrial. It has no plans to extend the city to the south for the foreseeable future.

Orange Agricultural Institute: This is a first class agricultural research station. The Government has already closed a number of agricultural research facilities in recent years. It is crucial that agricultural research continue at a strong pace in order to keep Australia at the forefront of food production. Food security being a major problem for the entire planet and Australia has a major part to play in developing our food resources for the future.

This is a significant resource centre located on prime agricultural land near a significant city. It has excellent synergies with other facilities in the region such as Charles Sturt University, TAFE, Department of Industry & Investment Head Office in Orange, etc. Its employees are a wonderful asset to the Orange community which we do not want to lose.

The current proposed development splits the research site and has housing located within metres of the current buildings. The southern boundary of the proposed development is zigzagged around the buildings at the Institute. This plan is certain to compromise research in the future. It seems only a matter of time before the planned development encroaches upon this facility and leads to it closing.

Orange City Council Development Plans : Orange City Council has planned development, with a staged release of land, to the north of Orange. A 2004 report to Council identified a number of potential zones to the north, west and south of Orange. It recommended that priority of any release should be given to those zones to the north of Orange, particularly due to the planned infrastructure developments in that area. The area around Bloomfield was identified as a potential development site but only in the medium to long term.

I understand that at present Council have plans to continue to release house blocks to the north at about 200 lots per year. This has been progressing for some time. The Council planning includes roads (Northern Distributor is being built to give further excellent access), parks, playgrounds, schools, a new large 4,500 square metre shopping complex to start building next year (large supermarket plus about 20 speciality shops), to which Council has given approval, etc. For the last few years Council has been developing an LEP, which it will show for public discussion later this year. The South Orange development jumps ahead of this planning process and jeopardises the planned future of this city. This urgent development proposal is being carried out by the State Government, with very little input from the City Council and absolutely no input from local residents and businesses. The planned development to the north of Orange will be put in jeopardy as Orange cannot sustain the planned development to the north of Orange and a massive new unplanned development to the south. Orange is only having steady growth. This proposal is out of kilter with Council planning and is way ahead of Orange?s current needs. There has been no consultation with the community or businesses and only limited discussions with Orange City Council. The report suggests there was ?extensive consultation? with council but my understanding was that Council had very limited opportunity to alter or defer this development.

The proposed development is on prime agricultural land that should be kept for agriculture. Good agricultural land is becoming a scarce commodity so where it exists it should be kept for this purpose. Next door are operating farms providing employment, producing export quality fruit and income for local families. If this housing proposal goes ahead these farms will be compromised as it is well known that it is impossible to carry out farming practises next to housing estates such as that proposed in this plan. There is no buffer in the current proposal between housing and the operating farms.

Shopping Centre: Initially this development was to have a shopping centre capped at 1500 square metres, but this has been proposed to increase to a massive 3,500 square metres with building to commence within the next year, which is a very similar timeframe to the large shopping complex to be built in North Orange. The report by Pitney Bowes (Appendix 4 Economic Impact Assessment) states "this cap [of 1,500m²] in our view is inappropriate. Such a cap would prove prejudicial to the effective operation of the retail floor space at the Bloomfield site?" The shopping centre at Greengate in western Orange is an example of a successful small shopping centre which provides for the needs of the residents in the suburb but does not detract from the viability of Orange CBD.

This report states "this facility [planned North Orange retail centre] will be of no competitive relevance to the future of retail floorspace at the Bloomfield site, as it will clearly serve the future residents who will move into the northern fringes of the Orange CBD whereas any retail development on the Bloomfield site would serve the residents of South Orange?" The report states South Orange would have its first year of trading in 2011/2, whereas North Orange will start in 2012/13. This is incorrect as Orange City Council is about to approve the North Orange retail space to be built by Woolworths with building expected to commence later this year. Clearly therefore this will correspond with the proposed building of the South Orange retail development. How can the South Orange retail development be ready for trading in 2011 when this proposal has not been approved, no development plans have started, no discussions held with Orange City Council, let alone plans be provided, no developer or supermarket anchor selected, etc? How can it possibly start building this development in 2011?

The adjacent Carmen property has had an application with Council for some time to extend its shop.

Orange cannot possibly cope with two new large retail developments on the northern and southern outskirts of the city. It will split the city shopping with all three shopping precincts suffering. The City Council will not be able to support the requirements of all three sites.

Pitney Bowes state that there are already 5 supermarkets within Orange CBD, of a variety of sizes. The Summer Centre, which includes Franklins, is planning an overhaul and expansion of floorspace and extra specialty shops. This is planned to go ahead in the near term. Pitney Bowes list a number of country towns with several supermarkets eg Young population 7392 with 3 supermarkets, but the population of Young Shire is over 12,500, plus it would draw on shoppers outside the Shire. Pitney Bowes are under representing the "catchment populations" for these towns.

Leyshon Consulting has disagreed with Pitney Bowes size of the "trading area" for the proposed shopping centre.

The proposed housing development at South Orange is to be staged over a number of years, yet the shopping centre is proposed to be built in 20011/12. Obviously it would only have minimal support from this housing estate in its first few years of operation. This means for it to be profitable it will have to draw customers from Orange City and so have a more significant impact upon Orange CBD and the concurrent building of North Orange shopping centre. Pitney Bowes suggest the new shopping complex will add 177 permanent retail employee positions. Some, if not many of these, will be drawn from CBD businesses as they lose sales to the new shopping centres.

There are also a number of smaller shops scattered throughout Orange. The largest are Greengate and the Alpine Stores where there are small supermarkets with several specialty shops. Then there are about 5 other mini-marts. All of these shops, which cater for their local area, must lose some trade if two new shopping precincts are opened next year.

Pitney Bowes state that the South Orange shopping centre will have minimal impact on the CBD. There are a number of vacant shops in the CBD, especially in the "Bottom Block" and arcades. Also the side streets such as Lords Place and Piesley Street have vacant shops. If the two new shopping centres are built there must be some businesses drawn from the CBD and hence leading to more vacancies. There are only a limited number of shoppers in Orange so there must be a significant impact upon the CBD. For example, the report states it will have no impact upon Orange City Centre (located in the CBD) as it does not have a supermarket. What about the shoppers who go to the proposed South Orange shops and buy some clothes, jewellery, go to the chemist, newsagency, coffee or have a meal? Many of these people would have most probably shopped at Orange City Centre for these items or services.

While this proposed shopping centre would be nearest to Cadia mine that does not mean the families will shop there. The families will shop where it is most accessible to their home. Most employees will live in Orange or surrounding villages not necessarily near South Orange. It must be remembered the current Hospital in the centre of Orange will close when the new one opens. So all the current employees will transfer their work, not their home, to the new hospital. It is not employing a whole new workforce. The current employees are living throughout Orange and surrounding district.

Proposed layout of the housing complex: I expect that those who would be interested to live near a hospital are older people and the new nursing and associated hospital staff moving from outside of Orange. I imagine many of these would want medium to high density housing within a parkland. Whereas all that this proposed development is offering is smaller housing blocks where "McMansions" will be constructed. This housing development proposal seems to be aimed at maximising the number of houses in this location. There is only one small park planned and no community facilities.

CONCLUSIONS

1. Orange Agricultural Institute is a first class research facility that must be allowed to continue it's work in Orange. The proposed development will split the Institute and compromise it's future activities. It is prime agricultural land.
2. Forest Road is already a very busy road being the access to significant sites including the Agricultural Institute, TAFE, Bloomfield, Ex-Services Golf Club, and the soon to be opened Orange Base Hospital. It is also the main route from Orange to the large Cadia mines. To add a large housing estate and shopping centre without the appropriate upgrade to the area's roads is dangerous. It is crucial that the new hospital have good access at all times. Orange City Council has no plans in the foreseeable future to add new access roads in the area, especially none before the proposed shopping centre is completed.
3. Orange City Council is releasing land to the north of Orange at an appropriate level as is needed for the city's growth. The Council has developed the appropriate infrastructure in this area including roads, water, etc. A large 3200m2 shopping precinct is expected to be developed in the next 12 months, opening before Christmas 2011. Council is about to release it's LED in the next few weeks, yet the State Government wants to override this planning with it's South Orange proposal. This proposed development is ahead of the city's needs and ahead of the Council's planning programme.
4. The proposed expanded shopping centre at South Orange will compete with Orange CBD and the about to be developed shopping centre in North Orange. Orange cannot support two new shopping centres. The Orange CBD will lose significant business and some businesses will move or close. If the South Orange shopping centre opens in 2011/2 as proposed it will be before the proposed housing estate is developed and so it must draw shoppers from Orange CBD to survive.

Name: Phillip Schwebel

Organisation: Collins Booksellers Orange

Address:

PO Box 774

Orange NSW 2800

IP Address: 124-169-20-93.dyn.iinet.net.au - 124.169.20.93

Submission for Job: #3790 Bloomfield Concept Plan

https://majorprojects.onhiive.com/index.pl?action=view_job&id=3790

Site: #1752 DPI Land at Bloomfield

https://majorprojects.onhiive.com/index.pl?action=view_site&id=1752

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Sporting Shooters Association of Australia

(Orange Branch Inc.)

Orange NSW 2800

We welcome all shooters with a sensible attitude and safety in mind.

PO BOX 205

Phone: 02 6365 8444



RE: Bloomfield Concept Plan – Exhibition.

To whom it may concern,

The SSAA Orange Branch (incorporated) would like to submit comment on the Bloomfield Concept Plan, and as such would like you to consider the information following in your assessment.

Background

The SSAA Orange Branch (incorporated) is a shooting club located in Orange, which is incorporated with SSAA NSW. The SSAA Orange Branch (incorporated) operates and maintains the “Orange Rimfire Range”. This range is also known as the “Rimfire Range” and the “small bore (rifle) range”. The Orange Rimfire Range is used for practice and in competition, in many Rimfire disciplines. Many other shooters who are not members of the SSAA Orange Branch also use the Orange Rimfire Range.

The SSAA Orange Branch (incorporated) has developed substantial facilities at the Orange Rimfire Range to cater for a variety of shooting disciplines for our regular membership, which includes but is not limited to junior members, and old age and medical pensioners.

One of the responsibilities of the club is to provide facilities to enable members to comply with the Firearms Regulations. In regard to genuine reason for holding a firearms license, where a member uses the membership of an approved shooting club, the member must attend a shooting range on no less than 4 occasions per year (Firearms Regulation 2006 Clause 96, Part 1,b,i-ii), and where a member uses the membership of an approved hunting club, the member must participate on no less than 2 occasions per year (Firearms Regulation 2006 Clause 96, Part 1,c). Firearms Safety Awareness testing is also carried out by The SSAA Orange Branch (incorporated). This testing is carried out for people in the wider community who are not usually members, although some do become members.

The SSAA Orange Branch (incorporated) provides other services to the wider community, including running the Hunter Education Course on behalf of the Game Council. These courses facilitate licensed shooters to become accredited with a restricted (‘R’) game license, ensuring ethical and humane hunting. Over 60% of the participants of the Hunter Education Courses run by The SSAA Orange Branch (incorporated) have been non-members.

In order to promote ethical, and humane hunting, and to promote firearm safety and awareness, The SSAA Orange Branch (incorporated), encourages all appropriately licensed shooters to utilise the Orange Rimfire Range. The philosophy behind this is to ensure that people using firearms are familiar and comfortable using firearms and are able to practise in a safe and controlled environment, with instruction and advice available. All people who obtain Safe Shooting Certificates attain restricted ('R') game licences, or visitors to the range are advised that they are able to use the facilities, whether they are a member or not.

The above information should show that The SSAA Orange Branch (incorporated) is not only an active club in a major rural centre, but also provides a range of services, that are actively used, to its members and to the wider community in general.

Comment on the Bloomfield Concept Plan

The SSAA Orange Branch (incorporated) commented on the State Significant Site listing: DPI Land at Bloomfield- Orange. In that submission the following was stated;

In the event that a suitable location can be identified within a reasonable distance from Orange, the planning and development of new facilities would be in excess of the capability of the club and would require substantial resources to complete the move. In this circumstance, if resources were not made available, then the club would oppose any change or development, which may impact on its ability to operate in its current capacity.

In the event that a suitable location cannot be identified, the club would require redevelopment of the current location in accordance with the recommendations of the NSW Firearms Registry, to remove any requirement for a safety zone. The NSW Firearms Registry Range Inspector, Barney Jenkins, has already indicated that this is possible, and practical. If this redevelopment was to take place, then The SSAA Orange Branch (incorporated) would require that the current land lease arrangement with the NSW Department of Lands, for the parcel of land under the current control of The SSAA Orange Branch (incorporated), be extended into a long term non- commercial lease, and that full disclosure of the presence of the Orange Rimfire Range be made to any developer or land purchaser in the proposed development area, to ensure that they are aware of the existing land use.

In the State Significant Site Study – Response to Public Submissions – South Orange, the following was published;

*Issue:
Shooting*

Agency Response:

- *Large area of land in study area part of the range safety zone. Rezoning land in this area will result in range being unusable, with no replacement site for the shooting club having been identified.*

- *SSAA Orange Branch has developed substantial facilities at the range rimfire range to enable members to comply with license requirements. Any move to another site would incur substantial resources and costs.*
- *If the range is to remain, it would be necessary to remove the need for a safety zone.*

Proponent's Response:

Attached is a letter (Attachment 2) from the Police Firearms Registry advising that once the small bore rifle club has undertaken improvements to the current range facilities, they will no longer require a safety zone when in use. The range will then have no impact on the proposed subdivision.

Various discussions have been held with the large bore rifle club over their relocation. Their relocation has almost been resolved with the verbal consent of Cadia Mine to provide a suitable area of land for the relocation of the large bore range.

The SSAA Orange Branch (incorporated) interpret this as an acceptance that redevelopment of the Orange Rimfire Range to remove the requirement of a safety zone is appropriate, and as such the SSAA Orange Branch (incorporated) would like to, in the light of the State Significant Site Study – Response to Public Submissions – South Orange,

Re-iterate that they would require a long term non commercial lease, and would require full disclosure of the presence of the Orange Rimfire Range.

To this end we would like to point out an omission in Section 4.3 of the Bloomfield Concept Plan Environmental Assessment where significant land use has been described, and that the Orange Rimfire Range has not been noted, and the SSAA Orange Branch (incorporated) are concerned that this omission may potentially impact on the way this development is viewed.

At this point in time, no revision of tenure has been undertaken, and as such the Safety Zone requirement is still in place.

In relation to Figure 10: Staging Plan, in the Bloomfield Concept Plan Environmental Assessment, the current safety zone as shown in Figure 1, at best estimation will impact on areas number 5 and 6, and the northern portion of area number 7.

The SSAA Orange Branch (incorporated), would like to ensure that the safety zone is addressed and removed prior to the proposed development proceeding, and feel that this can done once suitable tenure of the land is confirmed, and appropriate development work on the Orange Rimfire Range can be completed.



Figure 1: Orange Rimfire Range Safety Zone, as defined by NSW Firearms Registry

Note in both Figure 8 :Concept Plan, in the Bloomfield Concept Plan Environmental Assessment, and Figure: Concept Plan in Bloomfield Concept Plan Appendix 2, Urban Design Rationale, the land to the North of the development area is described as “Future Residential”.

This is the parcel of land, DP 750401 (Declared for use as a Rifle Range) in which the Orange Rimfire Range is located.

This land is described in Report, Louise Harcombe (2007), Assessment of Crown Land at Bloomfield, Orange, Department of Lands, Section 4.4, p 133, as having the following suitable land uses with the following notes;

Suitable Uses Determined for Mapping Areas 1 & 2

*Heritage
Recreation
Catchment Protection
Nature Conservation*

Mapping Areas 1 & 2 are currently lawfully occupied and used, in association with the adjoining Commonwealth land, for a rifle range. The identified site constraints that exist on the site impact on the suitable uses that will optimise benefit to the people of New South Wales. As these site constraints are significant issues that would greatly impact on the urban development potential of the site, and would require a more intensive investigation than occurs within this process, the suitable uses have been identified as those that are passive in nature. The identified aboriginal heritage significance present on the site is not adversely affected by the current recreational land use, with catchment protection a secondary suitable landuse that is complementary to nature conservation, heritage protection and recreation. The European heritage significance associated with the historical presence of the rifle range is also not adversely affected by these passive landuse options. The identified presence of threatened species on adjoining mapping areas and known feeding habits require these mapping areas to be similarly considered as of very high nature conservation value, given the native pasture present. The suitability for nature conservation is consistent with other passive uses, and should be considered as one of the primary suitable uses, along with aboriginal heritage due to the current legislation associated with these features.

NOTE: Any change from the passive landuse of Mapping Areas 3, 4, 10 and 13 to a more intensive occupation will have a serious impact on the existing rifle range activity, due to the presence of the required shooting safety zone.

Further information regarding the suitable land use for Mapping areas 1 & 2 in the same document in Section 3, pp 75 – 78 and Section 4.4 p 121.

Bloomfield Concept Plan Appendix 11, Cultural Heritage Issues, in Section 5 references the presence of areas of potential heritage significance, in the form of areas dating back to the 1880's used for military training for the Boer War, and continuous use since.

SSAA Orange Branch (incorporated) feels that based on the above information, that the land marked as “Future Residential” is unsuitable for that use.

Bloomfield Concept Plan Appendix 11, Cultural Heritage Issues, in Section 5 also references that the current land use ...*"it is unlikely to constrain development on neighbouring land except to the extent that it constrains proximity and the use of development for safety reasons."* The SSAA Orange Branch (incorporated), would like to ensure that these safety reasons are suitably addressed prior to the proposed development proceeding, and feel that this can adequately done once suitable tenure of the land is confirmed.

In summary, The SSAA Orange Branch (incorporated) would like to express that they are an active club, in which provides many services both for its own members as well as the wider community. While they are not opposed to the development they would like to have taken into consideration the issues raised in order to continue to provide the services that it currently does.

Thankyou for your consideration

Jason Wilde
President, The SSAA Orange Branch (incorporated)

Boyd Mackinlay
Secretary, The SSAA Orange Branch (incorporated)
ssaaorange@gmail.com

References

Annand Alcock (2010), *Bloomfield Concept Plan Appendix 2 Urban Design Rationale*, NSW Department of Planning

Louise Harcombe (2007), *Assessment of Crown Land at Bloomfield, Orange, NSW* Department of Lands

NSW Department of Lands (2009), *State Significant Site Study – Response to Public Submissions – South Orange*, NSW Department of Lands

NSW Firearms Legislation 2006

Peter Andrews + Associates Pty Ltd (2010), *Bloomfield Concept Plan Environmental Assessment – Application No. MP10_0021*, NSW Department of Planning

Susan McIntyre-Tamwoy (2010), *Bloomfield Concept Plan Appendix 11 Cultural Heritage Issues*, NSW Department of Planning

Environmentally Concerned Citizens of Orange

The Director General of Planning

Dear Sir/Madam,

Environmentally Concerned Citizens of Orange (ECCO), as a consequence of recent public meetings, resolved to lodge a submission opposing the proposed Concept Plan for the development of land belonging to the Department of Industry and Investment, which is currently part of the land set aside by the former Department of Primary Industry for agricultural research.

In February 2009, ECCO expressed its opposition to the development of this land, and our previous objections still stand. Our current submission also includes objections to many features of the Concept Plan.

1. ECCO objects to the siting of the Concept Plan on the designated land.

The combined influences of climate change, peak oil and an inevitable price on carbon will mean that in the near future the populations of the Central West and the Sydney Basin will be looking for more local food security. At the same time more land is being resumed for housing, or rendered unfit for agricultural use through coal and gas mining activity.

The siting of the Concept Plan on land used by the Orange Agricultural Institute (OAI) will result in the loss of 78.6 hectares of prime agricultural research land out of 171.3 hectares, which is a loss of 46% of the land in question. This land also contains significant areas of red basaltic soil, which is the dominant soil type of the Tablelands region. These soil types are eminently suitable for agriculture and horticulture, and will be called upon to play a major food production role in a changing climatic environment. As such, every hectare of this prime agricultural land should be preserved for food production research, not becoming victim to resumption for housing as is increasingly becoming the case.

If we are to successfully provide food security for our community in a changing climatic environment we must be prepared to set aside resources such as land to research more efficient methods of providing food security. The emerging loss of farming land in the Sydney basin due to urbanization will result in greatly increased fruit and vegetable production in the Central Tablelands and the Central Slopes. The OAI is strategically located in this region and will be called upon to carry out emerging research needs. Any loss of land will have the impact on the OAI's ability to meet this need and in turn it threatens Australia's capacity to grow its own fresh food.

The proposed area for development will be flanked to the South and West with either agricultural research land or private agricultural holdings. Due to the proximity of the proposed residential area to the research area and to highly productive rural properties, and the lack of an adequate buffer zone, it is highly likely that conflict will occur between future urban dwellers and those using the neighbouring highly productive rural land, over such issues as spray drift, night spraying, noise etc. This

frequently results in restrictions placed on farming communities, which could jeopardize livelihoods and reduce the effectiveness of vital food research and production in the area.

Consideration could be given to the development of prime agricultural land within the boundaries of Orange if there was a desperate need for land for residential development, but this is not the case. Our city currently has enough land available for residential development for the next fifteen to twenty years. This land is situated in the North and West of the city, which is where planned development is to occur.

Not only is the development unnecessary, but the location of the proposed development will impose extra and unnecessary cost to Orange residents, as well as placing further pressure on Orange's unreliable water supply.

2. ECCO objects to design components of the Concept Plan.

ECCO regards the design of the proposed Concept Plan as being extremely disappointing. Planners had the opportunity to design a residential subdivision incorporating environmental, health and social features prevalent in similar areas both in Australia and overseas. Instead designers appeared to have opted for conventional features which meet minimum compliance standards, with emphasis placed mainly on maximizing returns to the developer.

The Concept Plan fails to provide adequately linked open space areas and green ways, both within the subdivision and around its perimeter. The design does not contain significant commitment to provide an environment which has aesthetic value and provides designated walking and cycling tracks within the internal street layout, and areas for community outdoor recreation and congregation, all of which have been proven to provide many health and social benefits.

The Concept Plan fails to provide space for dedicated areas to encourage community living, such as a Community Garden or a Community Centre. The Concept Plan also fails to provide dedicated off-road easements for walkways, cycle ways, corridors and linkages within the suburb and linking to adjacent hospital and township areas, increasing dependence on motor vehicle transport.

Passive solar design is important in all housing, as it has the capacity to reduce reliance on other higher carbon footprint forms of heating. The concept design does not provide sufficient flexibility to allow living areas of houses to face North to take advantage of maximum sunlight in the cold winter months.

Significant motor vehicle congestion will be the result of having only one intersection to Forest Road, which is the site of the convergence of motor vehicle traffic from residential, mine, linen service, hospital, agricultural, research and outlying rural properties through one intersection. The proposed western exit road for the residential area will become a thoroughfare for commuting traffic, thereby converting a residential street to a busy thoroughfare.

The proposed buffer zone between the residential area and adjoining agricultural land is five metres, which is much too narrow and will not allow for the planting of trees to

create a 3D buffer. There is no provision for a laneway for livestock to move from OAI paddocks to the North to access the animal facilities in the South. Without a dedicated laneway to the shearing shed and the yards, livestock will be forced to walk around the buildings and on roadways and lawns. The OAI dam depicted on the Plan is important for irrigation and livestock, and its use could be a source of conflict between residents and agricultural users, particularly with regards to noise from pumping.

The Concept Plan fails to utilise existing natural assets of the current landscape, including re-vegetated corridors, water drainage lines, scenic water bodies, and view corridors to remnant woodland areas, and fails to provide adequate biodiversity protection measures for high conservation remnant woodland, dam and riparian areas. These areas are known breeding sites for several threatened species under the NSW TSC Act and Commonwealth EPBC Act, as well as feeding sites for the Japanese (or Latham's) Snipe, which is an internationally recognized endangered migratory species, whose survival is threatened by loss of habitat, partly due to urban development.

The Environmental Assessment desktop exercise flora and fauna assessment has not adequately assessed flora and fauna biodiversity, and has not investigated the occurrence of several taxonomic groups as recommended by its flora and fauna assessment, appendix 7. It therefore fails to adequately assess the heritage values of the site.

3. Conclusion.

ECCO is of the opinion that this Concept Plan should not be approved in the interests of the current and future agricultural and horticultural research needs of this important part of regional New South Wales, particularly as its role increases in an era of threatening climate change.

The security of current research and the viability of the existing research community will be jeopardized by any loss of research capability due to a reduction in land area.

If the proposed Concept Plan were to proceed, there would be significant conflict between adjoining residential and agricultural users. At the same time, the current concept design does not meet the needs of a truly sustainable urban suburb of the 21st Century, and does not adequately address environmental issues, and health, community and social needs

Neil Jones
President
ECCO Orange Inc.

26th September, 2010

Mr P. West
42 Sharps Road
Orange NSW 2800

26 September 2010

Director-General – Planning
NSW Department of Planning

Dear Director-General

Re: Draft concept Plan for the Department of Industry & Investment land at Forest Road, Bloomfield. Orange.

I am writing in regard to the Draft Concept Plan for the I&I NSW land at Bloomfield, Orange, as exhibited from 28 August, 2008 – 27 September 2010, and wish to make the following submission to the NSW Department of Planning.

As an adjacent land owner residing at Sharps Road, I have several concerns about the proposal to sell off the land for urban/residential and retail development, and I also have a series of concerns regarding the concept plan and design layout.

I have previously commented on the Environmental Assessment (February 2009) and Department of Lands Bloomfield Crown Land Assessment (March 2007), and I am very displeased to learn that land in question has/will be rezoned to permit the proposed urban-residential and commercial development.

After reviewing the Bloomfield Concept Plan, I have come to the conclusion that I object to the proposal on the following grounds:

Overall proposal to redevelop south orange and sell-off I&I NSW research station:

1. There is a lack of genuine need for urban/residential and retail development in South Orange, and there is a lack of reliable water supply in Orange to accommodate for additional 550 residential premises, above and beyond the scheduled residential and urban development in North Orange
2. The plan will result in the loss of essential research facilities undertaking critical research on food security and emerging agricultural industries needed to feed and cloth Australian's into the future.
3. The rezoning and sale of this land will permanently remove the viable high productivity agricultural land from being used as a food production zone or research on agricultural production to support local farming industries.

Draft concept plan for proposed urban/residential and retail development:

4. The draft concept plan fails to provide a buffer zone for existing agricultural research facilities – which will likely result in resident-research station conflicts, and fails to provide adequate buffer zone to neighbouring horticultural production areas which may result in resident-farmer conflicts, and possibly

restrictions on their activities that may jeopardise their livelihood's, as well as reduce areas viable food production.

5. The draft concept plan also does not adequately provide a buffer to adjacent rural properties including orchard growers to prevent a risk of chemical spray drift to urban residences. This will result in unnecessary health risks to local residents.
6. The draft concept plan fails to provide a livestock transport route for agricultural livestock movement between the DII research facilities, and the northern DII land, and fails to provide adequate laneways for safely moving livestock among existing DII grazing lands.
7. The draft concept plan fails to utilise existing natural assets of the landscape including re-vegetated drainage lines and creeks, and fails to protect existing water body areas (e.g. 4 small dams), as well as remnant woodland areas within the proposed urban-residential-retail development area for which there are several remnant pockets of standing woodland with ecological values. These could be better integrated into the future concept plans.
8. The draft concept plan fails to provide adequate linked open space areas and there are few greenways within the suburb for outdoor activities, such as walking, recreation, exercise and aesthetic value - that have been shown to provide many health benefits.
9. The Draft concept plan does not provide a linking corridor between the existing Gosling Creek Reserve area (south orange), with remnant woodland area on the northern DII land, and fails to incorporate the revegetated corridor between these venues that is used as a wildlife corridor for many species.
10. The concept design proposal provides no wetland filtration system (ie, no low-lying filtering reed beds) to naturally purify run-off water, and prevent urban pollutants from entering Orange's world renowned stormwater harvesting scheme.
11. The draft concept plan does not provide dedicated community garden areas, to promote sustainable living practices and social cohesion. This could include several small garden areas to be dedicated community spaces and garden development.
12. The proposed residential development area will result in houses being built on low-lying areas where the soil is heavily waterlogged during wet periods and may result in land subsidence/ movement.
13. The orientation and size of the proposed urban/residential blocks size does not adequately cater for passive solar home design - thereby failing to encourage sustainable living currently advocated by NSW Government.
14. The draft concept plan for urban and residential development will result in increased storm-water run-off and the DII dam to the north will need to be upgraded to continue provide flood mitigation for Orange.

15. The draft concept plan fails to provide dedicated off-road easements for walkways, cycle-ways, open space corridors within the suburb, and fails to link with adjacent cycle ways, the new Bloomfield base and mental health hospital, and adjacent facilities such as Gosling Creek Reserve. This demonstrates that the concept plan has been prepared independent of local government plans and infrastructure.
16. The concept plan also fails to provide an interconnected network of walking and cycle commuter routes thereby increasing dependence on motor vehicle transportation.
17. The draft concept plan fails to incorporate suitable design features for future high-level pedestrian movement between the expanding Hospital precinct and the urban residential area – ie, lack of open areas, centralised and protected walkways, and interlinked cycle-paths between the residential, retail and hospital zones.
18. The draft concept plan will place huge pressure on Forest Road, and on one intersection for all traffic from the urban/residential area (550 allotments), as well as Bloomfield Mental Health Hospital and the new Orange Base Hospital, associated hospital services, the proposed retail centre, as well as existing facilities including, local rural residents, commuting mine workers, research staff at DII, and linen service shift workers. This intersection will become heavily congested and may become a future 'blackspot accident site' given pedestrian and motor vehicle traffic volumes.
19. The draft concept plan and future western exit road onto Sherilee Road (Woodward Road) will become a shortcut thoroughfare for commuting mine vehicle traffic, hospital staff, retail, and linen service employee's that will divide the proposed suburb with a busy arterial road.
20. The concept plan fails to provide cycle-ways from the proposed residential area towards the orange township. Residents will have to rely on motor vehicle transportation.
21. While I commend the Department of Planning for identifying a number of threatened bird species at this site, it is my view that many of the local natural heritage and biodiversity values have not yet been adequately assessed, thereby the Environment Assessment and Concept Plan fail to adequately assess the true biodiversity and natural heritage values.
22. Furthermore, in my assessment, the Draft concept plan and Environment Assessment fails to adequately demonstrate that the proposal ensures future protection of the high conservation areas (e.g. the remnant box gum woodland and dam foreshores) needed for several nationally and NSW threatened bird species known to the site. These areas require future protection and urban encroachment and disturbance will compromise their future values.
23. The flora and fauna assessment also failed to conduct field surveys and failed to assess the occurrence of several large taxonomic groups including bats, reptiles and amphibians. The recommendations of the Environmental Assessments Flora

and Fauna Assessment includes “surveys in an appropriate season” - These have not been conducted so the assessment can not claim to adequately report the sites true biodiversity and natural heritage values, and a thorough seasonally relevant field survey is required before the Environmental Assessment or rezoning/sale can proceed.

24. Of the significant species that have been identified in the site, 3 are currently listed as threatened under the NSW Threatened Species Conservation Act 1995 and/or the Commonwealth’s EPBC Act 1999 (including migratory water birds and the Superb Parrot that are well known to the area). Under the EPBC Act, the occurrence of the threatened species in this site means projects or activities that could have an effect on these species would need to be assessed and approved by the Federal Government. As the concept plan for the proposed urban residential area encroaches on habitat of these 3 threatened species, and is directly within the catchment of the main dam (where a large number of migratory waterbirds forage and breed – including the threatened Blue-billed Ducks), the proposal must be reported to the Federal Department of Environment for assessment under the EPBC Act 1999. A full risk assessment should be performed to identify whether the proposed rezoning and development may threaten the habitat of these species. To date, it is my understanding that this has not been performed. The proposed zone also provides a vital habitat corridor with Gosling Creek reserve, and further fragmentation of habitat for these species may compromise their capacity to survive at this site. It is my view that the corridor habitat values have not been adequately considered in the draft concept plan to date. The site presents a valuable opportunity for corridor enhancement, providing a greater link between remnant woodlands and fragmented habitat.
25. The draft concept plan fails to demonstrate adequate areas will be allocated to protect the ecological values of the DII northern dam, whereby waders and nesting ducks rely on un-disturbed riparian growth, including Threatened Freckled Ducks and Blue-billed Ducks known to nest along the foreshores of the dam, and the migratory Japanese or Latham’s Snipe which relies on reed flats and low lying wetland grasses. The proposed suburb encroachment will threaten 3-4 State and Nationally Threatened bird species to the area, and contradicts current Threatened Species and Biodiversity Conservation Legislation.
26. Urban encroachment and lack of predator proof fencing will allow domestic cats and dogs to disturb or prey on ground foraging Superb Parrots, ground foraging ducks (ie, Blue-billed ducks and Freckled ducks) and a wide variety of non-threatened bird and reptile species. Therefore, permanent and maintained predator-proof fencing is required to be installed to prevent entry of urban domestic pets thereby protecting these nationally recognised species and their habitat. This should be a condition of development, if urban development proceeds. An example of an urban predator proof fence project to protect ecologically significant species is the ‘Mulligans Flat Project, Canberra ACT’.

Thank you for the opportunity to comment on the Bloomfield Environmental Assessment and Draft Concept Plan, and for considering the interests and values of the relevant stakeholders is this very important issue.

Sincerely

Mr P. West
42 Sharps Road,
Orange NSW 2800

PETER KIRCHER GLASS STUDIO

78 WALLACE'S LANE (off PINNACLE ROAD)
ORANGE, NEW SOUTH WALES, 2800
PHONE: (02) 6365 3366.

NSW Government Planning

Bloomfield Concept Plan

Application No. MP 10 0021

Forest and Rifle Range Roads, Bloomfield

27.09.10

Dear Sils,

RE. Proposed Forest Road, South Orange
Development.

I wish to comment on this development. I agree 100% with this 550 residential allotment and 3500 m² retail floor space development. Many issues concerning this have been raised. They include;

- I - residents of this new development should agree not to interfere with bordering farms operations, such as raising livestock and spraying.
- II - there should be a compromise between sustainable growth and environmental protection.
- III - having the proposed southern distributor road brought forward. This Southern development, and Orange's new hospital to be completed soon, would benefit greatly from this new road.

2

I believe there is one issue that has been completely ignored, and that is the poorly planned CBD of Orange as it is today. In my opinion, there is only one adjective that comes to mind to describe this precinct of Orange, and that is: chaotic. This CBD is extremely congested, simply because it was never allowed to spread out. There is also a major problem of lack of parking. A multilevel carpark in the CBD is pure fantasyland. This proposed southern development would definitely relieve some of this congestion. Certain members of the Orange city council, and the chamber of commerce see this development as a threat to the CBD. I believe they should look at the city of Dubbo. Some years ago Dubbo had the foresight to develop the Orana mall on the outskirts of their city, relieving the congestion of their CBD greatly. Dubbo's CBD did not die, just like Orange's CBD will not die.

3

If I can be of assistance in the future, please contact me at the above address.

Sincerely

Peter Kircher

Cr Fiona Rossiter

P.O. Box 35

Orange 2800 NSW

Orange City Council

General Manager

Gary Styles

27th September 2010

Dear Gary,

I understand that submissions are being received with relation to the South Orange Development. I agree with further development to the south in support of the new health facilities, Rural Fire Service, Cadia Valley operations, Industrial development to the South East, Educational facilities and two new care facilities being built in the near future. It is important to have infrastructure in place supportive to the needs of the people employed, utilising and accessing services mentioned above.

I do however have an issue with the lack of forward planning with regards to road infrastructure to the South. I have been contacted and spoke with Council about issues concerning access to the South and these are:

Increased traffic flow along Gardiner and Sharps road has become hazardous, ask the residents in that location. A road counter previously counted in excess of 5,000 car movements along Gardiner road which is a residential road and seems to be carrying the major traffic flow at this time. Furthermore numerous accidents have occurred along that road to date.

There is no direct access to the Southern side without having to drive through four school zones and/or across a disjointed bridge crossing the rail line and/or a level railway crossing on the eastern side. Several health professionals have already spoken with me about this matter, one of which was left stranded on the Peisley street Bridge when two trucks were backed up. There was no way he could reach his destination at the new hospital to commence work at his committed starting time.

Ploughman's lane needs to be incorporated as an access point to the Southern link. Given that the new Base Hospital is located in the south and is a major referral centre for the Central West with the radio-therapy service now incorporated there should be ease of access for all people utilising this service. 70% of the case work load for the health service comes from the West and to provide direct access to these people should be a priority. At this point in time people need to travel in a disjointed manner and through several school zones when accessing the hospital from the West.

With the proposed new development for housing, opening of the new base hospital, the private hospital development, 2 new accommodation areas, increased employment and business from already existing services who are expanding, there is the impact for a potential hazards to occur along the road infrastructure as it is now.

I have previously mentioned this on numerous occasions at Orange City Council and have been told it will be at least one year until the Sharps and Forest Road roundabout will be completed. There is

far more work to be done with all links into the Southern feeder road becoming a priority. A call to action for the Southern link should be a priority. This is far too long to wait. I have previously asked through the Orange Health Liaison Committee for a traffic impact study which has not been received to date.

My submission is a call to action and requires Orange City Council and relevant other bodies to complete the traffic study as requested within the next month. Additionally plans need to be completed with all feeder roads to the Southern link incorporated. Furthermore funding needs to be lobbied for now and work should commence prior to the opening of the new hospital around March 2011.

Yours Sincerely

Cr Fiona Rossiter

Orange Business Chamber

Affiliated with Central West
Business Chamber and



27 September 2010

Department of Planning

To Whom It May Concern,

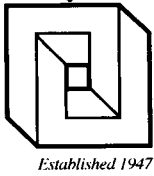
The Orange Business Chamber Executive would like to strongly oppose the proposed South Orange Development (Bloomfield Concept Plan) on behalf of its Members on the following grounds ;

- The negative impact on existing Retail business' in the central business district.
- The lack of consultation with local businesses owners.
- The apparent bias of the NSW State Government in re-zoning land for their own use, while existing business owners have been denied the same opportunity to re-zone their land.
- The inappropriate use of prime agricultural land for housing.
- The lack of consultation with Orange City Council Development Planning for staged land release to the north of Orange.
- No provision for the upgrade of Forest Road to cater for the increase use in the area.

It is our intention to continue lobbying all political parties about these matters in the lead up to next year's State election and to have this raised as a major election issue.

Yours truly

Chris Morrison
President



CARPENTER, COLLINS & CRAIG

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TIM COLLINS PTY LTD ACN 069 932 912 ABN 32 069 932 912
DAVID CRAIG PTY LTD ACN 119 577 249

Glyn J Carpenter BSurv MISAust

Tim Collins BSurv MIS Aust

David Craig BSurv MIS Aust

OUR REF:

YOUR REF:

Orange City Council
Scanned

DATE:
15th September, 2010

17 SEP 2010

The General Manager
Orange City Council
P.O. Box 35
ORANGE N.S.W. 2800

Container No
PR4075

DEVELOPMENT OF D.P.I
AGRICULTURAL RESEARCH STATION
FOREST ROAD.

Dear Sir,

We wish to comment on the Rezoning under Part 3A and Development of a 550 lot subdivision and 3000m² supermarket and speciality shops off Forest Road.

- 1) **Timing of Subdivision & Staged Releases**
There would be about 150 developed and unsold residential lots in north and west Orange. In addition there is Zoned residential land with development control plans for about 1,000 residential lots which will serve the residential requirements of Orange for about 5 years. The South Orange Development will be about 5 years premature.
- 2) **Existing Roads and Services.**
 - 2.1) **Roads** Until the Southern Distributor is constructed and links available to Cecil Road, Woodward Street & Ploughmans Lane the traffic pressure on Forest Road will be unsatisfactory, Particularly with the new hospital and Cadia Mine traffic.
 - 2.2) **Sewerage**
Apart from a very small capacity in existing mains, major augmentation will be required right through Orange to the Treatment Works for 500 or so lots.
 - 2.3) **Water Supply**
We suspect that major augmentation of water mains (potable and non potable) will be needed.
Council has other priorities other than serving this area before it is needed.
- 3) **The Development Plan Proposed**
 - 3.1) The 550 lot development has only one road link out of the subdivision to Forest road. Further road links should be available to the west, Woodward Street, Rifle Range Road and Lysterfield Road. An overall DCP is needed for South Orange prior to this development.
 - 3.2) Public Reserve links and bicycle paths should be available to Forest Road and Gosling Creek Reserve.

Refer Paul Johnston

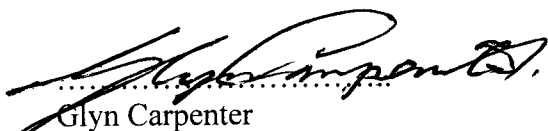
- 3.3) For affordable housing a range of lot sizes from 450m² to about 1000m² should be available and dual occupancy lots restricted to those determined at the DA Stage.
- 3.4) We have no great objection to the concept of a modified grid layout for the roads. Some roads are in excess of the desired departure of about 20° from north-south or east-west orientation.
- 4) **The Shopping Centre**
The North Orange Woolworths Development together with the existing CBD should supply the needs of Orange for at least 5 or 10 years. The justification for a 3000m² development based on the existing population of Glenroi and areas south of Gardiner Road we believe is not valid and a major shopping centre should not be undertaken until the South Orange development has about 200 occupied dwellings.

To protect the CBD, more parking areas are required in close vicinity to the major supermarkets (multi storey).

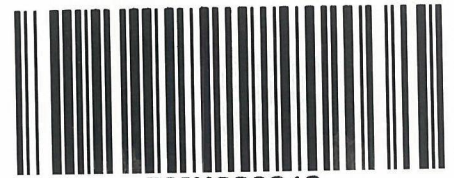
A small supermarket of about 750m² may be justified to service the new hospital, Care West Lodge and Ronald McDonald House.

- 5) **Buffer Zones to existing Orchards and DPI Research Station.**
A substantial buffer zone of 100 metres or so should be required to existing Orchards and DPI Research area.
A residential area in close proximity to Agricultural pursuits will restrict the operation of orchard spraying, hours of operation due to noise etc.
It is unfortunate that the area has been prematurely rezoned because N.S.W. now lacks highly productive agricultural basalt soils with rainfalls in excess of 750mm rainfall as is the case of the area south of the railway line west of Forest Road to the Cabonne Shire Boundary.

Yours faithfully,


Glyn Carpenter
Registered Surveyor

Department of Planning



PMU006312

DIRECTOR GENERAL'S CORRESPONDENCE

PRIORITY:

☐ URGENT	Date due: / /
☐ Early (2 weeks)	
☐ Routine (3 weeks)	

ACTION REQUIRED:

DRAFT LETTER FOR SIGNATURE BY:	
Director General (Full brief ☐ Short Brief ☐	☐
Deputy Director General	☐
Executive Director	☐
Director	☐
Regional Director	☐
BRIEFING NOTES FOR DIRECTOR GENERAL	☐
DISCUSSION WITH DIRECTOR GENERAL	☐
CONTENTIOUS ISSUES / SPEECH NOTES	☐
NOTES FOR INCLUSION IN COORDINATED REPLY	☐
DEPARTMENTAL ACTION (Letter of behalf of DG template – discretionary use ☐)	☒
INFORMATION ONLY	☐
OTHER:	☐

ACTION OFFICER(S) AND COMMENTS:

	Received 27 SEP 2010 M.C.U.
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East Lands & Special Projects

Charles Everett
3 Narambla Place
Clifton Grove
NSW 2800

15th September 2010

The Director General
Department of Planning
23-33 Bridge Street
Sydney
NSW 2000

Dear sir

Attached are a list of my concerns against the Concept Plan for the development at South Orange.

I also objected to this proposal when it was first announced.

Orange City Council has already in place serves 's in North Orange to cater for development for 15 years at the present rate of growth.

Why push this forward now?

Why weren't the residence of Orange consulted on this development at a public meeting to gain their views instead of just pushing ahead with it in private.

Please acknowledge that you have received this Correspondence.

Yours Sincerely



Charles Everett

charles.yvonne@bigpond.com

ENVIRONMENTAL ASSESSMENT
CONCEPT APPLICATION
BLOOMFIELD SOUTH ORANGE

Submission Against the Concept Plan.

The Document submitted and on display at Orange City Council is flawed as it is based on the assumption and worded as if Orange City covered a large area and had traffic problems.

Now you can travel from the furthest part of the City to this site in about 15 minutes. AS an example I live 10km north of the CBD in a Rural Area, adjacent to the adjoining council area, and I can be at this site in south Orange in 22 minutes.

Most job opportunities are within the city limits, the Gold mine at Cadia that employs a large workforce is outside the Orange City Council Boundary and any travel within the City would be minimal.

Therefore the the statements pertaining to distance and travel times are inappropriate in the context of this Environmental Assessment.

The Document is supposed to be an environmental assessment on what effect this Concept Application will have, with a plan of this size it should be looking at the big picture and not only look at the City of Orange but the effect on the whole area that this will impact on. This document does not do that.

Every drop of water diverted, stored or flow increased/decreased will have some effect on the Murray Darling Basin. It will also effect the collection of water by towns/cities below Orange. The proposal will increase the amount of water Orange City will have to store.

With the area under consideration been turned from soft grasslands to a mixture of mainly hard surfaces, what effect will this have on the average temperatures of Orange. What percentage loss of flow will there be into the Macquarie River.

Again you will be taking out of production fertile soil.

Since the early sixties I have heard learned persons asking governments to stop this practise as it is needed for food production. But Governments still allow this practise to continue.

You can take water to satisfy the need of a city But you can not take Fertile Soil.

This soil is more important than most as it is used or could be used for the experimental growing of crops to replace the crops that are now grown on land that will be covered by the ocean if the scientific predictions on climate change are correct. And every kilometre you transport food adds to the Climate Change. Governments use 1000 year predictions on water storage but there appears to be no forward thinking on food production.

Then there will be the effect on the rural land adjacent to the site, there is no buffer area shown, and time and time again it has been shown that rural pursuits and domestic living cannot survive together.

The Stormwater and surface water are shown to be captured in a small farm dam, then fed into a creek that is used to supplement the Orange water supply.

With all the hard surfaces that this water will be flowing off, the flow rate will be much higher and the time taken to reach the a lot shorter will the dam construction be able to withstand the pressure.

How is it going to be protected from becoming a cesspool full of oil, Dog excreta, and general domestic rubbish.

Your study does not address what effect the the earlier faster flow will impact on the present drainage system in place in the CBD.

At present there is absorption taking place and natural slow run off.

The concept layout plan is Old Hat, why not something new like clusters around a central garden with a deep earth heating connection point. The local park on the main entry road, what about child Safety. One entry point, through or adjacent to a car park, this is building a Black Spot.

The description of the Shopping Centre as a village centre is misleading the area proposed is only 4.1ks from 5 major super markets.

No mention on the effect of the Commercial Laundry that works all hours on the closest lots.

From Orange every access road has to cross a rail line Anson street a narrow bridge with limited vision, Peisley Street a diabolical S bend Bridge, Ash Street a level Crossing, all ending up at the same notorious intersection on Forest Road. How does this fit in with your environmental plan

Anson Street has a Primary School, Special School and a High School and is already busy.