

D10/18711 action IC10/9617
PR4075

27 September 2010

Department of Planning
(Attention Daniel Cavallo)
GPO Box 39
Sydney NSW 2001

Dear Mr Cavallo

**ORANGE CITY COUNCIL'S RESPONSE ON BLOOMFIELD CONCEPT PLAN
(ORANGE LGA) - YOUR REFERENCE - MP 10_0021 (letter dated 26 August 2010)**

BACKGROUND

Thank you for the opportunity to provide input into the Concept Plan assessment for the Bloomfield South Orange land. I do so on behalf of the Mayor and the General Manager of Orange City Council ("OCCC") and as the Director of Development Services.

I refer you also to the following previous correspondence relevant to our submission (attached):

- 26 March 2009 - from Council's General Manager, Garry Styles; and
- 8 March 2010 - from Council's Director Development Services, David Waddell, to Megan Webb.

I thank you also for visiting Council on Tuesday, 21 September 2010 to discuss the development.

OVERALL VIEWS

This development has the ability to enhance our City through excellent planning but must take into account the wider issues facing Orange together with the new Bloomfield Hospital development, the DADHC Riverside development, the new Private Hospital and the other NSW Health Assets Divestures planned around Bloomfield.

We do not believe the proponent has fully addressed the Director General's requirements.

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For example, Item 2 in the DGR requests "demonstrating incorporation of the principles for:

- sustainable subdivision design;
- appropriate mix of lot sizes and future housing diversity, with consideration of provisions for affordable housing".

Whilst OCC is not against this development *per se* but rather resigned to it, we are concerned that this latest effort does not reflect many of our previous comments.

We note generally that the development:

- will detract from the CBD if the full retail floor space is allowed. Our advice from Leyshon Consulting is that the amount of retail proposed is unviable;
- uses the B4 zoning, which we believe should be the B2 Local zoning under the standard template;
- seeks too much of the B4 zoning - the northern B4 zoning appears to be speculative at best;
- creates land use conflicts - buffers against agricultural land are required to protect farmers such as they exist in and around the development;
- doesn't represent "best practice" design nor provide the housing mix that is required;
- doesn't provide broader links to wider Orange that are essential to service the south; and
- doesn't address the potential traffic problems on Forest Road that will result in this and the other major developments occurring in the area.

Our main concern is that the project is again being considered in isolation to OCC's other developments within the LGA - including:

- our wider settlement strategy;
- the Bloomfield Hospital expansion;
- the Private Hospital project;
- the NSW Health Assets Divestiture program (that includes the sell-off of large tracts of land in the LGA); and
- the current LEP (which we are hoping to put on exhibition this year).

We again respectfully request that the DG seek a strategic review of the LGA as a whole. OCC has in hand:

- Leyshon Consulting's Retail Review,
- GHD's Sub-regional Strategy, and
- NewPlan's update of the Sustainable Settlement Strategy,

which could provide some guidance to the Department.

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POINTS OF DETAIL

- 1 The internal layout of the proposed street network is considered to be inadequate and fails to respond to the context of the broader road network including the future strategic needs of the community. The single east-west connection between Forest Road and Hawke Lane does not provide suitable opportunities to manage the longer term urban growth of Orange.
- 2 Figure 6: Site Context on page 20 of the Environmental Assessment illustrates a potential connection to the north-west of the site, joining Shiralee Road via an unmade 30m wide road reserve. From that point, Shiralee Road proceeds north into the heart of the City becoming Woodward Street and ultimately feeding directly into Molong Road.
- 3 No ring road hierarchy system for has been allowed for traffic circulation. Any connection to Shiralee Road should provide for a connector road standard not residential standard as currently shown. In addition, most roads appear to be only 12-15 metre wide, so carriageways would only be 5-6 metres wide and/or have minimal width footpaths. This does not correlate well with the intention for the precinct to be of high quality urban design and most carriageways should be widened to allow for a high standard of public realm.
- 4 Given that the Bloomfield Base Hospital will be a major attractor of traffic for decades to come, it is vital that a clear and direct connection between the Shiralee Road access point and Forest Road be provided. This would enable the western half of the City to directly access the hospital without being funnelled through the "village centre" commercial precinct. In addition, it would alleviate traffic flows on Forest Road by allowing residents of this development to have a viable alternative route into the City. Furthermore, a direct connection with Shiralee Road would assist ambulance services to cut travel times between the western half of the City and the base hospital.
- 5 The proposed east-west connection emerges into an unmade portion of Hawke Lane. It should be noted that the Hawke Lane road reserve is only 9m wide. While this will ultimately be beneficial in connecting the urban growth area to the west, the internal layout again serves to funnel all this traffic through the "village centre". In due course, this is likely to result in the village centre becoming a choke point for traffic movements, which may ultimately impact on ambulance service travel times.
- 6 It should also be noted that while there is a 30m road reserve running alongside the western side of the site, connecting these two access points, there are major engineering constraints preventing the construction of that link. Overflow drainage from a chain of dams on private land to the west crosses through this road reserve before entering the subject site. To effectively construct a road through this corridor would, in effect, require a bridge of at least 200m in length. Consequently, it would be far more prudent to require the development to be designed around an appropriate Shiralee Road to Forest Road link of inter-district distributor dimensions.

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- 7 The layout seeks to funnel all traffic (including from future urban growth to the west) through a single connection point to Forest Road. In addition there is an existing vehicle access on the eastern side of Forest Road, which will conflict with the proposed connection point. Therefore, a seagull intersection is not a suitable access treatment for access at this point.
- 8 The design should be altered to provide for some higher density residential opportunities adjacent to the village centre. This would provide for greater diversity in housing stock and increase the activity and vibrancy of the village centre as well as improving the viability of the development.
- 9 The triangular-shaped park at the southern end of the development (adjoining the DII Research Facility) is in an isolated position and highly unlikely to be actively used by most members of the community. Council is concerned that such an isolated remnant of open space would become little more than a dumping ground and would be poorly monitored and may therefore be contrary to Crime Prevention Through Urban Design principles. This site originally earmarked a water reservoir but detailed designs indicate that the reservoir needs to be located to the west of the site on higher ground. Accordingly, the design should use this space for other purposes with a commensurate increase in area of the central Local Park.
- 10 We are still somewhat sceptical of the retail argument put. Orange has a strategic goal of maintaining the integrity of our CBD and we believe the proposal to increase the floor space for retail from that previously agreed in the SEPP will have the ability to cause significant impact to the CBD retailers of Orange.
- 11 We assumed that the analysis of any aspect of the development would contain the assumption that the new hospital is finished, the private hospital is finished, the NSW Health program is implemented and the Cadia expansion is in full swing. In addition, the retail analysis doesn't appear to take into account the current North Orange Woolworths development that is soon to go before the JRPP.
- 12 We believe strongly that the owner's of the block known as Carmen's have been left out in this development. We suggest that the possibility of including their block in the retail zone be considered - at least their holding needs consideration in design of accesses, etc. Figure 6 page 20 indicates that a direct connection to Forest Road is proposed. This is incorrect as the RTA has previously advised that limited combined access points should be constructed.
- 13 We note with disappointment that large areas previously tagged for open space/green space now appear to be far reduced.
- 14 OCC has a problem with the strictly linear layout of streets and residential allotments. Such a layout is unimaginative and fails to allow for naturally occurring slopes and aspects.

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- 15 The layout does not recognise the importance of an open space green corridor (for vegetation and wildlife) following the main north-south natural creek/drainage line, which has the potential to link the main dam/wetland (DII land) and woodland (Rifle Range) in the north to Brandy Creek and Gosling Creek Reserve in the south. Although transferring current DII land, a concept of a future walking trail/cycleway should be embraced. This potential was recognised in the original NSW DPI Master Plan, October 2008.
- 16 OCC encourages a mix of lot sizes in our LEP 2000 - we would encourage this. Indeed, some form of medium density units close to the village centre may assist in the longer term viability of the commercial element.
- 17 The entry road lies between the Linen Service access and south entrance for Bloomfield Hospital. The should provide access for Carmen's land, however the plan shows commercial/medium density between the entry road and Carmen's south boundary.
- 18 The traffic implications need to be carefully assessed, having due regard for the likely long term growth of Orange into the lands west of the site (as well as further infill growth in the established urban area) and the need to ensure that access to the major attractor of the new base hospital is not obstructed or hindered. The fact that the design seeks to funnel all traffic through the commercial area should be recognised as self serving and potentially to the detriment of logical and efficient management of local traffic in the medium to longer term.
- 19 The staging of the development raises concern that the western connections may not be available for several years. The western connections should be required to be constructed, to the sites' boundaries, in the early stages of the precinct. A link to Shiralee Road should be required within the first three stages and the connection to Hawke Lane should be required before completion of Stage 6. This would enable immediate relief of traffic flows along Forest Road and provide Council flexibility in the timing of development of other parts of South Orange. If these connections are left until the end of the project and if the project's take-up rate fails to reflect the optimistic assumptions of the concept plan, then this may hinder the orderly development of South Orange, with such development needing to enter the established urban areas and cross over to Peisley Street/Forest Road imposing unnecessary traffic volumes on the established residents of South Orange.
- 19 The main dam in the DII grazing land and adjoining woodland is a highly significant site for threatened and migratory bird species - eg, Freckled Duck, Blue Billed Duck, Latham's Snipe, Superb Parrot - and the woodland to the north also supports a small kangaroo population. It is critical that this area is linked by green corridors to watercourses, reserves and bushlands to the north, south, east and west but particularly through the proposed residential areas in the south.

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20 The removal of the drainage line through the site originally contained within Public Reserve will remove overland flow capacity. Central open space on the western side contains a dam - OCC generally doesn't support dams within open space. This dam receives overflow from dams west of the site. Should this dam be removed, then overland flows will need to be appropriately managed through the site to the larger dam in the north and the effect of reducing storage in this system needs to be considered in terms of flood management for lands on site and downstream of the main dam.

21 The site is ringed by cycleways and consideration should be given to providing logical connections through the site - including both on-street and off-street routes where possible. For example, the main east-west "inter-district distributor" should be widened to include an on-street cycle lane with an off-street cycleway connecting to this at the eastern end of the local park proceeding north-west to link with the existing cycleway west of the site. Cycleways generally serve two purposes: recreational cycling; and an alternative travel mode. To promote the fullest possible usage, cycle routes should avoid meandering circuitous routes that discourage the latter.

SUGGESTED CONDITIONS

We note however that a Concept Plan approval is being sought and so acknowledge that the Project Plan Approval may present the opportunity to gain a better design.

We would appreciate conditions are placed by the Department including conditions along the lines of:

- 1 a VPA must be negotiated prior to construction of stage 1, to ensure that servicing, major intersections, road connections, cycleways and embellishment of community parks occur without cost to the established residents of Orange;
- 2 provision of additional access roads to the west linking into Orange's existing road network and wider road reserves within the development must be provided to the satisfaction of Orange City Council;
- 3 the final design of the subdivision layout must be done in consultation with Orange City Council and with the approval of the Director-General;
- 4 the B2 zoning should be used for all retail components of the development.

SUMMARY

OCC has a unique opportunity here to gain a high quality suburb/precinct, including the DPI land, the new Hospital and some of the Asset Divestiture sites programmed for sale. We are keen to work with all agencies to get the best result for Orange.

We encourage the Department to include conditions that ensure the proponent(s) will need to work closely with Orange City Council at the Project Plan stage.

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If you require further information or clarification, please contact me on 6393 8261.

Yours faithfully


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David Waddell
DIRECTOR DEVELOPMENT SERVICES
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