

Lithgow City Council's Submission on Draft Central West and Orana Regional Plan 2041 (Officer Level)

Thankyou for the opportunity to provide feedback on the Draft Central West and Orana Regional Plan.

Summary of key comments

- Further detail be requested in relation to implementation accountabilities of the plan and how these will be measured, monitored, and reported upon. In this regard, consideration be given to respecting additional resource demands on local councils which could also impact on delivery.
- Further explanation of the difference between the Departments population projections and the aspirational targets of each Local Government Area. Further sub regional projections and targets expressed within the Regional Plan would assist to better align the two and prevent unnecessary planning, infrastructure spend and competition between centres.
- Acknowledgement and appreciation of the collaboration activity (CA12) to form a project control group (Department of Regional NSW, Department of Planning and Environment (DPE), Training Services NSW, Lithgow City Council, and industry representatives) to oversee the preparation of an economic transition and diversification plan (LEEP) for Lithgow.
- Given the unique economic transition issues of the Lithgow LGA; locational characteristics; and interface between Sydney and the Central West Orana Region, consideration be given to a special characterisation of the LGA to assist in planning, government incentives; investment; fast tracking development and flow on benefits as an economic corridor between Sydney and the west.
- A request to identify more clearly the sub regional roles of the Strategic Centres within the Regional Plan. To recognise within the Regional Plan the unique opportunities of Lithgow LGA (Local Government Area) as a strategic centre with a transitioning economy and its unique and enviable sub regional and cross regional locational advantages, being within 90 minutes to the major growing city of Western Sydney Parkland City and 60 minutes to the Regional City of Bathurst. Specifically, it is requested that the Regional Plan recognise the importance of the Marrangaroo Urban Release Area and the GreenSpot initiative to contribute to the provision of the region's future housing and employment needs.

Such recognition will provide better line of sight between state, regional and local strategic planning statements and would assist in focusing and directing limited planning and infrastructure resources of all stakeholders. The plans for these areas dovetail with Council's emerging economies project and are consistent with many of the objectives of the Regional Plan.

- A request to recognise within the Regional Plan Lithgow's ability to attract and support significant renewable energy projects that are outside the Renewable Energy Zone (REZ) and to investigate whether consideration should be given to including Lithgow in the REZ.
- Identification of where the regional plan objectives are reflected in Council's 2040 Local Strategic Planning Statement
- Identification of where the plan could be improved in structure and/or where omissions have occurred to assist with public understanding.

General Comments

Lithgow City Council supports the review and delivery of the Central West Orana and Regional Plan to provide a strategic framework for the region. The themes and objectives generally align with those identified in Council's current 2040 Local Strategic Planning Statement (LSPS).

As the Central West and Orana Region is large and significantly diverse it is considered that Part 2 and 3 of the regional plan would benefit from greater detail and refinement in relation to sub-regional relationships between the regional cities and strategic centres and their roles building on the sub-regional service catchments identified in Figure 4.

The current draft of the regional plan focuses heavily upon the three regional cities of Dubbo, Orange and Bathurst and the opportunities provided by the Parkes Special Activation Precinct (SAP) and Central-West Orana Renewable Energy Zone (REZ). This is supported but it is considered that the strategic centres, especially Lithgow, can and should play a much greater role in the region's growth and prosperity where possible through activation of the key Urban Release Areas and employment lands.

Identification of sub-regional significant employment lands and housing opportunities/precincts within the Regional Plan would assist in providing a better line of sight between state and regional plans and local strategic planning statements and would assist in focusing and directing limited resources of all stakeholders. Key locations should be mapped at the sub-regional scale.

It is acknowledged that Strategies 6.1, 7.2, Action 4 and Collaboration Activities 4, 6, and 14 go part the way there to address these concerns however do not go far enough to be clear about where and when the region will provide future housing and employment lands.

Lithgow is strategically located between the Regional City of Bathurst (60km) and the Western Parkland City (centre (100km). The LGA is a "metro satellite" as identified in the *20-Year Economic Vision for Regional NSW, 2021*. Future transition to a more diversified economy will be strengthened by leveraging its proximity to growing major cities.

The Draft Regional Plan does not sufficiently (pg. 41) acknowledge Lithgow as a strategic centre with both regional and cross-regional opportunities for growth. With the planned improvements for rail and road connectivity outlined in the Regional Transport Plan 2021, Lithgow, being the eastern most centre within the region, will have significant locational advantages to leverage the shift in travel patterns, remote working, and decentralisation of business to increase regional employment and population growth.

Council would like to see the Regional Plan through its strategies, actions and collaboration activities recognise and support the Marrangaroo and GreenSpot initiatives as regionally or sub-regionally significant.

Council is particularly supportive and appreciative of CA 12 to assist Council in the preparation of an economic transition and diversification plan for Lithgow.

Engagement Process

Council is appreciative of the consultation and engagement opportunities afforded during the preparation of the Draft Plan. However, challenges were experienced in the timing of the public exhibition and consultation period over the November to February period coinciding with local government elections, the holiday season and end of year local budget processes for Councils. The rollout of several significant reforms by the department over the same period stretching beyond the capacity of Council to effectively engage and respond also proved to be a challenge.

Plan Structure

Objective 16- "*Sustainably maximise the productivity of resource lands*". The narrative of this objective covers several issues related to resource lands including protecting resource lands, demand drivers for resource, physical and economic life cycle as well as industry decline and economic transition and diversity.

It is suggested the wording of the objective be reviewed to encompass all elements and give clearer links to strategies 16.1- 16.3 and CA 12. Alternatively consider splitting the objective into two parts: sustainably maximising the productivity of resource lands; sustainably managing resource impacts upon communities. CA 12 is no longer about maximising productivity but transitioning and diversifying away from coal resource dependence.

It is considered the Regional Plan could be strengthened by better integration of the location specific responses in Part 4 within the relevant objectives of Parts 1-3.

Currently Part 4 appears to be a tack on with no direct or obvious outcomes from the previous stated objectives or implementation mechanisms.

For example:

Objective 19 would be better located as the first objective of Part 2.

Objective 20 and 21 would be better located in Part 3.

Objective 22 would be better located in Part 1 or Part 3 depending on the key outcome focus of the objective; environmental or economic.

Responses at a strategic centre level could then also be integrated in the same way.

Whilst it is important that local government priorities are recognised within the Regional Plan, it is considered that these would have greater effect if they were directly integrated within the objectives and implementation mechanisms of the Regional Plan. If LGA priorities are not significant at the regional level, then these fit better within the individual local strategic planning statements or community strategic plans.

That being said, if the narratives are to remain in the Regional Plan, Lithgow City Council would like to take the opportunity to further amend its copy.

Implementation and Resourcing

The review of the draft plan would have been enhanced by a draft implementation plan to enable Council and state agencies to clearly understand assigned accountabilities for

implementing actions, identified funding opportunities and the proposed governance and monitoring requirements of the plan.

At present, there is some concern that Council's will carry much of the implementation burden and associated community expectation associated with the plan. The plan identifies 60 strategies and 15 collaboration activities (CA), the majority of which call upon Council to undertake significant bodies of work or to participate in engagement and consultation. Given local council resourcing challenges, this has the potential to impact upon delivery.

In contrast, DPE have only identified eight actions over the next five years.

Although Council appreciates the autonomy granted by the draft regional plan to be self-determining, in relation to strategic land use planning, it must be recognised that the majority of LGA's within the region are not appropriately resourced to undertake the significant bodies of work necessary to deliver the outcomes of the regional plan within a reasonable timeframe.

There is a need to improve the balance of future work between the Department, councils and other agencies aligning responsibility with resourcing. This will require a greater commitment to implement the plan with a range of support such as direct funding, provision of resources, specialist training, and commissioning or review of technical studies to inform work required to implement the actions and strategies.

Clearly identifying the roles of centres within the region to deliver the regional plan objectives will assist the allocation of limited resources for all stakeholders.

Council supports the establishing of a Co-ordinating and Monitoring Committee as outlined in the draft plan. DPE should consult council's and agencies on the terms of reference of this committee. As the CWOR is large, perhaps consideration of sub regional committees should be considered.

Please note Lithgow City Council is not a member of the Joint Organisation of Council's (JO) and therefore any governance structure using the JO needs to consider this fact.

Objectives, Strategies and Collaboration Activities

Part 1: A sustainable and resilient place

Objective 1 – Identify, protect, and connect important environmental assets.

The objective and its associated strategies are supported and are consistent with Planning Priority 11 in Council's LSPS. Council welcomes the action of sharing of spatial data on biodiversity data via the NSW Planning Portal to inform local planning and DPE collaboration to review biodiversity mapping and assist access to data.

Objective 2 – Support connected and healthy communities

The objective and associated strategies are supported and are consistent with Planning Priority 6 in Council's LSPS. Council welcomes DPE collaboration to improve access and facilities in and around significant national parks, waterways, and recreation areas.

The Gardens of Stone and Lost City Adventures Project and Farmers Creek Precinct are focus projects of this collaboration activity in the Lithgow LGA.

Objective 3- Plan for resilient places and communities

The objective and associated strategies are supported and build on Council's actions in Planning Priority 12 in Council's LSPS.

Council is currently undertaking work within this space consistent with each of the strategies. Following the 2019 bushfires Council has worked directly on recovery action plans, and Adverse events Plan that feed into the State Resilience Strategy.

Council welcomes Action 3 to investigate increased energy and thermal performance standards for housing.

Objective 4- Secure and resilient regional water resources

Lithgow LGA lies predominantly within the Hawkesbury- Nepean Water Catchment with a small area in the west in the Macquarie-Bogan Catchment. The LGA contains eight sub-catchments. A significant percentage of the LGA (18.44 %) is located within the Sydney Drinking Water Catchment. Therefore, land use in the Lithgow LGA has cross-regional impacts on water quality and security.

Lithgow currently has two water supplies: Farmers Creek and Fish River. Lithgow also has an abundance of underground water resources held in closed or nearing end of life coal mines.

These resources have the potential to not only secure the future water supply for the Lithgow LGA reducing reliance on the Fish River Scheme but also to assist and aid other LGA's within the central west region to improve their water security through cross catchment transfers.

It is recommended to add a new Collaboration Activity (CA) to be led by State government regulators and agencies in collaboration with local water utilities.

*CA – Identify and explore potential sub-regional water resourcing strategies using **surplus water** from Lithgow through to the central west region to improve water security and to identify potential water transfer arrangements across catchments to service industry and growth.*

Objective 5- Ensure site selection and design embraces and respects the region's landscapes, character, and cultural heritage

The objective and associated strategies are supported and build upon Planning Priority 4 and Action 2.2 of Planning Priority 2 of Council's LSPS.

Implementation of the strategies require a significant body of work to be undertaken by Council particularly in relation to filling a gap in our knowledge in relation to Aboriginal Cultural heritage and scenic and cultural landscapes.

Council will find it difficult to appropriately resource the completion of this work and therefore funding opportunities should be considered by DPE.

Part 2: People, housing, and communities

The Regional Plan identifies that by 2041 the population of Central West and Orana Region is projected to grow to more than 306,000 (+21,400) people requiring at least 18, 992 new homes. DPE, within its consultation material, have suggested it is expected that at least 85% of this growth will occur within the three Regional Cities of Bathurst, Orange, and Dubbo, however the Regional Plan is silent in relation to this target.

Each local government area within the region has its own aspirational population growth projections that would far exceed the above departmental identified growth projections. Sub-regional projections and targets expressed within the Regional Plan would assist to better align the two and prevent unnecessary planning, infrastructure spend and competition between centres.

Objective 6 – A network of healthy and prosperous centres

The objective is supported. A better line of sight between the regional objective and local plans would be achieved through better sub-regional planning and collaboration identifying the role of each centre (housing and employment relationships) to enable Strategy 6.1 to be implemented.

CA 4 is identified for “smaller centres”, a term that is undefined in the Plan. Suggest clearly defining the smaller centres”, is it all centres outside Regional Cities and Strategic Centres?

CA4 should be extended to include strategic centres to provide evidence base for implementation of the strategy.

Objective 7 – Provide well located housing options to meet demand

The objective and associated strategies are supported and build upon Planning Priorities 1 & 2 of Council's LSPS.

It is recommended that Action 4 also develop strategies to inform sub-regional housing supply needs based on the proximity of Lithgow and Bathurst to Western Sydney Parkland City.

It is recommended an additional action be added in the Regional Plan to work with and assist Strategic Centres to prepare local housing strategies. This action will assist in implementing recommendation 3 of the Regional Housing Taskforce to provide more certainty about where, when and what type of housing will be built to meet the regions projected housing needs.

Council's key priority to address future housing needs is to implement the Marrangaroo Masterplan within the Marrangaroo Urban Release Area. The Lithgow LGA has limited greenfield land options to provide for future housing opportunities of suitable topography, environmental capacity and within servicing limits of existing infrastructure.

This area is considered an integral component to Council's diversification and transition from a coal dependent economy.

The Marrangaroo Urban Release Area has been master-planned to provide 1584 residential lots of varying typologies supported by 1ha village centre and 16 ha of business and productivity support land. The site is also adjacent to 49ha of industrial employment lands. The site is strategically located within 60m mins of Bathurst Regional Centre and 90 mins to Western Sydney Parkland City with good transport links to the west and north-east of the region.

Council requests that the Marrangaroo Urban Release Area be supported in the Regional Plan as a key regional housing precinct.

Recognition within the Regional Plan will provide more certainty to attract and inform investment.

Should this initiative not be supported in the Regional Plan, consideration would need to be given to removal of the URA status of the lands within Lithgow LEP to enable landowners' future development opportunities in the short to medium term. This would be a significant lost opportunity for the region to expand its Gateway and potentially stagnate the growth potential of the Lithgow LGA.

It would also require further planning work to explore more marginal investigation areas.

Objective 8 – Plan for diverse, affordable, resilient, and inclusive housing

The objective and associated strategies are supported and build upon Planning Priority 2 of Council's LSPS.

A local housing strategy is essential to inform land use planning decisions to deliver this objective. Council recommends that a new action be added to the Regional Plan to support all strategic centres to prepare local housing strategies.

There is a strong market trend within the region to provide for large single dwellings on larger residential allotments despite local plans providing the framework for more diverse and affordable housing typologies.

Council strongly supports collaboration activity (CA) 8 to work with NSW government and industry to explore innovative pilot projects to test new housing typologies and unlock opportunities through the private market.

Objective 9 – Manage rural residential development

The objective and associated strategies are strongly supported. This is echoed in Council's LSPS Planning Priority 3.

Council is progressing the development of its Rural and Rural Residential Strategy to support the LGA's centres hierarchy and to reverse unsustainable trends towards rural living in favour of urban centres.

Objective 10 – Provide accommodation options for temporary workers

Objective and strategies are supported.

Objective 11 – Co-ordinate smart and resilient utility infrastructure

Objective and associated strategies are supported and builds upon Planning Priority 5 of Council's LSPS.

Identification of sub-regional housing and employment opportunities will assist in improved infrastructure planning and alignment with growth and funding.

Part 3 – Prosperity, Productivity, and Innovation

Objective 12 – Leverage existing industries and employment areas and support new and innovative economic enterprises

The objective and strategies are supported and builds upon Planning Priority 9 of Council's LSPS.

The Regional Plan would be strengthened by the identification of the regions or sub-regional strategic employment land precincts within the Plan.

Council's LSPS identifies two significant employment lands precincts located at Marrangaroo and Wallerawang. These areas provide zoned land to support a range of industrial, business

support activities, renewable energy projects, innovative agricultural and circular economy businesses. Both precincts are strategically located with strong transport connectivity located close to the convergence of two major highways. The Wallerawang precinct also has access to the Great Western Rail Line.

Council requests these areas to be supported in the Regional Plan as key regional employment precincts.

Objective 13- Protect agricultural production values and promote agriculture innovation, sustainability and value add opportunities

The objective and associated strategies are supported. Council is progressing the development of its Rural and Rural Residential Strategy to action these strategies as identified in Planning Priority 3 and 9 of Council's LSPS.

Lithgow Council has participated in a pilot project to identify the LGA's important agricultural lands and is awaiting the final report and maps to inform future land use planning decisions.

Objective 14 – Protect and leverage the existing and future road, rail and air transport networks and infrastructure

The objective and associated strategies are supported. Council welcomes CA 9 to plan for improved connections to eastern NSW and major metro centres. This activity could be strengthened by also identifying the associated emerging economic and social opportunities for the region from these improved connections.

Objective 15 – Implement a precinct-based approach to planning for higher education and health facilities

The objective and associated strategy is supported.

Objective 16- Sustainably maximise the productivity of resource lands

The objective and associated strategies are supported and build on Planning Priorities 8 and 9 of Council's LSPS.

Council supports and is appreciative of CA 12.

Refer to comments under Plan Structure.

There is also opportunity to recognising Lithgow's response to declining resource and industry base within Objective 12 "*Leverage existing industries and employment areas and support new and innovative economic enterprises*".

Refer to comments under Objective 4 in relation to strategy 16.1 – addressing water resource constraints and impacts.

Objective 17 – Support a diverse visitor economy

The objective and associated strategy is supported and builds on Planning Priority 7 of Council's LSPS.

This objective could be strengthened by adding a collaboration activity to commit to better planning and co-ordination of regional and sub-regional opportunities to grow the visitor economy together rather than at the LGA level.

The recent announcement of the Gardens of Stone and Lost City Adventures project will provide significant increases to the Lithgow and regional visitor economy (200,000 + visitors per year) with a potential to create significant employment opportunities (190 +).

Objective 18 – Strengthen the economic self-determination of Aboriginal communities

Supported. Strategies 18.1 and 18.2 are predominantly DPE led and therefore would be best expressed as actions.

Part 4 - Location specific responses

Refer to comments on Plan Structure.

Objective 19 – Strengthen Bathurst Dubbo and Orange as innovative and progressive regional cities

This objective and associated strategies are supported.

Objective 20 - Leverage the Central- West Orana Renewable Energy Zone to provide economic benefit to communities

Noted. However, it should be recognised that there are significant opportunities for renewable energy projects outside of this zone. Lithgow is endowed with a significant transmission network that enables projects such as Lake Lyell Pumped Hydro (Energy Australia), Great Western Battery (Neoen) and Wallerawang 9 Battery (GreenSpot) recently proposed. Consideration could be given to inclusion of Lithgow in the REZ.

Objective 21 - Leverage the Parkes Special Activation Precinct and plan for associated growth

Supported.

Objective 22 - Protect Australia's first Dark Sky Park

Supported.