



Department of Primary Industries

OUT20/4216

The General Manager
Lithgow City Council
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Attention: Sherilyn Hanrahan, Strategic Land Use Planner

Dear Sherilyn

Draft Lithgow 2040 Local Strategic Planning Statement (LSPS)

Thank you for the opportunity to provide comment on the Draft Lithgow 2040 LSPS as per your correspondence dated 3 March 2020. The NSW Department of Primary Industries (NSW DPI) Agriculture provides advice to consent authorities about the protection and growth of agricultural industries and the resources upon which these industries depend to provide economic growth.

The draft LSPS identifies the key advantages Lithgow's industries have to offer and may pursue in the future. We note that the key agricultural opportunities and issues identified in the draft LSPS include:

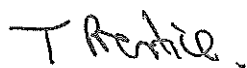
1. The proximity of the Lithgow LGA to Sydney. This presents both advantages and disadvantages to the area that are addressed in the LSPS,
2. The current industry base including agriculture, mining and extractive industries that require protection from land fragmentation and land use conflict, and the recognition of the Right to Farm Strategy.
3. Rural lifestyle living opportunities are a prevalent land use, which need careful planning for any future releases, including avoiding primary production resource lands. The acknowledgement that this issue is the biggest threat to resource lands in the shire is supported.
4. The potential for technology based and value adding agricultural industries taking advantage of proximal markets.
5. Small acre intensive agriculture is an existing use which is to be encouraged. The lot size spread demonstrates plentiful supply of allotment in this size range, with further development possible depending on the need for, and availability of, fixed infrastructure.

We are aware of the urgency for the final Lithgow Council *Locally Significant Agricultural Land Report* as highlighted in the draft LSPS and will endeavour to get this to you in the near future, with the support of the Department of Planning, Industry and Environment.

The Department will continue to support the Council in its future identified planning actions.

Should you require clarification on any of the information contained in this response please contact Agricultural Land Use Planning Officer Mary Kovac on 68811250.

Yours sincerely

A handwritten signature in black ink, appearing to read 'T Prentice'.

21/4/20

Tamara Prentice

Manager Agricultural Land Use Planning Unit

DPI Agriculture Review of the Draft Lithgow 2040 LSPS

Section	Relevant Action	Summary	DPI Comment
Theme 1 Our Liveability			
Planning Priority 1	Council action identifies that a rural residential strategy will determine how much and what type of growth in our rural land is sustainable.	The rationale notes the importance of infrastructure investment and land use planning for growth to be achieved. One of the key areas of attention will be to ensure that studies will seek to manage growth and include support productive, economic and environmental values in rural areas. Council will "resist planning proposal that are inconsistent with the Lithgow Landuse Strategy growth management directions, which include being informed by a Rural and Rural Residential Strategy and Employment Lands Review". (page 24)	The Department supports Council in its strategic planning for rural residential development that minimises impact on lands used for primary production.
Establish a Framework for Sustainable Growth			The Department supports the development and the outcomes of the Lithgow Land Use Strategy and its role in providing clear direction to growth and living opportunities in the council area. The need to consider the diverse values of rural lands is important.
Planning Priority 3: Plan and Appropriately Manage Rural Lifestyle Development (page 27)	The rationale notes the amount of rural living opportunities that exist in the Lithgow Council area. It is of note that the "latent" supply of rural lifestyle lots that may already exist that has the potential to impact on other uses in the rural zones.	This section notes that rural living opportunities still continue to be in high demand. Whilst this demand will be considered it also notes that it should not detract from current urban areas or the production, economic and environmental value of our rural lands, particularly by the fragmentation of primary production lands (Page 38). The imposition of unreasonable demands for services and facilities outside existing urban centres is noted. Council will investigate the development of a rural living handbook that includes aspects such as landuse conflict and the need to	The Department concurs with the ongoing issues related to rural living that threaten current agricultural production and sterilise future opportunities. We support planning for rural living opportunities that consider the primary production resources that exists in Lithgow Council area, and ways to ensure it can continue without the threat of land use conflict and continue to contribute to the benefit of the Lithgow community and rural area. There are a number of resources that are already available for the region or state e.g. the <i>Rural Living Handbook A guide for rural landholders</i> published by the Central Tablelands Local Land Services, available at https://centraltablelands.lis.nsw.gov.au/data/assets/pdf_file/0011/53299/1/rural_living_handbook.pdf

promote the primary production and environmental values of rural land.

Also available is the *Rural Living Handbook A guide for rural and rural residential landholders* that is published by the Greater Sydney Local Land Services and available at

https://greater-sydney.nsw.gov.au/data/assets/pdf_file/0006/708126/Greater-Sydney-RLH-redesign-2017-FINAL-WEB.pdf

The Department of Primary Industries also has available *Living and Working in Rural Areas Handbook* that was developed for the North Coast but is relevant to other parts of the state. It is awaiting and update through the Department of Planning Industry and Environment but this current version is available at

<https://www.dpi.nsw.gov.au/agriculture/lup/living-and-working-in-rural-areas/living-and-working-in-rural-areas-handbook>.

These could form the basis for a more Lithgow orientated publication.

Theme 3 Our Economy Page 37)

Planning Principle 10. Ensure that tourism related developments and activities don't adversely impact on our existing communities or lifestyle.

Council notes that rural lands will be managed and controlled to reduce land use conflict between tourism and other competing land uses (page 39).

Consideration of the rural character in relation to tourism developments is noted. The Department is currently investigating appropriate tourism provisions in primary production zones that are ancillary and complementary to agriculture. This information can be supplied to Council in their strategy development as this develops.

Planning Principle 12. Protect primary production and extractive industry lands from further

This principle is the basis to land use planning for primary industries that support the Lithgow economy.

The Department will continue to support Lithgow City Council with this planning.

land fragmentation and land use conflict.	
Planning Priority 7 Increasing the Visitor Economy (Page 39)	The rationale notes the need for complementary tourism development in rural areas. The impact of tourism ancillary to agricultural enterprises is an issue currently being investigated in state government including our Department. We can assist in providing updates and comment on items of interest.
Planning Priority 8 Protect the Economic Values of Rural Areas Through Managing Land Use Conflict (page 40)	The issue of land use conflict that arises from incompatible development both for agricultural and extractive industries is noted in the rationale. The greatest threat is rural residential housing or the community's expectation of dwelling entitlements on rural lands, particularly on those with high agricultural potential. This exacerbates land use conflict where commercial operations have to mitigate at a much higher level. The mapping of locally important agricultural lands by DPI Agriculture will help in identifying the future areas where agricultural investment can occur. The Department notes the acknowledgement of the ongoing issue of dwelling entitlement expectations and increased settlement outcomes in rural areas, which impact on future agricultural land uses or impact adversely on existing agricultural business. Lithgow's proximity to Sydney and its attractive landscape results in high pressures, requiring strong management to maintain agricultural and extractive industry opportunities, protect scenic vistas, maintain environmental integrity and minimise servicing costs. The involvement of our Department in developing a locally significant agricultural lands map and report is noted in this priority area. This should also acknowledge the Department of Planning (Western Region) and Council's valued involvement. These maps and an accompanying report are almost complete. The NSW Right to Farm Policy is also a driver in this work. The commitment by Council to provide a buffer to protect sensitive land use from invasive land use is commended. It should be noted that agricultural land suitability is a superseded mapping system. It would be preferable to consider other mapping resources such as soil landscape mapping and the agricultural maps to be produced by DPI and DPIE. (Page 41). The publication "Agricultural land use mapping resources in NSW: Users Guide available at https://www.dpi.nsw.gov.au/agriculture/lup/agriculture-industry-mapping/agricultural-land-use-mapping-resources-in-nsw-user-s-guide provides a current summary of the mapping data currently available.

Planning Priority 9 Attracting Investment and Growing Local Jobs (Page 42)	Attracting Investment and Growing Local Jobs: Agricultural (Page 43)	The rationale to this priority includes an analysis of agriculture, including the number of businesses and employment. There is acknowledgement that the Lithgow area does provides an opportunity for intensive and specialised production. Acknowledgement that consolidation of holdings to increase farm operations is possible but unlikely due to the encroachment of lifestyle holdings competing for land and increasing land values making this unviable particularly in the Hartley and Tarana areas. It is acknowledged that large allotments should be protected especially with established farms. Council supports intensive agricultural development on the smaller scale lots where appropriate. Value adding or supportive industries are also encouraged.	This section acknowledges that agriculture still has a place in the Lithgow area that provides an important economic value to the region and capitalises on its environment and proximity to market, both in the current and future opportunities. There is evidence that small scale activities are being undertaken on some existing small lots in the area. These provide opportunities for more intensive agricultural activities e.g. growing vegetables if the resources are available and suitable for purpose. There is opportunity for acknowledgment that this has a place in the Lithgow area, especially considering the amount of these lots that exist in the rural area. We would highlight that there are already existing lots that provide opportunities for this to happen rather than more lots be encouraged to be developed. The current status of agricultural business in the area shows that it is still an important economic feature of the Lithgow area. Whilst the level of subdivision has increased barriers to traditional consolidation opportunities, it is important that existing agricultural industries are protected. The Department supports Council in this priority. The availability of existing small lots provides a bases for intensive/ alternative agriculture in the Council area. As noted previously, the existing supply of small lots is available to undertake such activities and is not a reason to allow more subdivision of rural lands. Lithgow's proximity to Sydney provides opportunities for the relocation of agricultural and agribusiness industries. This opportunity requires suitably productive and scaled lands, with protection from adjacent land uses, as well as well serviced land to support value adding industries that are appropriately located in the rural zone.
Planning Priority 9	Attracting Investment and Growing Local Jobs: Industrial (Page 45)	The rationale identified the opportunities the Lithgow area has for business investment and growth. The commitment by council states that it will protect the agricultural value of regional lands while allowing for supplementary land uses that value add to agriculture industry. This will be part to the LEP and DCP review by Council.	

Theme 4 Our Environment (page 47)	Planning Priority 12 Adapt to Natural Hazards and Climate Change (page 52)	This section also provides that the former Wallerawang Power Station is being investigated for a potential eco- industrial business park.	We note that the former Wallerawang Power Station area may also be suitable for intensive agricultural developments that are not soil dependent, but prefer flat lands and have access to water.
		This section notes the predicted changes associated with climate change. The natural hazards of bushfire and flooding are noted, especially for lifestyle development in areas identified in or near Category 1 lands.	The predicted changes associated with climate change also reinforce the need for agricultural land opportunities to be retained in the Lithgow Council area. The rationale notes that the effects of climate change are of a lower intensity so the opportunities for agricultural production to be retained albeit at warmer temperatures with less rainfall is a feature to further consider in the land use planning regime. Retaining land for agriculture may be a preferred option in areas that are near Category 1 lands.