



ATTACHMENTS

UNDER SEPARATE COVER

Ordinary Council Meeting

20 February 2024

Table of Contents

Mayor Minute - Cost Shifting

Attachment 1 Annual Report - Cost Shifting.....4

Delivery Program 2022-26 Half Year Performance Review - 31 December 2023

Attachment 1 Delivery Program 2022-26 Half Year Performance Review 1 July
2023 to 31 December 2023.....41

Planning Proposal - Lot 1 in DP1011106, 42 Manderlay Road, Narrandera (Red Hill
Industrial Estate)

Attachment 1 Planning Proposal for 42 Manderlay Road (Red Hill Industrial
Estate) PP-2024-222.....88

Attachment 2 Attachment A - Scoping Report.....142

Attachment 3 Attachment E - Scoping Report RFS comments160



LGNSW Cost Shifting Report –

How State Costs Eat Council Rates



© Morrison Low

Except for all client data and factual information contained herein, this document is the copyright of Morrison Low. All or any part of it may only be used, copied or reproduced for the purpose for which it was originally intended, except where the prior permission to do otherwise has been sought from and granted by Morrison Low. Prospective users are invited to make enquiries of Morrison Low concerning using all or part of this copyright document for purposes other than that for which it was intended.



Contents

Contents	i
Tables	i
Figures	ii
1 Executive Summary	1
2 Background	3
2.1 What is cost shifting?	3
2.2 Cost shifting and the rate peg	4
2.3 This report	4
3 Findings	5
3.1 Emergency service contributions and obligations	8
3.2 Waste levy	16
3.3 Rate exemptions	19
3.4 Regulatory functions	22
3.5 Funding programs	24
3.6 Pensioner rebates	26
3.7 Service gaps	28
3.8 Other cost shifts	29
3.9 Future survey considerations	30
4 About the survey	32
4.1 Development of the survey	32
4.2 Conducting the survey	32
4.3 Responses to the survey	32
4.4 Data validation and analysis	32

Tables

Table 1 Cost for rate exemptions	22
Table 2 Cost for increased regulatory functions that cannot be recovered through fees and charges	24
Table 3 Cost for services provided by Council as a result of a State or Federal service gap or market failure	29



Figures

Figure 1 2021–22 cost shifting components	2
Figure 2 2021–22 cost shifting components	6
Figure 3 Total cost shift by council classification	7
Figure 4 Cost shift per ratepayer by council classification	7
Figure 5 Emergency services contributions and obligations by council classification	9
Figure 6 Respondent councils with the highest emergency services contributions and obligations burden	9
Figure 7 Respondent councils with the highest emergency services contributions and obligations burden as a proportion of total operating expenditure	10
Figure 8 Respondent metropolitan and fringe councils with the largest ESL bill for 2021–22	11
Figure 9 Respondent regional and rural councils with the largest ESL bill for 2021–22	11
Figure 10 Respondent councils with the largest ESL bill as a proportion of total operating expenditure	12
Figure 11 Top 10 councils with the highest ESL bill in 2023–24	12
Figure 12 Top 10 councils with the highest 2023–24 ESL increase as a percentage of the rate revenue increase	13
Figure 13 Additional RFS contributions by council classification	14
Figure 14 RFS Depreciation Expense by council classification	15
Figure 15 Waste levy by council classification	17
Figure 16 Respondent councils with the highest waste levy	17
Figure 17 Waste levy area map	18
Figure 18 Rate exemptions by category	20
Figure 19 Rate exemptions by council classification	20
Figure 20 Average rate exemption for respondent councils as a proportion of rates revenue by council classification	21
Figure 21 Respondent councils with the highest rate exemptions as a proportion of rates revenue	21
Figure 22 Unfunded regulatory costs by category	22
Figure 23 Unfunded regulatory costs by council classification	23
Figure 24 Respondent councils with the largest regulatory cost as a proportion of total operating expenditure	23
Figure 25 Funding program costs shifted by category	25
Figure 26 Funding program costs shifted by council classification	25
Figure 27 Respondent councils with the largest funding program costs shifted as a proportion of total operating expenditure	26
Figure 28 Average total pensioner rebates as a proportion of total rates revenue by council classification	27
Figure 29 Service gap costs by council classification	28
Figure 30 Respondent councils with the highest service gap cost as a proportion of total operating expenditure	28
Figure 31 Other cost shifts by category	29



1 Executive Summary

Cost shifting remains one of the most significant challenges facing the NSW local government sector. As the peak organisation representing the interests of all 128 general purpose councils in NSW, as well as special purpose councils and related entities, Local Government NSW (LGNSW) regularly monitors the extent of cost shifting onto local government via its Cost Shifting Survey.

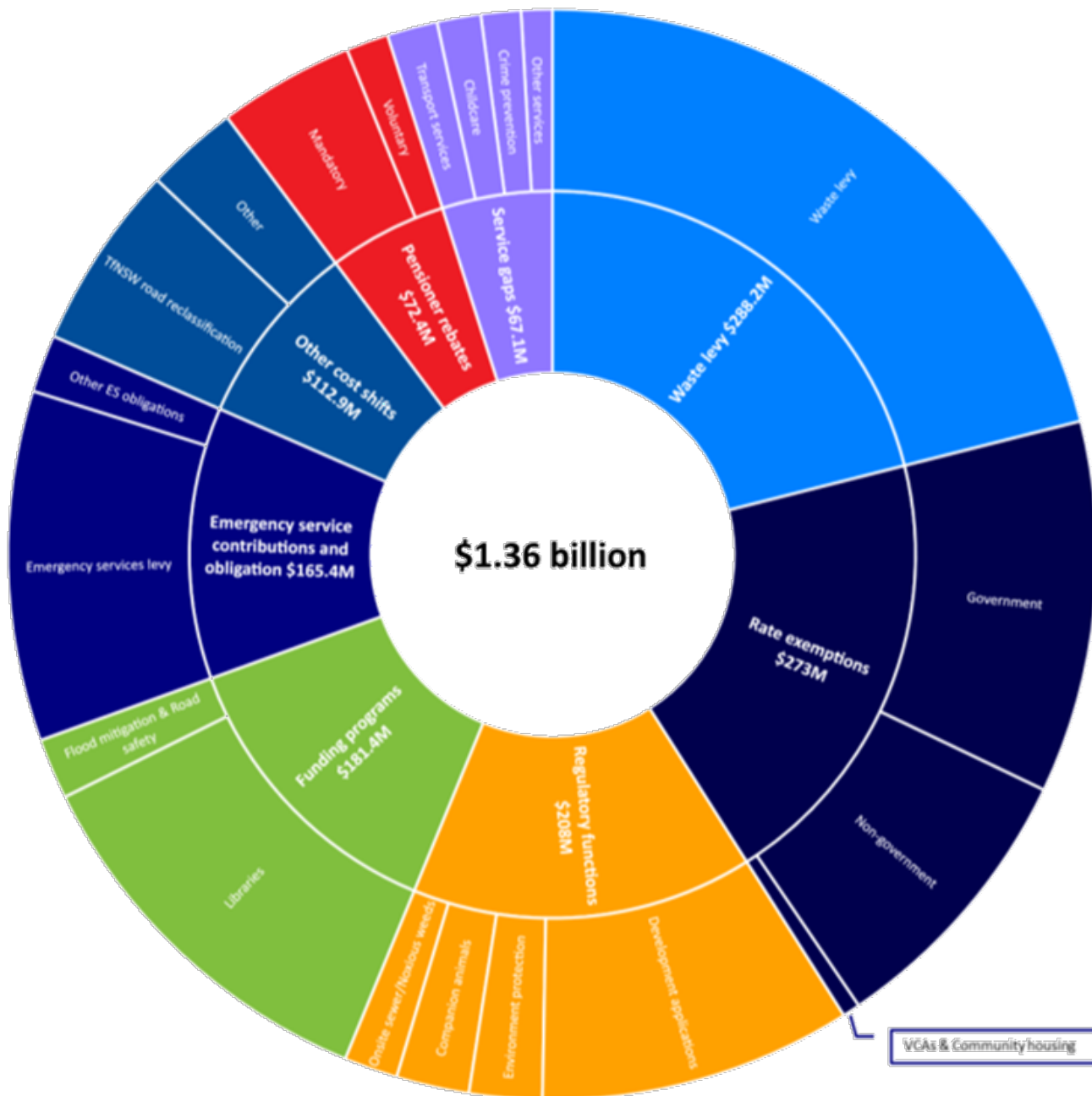
The 2021–22 Cost Shifting Survey has revealed that cost shifting totalled **\$1.36 billion** in 2021–22 (see figure on the next page), far exceeding historical records and representing an increase of \$540 million since the Cost Shifting Survey was last carried out in 2017–18. Alarming, the increase in cost shifting has been accelerated by various State Government policies, with the most significant examples of cost shifting in 2021–22 being:

- The **waste levy**, which remains the largest single contributor to cost shifting in NSW, totalling \$288.2 million, because the NSW Government did not fully reinvest the waste levy, paid by local councils, back into waste and circular economy infrastructure and programs.
- The **Emergency Services Levy** and associated **emergency service contributions**, which totalled \$165.4 million and represented the largest direct cost shift to local councils. In 2021–22, councils contributed \$142 million through the Emergency Services Levy, \$12.7 million through Rural Fire Service (RFS) obligations, and \$10.7 million in depreciation expenses on RFS assets.
- The NSW Government's failure to fully reimburse local councils for mandatory **pensioner rate rebates**, resulting in councils losing \$55.2 million.
- The NSW Government's failure to cover the originally committed 50 per cent of the cost of libraries operations, resulting in an additional \$156.7 million in costs to councils.

Local councils and their communities are facing unprecedented challenges. As they lead the recovery efforts from both the COVID pandemic and repeated natural disasters across much of NSW, local councils are also grappling with the same challenges affecting the State and Federal Governments, such as rising costs, increased economic uncertainty, and severe skills and labour shortages – all of which are impacting council budgets and affecting service and infrastructure delivery in local communities. The continual shifting of the obligations and costs for State and Federal functions and services onto local government coupled with a defective rate peg system, is only making the situation worse. In 2021-22, each ratepayer of NSW has approximately \$460.67 from councils' rates eaten by state government costs.



Figure 1 2021–22 cost shifting components





2 Background

2.1 What is cost shifting?

Cost shifting describes a situation where the responsibility for, or merely the costs of, providing a certain service, concession, asset, or regulatory function is imposed onto local government from a higher level of government (Commonwealth or State Government) without the provision of corresponding funding or the conferral of corresponding and adequate revenue raising capacity other than out of general rates.

As the council cannot raise or receive sufficient revenue to fund the imposed service concession asset or function, cost shifting forces councils to divert funding collected from ratepayers away from planned projects or services that the council has committed to the community to deliver in its Delivery Program.

In NSW, cost shifting has taken a number of forms including:

- **The Emergency Service contributions:** Councils are required to fund 11.7 per cent of the cost of Fire & Rescue NSW, Rural Fire Service (RFS) NSW and the NSW State Emergency Service (SES) through an Emergency Service Levy (ESL). 73.7 per cent of emergency services costs is funded through insurance premiums and the remaining 14.6 per cent from the NSW Government's treasuries. Councils provide additional financial contributions to emergency services agencies in addition to the ESL.
- **The waste levy:** The waste levy is not as much a cost shift to councils as an invisible tax levied on ratepayers through councils. The waste levy is a levy paid by all waste facilities to the NSW Government, the cost of this levy is recovered through the waste collection fees levied by councils, in effect shifting the burden of this tax on to ratepayers.
- **Forced rates exemptions:** Councils are required to exempt government and other organisations from paying rates in the local government area. These organisations utilise local government services and infrastructure. As they are exempt from paying rates, the burden of the costs they incur is shifted to the ratepayers to fund. Examples of exempt organisations include government departments, private schools, and non-government social housing providers.
- **Imposing additional regulatory functions:** State and Federal levels of government implement or increase regulatory requirements through legislation that is then administered by local government. The costs of this new or increased regulatory function is often not funded by the determining level of government and councils must fund this through their own revenue sources including rates.
- **Cutting or failing to adequately continue to fund programs for services that need to continue:** Many funding programs announced by State or Federal government are required to be delivered by local government but are either not fully funded from their initiation or, if an ongoing initiative, funding is reduced over time leaving councils with the decision to either continue the program and make up the burden of the cost or cease the program entirely. An example of this in Libraries, where the original commitment from State Government was to fund 50 per cent of libraries cost, it now covers approximately 8 per cent of the total costs, leaving councils to fund an additional \$156.7 million to make up the difference.



- **Pensioner rebates:** Councils are required to provide pensioner rebates on rates and other charges, for which the State government only subsidises 55 per cent of the cost, the remaining 45 per cent is funded by other ratepayers.
- **Councils absorbing the costs of service and market gaps that should have been provided by State or Federal governments:** This is particularly an issue in rural and regional NSW, where councils often must step in to provide or support a service that is traditionally delivered either directly or through subsidised private providers. This can be for a diverse range of services from aged, disability or childcare through to medical services, education, or public transport services.

2.2 Cost shifting and the rate peg

Cost shifting has been a term used for many years to describe the cost impact on local government of decisions made at the State and Federal level. It is particularly relevant in NSW where a rate pegging system is applied to restrict how local government can raise rates revenue.

The issue of State and Federal decisions having a direct financial impact on local government exists in all States and territories of Australia to some extent. In many cases, local government can be the best and most efficient partner for State and Federal government to deliver its programs or services.

Challenges arise with respect to how the State and Federal initiatives are, or continue to be, funded. In States where there is not a rate pegging system in place, local councils are able to better manage the financial impacts by adjusting rates or levying specific fees and charges to reflect the change in costs of providing the imposed service, concession, asset, or regulatory function.

The rate peg in NSW sets out the maximum amount that local councils can increase their rates by and is set by the Independent Pricing and Regulatory Tribunal (IPART) each year. In determining the rate peg, IPART does not adequately consider the cost shifting impacts on councils. As a result, increases in the costs shifted to councils identified here are not covered by a commensurate increase in rates revenue. This means that councils have to divert funding from other commitments agreed with their communities in their Community Strategic Plan and Delivery Program to fund the cost shift incurred. This has a direct impact on councils' ability to deliver services to the community and their overall financial sustainability.

2.3 This report

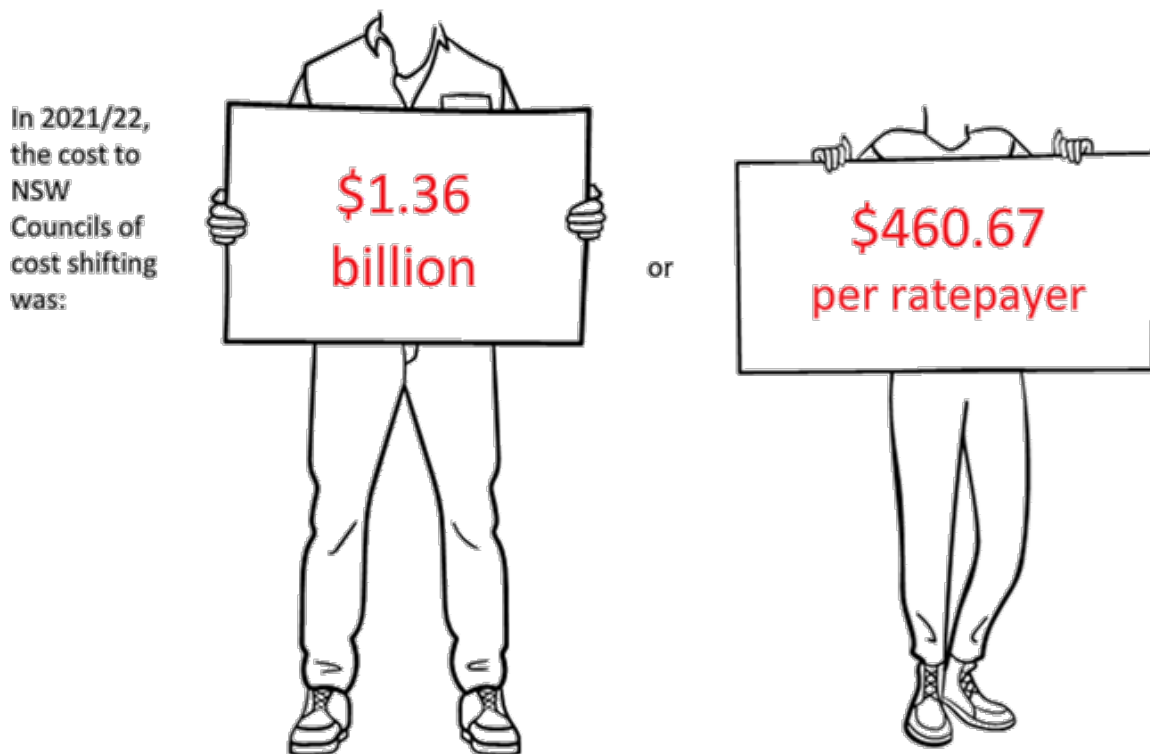
This report provides analysis and insights from the 2021–22 Cost Shifting Survey conducted in May 2023.

Section 3 of this report provides more detail on the findings from the survey, breaking down the findings into their key cost shifting areas, as identified in section 2.1 above, and Section 4 outlines the approach and methodology used in the survey and analysis..



3 Findings

Our survey found that cost shifting cost NSW councils \$1.36 billion in 2021–22, which represents \$460.67 for each ratepayer. In effect, this is the average amount of rates that councils must divert from the services and infrastructure that council has committed to provide the community in order to fund the unrecoverable cost services, programs and functions that are imposed from the State or Federal governments.



Many services, programs, and functions that the State and Federal governments require local councils to deliver, in turn provide benefits to the local communities they serve. This report does not provide an assessment on the merit of these costs, only to bring them to light. Due to the nature of how the services, programs and functions are provided and funded, cost-shifting can be hidden from view. This analysis helps to quantify and highlight these costs for all tiers of government and the community.



Figure 2 2021–22 cost shifting components



The largest direct cost shift to councils is from emergency service contributions and other emergency service obligations, totalling \$165.4 million.

However, the cost of rate exemptions are higher still, representing a total of \$273.1 million of potential rates that are exempted and redistributed to other ratepayers to pay. An additional \$288.2 million in waste levies are passed onto the ratepayers through the waste collection fees in their rates bill. A further \$156.7 million



in costs for libraries has been covered by councils to make up the difference between the committed funding for councils' libraries and the subsidies received.

While in nominal terms the largest total cost shifts have been seen metropolitan councils, was on a per ratepayer basis rural and large rural councils have seen a greater impact, as the graphs below indicate.

Figure 3 Total cost shift by council classification

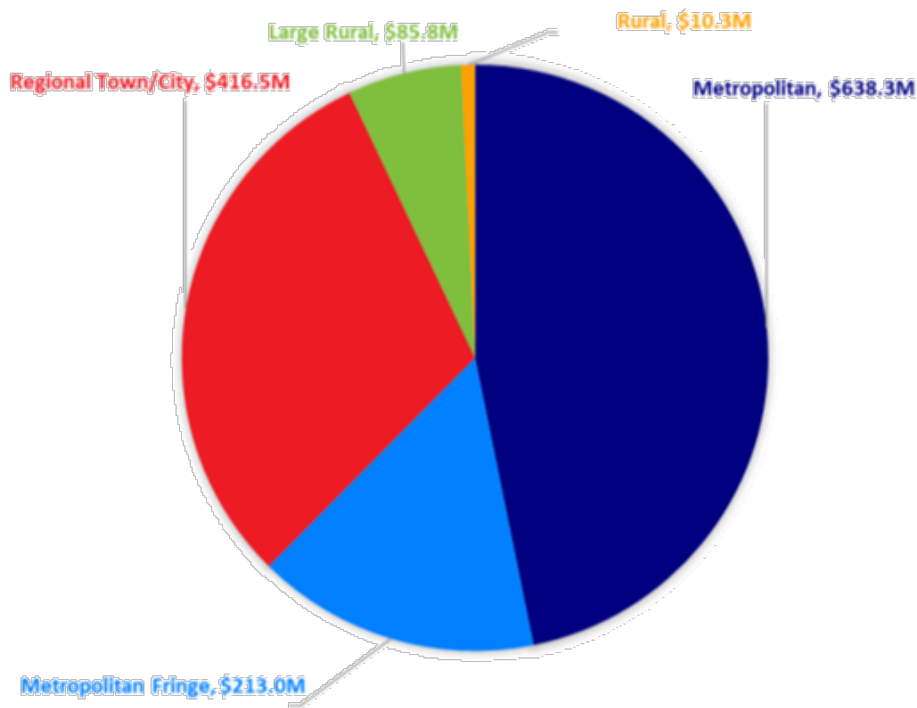


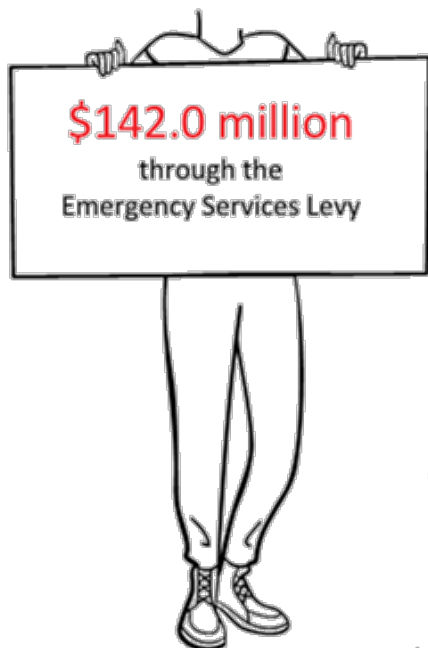
Figure 4 Cost shift per ratepayer by council classification





We will explore each component of rate shifting in the following sections.

3.1 Emergency service contributions and obligations



In 2021–22, NSW
councils contributed
\$165.4 million
to emergency services:





Figure 5 Emergency services contributions and obligations by council classification

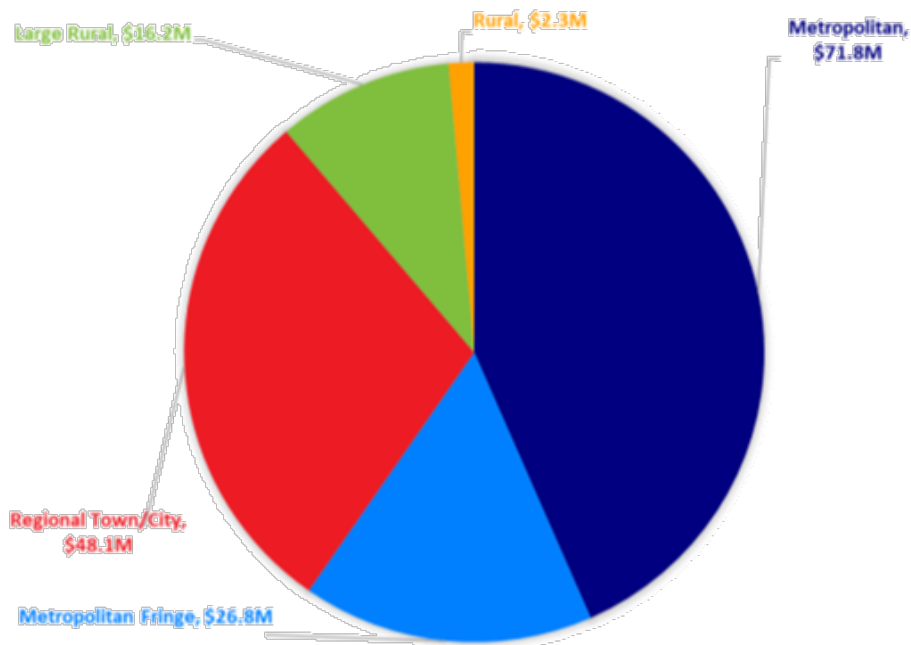


Figure 6 Respondent councils with the highest emergency services contributions and obligations burden

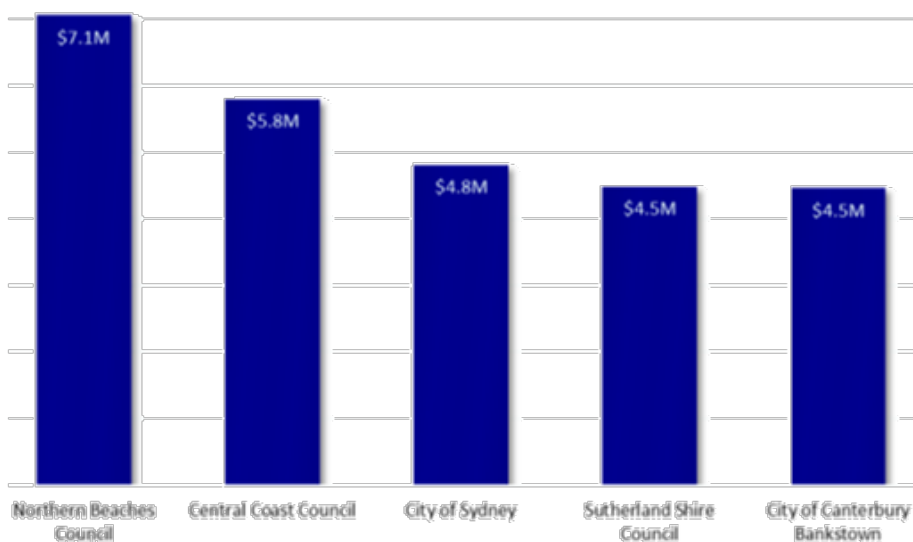
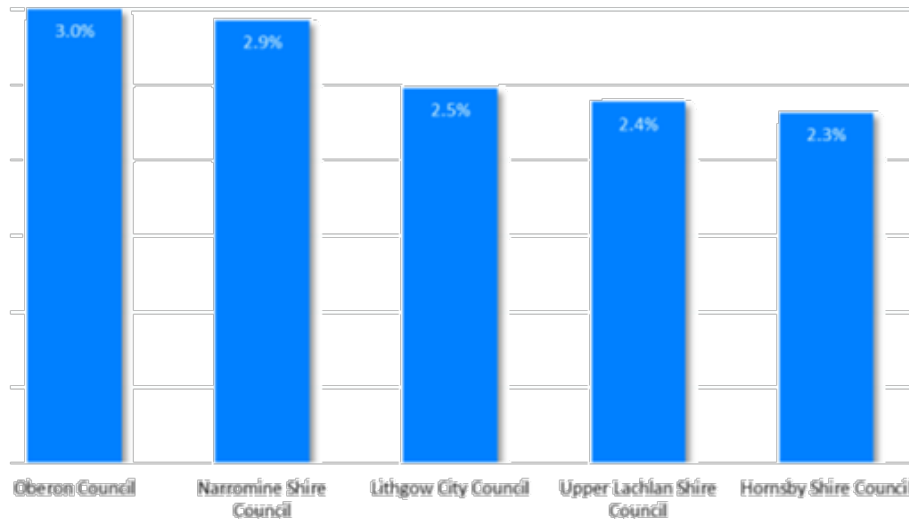




Figure 7 Respondent councils with the highest emergency services contributions and obligations burden as a proportion of total operating expenditure



NSW councils are required to fund 11.7 per cent of the NSW SES, NSW Fire and Rescue and NSW RFS budgets through a direct contribution levied each year by the State Revenue Office. This is funded directly from general revenue, primarily rates, as councils have no ability to raise revenue to fund this in any other way.

Councils also have no influence on the costs or budget setting of these organisations. This contribution of ratepayers’ funds is in addition to the Emergency Services Insurance Contribution that is extracted through insurance companies, who cover 73.7 per cent of the agencies’ budgets and results in higher insurance premiums for policy holders

The emergency service levy is estimated to have cost NSW councils overall \$142.0 million in 2021–22. That is a total of \$46.23 per ratepayer, which goes directly to the NSW Government as part of the emergency services contribution.



Figure 8 Respondent metropolitan and fringe councils with the largest ESL bill for 2021–22

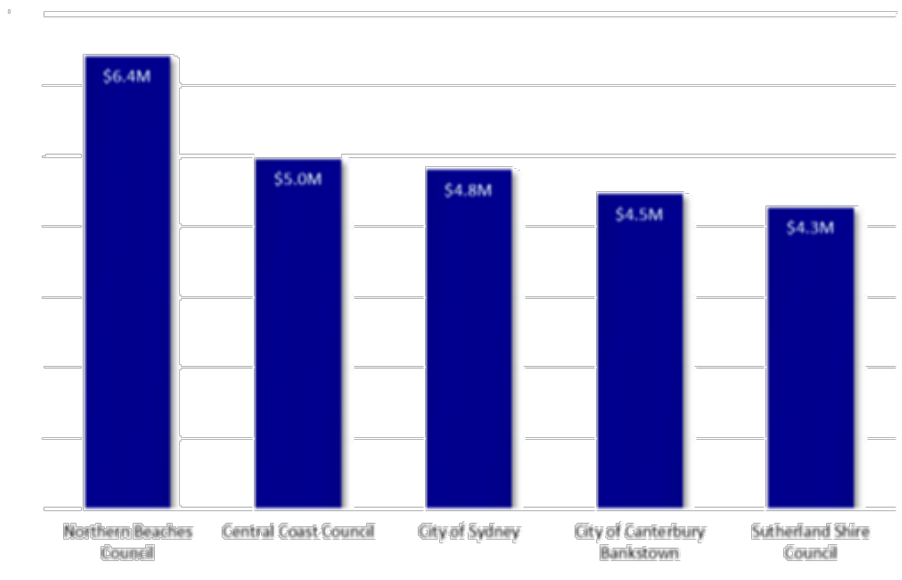


Figure 9 Respondent regional and rural councils with the largest ESL bill for 2021–22

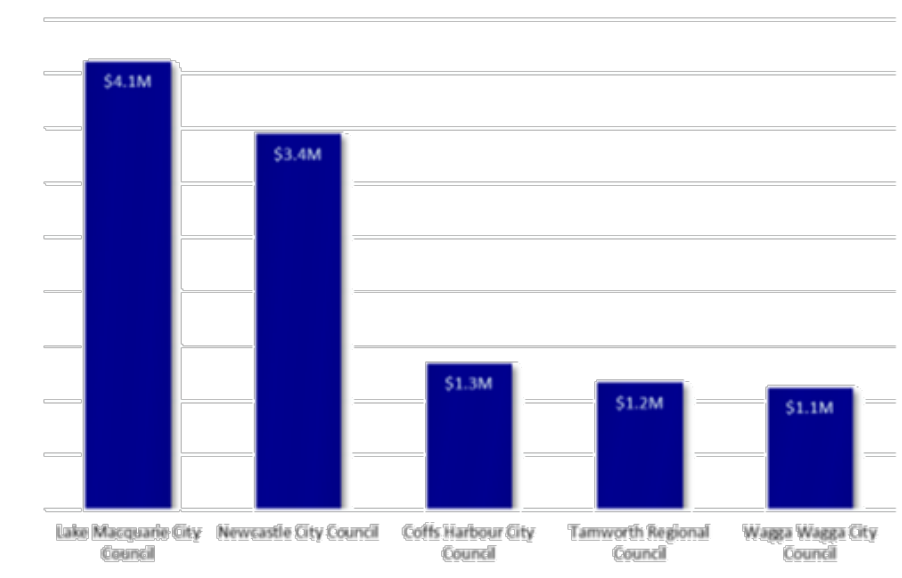
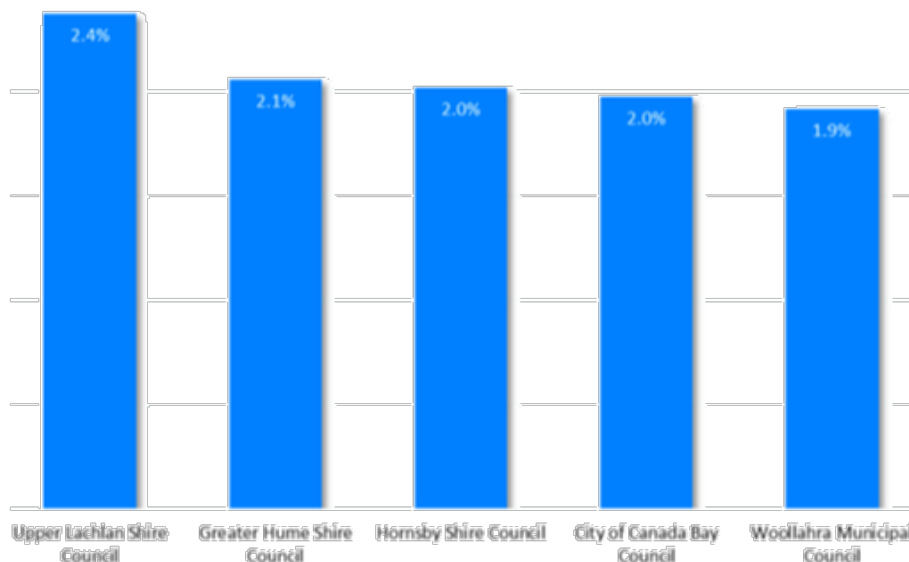




Figure 10 Respondent councils with the largest ESL bill as a proportion of total operating expenditure



In 2019, the NSW Government subsidised councils for the increase in Emergency Service Contribution costs, because of a large increase in the ESL resulting from large increase in workers compensation costs followed by the Black Summer Bushfires and the unfolding COVID pandemic. From the 2023–24 financial year, the NSW Government increased the budgets and therefore costs for the three relevant agencies and removed the subsidy at the same time. Councils were not advised of this change until after they had developed and put their 2023–24 budget on public exhibition as they are required to do. The increase represented a \$41.2 million cost increase from the prior 2022–23 financial year.

With the rate peg set at 3.7 per cent for the 2023–24 rating year, the increase in emergency services contributions has put substantial pressure on the financial sustainability of local government.

Figure 11 Top 10 councils with the highest ESL bill in 2023–24

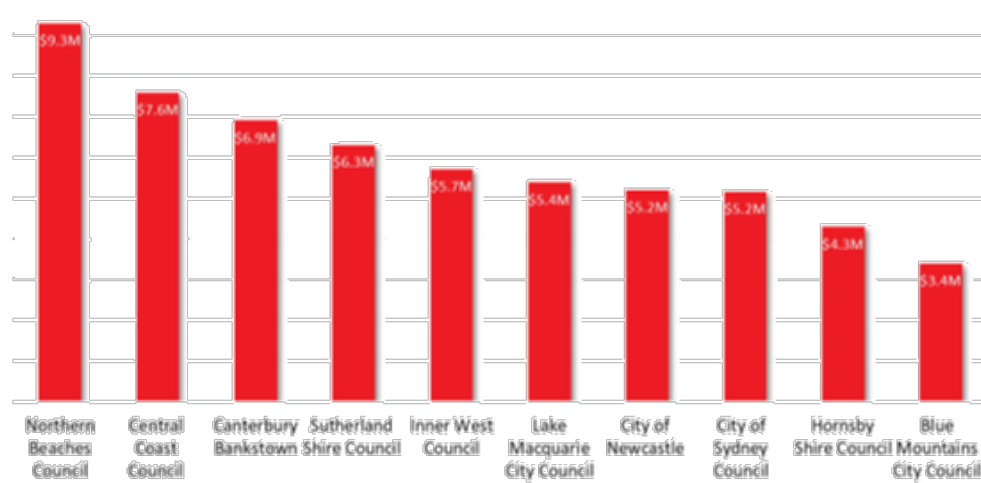
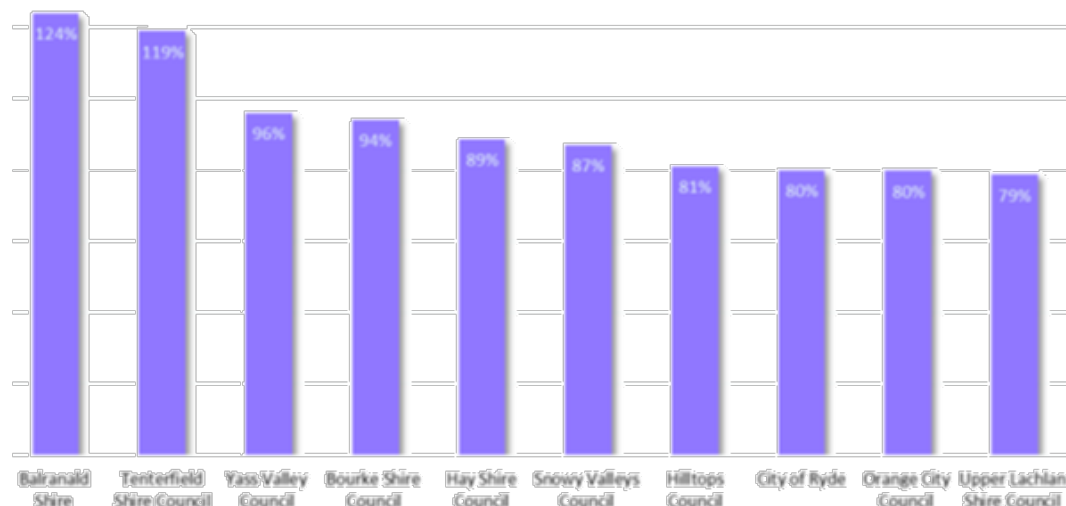




Figure 12 Top 10 councils with the highest 2023–24 ESL increase as a percentage of the rate revenue increase



The increases in emergency services contributions from councils have hit both the largest and smallest of councils.

“Two of the four biggest expense payments that Central Coast Council must make each year are for State government levies: the emergency services levy and the waste levy. They are in the millions each and are funded straight out of our rates and waste revenue.”

David Farmer, CEO, Central Coast Council



“Central Darling Shire is the largest shire in NSW covering an area of 53,000 square kilometres in Far Western NSW, but it has the smallest (and declining) population of less than 2000. CDS is not a typical shire as it consists of a series of isolated communities (Menindee, Ivanhoe, Wilcannia and White Cliffs) and large pastoral holdings. It borders the large unincorporated area of the Far West.

For Council, the Emergency Services Levy has increased by \$70,000 for 2023/24, bringing the total Council contribution to \$318,989. The increase is some \$70,000 which is more than double the increase in rates due to rate pegging.

For the 2023/2024 financial year the Council income from rates is budgeted to be \$913,000. This includes the rate peg increase of 3.7 per cent, which looks like being eaten up by the hike in the ESL.

For a Council like Central Darling this level of increase is simply unsustainable and will result in the further reduction of services to our residents.

There is a clear case for the NSW Government to fully fund this increase as part of its community service obligation as small rural councils with a limited rate base cannot afford to continue to pay.”

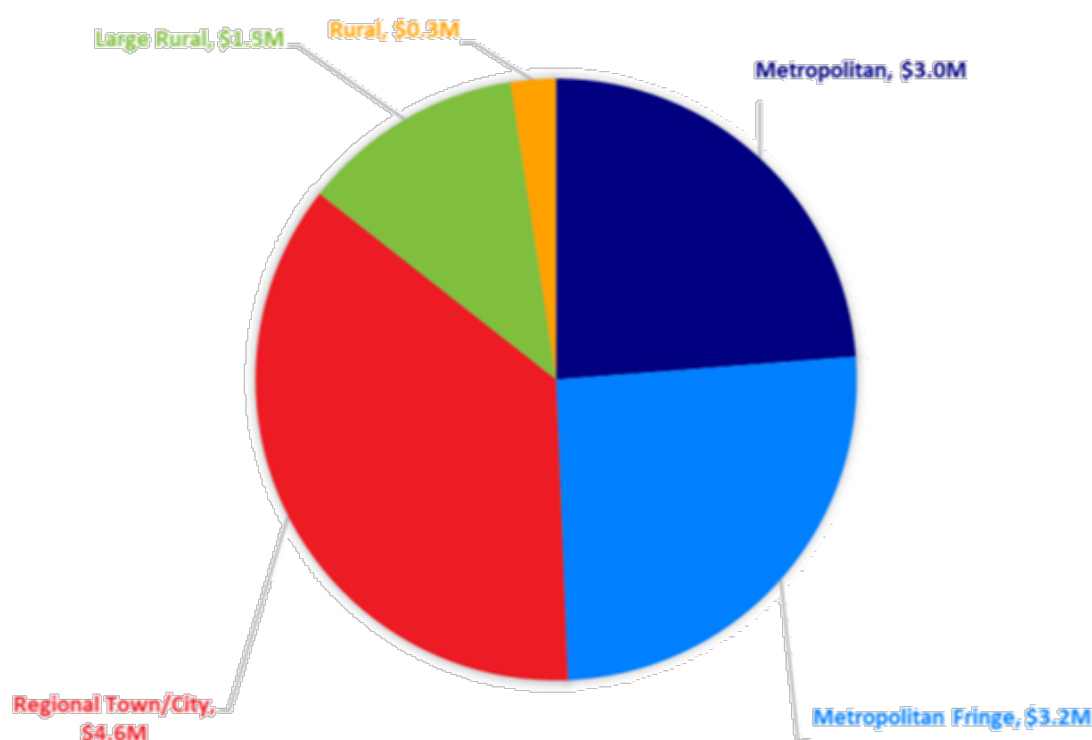
Bob Stewart, Administrator, Central Darling Council¹

¹ Figure 11 does not include Central Darling’s actual result as it was not provided to LGNSW.



In addition to the emergency service levy, local councils are required to support the RFS and SES in other ways. This commitment seems to be different for different Councils. For example, for some councils, when the RFS annual budget is allocated back to the districts, some of these funds are vested in councils through the Rural Fire Fighting Fund (RFFF). These funds are then administered by councils to deliver repairs and maintenance of buildings and a small amount of plant and equipment. In some cases, Councils also fund other functions such as training and provision of office supplies. If the RFFF is insufficient to provide these in any one year, some councils will then provide further financial support directly to the districts to meet the difference. In 2021–22, the cost of this additional support has been estimated at \$12.7 million.

Figure 13 Additional RFS contributions by council classification



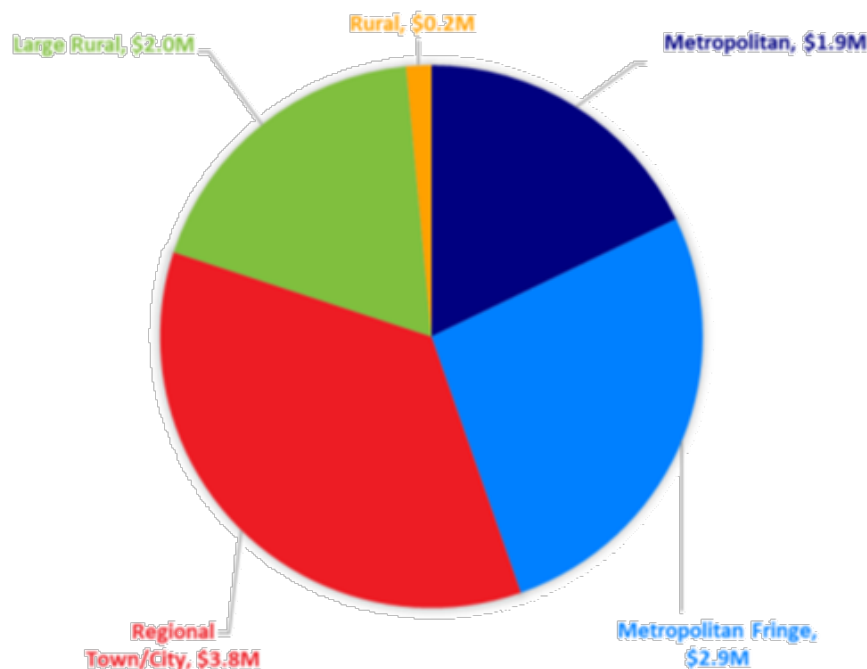
The RFS funding arrangements are the most complex of the all the emergency services and creates challenges for both councils and the RFS. While councils are aware that their obligations to provide financial support to the RFS are generally over and above the RFFF, the costs at a district level are extremely volatile from one year to the next and dependent on whether there is a bushfire in the district (in which instance the district will fund some aspects of other districts’ costs if they come to support the local bushfire response) or if the district comes to the aid of another district (in which instance they will receive additional funding which reduces the pressure on its own budget and therefore the financial support required from the local council).

What results is that councils have to bear the budget risk of the volatility of RFS costs and funding, while RFS districts don’t have accountability for their own budgets and costs, and are not able to help to provide certainty because they don’t know where the next emergency will be. Much of these volatility issues are resolved at a State level, when looking at the RFS services overall.



In addition to the direct repair and maintenance costs, councils are also required to recognise RFS red fleet assets and account for their depreciation expense in council financial reports. In 2021–22, this depreciation cost is estimated at \$10.7 million.

Figure 14 RFS Depreciation Expense by council classification



This has been a somewhat contentious issue in recent years and ultimately comes down to identifying where control of these assets lie. In summary, the NSW Government has concluded under the *Rural Fire Services Act 1997*, which states that these assets are vested to councils and therefore “on balance, councils control this equipment” under the Australian Accounting Standards². The NSW Audit Office has accepted this position in undertaking their audit function of local government.

Many councils, with the support of LGNSW, have refused to accept this position, which has resulted in 43 NSW councils receiving a qualified audit opinion of their 2021–22 financial reports. Their position is that control of these assets sits with the RFS, and therefore the NSW Government, based on the Australian Accounting Standards Board Conceptual Framework, which does not necessarily define control as a legal ownership right, but rather:

“... the present ability to direct the use of the economic resource and obtain the economic benefits that may flow from it. Control includes the present ability to prevent other parties from directing the use of the economic resource and from obtaining the economic benefits that may flow from it. It follows that, if one party controls an economic resource, no other party controls that resource.”³

² Audit Office of New South Wales (2023) *Regulation and monitoring of local government*, NSW Government, 23 May 2023.

³ Australian Accounting Standards Board (2022) *Conceptual Framework for Financial Reporting*, AASB, 7 April 2022.



This issue is ongoing, and while depreciation itself is not a cash expense, the accounting for depreciation in local government has two key financial implications. Firstly, the increase in depreciation expense will reduce a council's overall surplus or increase its deficit, which has implication for a council's measures of financial sustainability. Secondly, for most local government assets, depreciation is used as the estimate of required renewal expenditure for councils to maintain assets at their current condition. In other words, councils must fund depreciation with a similar level of capital cashflow to ensure assets are kept at required standards, this is not the case for firefighting equipment, which is funded through the State Government's budget allocation to the RFS. This remains an ongoing issue at the time of writing this report.

3.2 Waste levy

The waste levy is a tax on landfill facilities and only applies to 42 metropolitan and 19 regional levy areas shown in Figure 18. Although, not technically a "cost shift" – as the cost of the levy is recovered through waste charges – it represents a somewhat "invisible tax".

The purpose of the waste levy is to provide economic incentive to alternative waste management processes, such as recycling and resource recovery. The funds raised by the waste levy go directly to NSW Government general revenue. Some funds do come back to communities and councils through grants for a variety of projects, but this only represents 10 to 15 per cent of the funds raised through the tax.

The metropolitan levy at \$147.10 per tonne in 2021–22 is nearly twice the amount per tonne of the regional levy at \$84.70 per tonne in 2021–22. Some councils, such as Central Coast and Newcastle, operate their own landfill facilities and pay the levy directly to the NSW Government. Not all councils operate landfills directly, many councils have their waste managed through contracts with private providers. While these providers will incur the levy directly, councils in the levy areas will collect waste charges that include the waste levy as a component of the waste fees. Depending on how their waste management contracts are structured, some councils have been able to provide an estimate of this levy collected in the waste fees while others have not.

Of the 51 councils surveyed who are in the levy area, 36 provided an estimate of the amount paid, which totalled \$287.8 million in 2021–22. Based on this data, we have estimated the total amount of the waste levy paid through waste collection fees in 2021–22 at \$292.9 million.



Figure 15 Waste levy by council classification

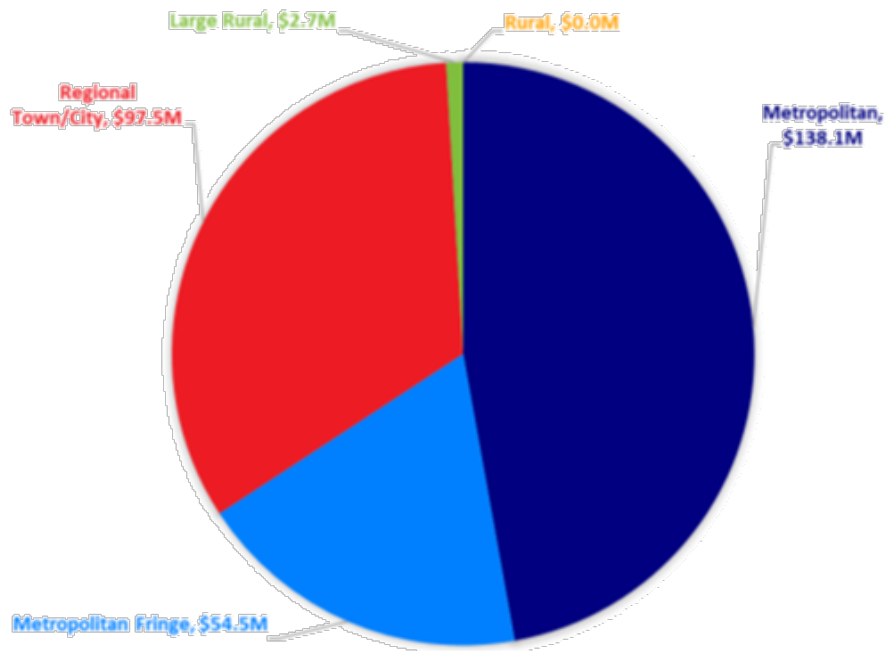


Figure 16 Respondent councils with the highest waste levy

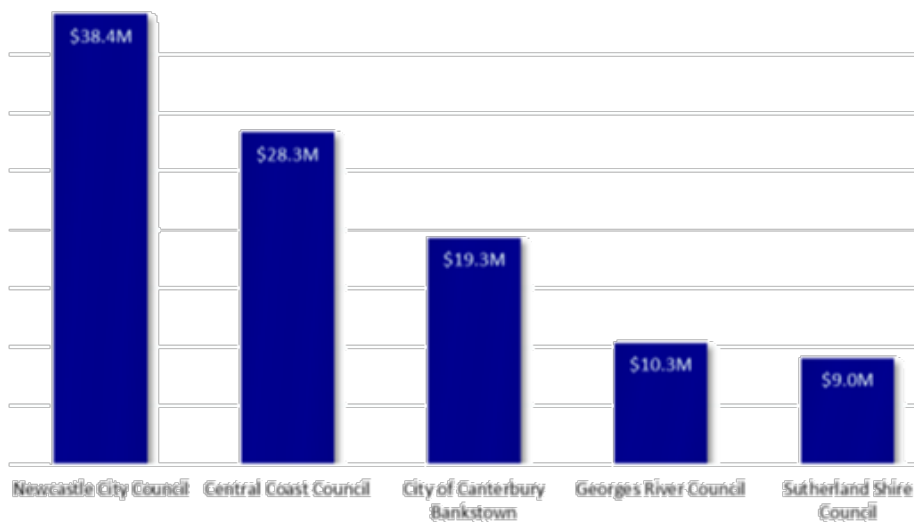




Figure 17 Waste levy area map⁴



⁴ <https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/wasteregulation/levy-area-map.pdf?la=en&hash=C00135E310556278B8A41EAE8222864C2655B186>.



3.3 Rate exemptions

Many government and private property owners in a local government area are exempt from paying rates to councils. Due to the way rates are calculated, this doesn't usually affect the total amount of revenue that councils are able to raise through rates. It does mean that the distribution of the rates burden falls more heavily on the existing ratepayer base.

For government-owned properties, rate exemptions are a part of a complex set of arrangements for exemptions of some taxes between the different tiers of government. State Owned Corporations (SOCs and GTEs) pay tax on lands owned and used for commercial purposes. This is provided for under competitive neutrality policy/National Competition Policy (a notable exception to this arrangement is the Forestry Corporation). Councils are exempt from most State and Federal taxes (for example land tax, payroll tax, stamp duty, and income tax). Councils are also involved in delivering a wide range of services or regulatory functions under various State and Commonwealth Acts and they receive a large number of different grants from State and Federal governments, including the untied Financial Assistance Grants that the States administer and distribute to councils.

Additionally, there are many non-government organisations that are also exempt from paying rates, including private schools, hospitals and retirement villages, as well as not-for-profit organisations such as religious organisations. While these organisations are exempt from paying rates; all expect and receive services and infrastructure from councils, the cost of which is funded by ratepayers.

Community housing was an area that we asked councils about specifically as the NSW government has been in the process of transitioning the ownership and management of public and social housing to non-government Community Housing Providers. Under past practice, social and public housing provided by State Government agencies paid rate equivalents on all their properties. CHPs are exempt from rates and more and more social and public housing is moving into this category. As a result, the rates exempt status seems to be moving with the community housing property.

The total amount of rate exemptions represented \$273.1 million, shifting approximately \$89.04 to each NSW ratepayer.



Figure 18 Rate exemptions by category

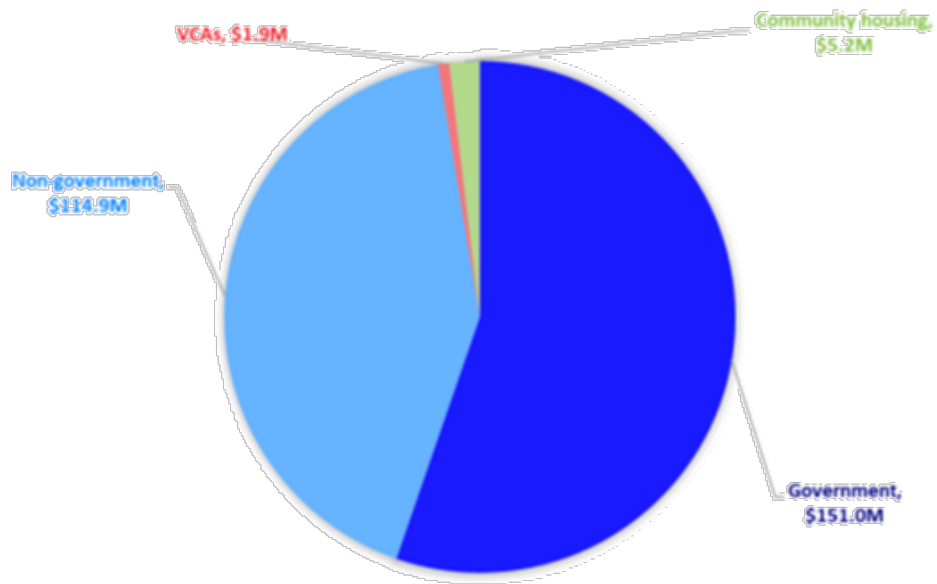


Figure 19 Rate exemptions by council classification

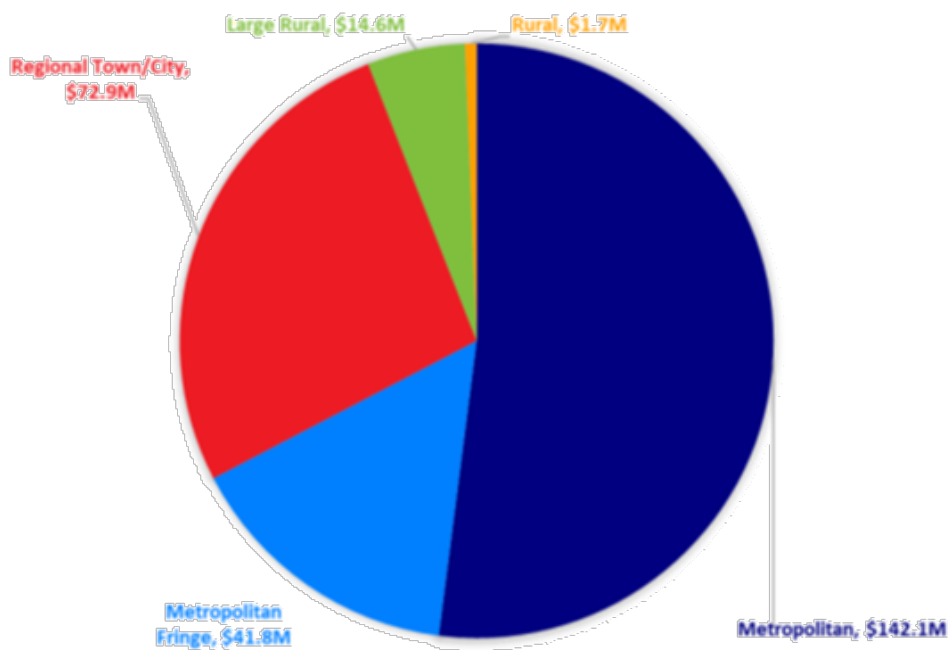




Figure 20 Average rate exemption for respondent councils as a proportion of rates revenue by council classification

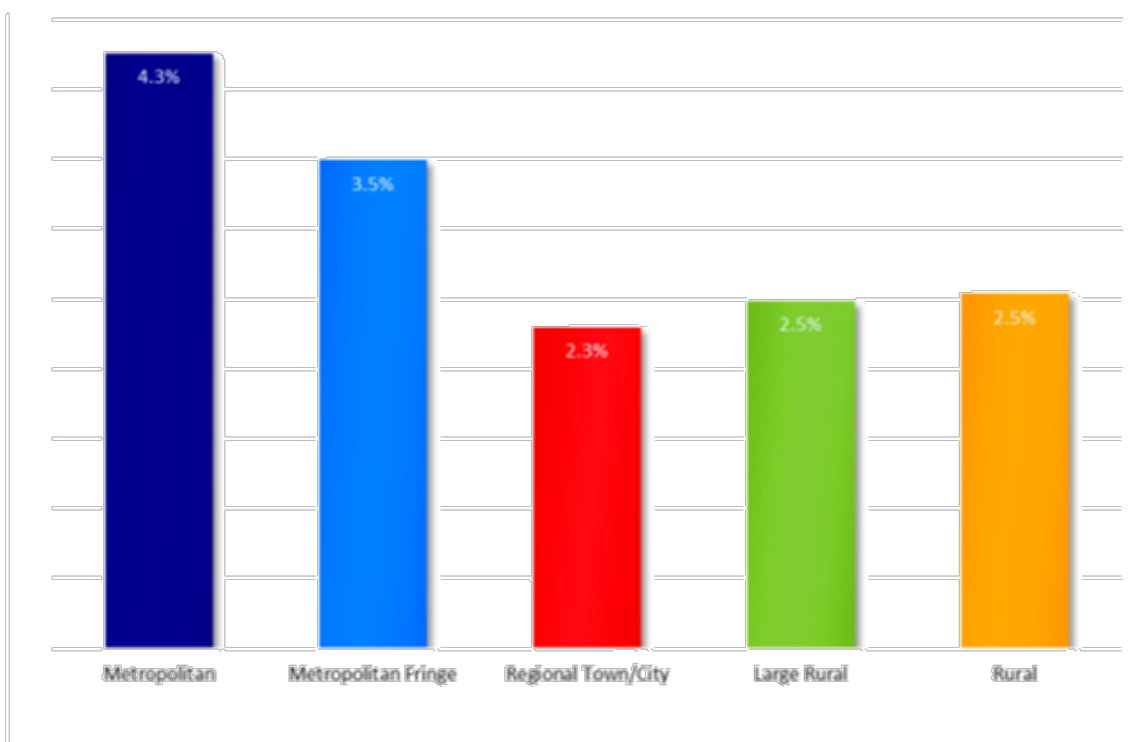


Figure 21 Respondent councils with the highest rate exemptions as a proportion of rates revenue

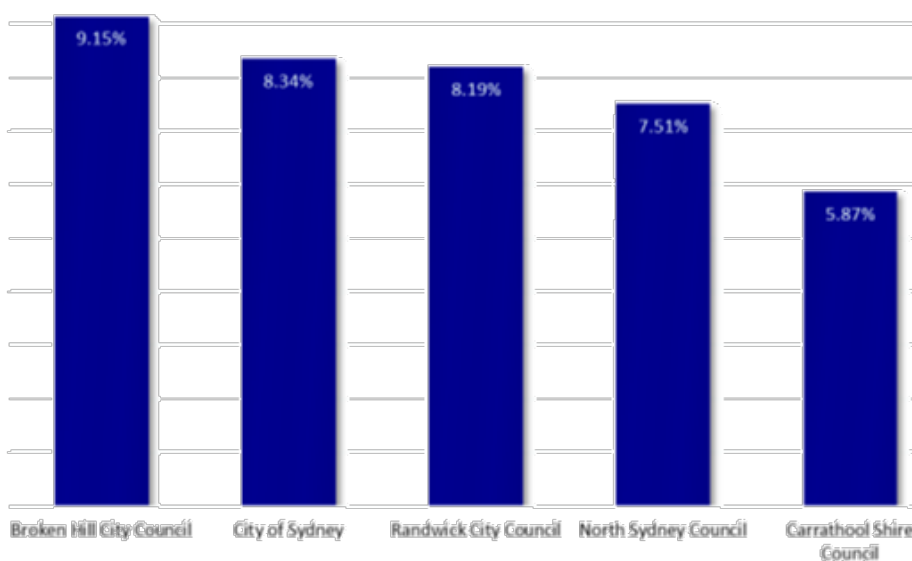




Table 1 Cost for rate exemptions

Rate exemption	Number of councils who responded to this question in the survey with a figure	Total amount of cost shift provided	Estimated total cost shift for all NSW Councils (based on population)
Government-owned property	62 (from which two councils put a figure of 0)	\$95.5M	\$151M
Non-government-owned property	61 (from which one council put a figure of 0)	\$72M	\$115M
Voluntary conservation agreements	47 (from which ten councils put a figure of 0)	\$1.2M	\$1.9M
Community housing	53 (from which 11 councils put a figure of 0)	\$3.3M	\$5.2M

3.4 Regulatory functions

In addition to the obligations under the *Rural Fire Services Act 1997*, *Fire and Rescue NSW Act 1989* and the *State Emergency Service Act 1989*, councils incur additional costs of increased regulatory responsibilities. These are additional functions or requirements that are not fully funded by increases in fees and charges.

In 2021–22, the unfunded costs for regulatory functions represented \$208.0 million.

Figure 22 Unfunded regulatory costs by category

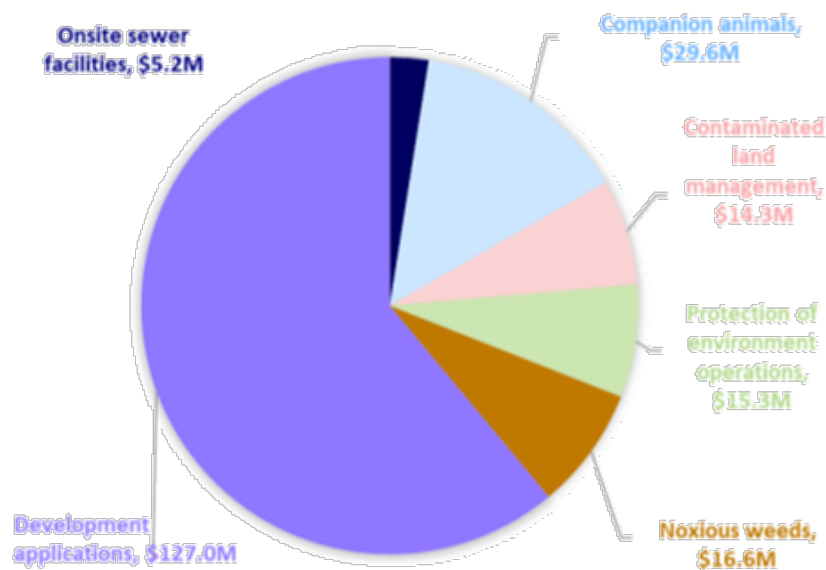




Figure 23 Unfunded regulatory costs by council classification

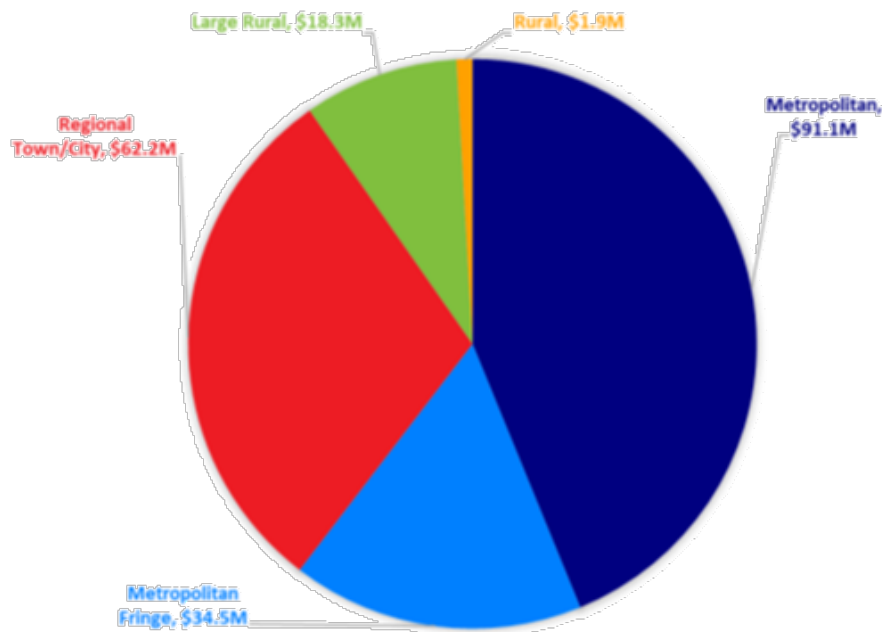
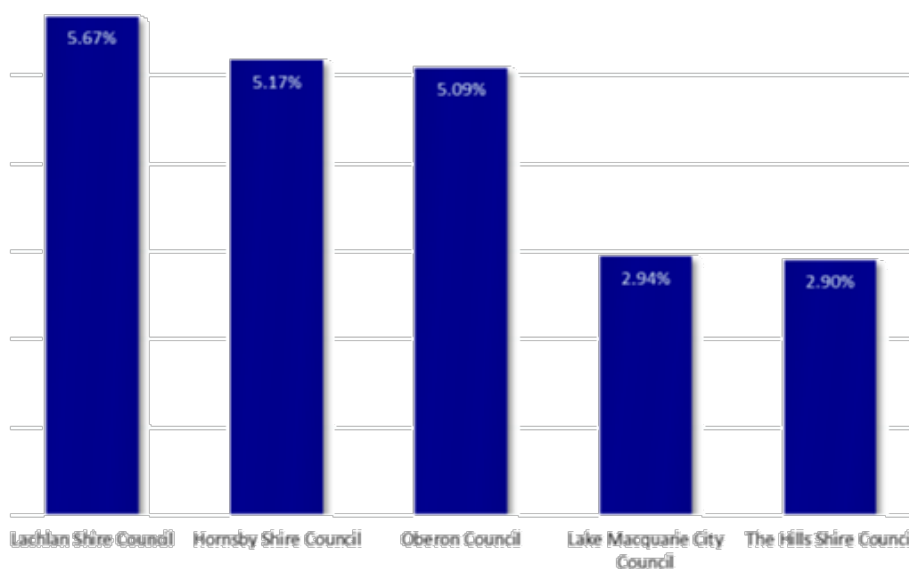


Figure 24 Respondent councils with the largest regulatory cost as a proportion of total operating expenditure



The function and total estimated costs from councils are outlined in the table below.



Table 2 Cost for increased regulatory functions that cannot be recovered through fees and charges

Regulatory function	Number of councils who responded to this question in the survey with a figure	Total amount of cost shift provided	Estimated total cost shift for all NSW Councils (based on population)
Onsite sewer facilities	35 (from which 15 councils put a figure of 0)	\$3.4M	\$5.2M
Companion animals	69 (from which four councils put a figure of 0)	\$19.6M	\$29.6M
Contaminated land management	45 (from which nine councils put a figure of 0)	\$7.2M	\$14.3M
Protection of environment operations	48 (from which four councils put a figure of 0 and one a negative amount)	\$9.9M	\$15.3M
Noxious weeds	64 (from which eight councils put a figure of 0)	\$11.1M	\$16.6M
Development applications	64 (from which five councils put a figure of 0 and one a negative amount)	\$86.7M	\$127.0M

3.5 Funding programs

Councils are occasionally required to fund the continuation of several funding programs that were instigated by the NSW Government, but for which funding commitments have, over time, either been reduced or removed entirely. The three main funding programs councils currently continue to fund are:

- **Library subsidies:** the original library funding subsidy was 50 per cent of the library services costs, however this has reduced over time. In 2021–22, councils paid an estimated \$156.7 million on library services that would have been covered by the originally committed 50 per cent State government subsidy.
- **Flood mitigation:** the program was originally established with the State and Federal governments providing 80 per cent of the costs and councils funding 20 per cent, the shortfall of this funding is estimated to be costing councils \$18.2 million in 2021–22.
- **Road safety program:** funding for programs and ongoing staff for education, however councils were not able to reduce the costs with the removal of the funding program. In 2021–22, councils have an estimated cost burden of \$6.4 million as result.

The total cost to council to continue to meet the funding shortfall of these programs was \$181.3 million, the vast majority which was the shortfall in the library subsidy of \$156.7 million.



Figure 25 Funding program costs shifted by category

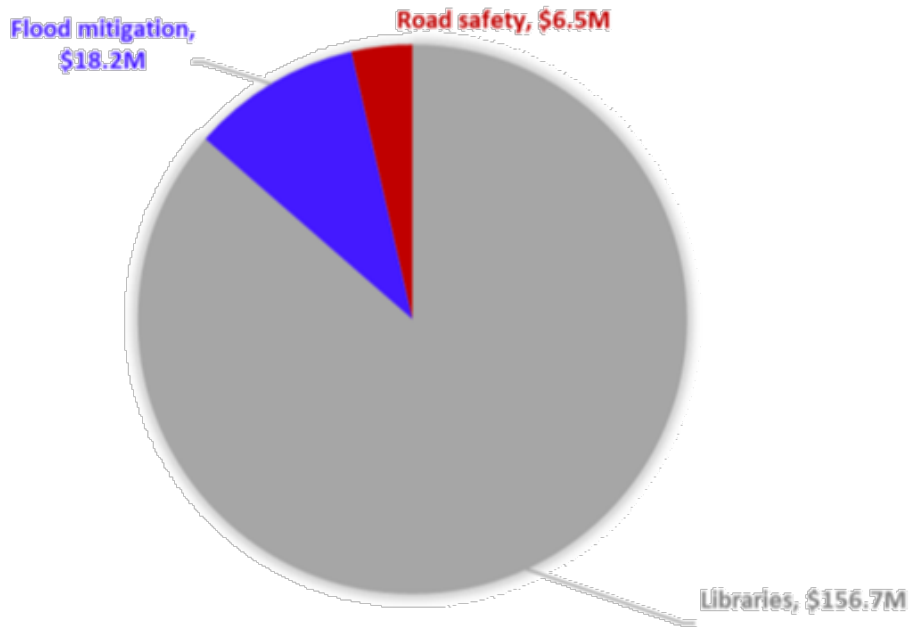


Figure 26 Funding program costs shifted by council classification

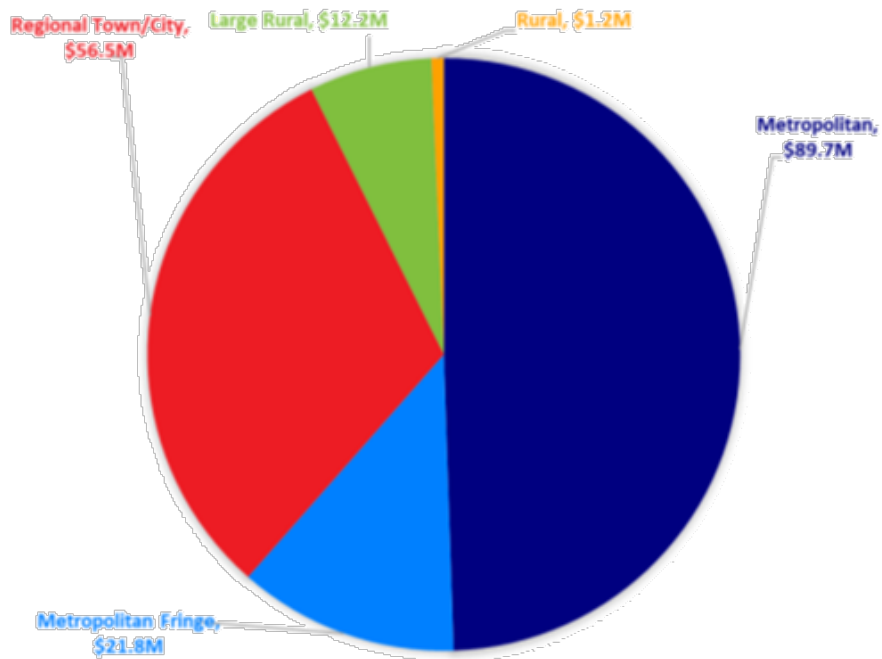
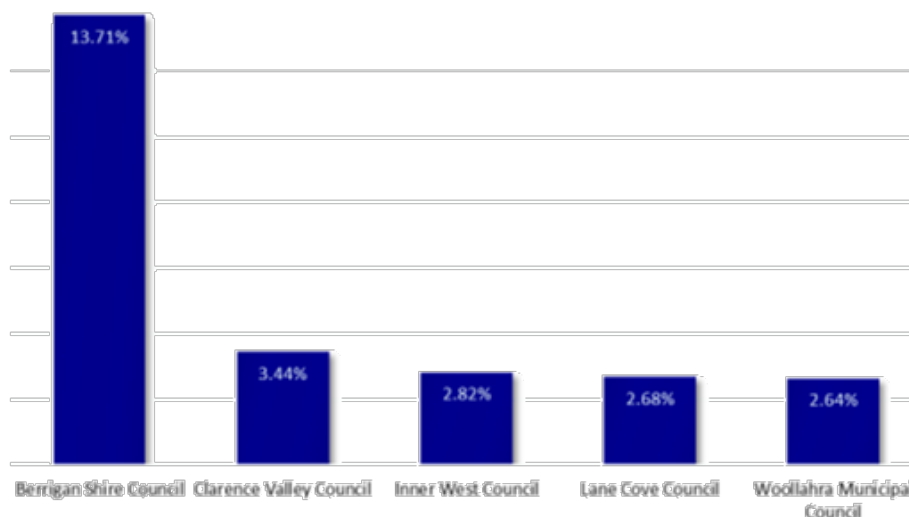




Figure 27 Respondent councils with the largest funding program costs shifted as a proportion of total operating expenditure



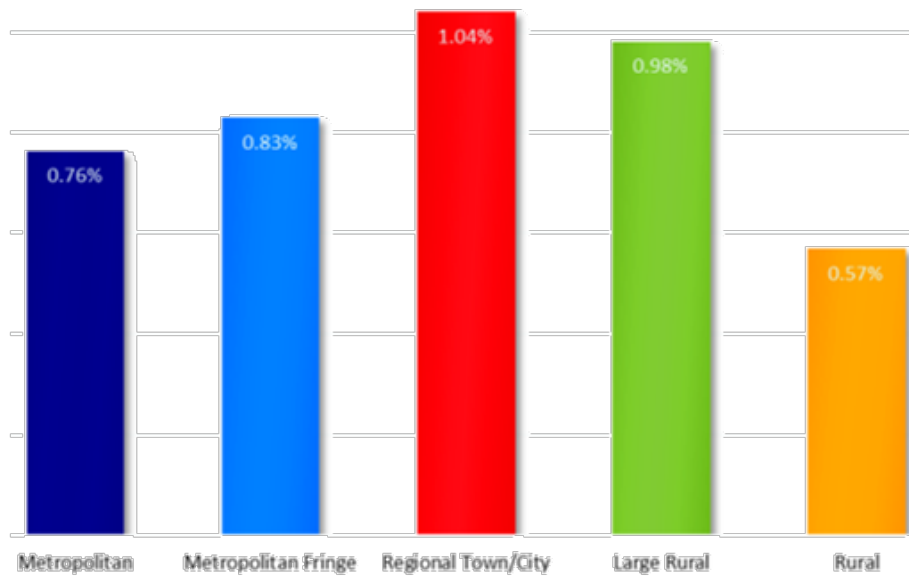
3.6 Pensioner rebates

Councils are required to provide rates rebates to pensioners, which are partially subsidised by the NSW Government. This mandatory pensioner rebate is an estimated net cost to councils of \$55.2 million. This does not include the cost of administering the mandatory pensioner rebates, as each pensioner claim needs to be registered and their details checked by the council.

The level of mandatory rebate has not risen substantially over many years, and therefore has not kept pace with inflation. As a result, many councils have elected to apply further voluntary rebates to ease the financial burden on pensioners. NSW councils incur an additional \$17.2 million in voluntary pensioner rebates. The total cost of pensioner rebates is estimated to be \$72.4 million.



Figure 28 Average total pensioner rebates as a proportion of total rates revenue by council classification





3.7 Service gaps

This section captures costs incurred by councils in providing services as a result of insufficient service provision by another level of government or a market failure of a subsidised or privatised public service. In 2021–22, it is estimated that councils spent \$66.6 million on filling these gaps.

Figure 29 Service gap costs by council classification

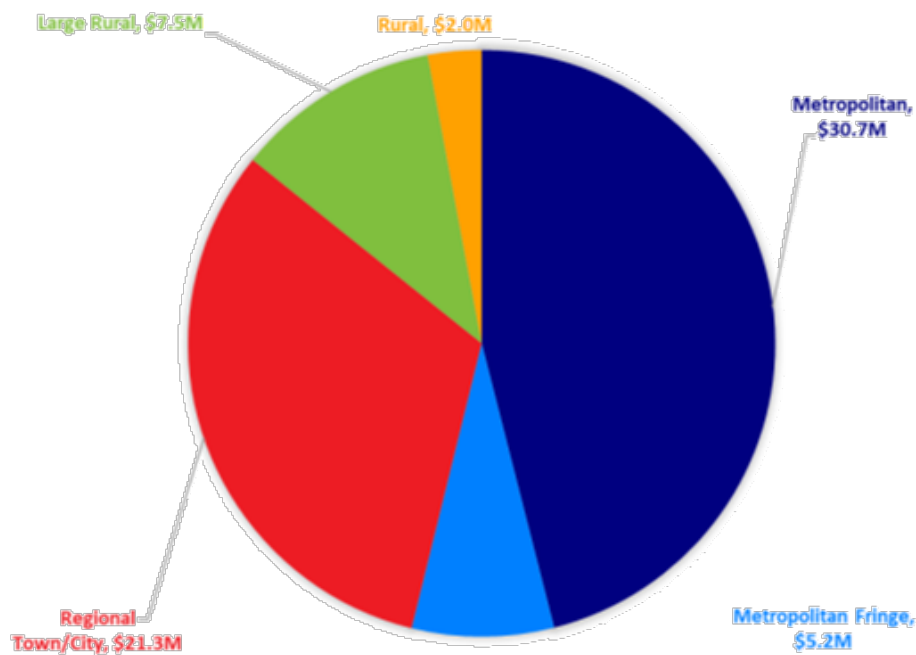
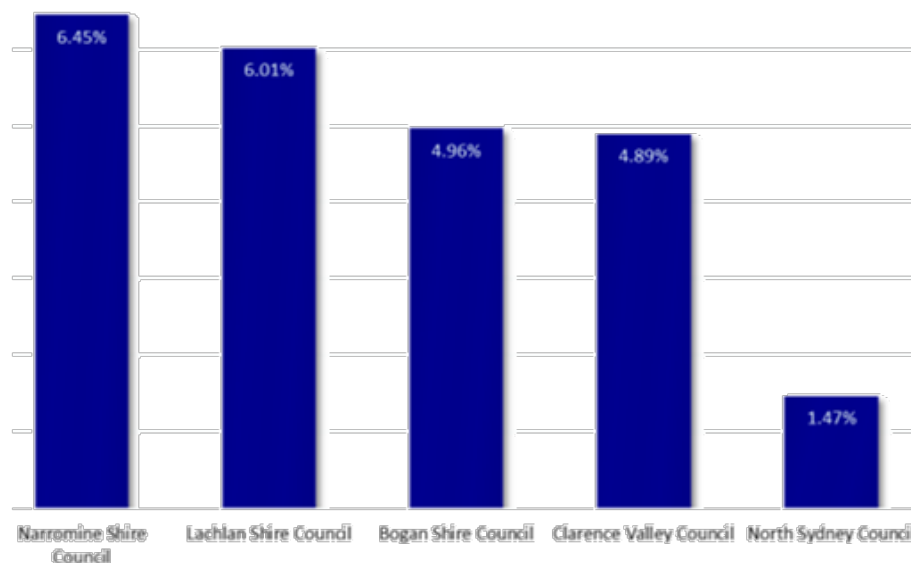


Figure 30 Respondent councils with the highest service gap cost as a proportion of total operating expenditure





The estimated costs are set out in Table 3, below.

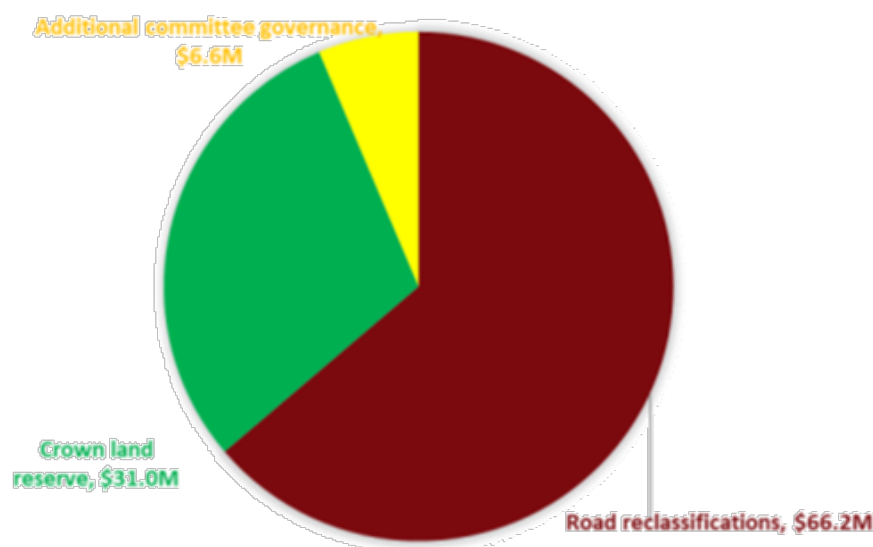
Table 3 Cost for services provided by Council as a result of a State or Federal service gap or market failure

Regulatory function	Number of councils who responded to this question in the survey with a figure	Total amount of cost shift provided	Estimated total cost shift for all NSW Councils (based on population)
Immigration and citizenship ceremonies	60 (from which ten councils put a figure of 0)	\$1.1M	\$1.6M
Crime prevention and policing	51 (from which 11 councils put a figure of 0)	\$10.2M	\$16.2M
Medical services	33 (from which 15 councils put a figure of 0)	\$2.2M	\$3.2M
Aged care services	36 (from which 19 councils put a figure of 0)	\$3.9M	\$5.6M
Disability care services	28 (from which 17 councils put a figure of 0)	\$1.4M	\$2.2M
Childcare services	49 (from which 19 councils put a figure of 0 and two councils a negative figure)	\$12.0M	\$17.8M
Transport services	37 (from which 20 councils put a figure of 0)	\$14.1M	\$20.5M

3.8 Other cost shifts

A number of other areas for cost shifting were identified and gathered in the survey and are outlined here.

Figure 31 Other cost shifts by category





Under the Transport for NSW (formerly RMS) road reclassification program in the 1990s, many roads were reclassified as local or regional road for councils to own and maintain. Of the 68 councils that responded to the survey, 32 were able to estimate the cost of this reclassification, 12 were not able to reliably estimate, and 24 stated that it was not applicable. The total estimate of costs provided by councils was \$26.7 million in 2021–22.

Under the Crown Lands Act 1989, councils have full responsibility to maintain crown reserves under council management and are expected to subsidise shortfalls in maintenance cost from general revenue. This is considered appropriate as the benefits from crown reserves under council management generally accrue to the local community. However, as a result, councils should also be entitled to any current or potential revenue from crown reserves that is required to cover maintenance and improvement cost (e.g., revenue from refreshment facilities, telecommunication facilities). The NSW Government will on occasion take over allowable revenue raising activities on council managed crown reserve land (not including national parks) or will require councils to transfer revenue from council managed crown reserve land to the State Government.

Of the 68 councils surveyed, 22 estimated the lost revenue at \$14.8 million in 2021–22. A further 27 councils were not able to reliably estimate the costs and 19 councils advised that this item didn't apply to them. This estimate does not represent the total net cost of managing (maintaining) crown lands. Nor does it include in transfers associated with the caravan park levy. Only any action by the State Government to limit revenue raising capacity or require the transfer revenue to the State Government has been considered cost shifting.

3.9 Future survey considerations

We asked councils what other areas that should be considered for future surveys. The key areas that respondents identified as costs to be captured in future surveys included:

- Monopoly services costs:
 - NSW Audit Office being the monopoly on local government external audits.
 - NSW Electoral Commission holding a near monopoly on council election administration.
- Cost of Joint Regional Planning Panels (JRPPs) requirement to access councils DAs as per mandated policy.
- Costs of mandatory On-Line Planning Portal – Implementation and ongoing operational costs.
- The Sydney Regional Development Fund Levy.
- Costs associated with Forestry NSW and impact of logging on council owned infrastructure. Rates foregone on State Forest land.
- Capturing the additional cost of Emergency Services administration staff.
- Heritage advisor costs, whilst there is some grant funding towards this it still needs to be administered by council who hand out the grant funds and do general administration.
- Cost involved in Special Variations applications given that councils have to undertake this process to recover costs shifted. This is a lengthy and resource intensive process, which is particularly challenging for smaller councils.
- Net cost of Street Lighting (Less subsidy from Transport for NSW).



- Cost of ongoing maintenance associated with the Community Water Bore program from early 2000s (the program was in conjunction with NSW Office of Water).
- Cost of management of overabundant native species doing damage to infrastructure. This is a NSW government function which is not being undertaken by the State and therefore some councils are doing it.
- Crown Land right to native title compensation (falling to Councils instead of the State).
- Any costs imposed by Service NSW (e.g., disability parking).
- Costs of sharing of facilities especially with Department of Education (schools, parks, playgrounds etc).
- Costs of maintaining State facilities that are located on Crown land.
- Provision of stormwater trunk drainage.

These additional items will need to be validated in terms of the details of what is entailed and whether they are indeed cost shifts before inclusion in any future survey.

We also recommend that some items in the current survey be considered for exclusion in future survey on the basis that they are onerous for councils to quantify and do not materially contribute to the total estimated cost shift for councils, nor are they expected to increase over time. The following items should be reviewed for exclusion:

- Road safety program (Q7) – (0.5% of total cost shift estimate).
- Onsite sewer facilities (Q10) – (0.4% of total cost shift estimate).
- Immigration and citizenship services (Q16) – (0.1% of total cost shift estimate).
- Waste management license fee (Q29) – (0.03% of total cost shift estimate).



4 About the survey

This section outlines the methodology employed to develop and administer the 2021–22 cost shifting survey.

4.1 Development of the survey

The last cost shifting survey of NSW councils was undertaken with 2015–16 financial data. We have used this last survey as the starting point for the 2021–22 Cost Shifting Survey questions. We undertook a review of the previous questionnaire guided by the following guiding principles:

- Ensure that questions are still relevant.
- Where possible maintain questions so that there can be direct year on year comparisons if required.
- Ensure that interpretation of questions is understood and consistent across all councils.
- Identify new areas of cost shifting where required.

An initial review of questions was undertaken by the project team, consisting of Morrison Low and LG NSW staff. We also established a working group that included representatives of senior leaders and financial staff of a cross section of rural, regional, and metropolitan councils. The working group undertook a review of the questions and provided their feedback through a facilitated workshop and feedback gathering tool. We also asked two leading local government academics to provide their feedback through email and one on one meetings on the questionnaire and our approach to understanding cost shifting in local government.

4.2 Conducting the survey

The final survey was provided in a Microsoft Excel format to councils on 17 April 2023 along with a request of councils' 2021–22 Financial Data Return (FDR), which contained council's audited financial Statement information. The FDR was used to gather a small amount of cost shifting information, but predominantly for data validation purposes.

4.3 Responses to the survey

Councils were asked to return their survey responses and FDRs by 8 May 2023. Some councils requested extensions to this date, which were granted up to 19 May 2023. A total of 75 out of 128 councils provided completed surveys (a 58.6% response rate), although not all answers were completed by all responding councils. Only 72 councils provided their FDRs, as three councils were still finalising their 2021–22 financial Statements at the time of survey completion date.

4.4 Data validation and analysis

Data validation included review of outliers both in total terms as well as a proportion of the council's proportion of total operating expenditure. Where possible, we also compared survey responses with councils FDR data returns to understand if there may have been discrepancies or misinterpretations of questions. This



required us to seek further information and validation with some councils on their responses to some questions.

We also utilised State Government financial reports for the Emergency Services agencies to validate to estimate of the ESL against the contributions that these agencies reported in their financial Statements.

For most questions, we have used population as the basis for estimating the total cost shift to all NSW councils for the survey data received. For some we were able to directly estimate through published reports. For example, we used the State Library's 2021–22 report on local council libraries with included operating costs and subsidies received. For other questions, such as the waste levy, where it is not relevant to all councils and there are different levels of the levy between metropolitan and regional councils, we used populations within the relevant and group councils as a basis for estimating the total cost of the waste levy.



1: DELIVERY PROGRAM 2022-2026

1: OUR COMMUNITY

1.1: To live in an inclusive, healthy and tolerant community with a positive attitude toward others

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
1.1.1	Acknowledge and celebrate our local Wiradjuri culture	Progress the implementation of the Cultural Plan to value our Wiradjuri Culture.	A community that is more aware of its Wiradjuri heritage.	Council continues to hold regular meetings of the Aboriginal Elders Liaison Group. These meetings have included the following agenda items; names for inclusion on the Wiradjuri Wall, introduction of the new Police Liaison Officer, NAIDOC Week celebrations, maintenance issues at Koori's Beach also funding from the Murrumbidgee Local Health District to construct a grieving circle at the Narrandera Hospital. Council also submitted a request to the NSW Geographical Names Board to have the name of Town Beach formally changed to Koori's Beach - this proposal was endorsed by the GNB and is currently on exhibition for community consultation.	Community Support Manager	Ongoing commitment	100%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
1.1.2	Support opportunities for community participation in diverse arts and cultural activities	Our Cultural Plan supports opportunities for the community in arts and our community through cultural events, programs and initiatives.	Number of events supported with details on participation and attendance.	The Cultural Plan details goals, actions and outcomes facilitated by Council. The Arts and Cultural Advisory Committee, Parkside Museum S355 Committee, the Bettering Barellan Advisory Committee, the Grong Grong Community Advisory Committee also other community groups, artists, artisans and community members are all active in this space. These groups support the aims and outcomes listed within the Plan. To increase usage of the Arts Centre, the Arts and Cultural Committee proposed a subsidy to reduce hire fees for not for profit Community Groups - Council has approved this and will apply when Visitor Information Services moves to the Destination and Discovery Hub. A policy for eligibility to receive the subsidy is being developed. The Arts Centre recently hosted the 'Shadow Places' exhibition organised by the CAD Factory. The exhibition was in place for September and October and complimented Council hosting a meeting of the Riverina and Murray Joint Organisation of Councils (RAMJO).	Community Development (including Library) Manager	Ongoing commitment	40%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
1.1.3	Work with event organisers to promote and improve participation in local events and festivals	Community events that are highly publicised and promoted with high levels of community participation and positive feedback.	Event statistics and participant feedback.	Contact with and publicity to assist local community groups initiate and promote community events is ongoing. In the past 6 months a number of community events have been successfully held; some have been assisted at a Council level with the support of the Events and Visitor Services Team Leader (EVSTL) and others on a more informal basis.	Events and Visitor Services Team Leader	Ongoing commitment	100%

1.2: Work together to advocate for quality health, education, youth and social services

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
1.2.1	Continue to work with the Aboriginal community fostering mutual respect and understanding through consultation seeking valuable feedback on important projects and initiatives	Build on the existing relationship and strengthen connections.	Summary of meetings held and the outcomes of consultation on projects and initiatives.	Council continues to hold regular meetings of the Aboriginal Elders Liaison Group. These meetings have included the following agenda items; names for inclusion of the Wiradjuri Wall, introduction of the new Police Liaison Officer, NAIDOC Week celebrations, maintenance of Koori's Beach, funding from the Murrumbidgee Local Health District to construct a grieving circle at the Narrandera Hospital. Council also submitted a request to the NSW Geographical Names Board to have the name of Town Beach formally changed to Koori's Beach. This proposal was endorsed by the GNB and is currently on exhibition as part of the GNB community consultation.	Community Support Manager	Ongoing commitment	100%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
1.2.2	Work with the Youth Council to implement the Youth Strategy	A Youth Council that is considered as part of Council.	Update of actions relating to the Youth Strategy also engagement and member recruitment opportunities.	The Narrandera Youth Advisory Council held four Youth Council meetings during the reporting period. The following agenda items were discussed; Election of Youth Mayor and Youth Deputy Mayor, new Youth Advisory Council nominations, resignation of two members, Spring Holiday Break funding, Summer/Autumn Holiday Break funding, request for support at Koala Festival and Australia Day, Blue Tree Project, events for attendance by the food trailer, Youth Council Social Media pages. The food trailer attended two events during the reporting period, the Slime Run and the Christmas Markets. Council held two successful School Holiday programs including Paint with Mates, Sewing Workshops, 3x3 Basketball, Games and Virtual Reality also an excursion to Family Funland, Mario Kart Tournament, Roller Disco and the Slime Run.	Community Support Manager	Ongoing commitment	100%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
1.2.3	Integrate the Youth Council into official Council and community events	A Youth Council that is engaged with leadership activities.	Outcomes achieved within the Youth Strategy, particularly the section of 'Voice' where the objective is to involve youth in the decisions that affect them.	The Youth Advisory Council meeting minutes are presented to Council each month at the ordinary Council Meeting, the recommendation contains important items that were discussed at each meeting. The Youth Advisory Council also the Community Support Manager & the Youth Liaison Officer presented the findings of the recent Youth Survey to the Council which provided an opportunity for members to engage with Councillors. The Youth Mayor and Youth Deputy Mayor were invited to the October 2023 Council Briefing Session where they were able to discuss with the Councillors matters of focus for the Youth Advisory Council.	Community Support Manager	Ongoing commitment	100%
1.2.4	Continued advocacy for the delivery of integrated health services and well-being programs.	Continued improvements in the delivery of integrated health services and wellbeing programs.	Improvements resulting from continued advocacy also outcomes from participation in the Narrandera Health Advisory Group.	During the reporting period, meetings have been held with the Parliamentary Secretary for Health with follow up letters and emails issued regarding staffing levels and accommodation for medical personnel in Narrandera.	General Manager	Progressing	50%

1.3: To feel connected also safe

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
1.3.1	Maintain and enhance the connection between Council and the community using available communication channels	A community and Council that is engaged.	Statistical information from the monthly media report submitted to the Executive Leadership Team.	Council is very proactive in engaging with the community utilising various communication channels including social media, website, radio, newspaper, digital newsletters, physical newsletters and television.	Communications Officer	Completed	100%
1.3.2	Continued advocacy for the strengthening of critical emergency services personnel and 'fit for purpose' infrastructure through the Narrandera Community Safety Precinct Committee	Critical emergency services and personnel are readily and consistently available to meet the current and emerging needs of the community.	Details of advocacy opportunities and outcomes relating to personnel numbers and infrastructure improvements.	Quarterly meetings have been held with regional Police to discuss crime activity within the Shire. A letter to the Minister for Police advocating for an upgrade to the Narrandera Police station has been sent and was followed up by phone conversation with the relevant Inspector.	General Manager	Progressing	50%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
1.3.3	Ensure that the CCTV network is functional and there is a program for enhancement	An enhanced CCTV network that captures anti-social behaviour.	A CCTV network that provides NSW Police with information to address anti-social behaviour leading to a reduction in requests to view footage.	Council staff have completed work with contractors to organise CCTV inside and outside the new Narrandera Destination and Discovery Hub. All cameras at the Destination and Discovery Hub, the Tiger Moth building, the Twynam Street amenities and the historic grandstand have now been consolidated into one centrally managed system. Staff are working to complete the financial funding grant to replace and enhance the existing public CCTV systems.	Information Technology Manager	Ongoing commitment	50%
1.3.4	Provide transport opportunities to support independent living at home	A community transport service that supports independent living at home.	The number of trips provided to clients by funding demographic, kilometres travelled cumulative per financial year and comparative to the previous year.	The Narrandera/Leeton Community Transport delivered 656 hours of social support during the reporting period, 172 hours of garden maintenance, 7 hours of flexible respite, 1,697 trips and 4 home modifications to persons aged 65 years and over or 50 years and over for those who identify as Aboriginal or Torres Strait Islander. A total of 2,883 trips were delivered to transport disadvantaged clients, 84 trips to NDIS clients, 40 trips to DVA clients, 1,030 trips at full cost recovery and 496 trips for non-emergency health related transport.	Community Support Manager	Ongoing commitment	100%

2: OUR ENVIRONMENT

2.1: To value, care for and protect our natural environment

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
2.1.1	Establish strong partnerships to protect, expand and promote Narrandera's unique koala population with a vision to establish a research centre in Narrandera	Our koala population is protected by the scientific and broader community, and a koala research centre is established in Narrandera.	Progress in establishing a research centre in Narrandera, but also the actions taken to protect our koala population and data on the population when available.	<p>Council continues collaboration with the Narrandera Koala Regeneration Committee to support its ongoing work to protect and grow the region's koala population. This partnership recently facilitated a significant meeting with the Australian Koala Foundation (AKF) to discuss the Key Individuals for Species Success (KISS) program and other potential conservation initiatives for this region's koala population. The KISS program is a targeted community-based approach to koala conservation that has achieved success in other regions.</p> <p>The annual Koala Count was conducted in October 2023, along with the Narrandera Koala Festival. Council's Narrandera Koala Festival is an opportunity to celebrate the region's healthy koala population and raise awareness about the importance of koala conservation. The Festival serves as a platform to engage the local community and visitors in understanding koala behaviour, habitat requirements and the impact of human activities on their populations.</p>	Economic Development Manager	Progressing	50%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
2.1.2	Key environmentally sensitive areas under the control of Council are managed with awareness and sensitivity	Environmentally sensitive areas controlled by Council area managed appropriately.	Details of actions taken to prevent environmental damage; where there is a breach, remedial actions taken and measures to prevent reoccurrence.	The Narrandera Flora and Fauna Reserve, the Narrandera Wetlands, the Lake Talbot and Rocky Water Holes precincts are all managed in accordance with the Crown Land Management Act, 2016. A targeted weed control and inspection program is in place for priority weeds.	Open Space Recreation Manager	Progressing	50%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
2.1.3	Preservation and enhancement of our significant tree assets to maintain our signature streetscapes	The preservation and enhancement of trees within our townscapes is practiced and encouraged by Council.	Continuation of the tree audit to identify risks and potential early issues with specific tree species also details of ongoing maintenance to our tree assets and comparative statistical data on trees removed, plantings and any projects where trees will be a significant feature.	The tree replacement program is continuing. Major tree maintenance packages were temporarily postponed to ensure budget compliance - this was mostly due to storm events and the need to divert resources both personnel and financial. Urgent and high priority works have been completed. It is expected that additional tree maintenance packages will be action in March to June 2024. All trees managed by Council have been assessed through a tree audit and where necessary tree faults or other works have been updated into the tree plotter within Council's tree management system.	Open Space Recreation Manager	Progressing	35%

2.2: Enhance our public spaces to enrich our community

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
2.2.1	Continually assess playgrounds to determine if fit for purpose, ensure compliance with the relevant standards and they meet community needs relevant to the level of use of the area	All playgrounds are considered fit for purpose to applicable service standards and by the community.	Compliance with relevant playground standards and Council's insurer StateWide Mutual best practice manual titled 'Playgrounds'. Details of grant funding applications to maximise opportunities also details of planned improvement works.	Community playgrounds are inspected weekly or monthly depending on their location and the level of use of the playground. The inspection process and findings are documented and saved into Council's risk management system "Vault". Any remedial actions are assigned as tasks to staff with the task only completed once repairs or replacements have taken place. A new playground has been installed at the Narrandera Water Tower area and a preoperational inspection was completed prior to opening. Two staff have recently completed essential training provided by the Australian Government (www.training.gov.au) - Conduct operational inspection of park facilities which includes the identification of hazards, existing and potential risks, non-conformities with Australian Standards and WHS requirements.	Open Space Recreation Manager	Progressing	50%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
2.2.2	Implement a renewal and maintenance schedule to support a diverse range of building facilities for the community	Facilities are maintained so that they are fit for purpose and continue to support both organisational and community activities and that there is a strategic plan in place for their replacement or renewal.	Details of actual and proposed renewal and maintenance activities achieved in the financial year in accordance with the schedule and allocated budgets.	Council buildings renewal and maintenance program for the 2023-2024 financial year is underway. Scheduled air-conditioning servicing, test and tag services, spider spraying and gutter cleaning have been completed or have been scheduled. Renewal activities include air conditioner replacement, identified fixture and fittings replacements, roof and gutter works, plumbing renewals, installation of security mesh and internal /external painting. Renewal and upgrade activities are being undertaken at the Brewery Flat amenities, the Narrandera Playgroup building at the rear of the Emergency Services Building, the Senior Citizens building, the Air League building also the Lake Talbot Rotary BBQ shelter and the Barellan Museum building as part of the Local Roads and Community Infrastructure grant funding.	Projects and Assets Manager	Progressing	50%

2.3: Maximise greater re-use of resources to increase sustainability within our community

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
2.3.1	Implementation of the Narrandera Shire Waste Management Plan and identify realistic opportunities for re-use of waste streams	Options to minimise waste streams to landfill to promote reuse and recycling are identified and progressed.	Statistical information for waste diverted from landfill obtained from the current EPA reporting regime.	The new waste transfer area has designed with construction of the transfer station nearly completed. Site preparation of the new area has been undertaken with internal roadway to commence in March. Community education program for waste separation to be undertaken over the next 6 months.	Deputy GM Infrastructure	Progressing	50%
2.3.2	Source funding and implement short to medium term actions from the Narrandera Shire Council Climate Action Strategy	Council progresses the 24 short term to medium actions identified under its November 2020 Climate Action Strategy as funding opportunities arise.	Progress on the 24 short term to medium term actions.	In line with Council's Climate Action Strategy (Efficiency, Renewable Energy & Emissions Reduction short to medium Action Plan) Council has engaged Enerigus to design and construct 'behind the meter' photovoltaic (PV) solar systems at a number of key sites allowing for either carport, ground and/or roof mounted systems. It is predicted that this will provide for a total of 230KW of energy generation and the capacity to store energy at two sites with the installation of 35kWh of battery storage. This project is scheduled to be completed by mid-February 2024.	Projects and Assets Manager	Progressing	40%

3: OUR ECONOMY

3.1: Create strong conditions for investment and job creation through quality infrastructure and proactive business support

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
3.1.1	Identify and develop targeted campaigns to attract industry/business also building on our distinctive strengths in agriculture and its related supply chains	New industries/businesses that situate their operation in the Shire as a result of targeted campaigns.	Outcomes of targeted campaigns that align with the Economic Development Strategy.	<p>Council continued its work with an economics consultancy to prepare the Narrandera Shire Economic Development Strategy 2024-2028. Consultation was undertaken with key stakeholder groups with the objective of preparing a Strategy that focuses on achieving positive economic outcomes and long-term growth to support the businesses and residents of Narrandera Shire. This Strategy will guide Council's efforts to achieve the next stage of the development of Narrandera Shire in being a destination of choice for living, working, visiting and investing. Key outcomes will include initiatives to attract industry and business investment, mechanisms to support employment growth and ongoing advocacy to attract external funding for Council development projects. Council also continued efforts to seek grant funding to expand the Red Hill Industrial Estate. This underpins Council's commitment to enhancing the region's infrastructure to facilitate the growth of established and emerging businesses.</p>	Economic Development Manager	Progressing	50%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
3.1.2	Promote collaborative marketing initiatives through regular meetings between businesses and Council on both a formal and informal basis	The business group and Council view their working relationship as constructive and progressive.	Details of meetings held, such as attendance also the outcomes achieved or proposed to be achieved.	<p>During the reporting period, Council's support for community events contributed significantly to the success of the Narrandera Business Group's Spring Fair. This event created a vibrant and engaging environment for local businesses to showcase their offerings and connect with the community. Additionally, the Small Business Month event hosted by Council at the TAFE Connected Learning Centre was a valuable opportunity for small business owners to gain insights into establishing and enhancing their online presence. Presentations were delivered by industry experts on how small businesses can best utilise their online presence to optimise sales and business outcomes. Council maintained its collaborative work with adjoining Councils on the continuation of the highly successful Murrumbidgee Trails initiative and on a range of tourism development matters through the Visit Riverina group.</p>	Economic Development Manager	Progressing	50%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
3.1.3	Promotion of Narrandera Shire using our heritage buildings, culture, location, waterways, ecotourism also business and sporting facilities	Promotion of the natural, cultural and built environments of our Shire results in increased tourism, business and sporting activity.	Details of promotional campaigns also the measuring of value-adding effects such as maximising visitor stays.	The unique natural environment and the built environment of our Shire is promoted in almost all of Council's destination marketing material, ranging from printed brochures, website content, hard copy advertising campaigns, street banners, billboards, and social media posts (32). Narrandera Shire's assets are also promoted through joint ventures including Murrumbidgee Trails and Visit Riverina to increase overnight stays, increase local destination visitation, and offer day trips to bordering local government areas.	Communications Officer	Progressing	80%

<p>3.1.4</p>	<p>Advocate and support the expansion of the Narrandera-Leeton Airport and increased business opportunities</p>	<p>The Narrandera-Leeton operations are strengthened by infrastructure upgrades including the parallel taxiway.</p>	<p>Outcomes measured by usage of the airport also advocacy for the enhancement of the Narrandera-Leeton Airport.</p>	<p>Council has actively supported plans of the Australian Airline Pilot Academy (AAPA) to construct a satellite campus at the Narrandera - Leeton Airport, linked to its Wagga Wagga campus, to help increase AAPA's capacity to train commercial airline pilots. It was expected that this initiative would significantly benefit Narrandera Shire and its residents through increased demand for services and goods to be supplied to the new campus. In late 2023, Council was advised that AAPA no longer had plans in the short term to develop academy facilities at the airport. Council also resolved to not proceed with the construction of a parallel taxiway due to the higher than expected construction costs. Council will continue to investigate other opportunities to grow the airport precinct - with the objective of generating employment and improved infrastructure to support broader regional economic development outcomes that are consistent with the activities of a regional airport facility.</p>	<p>Economic Development Manager</p>	<p>Progressing</p>	<p>50%</p>
--------------	---	---	--	--	-------------------------------------	--------------------	------------

3.2: Encourage new housing supply to meet the needs of the community

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
3.2.1	Actively seek and where possible, assist prospective developers to facilitate a mixed housing development that includes an independent living complex and affordable housing in Narrandera	A mixed housing development that includes independent living and affordable opportunities is built in Narrandera.	Advocacy actions to promote such a development within Narrandera.	Council maintains open channels of communication with prospective developers and local real estate agents to help facilitate potential housing developments in Narrandera, including an independent living complex and affordable housing. Council has also identified Council-owned land suitable for such a development. Council actively supports this initiative as the benefits include: individuals of all ages and income levels having access to suitable affordable housing options; support for our elderly residents who prefer independent living with appropriate facilities; improved social cohesion; and enhanced diversity of our local community.	Economic Development Manager	Progressing	50%
3.2.2	Strategic land use planning for future housing, recreational, commercial and industrial needs	A housing and industrial land strategy is developed and implemented.	Land is identified within the new Local Environment Plan for future housing, recreational, commercial and industrial needs.	The planning proposals for the 'Red Hill' expansion as identified in the Employment Zone Land being undertaken.	Deputy GM Infrastructure	Progressing	50%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
3.2.3	Continue to lobby NSW Government to resolve Aboriginal Land Claims on lands suitable for potential development	Aboriginal Land Claims relevant to the Shire's desired housing and industrial development strategies are heard and resolved.	Progress of any land claims proposed for settlement.	Verbal submissions have been made to Minister urging action on outstanding Aboriginal Land Claims.	General Manager	Progressing	50%

4: OUR INFRASTRUCTURE

4.1: To have an improved and appropriately maintained road network

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
4.1.1	Submit funding applications to maximise opportunities to upgrade the local and regional road network	Commonwealth and State funding is sourced to upgrade the local and regional road network.	Details of financial applications submitted for road related funding also the details of successful applications.	Council has applied for and is awaiting notification of the following financial grant applications: \$129,766.76 AGRN 1030 Emergency Works (EW) \$204,364.34 AGRN 1034 Emergency Works (EW) \$272,573.56 AGRN 1034 Immediate Reconstruction Works (IRW) \$506,802 AGRN 1034 Essential Public Assets Reconstruction Works (EPA-RW) Council has applied for and was successful in receiving: \$3,976,990 Regional Emergency Road Repair Fund (RERRF).	Works Manager	Progressing	60%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
4.1.2	Plan and undertake road maintenance and upgrades based on available funding	Local roads are maintained within budget with reference to the strategic 3 year works plan for upgrades and maintenance.	Details of works undertaken also statistical data such as kilometres and costing.	At end of December 2023, Council completed 25.7 Kilometres of scheduled Gravel Resheet works (approx. 73% of the years regular scheduled works), 237 Kilometres of maintenance grading (approx. 57% of the years regular scheduled works). Included in these figures, Council has undertaken Essential Public Asset Reconstruction Works (EPA-RW) Gravel Resheet works of 1.8 Kilometres of road network as part of Natural Disaster AGRN1001 (January 2022).	Works Manager	Progressing	60%
4.1.3	Strategic lobbying for the replacement or upgrade of the bridge across the main irrigation canal on Irrigation Way	The bridge across the main canal along Irrigation Way is upgraded or replaced.	Lobbying outcomes until a successful outcome is achieved.	Council has ongoing communication with Transport for NSW and the Local Member, but there is no commitment to improve the bridge at this stage. Confirmation has been received that there are no funds allocated or planned at this stage for any of the required works.	Deputy GM Infrastructure	Ongoing commitment	20%

4.2: Actively investigate opportunities to enhance our potable water quality

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
4.2.1	Implement the adopted Integrated Water Cycle Management Plan (IWCM)	Implementation of the IWCM.	Actions taken to implement the IWCM.	Amendments to the Integrated Water Cycle Management Strategy IWCM are progressing. The scoping study of a new Water Treatment Plant is expected to be completed during February 2024. Taste testing study was completed in December 2023, this involved pouring a different type of water into a cup with the participant rating the taste of each sample.	Water Sewer Manager	Progressing	50%
4.2.2	Continue to address water quality issues within the potable water supply network	Continued improvements to the Narrandera potable water supply as outlined in 2020 Clean Water Strategy.	Implementation of the action plan and statistical analysis of water quality monitoring reports.	Water mains cleaning, household water filtration installation program and water mains replacement programs are progressing.	Water Sewer Manager	Progressing	50%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
4.2.3	Ensure that wastewater returned to the environment is in line with guidelines from relevant authorities	Wastewater is appropriately treated and returned to the environment.	Reporting on the wastewater testing regime and any variations outside of parameters of acceptable load limits of pollutant discharge.	The most recent annual NSW Environment Protection Authority return for 2022-2023 was submitted and approved in April 2023 - the current year 2023-2024 wastewater discharges are of acceptable quality.	Water Sewer Manager	Progressing	50%
4.2.4	Keep the community informed of water supply matters and proposed infrastructure upgrades, encourage water customers to register and use the new water billing portal	An informed community about improvements to the Narrandera potable water supply.	The number of media items issued to the community relating to the potable water supply.	The timeline has progressed with the scoping study moving to the next phase, where water taste testing events were held on Friday 15 December 2023. As part of this process content was created and distributed using social media, the website of Council, the Narrandera Argus - at the event there were many face to face discussions held with consumers and key staff.	Communications Officer	Completed	100%

4.3: To improve, maintain and value-add to our essential public and recreational infrastructure

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
4.3.1	Undertake stages 1 & 1A of the Narrandera Business Centre Upgrade, including the implementation of improved stormwater drainage and seek funding for the additional stages of the project	Stages 1 and 1A of the Narrandera Business Centre upgrade and improved stormwater drainage are implemented.	Milestones achieved as the project progresses.	Report presented to the June 2023 Council meeting resulted in the deferring this this project, due to strong community objection. The detailed design of the drainage scheme is complete, with grant funding to be secured for these works.	Deputy GM Infrastructure	Progressing	80%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
4.3.2	Through stakeholder consultation, in any project consider the diverse mobility needs of our community, consistent with the Disability Inclusion Action Plan	That the Disability Inclusion Action Plan is considered in any project.	Consideration of the Disability Inclusion Action Plan in any project and what elements of the Plan have been included in the project.	Council staff are and will continue to undertake stakeholder consultation to determine the mobility needs of our community in accordance with the Disability Inclusion Action Plan.	Projects and Assets Manager	Progressing	30%
4.3.3	Through community consultation develop a new masterplan for Marie Bashir Park	A masterplan for Marie Bashir Park is developed.	Details of actions taken to deliver a new masterplan, including a timeline and budget predictions.	A consultant has been engaged to develop a masterplan for Marie Bashir Park - at the time of writing this report the adventure playground master plan has been completed and will be displayed to the community using the website of Council and social media.	Open Space Recreation Manager	Progressing	50%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
4.3.4	Through consultation with all user groups of Narrandera Shire sporting facilities, prioritise improvements for venues and seek funding to implement the improvements	Sporting facilities are improved through works agreed with key stakeholders, users and the community.	Feedback from advisory groups and user groups also details of grant submissions.	Council staff are continuing to work with user groups to improve our sporting facilities. Three new netball courts have been constructed in Barellan along with spectator shelter areas constructed at both the Barellan and the Narrandera Sportsground. An off-leash dog area has been built at the western boundary of Henry Mathieson Oval which is a fully fenced and gated area of land for the recreation needs of dogs - it is planned to install dog friendly play infrastructure.	Open Space Recreation Manager	Progressing	80%
4.3.5	Establish an off-leash companion animal area adjacent to Henry Mathieson Oval	A purpose built off-leash companion animal park at Henry Mathieson Oval is available to the community.	Development of a new off-leash for companion animals.	Construction of the off-leash area adjacent to the Henry Mathieson Oval has commenced with works soon to be completed, with shelters, water and other features to be installed.	Deputy GM Infrastructure	Progressing	85%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
4.3.6	Source funding to improve vehicle parking at the Lake Talbot Water Park	Parking at the Lake Talbot Water park is maximised for all users.	Investigation and presentation to Council on available parking options and how the project is intended to be funded.	A detailed line marking layout has been completed with comments from the Lessee of the Lake Talbot Swimming Pool considered. Council staff are currently searching for suitable financial grant funding opportunities for this project.	Projects and Assets Manager	Progressing	15%

5: OUR CIVIC LEADERSHIP

5.1: Have a Council that provides leadership through actions and effective communication

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
5.1.1	Manage the functions of ARIC also the schedule of Internal Audits and Service Reviews.	Internal audits completed in accordance with the adopted program also service reviews carried out on identified areas of operation.	ARIC at its July 2022 meeting affirmed its commitment to 4 Internal Audits per financial year.	The Audit, Risk and Improvement Committee (ARIC) continues to progress to conformance with the guidelines for the management of ARIC released by the Office of Local Government mid December 2022. The ARIC have adopted the Terms of Reference and Internal Audit Charter and have appointed Mr. Stuart Todd as the 3rd independent member. Since the last update, the National Audits Group, was appointed to continue as Council's Internal Auditor for a further 3 years. At the present time 2 internal audits are under way being Personnel Succession Planning/Attraction also Corporate Governance Framework, a further 2 internal audits are planned to be finalised before 30 June 2024 being Community Transport and Treasury Functions - Investments.	Governance & Engagement Manager	Progressing	40%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
5.1.2	Support ethical, transparent and accountable corporate governance	A Council that supports ethical, transparent and corporate governance such as reporting on the Delivery Program every 6 months which is presented to Council and published to the community.	Presentation of information to Council and the community such as 6 monthly reporting of the actions contained within the Delivery Program being 31 December and 30 June.	Good governance promotes public confidence and is paramount to service delivery and the economic and efficient use of public money. Governance is the high-level processes and behaviours that ensure an organisation performs by achieving its intended purpose, complies with relevant laws, codes and directions while meeting community expectations of probity, accountability and transparency. Council achieves this in many ways - the most visible is the Council business paper also live streaming of non-confidential Council meetings to the community. The overarching document of Council is the Community Strategic Plan which is supported by key documents like the Delivery Program containing the strategies, actions and targets of Council which is reported to both Council and the community every 6 months - the report for 1 July 2023 to 31 December 2023 will be presented to Council in March 2024 and published to the community using the website of Council.	Governance & Engagement Manager	Ongoing commitment	100%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
5.1.3	Gauge customer and resident satisfaction with services and operations	Identify trends within the areas of importance identified from the 2021 community survey and in 2024 action a new community survey and report on variation to important issues.	From the 2021 Community Survey identify areas of importance and identify trends. In the 2023-2024 budget ensure there are financial resources to conduct a third Community Survey to be used to develop the new Community Strategic Plan and other supporting documents for adoption prior to 30 June 2025.	From the 2021 Community Survey the third largest performance gap analysis (importance v satisfaction) was 'Promotion of business establishment and growth of our Shire' - importance was scored at 85% and 59% satisfaction - the performance gap being 26%. The Economic Development Manager reports that Council has been very proactive with the business community through its consultation to develop the 2023 Economic Development Strategy. The Strategy provides for an increase in business investment and attraction, improve social and economic outcomes for residents, greater consumption of local goods and services, enhancement of workforce skills and training and grow the value of the visitor economy. Preparations are also underway for the 2024 Community Survey with a 'Request for Quotation' now active using VendorPanel with 4 potential service providers asked to supply a quotation by close of business 7 February 2024.	Governance & Engagement Manager	Progressing	50%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
5.1.4	Report on compliance with the financial performance measures within the annual financial statements	Financial reporting is compliant with measures set by the Office of Local Government also the NSW Audit Office.	Attaining or exceeding the benchmark ratios for the financial performance measures.	<p>The Auditor General NSW conducted the audit of Council's Annual Financial Statements expressing an unmodified opinion on the General Purpose Financial Statements on 18th September 2023.</p> <p>Audit also provides an overview of Council's performance against the performance measures and performance benchmarks set by the Office of Local Government. Council met the benchmarks except for the Own Source Operating Revenue Ratio. The benchmark is 60% while Council's ratio is 45%. Council's ratio is consistent with that achieved in previous years. Over recent years council has received increasing amount of operating grants. This continued in 2022-23 with substantial road funding and the prepayment of the Financial Assistance grant. These grant receipts act to reduce the ratio of Council's own source funds to operating revenue.</p>	Deputy GM Corporate & Community	Completed	100%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
5.1.5	Continue strategic advocacy for the strengthening of the Shire centres of learning	Improvements to our centres of learning.	Learning centre outcomes such as improved course availability and advancements in technology to assist in remote learning.	Financial Assistance from Council remains in place to fund both academic and other achievement awards with the Mayor, Deputy Mayor, Councillors and senior staff available to attend ceremonies when invited. The General Manager recently wrote to all Principals within the Shire inviting participation in emergency safety policy development which is part of the Riverina & Murray Joint Organisation of Councils project to assist communities to prepare for, understand and take action to reduce multi-hazard disaster risks - this will be facilitated through workshops organised by the Australian Red Cross and is jointly funded by the Australian and NSW Governments.	General Manager	Progressing	50%
5.1.6	Continue strategic advocacy for the improvement of telecommunication networks across the Shire	Improved telecommunications network in the Shire.	Outcomes of advocacy, improved infrastructure and reduction in the number of 'black spots'.	One meeting held with Telstra staff to discuss introduction of 5G across the Shire, this meeting has been followed up with emails and telephone conversations.	General Manager	Progressing	50%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
5.1.7	Make representations to both Federal and State Government agencies to determine the feasibility of the Lake Mejum and Lake Coolah concept	An informed decision of the feasibility of the Lake Mejum and Lake Coolah water storage concept is made and relayed to all stakeholders.	Progress of representations and outcomes of any study.	Water storage at both Lake Coolah and Lake Mejum have been included in the long list of storage options listed in the draft Murrumbidgee and Murray River strategies.	General Manager	Progressing	50%
5.1.8	Ensure that workforce policies remain current in a changing environment	An organisation where workforce policies suit a changing work environment and succession planning is in place for key roles.	Compliance to the policy review schedule also details of organisational training and successes in attaining qualifications. Succession planning for key roles is in place.	The Human Resources team use task notifications in MAGIQ to advise when policies are due for review. Policies are reviewed as time permits, recently this proven difficult due to the implementation of outcomes from the working party reference group and higher than normal performance management issues.	Human Resources Manager	Progressing	40%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
5.1.9	Maintain the connection with Price Waterhouse Cooper to complete the LG Performance Excellence Program on an annual basis	Participation in the annual Price Waterhouse Cooper survey titled LG Performance Excellence Program.	Completion of the survey on time, reporting the findings to the Executive Leadership Team.	Council has participated in the Price Waterhouse Cooper survey each year since 2017. This is a very extensive survey and the information sought is from across most of the operations of Council including financial, operational and strategic aspects. When finalised a full report is provided to the Executive Leadership Team for information, the information is then used to develop strategic plans such as the Workforce Strategic Plan also the overarching organisational document referred to as the Community Strategic Plan.	Human Resources Manager	Completed	100%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
5.1.10	Ensure our workforce is well trained and meets the needs of the organisation now and into the future with succession planning for key roles within the organisation	A workforce that is well skilled and succession planning for key roles in place.	Details of organisational training and successes in attaining qualifications also details of successional appointments where appropriate.	Council continues to actively encourage employees to undertake external training or embark on tertiary studies to gain accredited qualifications. Council also looks to provide either internally or externally relevant training or short courses to employees as necessary to comply with legislative changes or to refresh and build on skills already acquired. At the present time, 15 employees continue with external study at Certificate II level or higher - during the reporting period 4 employees gained their qualification. Succession planning is a requirement of the Workforce Strategic Plan, opportunities for secondment and short-term higher duties are also provided to employees where and when possible. Council currently has 2 employees who are undertaking secondments to further their knowledge and career prospects.	Human Resources Manager	Completed	100%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
5.1.11	Recognise the achievements of the Council workforce	A workforce that is recognised for performance, qualifications and service.	Continue the practice of hosting breakfasts with recognition of improved work outcomes as well as qualifications attained and service awards, also use the internal Communique to recognise individual and team efforts.	Council continues to host an employee function each October, this function provides the ideal opportunity to inform employees of issues affecting their employment. This event also provides the perfect occasion to recognise the achievements of employees who have completed external studies and to also recognise those employees who have achieved a significant milestone in their years of service to the organisation. The next function is scheduled for October 2024.	Human Resources Manager	Ongoing commitment	100%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
5.1.12	Maintain an Information Technology Strategy that meets the needs of the organisation, is fit for purpose and provides best value for money	An appropriate Information Technology Strategy is in place and operating.	System availability (or uptime) indicating whether critical business operating systems are fully functioning during the standard business hours of operation but excluding scheduled maintenance or scheduled downtime.	The current Information Management Strategy is referenced each year for the budget preparation process. Information Technology staff have completed staff consultation for the next strategy update which will be completed as time permits.	Information Technology Manager	Progressing	25%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
5.1.13	Actively protect the organisation from cyber threats such as spear phishing emails and unauthorised access to the network	Cyber threats to the organisation are reduced.	Addressing issues detected from periodic auditing or penetration testing.	Information Technology (IT) staff organise periodic penetration testing with the Executive Leadership Team informed of the results. IT staff organise compulsory cyber security training for all staff that use a computer as part of their work. Staff are regularly informed of any threats discovered by the IT section or alerted to Council by Cyber Security NSW. IT staff action any issues identified by regular Australian Cyber Security Centre testing and reported to Council. IT staff have recently developed a Cyber Security Strategy for the next 3 years.	Information Technology Manager	Ongoing commitment	50%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
5.1.14	Monitor the availability of Federal and State funding grants payable to Council	Income from funding sources is accounted for and acquitted.	Maintenance of documents that detail grant funding opportunities applied for and if the application was successful and the acquittal of funds.	Council has developed a centralised register that records grant applications and from where the funding is being sourced. Should the funding be successful then other information is required such as the date and the amount of the funding received, the proposed date of acquittal as well as the actual date of acquittal. The centralised register also provides other essential financial information including the amount received, amount expended and remaining funds of the grant as well as if a contract liability or contract asset exists.	Finance Manager	Progressing	75%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
5.1.15	Maximise the revenue streams of Council	Revenue for Council is maximised.	Arrears collection statistics comparative to previous years, investment return against investment benchmark.	Council's Revenue Officer closely monitors property arrears and manages these cases in accordance with established policies and procedures. Arrears statistics are reported to Council monthly along with details on the number of assessments being managed by Council's debt recovery agency. Throughout the year assessments are monitored for rateability i.e., rateable to non-rateable and non-rateable to rateable. The Finance Manager regularly reviews financial investments in accordance with the Investment Policy and a report detailing the invested monies of Council is presented to each Council meeting - this report details all transactions that have taken place within the preceding month and gives a snapshot of the portfolio and credit limits to make sure that Council remains within the prescribed amount allowed for each financial institution.	Finance Manager	Progressing	90%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
5.1.16	Provide a summary of ranger activities, including the number of dogs and cats registered in accordance with the Companion Animals Act 1998	Monitoring of Companion Animal statistics and compliance statistics.	Community awareness activities and information on companion animal registration, impounding, release, re-homing and euthanasia.	Companion Animal statistics reported to each Council meeting. Community awareness campaign for a number of related activities to be undertaken in early 2024.	Deputy GM Infrastructure	Ongoing commitment	80%
5.1.17	Provide a summary of Development Applications received and assessed	Development applications received and assessed within established timeframes also statistical information on development applications received cumulative annually and comparatively to the previous year.	Development application activity statistics based on annual cumulative and previous year comparative information.	Development activity report and statical data provided to each Council meeting.	Deputy GM Infrastructure	Ongoing commitment	80%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
5.1.18	Maintain an up to date Asset Management Strategy and supporting Asset Management Plans which are reflected within the 10 year capital works program.	Measurement will be the completion of projects identified in the Long Term Financial Plan or other supporting plans.	The performance target will be to have contemporary Asset Management Plans that have a 10 year rolling forecast, a 4 year timeline to guide asset decision making with detailed actions to be included or referenced within the annual Operational Plan.	Updated Asset Management Strategy and supporting management plans have been adopted by Council. Staff are working on finalising long term renewal plans to be included into the relevant asset plans.	Projects and Assets Manager	Progressing	50%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
5.1.19	Investigate solutions that will assist in the financial stability of Narrandera Shire Council to undertake major capital expenditure such as a Special Rate Variation (SRV). A SRV would enable the commencement of the major capital works project - Narrandera CBD stormwater infrastructure duplication project.	Measurement will be the listing of outcomes and where successful the resulting benefits to the community.	The performance target would be to list the solutions being considered with commentary on the progress of assessing, planning, consultation and implementation.	General rates increase annually with a percentage set by the Independent Pricing & Regulatory Tribunal (IPART) - this is calculated annually based on methodology including a local government cost index and is known as the 'rate peg'. For the 2023-24 financial year, the rate peg for NSW Councils was 3.7%. If a Council's rate revenue is not sufficient to maintain service levels or undertake capital renewals and ensure sustainability, it can apply to IPART to increase general rate revenue by more than the rate peg - this is a Special Variation (SV). In November 2023 Council resolved to secure the financial future of the Shire by deciding to apply to (IPART) seeking increases to the general rate income by implementing an (SV) over two years. The increase means 25.5% in 2024-25 and 18% in 2025/26 - this increase, including the rate peg, will be a permanent adjustment retained within the rate base. Council will make relevant applications to IPART in February 2024.	General Manager	Progressing	30%

5.2: Promote a community spirit that encourages volunteerism and values effective partnerships

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
5.2.1	Through energised Advisory Committees seek input for the improvement of facilities and services under their management	Advisory Committees that are proactive and provide input for improvements to amenities as outlined in their Terms of Reference.	Outcomes achieved for improvements.	There are 6 active Advisory and S355 Committees coordinated through Corporate Services. The Parkside Museum S355 Committee have made great strides in improving and reinvigorating the Museum through hard work and some strategic grant funding. This culminated in November 2023 with the Old is New New is Old launch. 100 attendees experienced the Museum enjoying both freshly activated and new exhibits. The Arts and Cultural Committee is working to promote the Arts Centre while the Bettering Barellan and Grong Grong Community Committees are committed to their respective villages. Representatives of the Railway Facility Management Committee worked in a volunteer capacity for 6 months to keep the station building operating for passengers following the caretaker's resignation and prior to new arrangements being put in place.	Community Development (including Library) Manager	Ongoing commitment	50%

Action Code	Action Name	Performance Measure	Performance Target	Comments	Responsible Officer Position	Status	Progress
5.2.2	Encourage volunteerism within Council operations and across the Shire where possible with recognition of volunteers at key times such as 'National Volunteer Week'	Identify opportunities where additional volunteers may be able to become involved in the operations of Council and strategies to retain the volunteers.	Statistical information on the number of volunteers within the organisation and the tasks performed, also details of recognition events.	Tec Exec mentor training sessions have been run at the Library to train volunteers to assist other community members experiencing difficulties with technology. Volunteer numbers and hours remain high at the Narrandera Shire Library also Community Transport. Community volunteers are participating in a number of local initiatives such as the 'With Once Voice Community Choir' who have performed at local events along with a Narrandera / Leeton Community Orchestra. Volunteer thank you events were held in December 2023 at both the Library and Community Transport with volunteers being acknowledged for their efforts.	Community Development (including Library) Manager	Ongoing commitment	40%

habitat — Planning Proposal

Amendment to Narrandera Local Environmental Plan 2013

JANUARY 2024

Rezoning from C2 Environmental Conservation to E4 General Industrial

Submitted to NSW Department of Planning and Environment
On behalf of Narrandera Shire Council

Contact

Ashley Mackey, Consultant
David Hunter, Director

Habitat Planning
409 Kiewa Street
Albury NSW 2640
02 6021 0662
habitat@habitatplanning.com.au
habitatplanning.com.au

Habitat Planning Pty Ltd
ABN 29 451 913 703
ACN 606 650 837

The information contained in this document produced by Habitat Planning is solely for the use of the person or organisation for which it has been prepared. No section or element of this document may be removed from this document, reproduced, electronically stored or transmitted in any form without the written permission of Habitat Planning.

PROJECT NUMBER
22140

REVISION NO	REVISION DATE	VERSION STATUS	AUTHOR	APPROVED
01	9/10/2023	Draft	AM	
02	15/01/2024	Final for submission	AM	DH

Contents

Executive Summary	5
1. Introduction.....	6
1.1. Overview	6
1.2. Background & Pre-Lodgement Advice	6
1.3. Scope and Format of Planning Proposal.....	7
1.4. Supporting Plans and Documentation	8
2. Site Description	9
3. Planning Proposal	10
3.1. Objectives and Intended Outcomes	10
3.2. Explanation of Provisions	10
3.3. Justification	13
3.4. Mapping.....	19
3.5. Community Consultation.....	19
3.6. Project Timeline	21
4. Conclusion	23
Attachment A: Scoping Proposal	24
Attachment B: Consistency with Riverina-Murray Regional Plan 2041	25
Attachment C: Consistency with State Environmental Planning Policies	31
Attachment D: Consistency with Section 9.1 Ministerial Directions	41
Attachment E: Scoping Report Comment NSW Rural Fire Service	54
Attachment F: Scoping Report Comment APA Group	Error! Bookmark not defined.

List of Figures

Figure 1 – Existing Land Zoning Map, subject land outlined	5
Figure 2 – Proposed Lot Size Map, subject land outlined	5
Figure 3 – Flowchart: Stage 2 Council-initiated planning proposal	7
Figure 4 – Location of the subject land (outlined) in context	9
Figure 5 – Existing Zoning Map, subject land outlined	11
Figure 6 – Proposed Zoning Map, subject land outlined	11
Figure 7 - Employment Land investigation sites (Narrandera Local Housing and Employment Zone Strategy)	15

List of Tables

Table 1 – Attachments to Planning Proposal	8
Table 2 – Project Timeline (indicative)	21
Table 3 – Consistency with Riverina-Murray Regional Plan 2041	26
Table 4 – Consistency with State Environmental Planning Policies.....	32
Table 5 – Consistency with Ministerial Directions	42

Executive Summary

This Planning Proposal report has been prepared on behalf of Narrandera Shire Council and is submitted to the New South Wales Department of Planning and Environment ('the Department') in support of a Planning Proposal to amend the *Narrandera Local Environmental Plan 2013* (LEP).

Specifically, the Planning Proposal seeks to rezone Lot 1 in DP1011106 and addressed as 42 Manderlay Road, Narrandera from C2 Environmental Management to E4 General Industrial and to abolish the minimum lot size (currently 400ha). The intention of the Planning Proposal is to enable an expansion of the Red Hill Industrial Estate to accommodate increased demand for industrial development in the Shire.

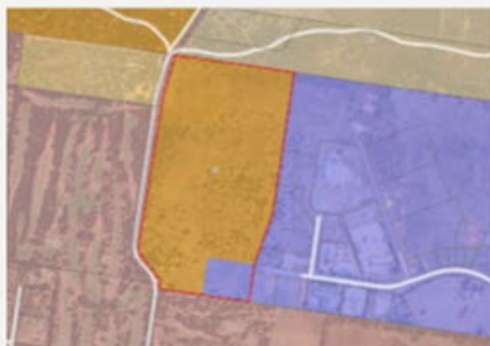


Figure 1 – Existing Land Zoning Map, subject land outlined



Figure 2 – Proposed Lot Size Map, subject land outlined

The report has been prepared to address the requirements of the *Environmental Planning and Assessment Act 1979* (EP&A Act), as well as satisfying the requirements of the NSW Department of Planning, Infrastructure & Environment's guideline titled: *Local Environmental Plan Making Guideline* (August 2023).

For the purposes of the Guideline, the application is classified as a 'Standard' Planning Proposal as it seeks to "change the land use zone where the proposal is consistent with the objectives identified in the LEP for that proposed zone."

This Planning Proposal provides an analysis of the physical and strategic planning constraints and opportunities and considers the relevant environmental, social and economic impacts of the proposal and its strategic merit.

The Planning Proposal has strategic merit and is in the public interest for the following reasons:

- The proposal directly facilitates the recommendations outlined within Section 5.1 of the *Narrandera Local Housing and Employment Zone Strategy* (December, 2022).
- The resultant development/redevelopment of the land will not create any unacceptable environmental or social impacts.
- The proposed amendment will encourage the orderly development and availability of industrial land in Narrandera.

It is recommended that Narrandera Shire Council resolve to support the changes to the LEP as detailed in this Planning Proposal and forward it to the NSW Department of Planning and Environment for a Gateway Determination.

1. Introduction

1.1. Overview

This Planning Proposal has been prepared by Habitat Planning on behalf of Narrandera Shire Council and is submitted to the NSW Department of Planning and Environment in support of a Planning Proposal to amend the *Narrandera Local Environmental Plan 2013* (LEP) by rezoning Lot 1 in DP1011106 and addressed as 42 Manderlay Road, Narrandera from C2 Environmental Management to E4 General Industrial.

This proposal has been prepared to address the requirements of Section 3.33 of the *Environmental Planning and Assessment Act 1979* (EP&A Act), as well as satisfying the requirements of the NSW Department of Planning, Infrastructure & Environment's guideline titled: *Local Environmental Plan Making Guideline* (August 2023).

For the purposes of the Guideline, the application is classified as a 'Standard' Planning Proposal.

This report will demonstrate that the proposed amendment is consistent with the intent and objectives of the planning framework and strategic plans and policies. Consequently, this will provide the NSW Department of Planning and Environment (DPE) with the confidence to endorse the proposed amendment as sought by this Planning Proposal.

It is requested that Council forward the Planning Proposal to the Minister for Planning and Public Spaces for Gateway Determination in accordance with Section 3.34 of the EP&A Act. The Gateway Determination by the Minister will decide:

- Whether the matter should proceed (with or without variation).
- Any necessary technical studies or supporting studies.
- Whether the planning proposal needs to be amended (and possibly resubmitted to the Department) prior to exhibition.
- The duration and extent of community consultation.
- Whether consultation with State or federal authorities (if required).
- Whether a local contributions plan is to be exhibited at the same time as the planning proposal.
- Whether a public hearing is needed.
- The timeframes within which the various stages of the process for making of the proposed LEP are to be completed.
- Whether the council is to be authorised to make the proposed instrument as the Local Plan Making Authority (LPMA).
- Any other conditions.

1.2. Background & Pre-Lodgement Advice

As required by the Department's guideline titled: *Local Environmental Plan Making Guideline* (August 2023), applicants are encouraged to undertake pre-lodgement discussions with Council (if proponent initiated) and/or the Department (where Council initiated). The purpose of this stage is to provide early feedback and identify and resolve key planning issues upfront to enable a streamlined LEP making process.

The purpose of these pre-lodgement discussions is to identify key information requirements, infrastructure needs and consultation requirements with key government agencies.

Following the completion of the initial Stage 1 Pre-Lodgement phase, a Planning Proposal (this document) is subsequently prepared and submitted to Council.

It is noted that the Planning Proposal is classified as a Council-initiated Planning Proposal. The following flowchart shows the process for a Council-initiated planning proposal.

A flowchart depicting this process is reproduced below:

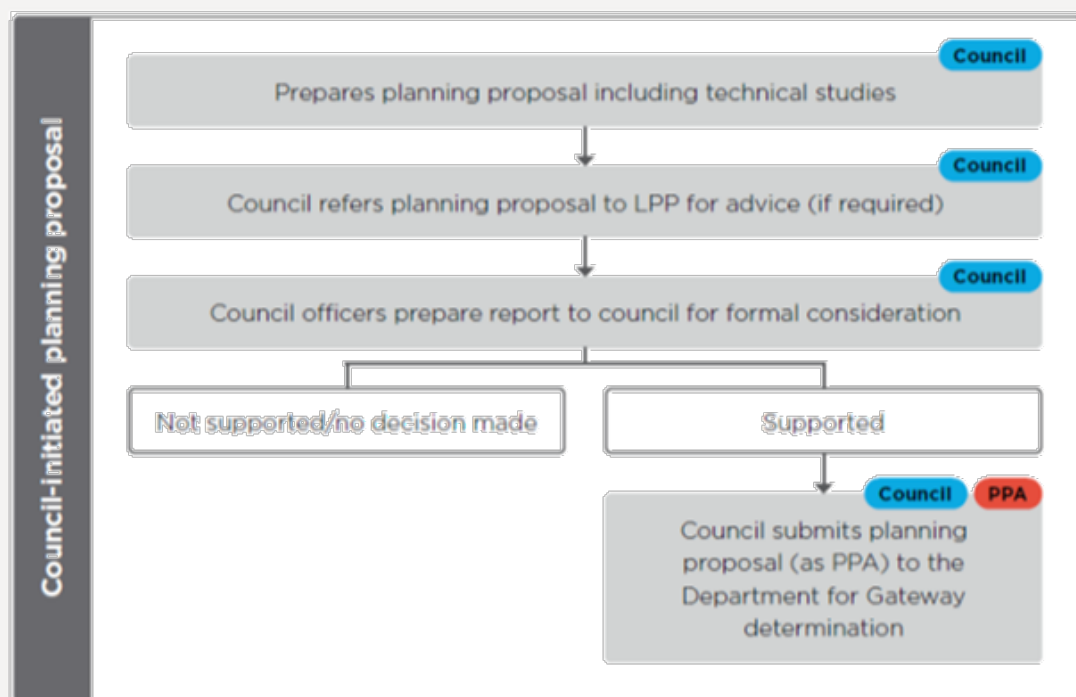


Figure 3 – Flowchart: Stage 2 Council-initiated planning proposal

In accordance with these requirements, a Scoping Report (Attachment A) was prepared and a pre-lodgement meeting was held with DPE on 11th September 2023.

Below is a brief summary of the items discussed during this meeting and formal advice provided post this meeting:

- Gas main easement across the north-east corner of the subject site to be investigated.
- Bushfire mapping and RFS consultation.
- Address relevant state and local strategies, 9.1 Ministerial Directions.
- Consultation with relevant state departments and stakeholders should occur.

The submission of this Planning Proposal seeks to address the matters raised in response to the Scoping Report.

1.3. Scope and Format of Planning Proposal

The Planning Proposal details the merits of the proposed changes to the LEP and has been structured in the following manner consistent with the Department of Planning & Environment’s guideline titled: *Local Environmental Plan Making Guideline*:

- Section 1.0 provides an introduction to the Planning Proposal.

- Section 2.0 provides a description of the site, its context and existing development, including identification of the land to which the changes are proposed.
- Section 3.0 contains the Planning Proposal, prepared in accordance with the matters to be considered in the Department of Planning’s document titled: *Local Environmental Plan Making Guideline*; and
- Section 4.0 provides the conclusions and recommendations to proceed with the Planning Proposal to Gateway Determination to amend the LEP.
- Appendices contains supporting plans and documentation.

1.4. Supporting Plans and Documentation

The Planning Proposal has been prepared with input from a number of technical studies and assessments which have been prepared to accompany the request. These documents are included as attachments to this report and are identified in Table 1.

Table 1 – Attachments to Planning Proposal

No.	Document Name	Prepared by
A	Scoping Proposal	Habitat Planning
B	Consistency with Riverina-Murray Regional Plan 2041	Habitat Planning
C	Consistency with State Environmental Planning Policies	Habitat Planning
D	Consistency with Section 9.1 Ministerial Directions	Habitat Planning
E	Scoping Report Comment – NSW RFS	NSW RFS

2. Site Description

The subject Planning Proposal relates to the Red Hill Industrial area, located north of Narrandera township, and is currently zoned C2 – Conservation Management.

The subject site is located at the northern periphery of Narrandera. Apart from some sparse patches of vegetation, it is has otherwise been cleared.

The site is surrounded by a mix of uses and land use zones. Directly to the east, is the existing Red Hill industrial estate, the sites in which have been exhausted. To the south, is the Narrandera Pony Club and race course beyond. To the west, across Manderlay Road is the Narrandera Golf Course. To the north is the edge of urban Narrandera, which is bounded by a wide strip of well vegetated land and zoned for primary production (RU1) beyond.

The location of the area is shown below at **Figure 4**.



Figure 4 – Location of the subject land (outlined) in context

3. Planning Proposal

This section of the report addresses the Department of Planning's document titled *Local Environmental Plan Making Guideline* and Section 3.33 of the EP&A Act. Specifically, this section provides:

- Objectives and intended outcomes;
- Explanation of provisions;
- Justification;
- Mapping
- Community consultation; and
- Project timeline.

3.1. Objectives and Intended Outcomes

The objective of this Planning Proposal is to amend the *Narrandera Local Environmental Plan 2013* by rezoning Lot 1 in DP1011106 from C2 Environmental Conservation to E4 General Industrial.

The rezoning will encourage industrial development in a preferred area of Narrandera, in accordance with the Local Housing and Employment Land Strategy and address a shortfall in availability.

3.2. Explanation of Provisions

The intended outcomes discussed above and within this report will be achieved by amending the LEP to alter the zone of the subject site, Lot 1 in DP1011106 from C2 Environmental Management to E4 General Industrial. The minimum lot size, currently 400ha, will be abolished.

This will involve an amendment to Land Zoning Map – Sheet LZN_002AA.

Extracts of the existing and proposed Land Zoning Map and Minimum Lot Size Map identifying the proposed changes sought by this Planning Proposal are provided in Figure 5, Figure 6, Figure 7 and Figure 8.

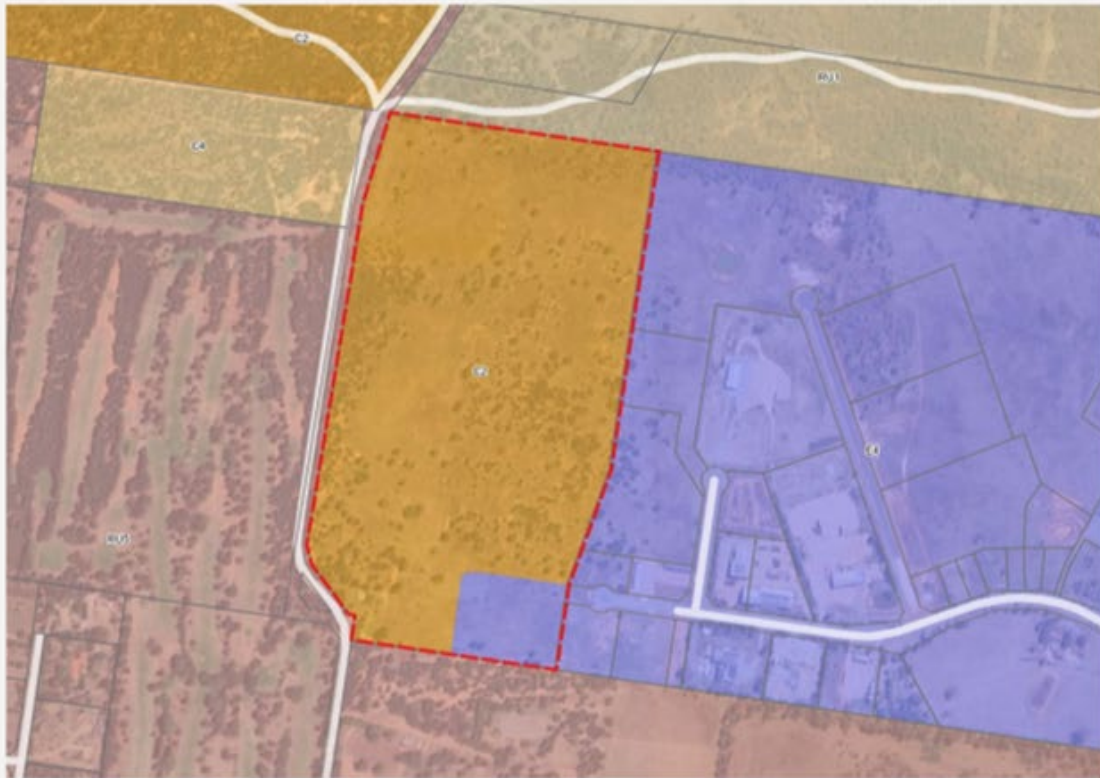


Figure 5 – Existing Zoning Map, subject land outlined

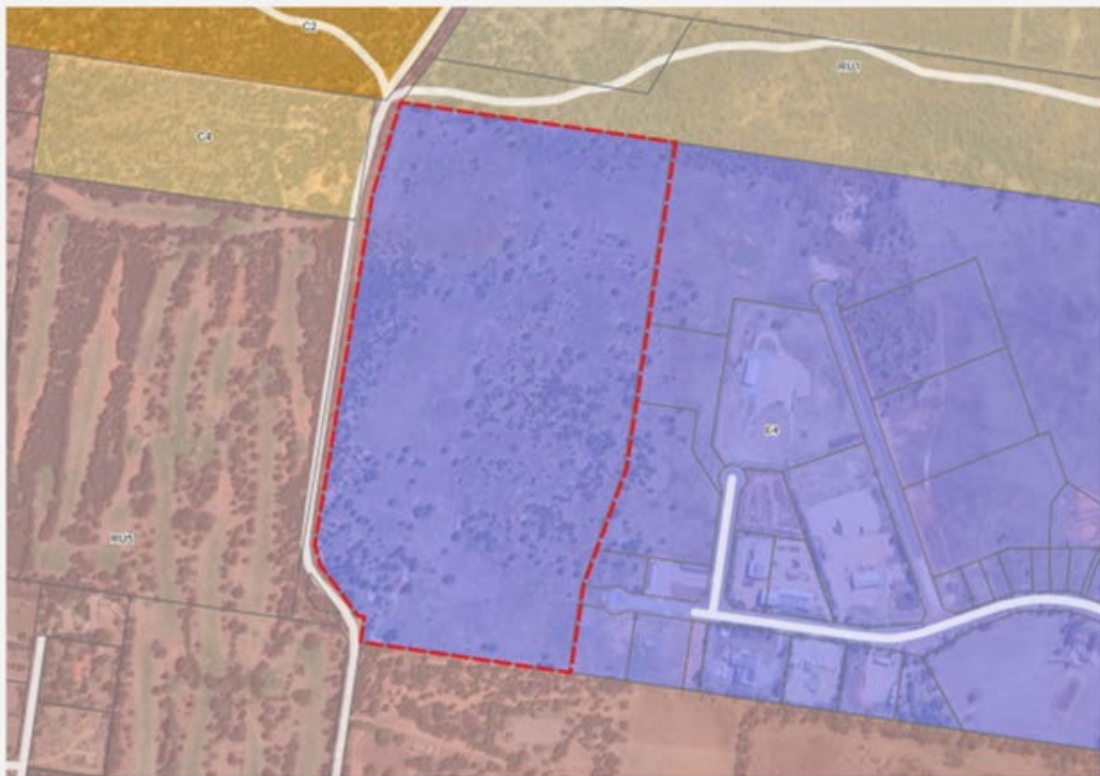


Figure 6 – Proposed Zoning Map, subject land outlined

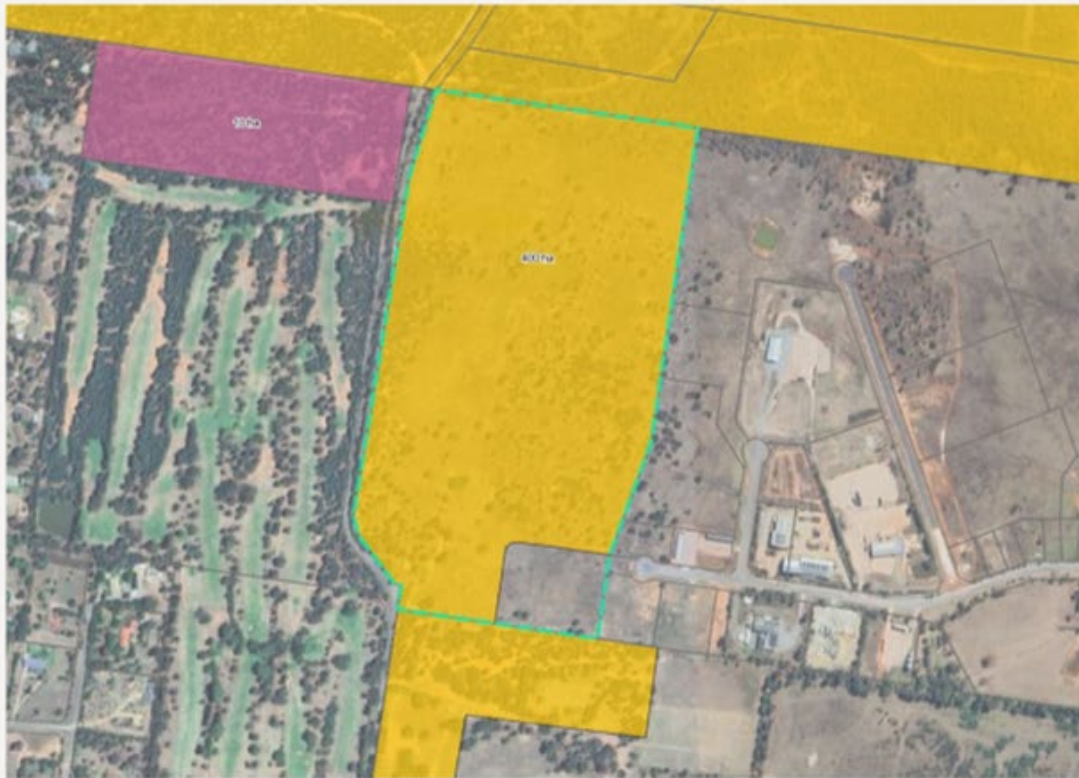


Figure 7 – Extract, existing minimum lot size, subject site outlined



Figure 8 - Extract, proposed lot size map, subject site outlined

3.3. Justification

This section of the Planning Proposal sets out the justification for the intended outcomes and provisions, identifies the strategic planning context and outlines what the community benefit will be.

3.3.1 Section A - Need for the Planning Proposal

Q1. Is the planning proposal a result of an endorsed Local Strategic Planning Statement (LSPS), strategic study or report?

The Planning Proposal has been prepared as a result of the *Narrandera Local Housing and Employment Zone Strategy (2022)*, as well as being generally consistent with the *Narrandera Local Strategic Planning Statement (LSPS)*.

Narrandera Shire Council Local Strategic Planning Statement

Prepared and endorsed in 2020, the Narrandera Local Strategic Planning Statement (LSPS) considers the shire's economic, social and environmental priorities, land use requirements and a framework of actions to "...deliver the priorities for the community's vision."

Council has identified the Red Hill precinct as a preferred location for industrial land at the periphery of the Narrandera township due to its proximity to the strategic road and rail network, as well as the lack of land use conflicts with more sensitive land uses.

The LSPS seeks to give effect to directions set out in the Riverina Murray Regional Plan 2036:

Priorities for Narrandera under the Riverina Murray Regional Plan:

- *Encourage local entrepreneurship and seek to attract new business and industry, and support and encourage emerging industries such as nuts and aquaculture to create long-term employment opportunities and attract skilled workers.*
- *Provide an adequate supply of industrial land to attract new industry and accommodate future expansion.*

Theme 3 – A Progressive Region – contains two relevant priorities and actions:

Priority 5 Transport and infrastructure connectivity

"Narrandera currently has a rail connection to the North (Dubbo through Parkes), East (Wagga Wagga), South (Shepparton, Victoria) and West (Mildura). Protecting and enhancing connections to local freight and logistics hubs such as WR Connects in Leeton and Riverina Intermodal Freight & Logistics (RiFL) Hub in Wagga Wagga will ensure our gateway to Murrumbidgee Irrigation Area (MIA) remains open.

Red Hill Industrial Estate is located at the North of Narrandera Township and is approximately 1km from the Newell Highway and 7km from Sturt Highway. The estate has Road train and HPV (Higher Productivity Vehicle) access, is appropriately located away from other sensitive land uses. Enhancement and protection of Red Hill Estate facilities and connections to the highway will ensure Red Hill estate can continue to thrive and grow".

Priority 5 also includes an action to

- Investigate opportunities for industries which may benefit from Red Hill Estate's location close to major transport routes.

Priority 6 Industry Growth and Diversification

"In an agricultural dependent economy like Narrandera, there are a variety of value-adding opportunities to diversify our produce beyond just production. Opportunities include organic and free-range production methods; packaging of produce; and preparing processed foods such as jams and nuts grown in the region. Council will coordinate the value-added manufacturing industries being strategically located so they have ready and cost-effective access to the regional freight network, utility infrastructure and export markets to help decrease supply chain costs. The Red Hill Industrial Estate is suitable for heavy industries and has capacity for further value-added manufacturing sites to be established."

Priority 6 includes actions to:

- Protect the Red Hill Industrial Estate from incompatible land uses on nearby land;
- Provide an adequate supply of industrial and business land; and
- Review LEP and DCP controls to support these priorities.

Narrandera Local Housing and Employment Zone Strategy (2022)

Prepared in 2022, the Narrandera Local Housing and Employment Zone Strategy (the Strategy) identified a lack of availability of suitably zoned land for industrial use that could fulfill the reported demand, cater to future expansion and provide a ready supply to encourage new business and employment in the area, particularly value adding opportunities to complement local primary production and rural land uses.

"An expansion of the existing Red Hill industrial precinct is recommended to provide an additional 30 hectares of zoned land and would result in an expansion to the west of the existing zoned area. This expansion is adequately buffered to existing and future residential land uses by the Golf Course. It is intended that the Red Hill development accommodate a range of lot sizes, as has been the case for earlier stages of development, and that staged release of the land be considered accordingly."

The Strategy identified the subject site as having potential to provide appropriate, serviced industrial land, in a location with access to transport and road networks.

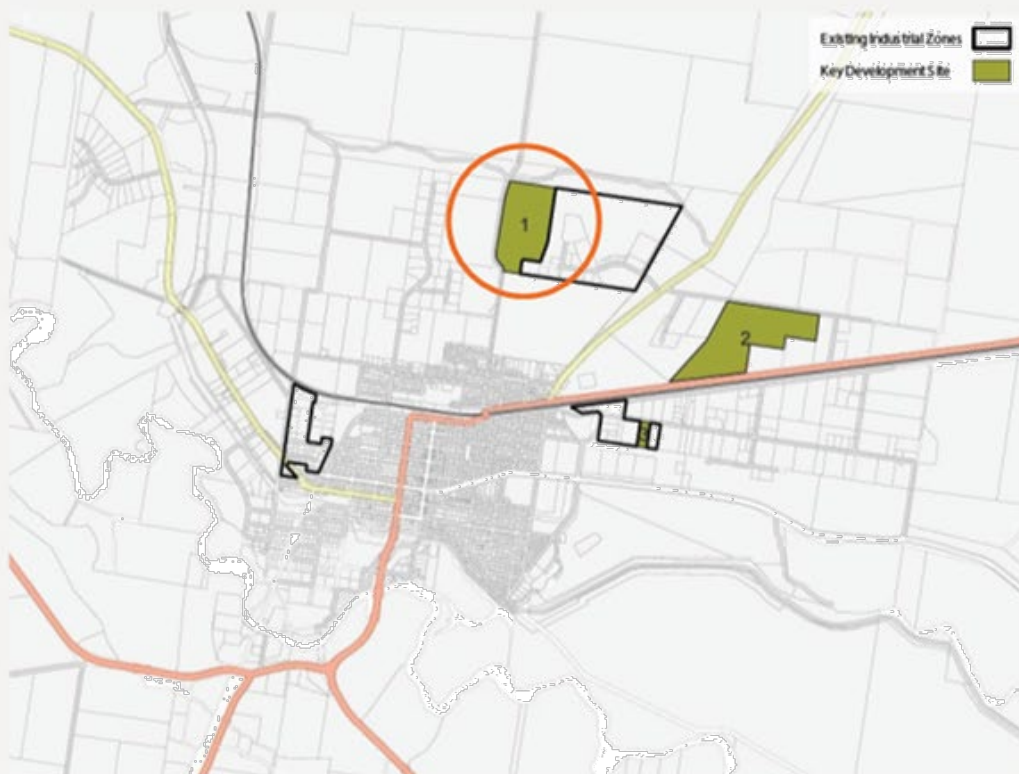


Figure 9 - Employment Land investigation sites (Narrandera Local Housing and Employment Zone Strategy)

Q2. Is the planning proposal the best means of achieving the objectives or intended outcomes, or is there a better way?

The Planning Proposal is considered the best means of achieving the objectives or intended outcomes.

Industrial land use has very specific requirements including larger lot sizes, road widths and access, and servicing capacity that cannot be catered to by other zones.

As the majority of existing industrial land throughout the shire is occupied, poorly sited or under-serviced, the rezoning of the subject site to E4 General Industrial is the most appropriate planning mechanism to ensure a stable supply, in a suitable and serviced location that avoids conflict with other land uses throughout Narrandera.

3.3.2 Section B – Relationship to Strategic Planning Framework

Q3. Will the planning proposal give effect to the objectives and actions of the applicable regional, or district plan or strategy (including any exhibited draft plans or strategies)?

The *Riverina Murray Regional Plan 2041* was adopted by the NSW government in 2022 and is the relevant regional strategy that provides the strategic planning framework to guide decision-making and development in the Riverina Murray region for the next 20 years.

The Regional Plan is structured into by three (3) key parts, with 18 underlying objectives including:

- Part 1 – Environment.
- Part 2 – Communities and Places
- Part 3 – Economy

Each of these parts and objectives is supported by a number of different strategies and actions, which seek to achieve the objectives of the goal.

The Planning Proposal addresses the following objectives:

- *Objective 12 – Strategically plan for rural industries.*
- *Objective 14 – Protecting and promoting industrial and manufacturing land*
- *Objective 18 – Integrate transport and land use planning*

Each of these goals is supported by strategies, actions and collaboration activities. The proposed amendment responds to the Regional Plan by aligning with the following;

Strategy 12.1 – Local strategic planning statements will:

- *identify confirmed or potential major projects and social and economic opportunities*
- *recognise trends and opportunities for rural land uses*
- *commit to preparing or updating local strategies to support rural land uses.*

Strategy 14.2 – Strategic planning for existing employment lands and new opportunities will:

- *locate new industrial land in areas accessible to inter-regional networks or in areas that could allow rail transport, unencumbered by natural hazards or environmental constraints while accessible to businesses and communities provide flexible and simplified planning controls that support the changing needs of industry, emerging industries and diversification, adaptation and innovation*
- *provide for the supply of diverse industrial land to meet the changing demands of industry*
- *encourage co-location and clustering of compatible industries to improve efficiencies and productivity, reduce land use conflict, maximise infrastructure investment and capitalise on supply networks*
- *drive competitive advantage by leveraging strengths, assets and attributes while maintaining integrity of existing industrial precincts*
- *investigate bespoke industrial precinct planning using targeted responses.*

Strategy 18.2 – Strategic and statutory planning will realise land use planning and transport integration by:

- *identifying and activating employment lands near freight infrastructure, using planning controls that support supply chain oriented land uses and limit incompatible land uses*

Strategy 18.4 - Strategic and statutory planning will protect supply chains, freight corridors and logistics facilities from future development impacts by identifying measures to mitigate associated noise and air emissions, encouraging off-road freight or connections between heavy vehicle routes that do not involve local roads, and identifying and maintaining buffers between freight infrastructure and incompatible land uses areas.

Further consideration of the Planning Proposal against the relevant goals, directions and actions of the Regional Plan is undertaken in **Attachment B**.

Q4. Is the planning proposal consistent with a Council LSPS that has been endorsed by the Planning Secretary or GSC, or another endorsed local strategy or strategic plan?

Q1 addresses the planning proposal's alignment with the endorsed:

- Narrandera Shire LSPS (2020)
- Narrandera Local Housing and Employment Zone Strategy (2022)

Q5. Is the planning proposal consistent with any other applicable State and regional studies or strategies?

The Planning Proposal is consistent with other relevant State or Regional studies and strategic as outlined below:

A 20 Year Economic Vision for Regional NSW

The foreword to the Strategy states: *The 20 Year Economic Vision for Regional NSW is the NSW Government's plan to drive sustainable, long-term economic growth in regional NSW. It is the roadmap to unlock significant economic potential in regional NSW.*

For the purposes of this Strategy, the Narrandera Local Government Area is located within 'Inland' area of NSW. Inland areas are characterised by their rural character and small but stable populations with agribusiness and forestry industries the drivers of local economies.

Accordingly, the proposal will contribute to the priority actions and underlying principles of the '20 Year Economic Vision for Regional NSW'. Specifically, the proposal will support:

- *Principle 3: 'Freight networks that will increase the competitiveness of key regional sectors.'*

The proposal seeks to make industrial land available on key road transport networks and take advantage of proximity to WR Connect intermodal and Wagga Wagga SAP.

Council seeks to enhance opportunities for employment and economic growth within the LGA and the region, as well as supporting opportunities for the development of employment lands.

- *Principle 7: 'Regulation and planning to promote commercial opportunities.'*

With access to the Wagga Wagga SAP, the proposal will enable the take up of affordable employment land for agricultural value-add industries and regional commercial opportunities.

- *Principle 8: 'Sustainable economies and communities are better able to recover from shocks.'*

The proposal will encourage infill development and urban renewal, which will increase the range and type of housing product currently available within the township. It will also encourage ageing in place and seeks to better utilise land and infrastructure.

Q6. Is the planning proposal consistent with applicable State Environmental Planning Policies?

Appendix C provides an assessment of the Planning Proposal against all State Environmental Planning Policies (SEPPs). In summary, many of the SEPPs are not applicable to the Narrandera Local Government Area and even less are applicable to the circumstances of the Planning Proposal.

Notwithstanding, an assessment has been provided in **Appendix C** outlining whether the Planning Proposal is consistent, or where applicable, justifiably inconsistent with relevant SEPPs.

Q7. Is the planning proposal consistent with applicable Ministerial Directions (s.9.1 Directions)?

Section 9.1 (formerly s. 117) of the *Environmental Planning and Assessment Act 1979* (EP&A Act) provides for the Minister for Planning and Homes to give directions to Councils' regarding the principles, aims, objectives or policies to be achieved or given effect to in the preparation of LEP's. A Planning Proposal needs to be consistent with the requirements of the Direction but in some instances can be inconsistent if justified using the criteria stipulated such as a Local Environmental Study or the proposal is of "minor significance".

An assessment of all s.9.1 Directions is undertaken in **Attachment D**. In summary, the Planning Proposal is either consistent, or justifiably inconsistent with the relevant Directions. Where there is an inconsistency, it has been justified utilising the provisions within each of the Directions.

3.3.3 Section C – Environmental, Social and Economic Impact

Q8. Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?

The planning proposal may be subject to a biodiversity assessment report that can assess the likelihood of threats to critical habitats, threatened species, populations or ecological communities as a result. Any recommendations from the report can be taken into consideration.

Q9. Are there any other likely environmental effects as a result of the planning proposal and how are they proposed to be managed?

The subject site is currently zoned C2 Conservation Management and may be subject to a biodiversity assessment report as part of the approval process. Any recommendations of the report can be taken into consideration.

Q10. Has the planning proposal adequately addressed any social and economic effects?

The current Red Hill industrial precinct, at the periphery of Narrandera has been fully utilised and the availability of suitable zoned industrial land is not keeping pace with demand.

The subject site has been selected to improve Narrandera’s social and economic position through enhancing employment generating opportunities. While the proposal cannot specifically outline the outcomes, the intention to make industrial land more accessible to potential businesses and employers should provide positive economic effects.

Similarly, the location has been selected to negate the potential effects of noise, odour or pollution from industrial sites and consolidate industrial land use in Narrandera LGA.

3.3.5 Section D – State and Commonwealth Interests

Q11. Is there adequate public infrastructure for the planning proposal?

The subject land is directly adjacent to the existing Red Hill industrial precinct at the periphery of Narrandera and the proposal seeks to consolidate industrial land use in the LGA. Consequently, the subject land has access to, or the suitable extension of relevant infrastructure including reticulated water, sewerage, drainage, gas, electricity and telecommunications.

This will reduce the pressure on and expense for public infrastructure by making better use of existing infrastructure and services.

Q12. What are the views of State and Commonwealth public authorities consulted in accordance with the Gateway Determination?

A scoping report was prepared, shared, and discussed with the NSW Department of Planning and Environment. The Department provided feedback on the Planning Proposal Scoping Report noting:

- A gas main easement across the north-east corner of the subject site to be investigated.
- A biodiversity assessment report.
- Bushfire mapping and RFS consultation.
- Address relevant state and local strategies, 9.1 Ministerial Directions.
- Consultation with relevant state departments and stakeholders should occur.

Notwithstanding, it is expected that the Planning proposal will still be referred to any other relevant government agencies as stipulated by the conditions of the Gateway Determination.

See Section 2.5 of this proposal for further details regarding community consultation.

3.4. Mapping

The Planning Proposal seeks to amend the following map within the LEP:

Land Zoning Map

- Land Zoning Map - Sheet LZN_002A

An extract of the existing and proposed Land Zoning Map is contained within Figure 1 and Figure 2.

The draft LEP maps and associated Map Cover Sheet will be prepared in accordance with the NSW Department of Planning & Environment's: Standard Technical Requirements for Spatial Datasets and Maps (Version 2.0, August 2017).

3.5. Community Consultation

The Planning Proposal will be exhibited in accordance with the requirements of Part 1, Division 1, Clause 4 of Schedule 1 of the EP&A Act, the NSW Department of Planning and Environment's: A Guide to Preparing Local Environmental Plans and any conditions of the Gateway Determination (to be issued).

As the Planning Proposal is categorised as a 'standard' proposal, it is expected to be placed on public exhibition for 20 days or as otherwise outlined in Council's Community Participation Plan.

Written notification of the community consultation will be provided in a local newspaper and on Councils' website. In addition to this, any affected landowner/s adjoining the subject land will be notified in writing, as well as any Public Authorities, Government Agencies and other key stakeholders as determined by the Gateway Determination.

The future consultation process is expected to include:

- written notification to affected landowners (where practical).
- public notices to be provided in local media, including in a local newspaper and on Councils' website.
- static displays of the Planning Proposal and supporting material in Council public buildings; and
- electronic copies of all documentation being made available to the community free of charge (preferably via downloads from Council's website).

The written notice will contain:

- a brief description of the intended outcomes of the Planning Proposal.
- an indication of the land which is affected by the proposal.
- information on where and when the Planning Proposal can be inspected.
- the name and address of Council for the receipt of submissions.
- the closing date for submissions; and
- confirmation whether the Minister has chosen to delegate Plan Making powers to Council.

During the public exhibition period the following documents will be placed on public exhibition:

- the Planning Proposal.
- the Gateway Determination.
- any technical information relied upon by the Planning Proposal.
- relevant council reports.

An electronic copy of all of the above information to be placed on public exhibition will be made available to the public free of charge.

At the conclusion of the public exhibition period Council staff will consider submissions made with respect to the Planning Proposal and will prepare a report to Council.

3.6. Project Timeline

The project timeline for the Planning Proposal is outlined in Table 3.

It is noted however, that there are many factors that can influence compliance with the timeframe including Council staffing resources, the cycle of Council meetings and submissions received, and issues raised. Consequently, the timeframe should be regarded as indicative only.

Table 2 – Project Timeline (indicative)

Project Milestone	Anticipated Timeframe
<p>Lodgement</p> <p>Lodge Planning Proposal with council and make any necessary adjustments or changes prior to council accepting the plan</p>	<p>2 weeks for council to review and provide any comments regarding the submitted Planning Proposal and for the report to be updated.</p> <p>January 2024</p>
<p>Council Report (seeking Gateway Determination)</p> <p>Council planning officers to prepare a report to council seeking council endorsement of the Planning Proposal and referral to the NSW DPIE seeking the issuing of a Gateway Determination.</p>	<p>2 weeks to prepare council report and include on council agenda.</p> <p>February 2024</p>
<p>Request Gateway Determination</p> <p>Council to request a Gateway Determination from the NSW Department of Planning to proceed to Planning Proposal to public exhibition (including any delegation of plan-making powers to council)</p>	<p>2 weeks following Council resolution and request for a Gateway determination</p> <p>February 2024</p>
<p>Public Exhibition</p> <p>Undertake public exhibition of Planning Proposal in accordance with the conditions of the Gateway Determination.</p>	<p>2 weeks to prepare and place a public notice in the paper and 4 weeks to publicly exhibit the Planning Proposal.</p> <p>March 2024</p>
<p>Consider Submissions & Finalise Document</p> <p>Council planning officers to consider, respond and report on submissions received and issues raised (if any) and where necessary, recommended relevant changes to the Planning Proposal.</p>	<p>2 weeks to collate, consider and respond to submissions received (if any).</p> <p>April - May 2024</p>
<p>Council Report (consideration of submissions)</p> <p>Council planning officers to prepare a report to council post public exhibition that considers any submissions received.</p>	<p>4 weeks to prepare council report and include on council agenda.</p> <p>May 2024</p>

Project Milestone	Anticipated Timeframe
<p>Submission to NSW DPIE/Parliamentary Counsel Forward Planning Proposal to NSW DPIE/Parliamentary Counsel (if delegated) for finalisation following public exhibition.</p>	<p>4 weeks June 2024</p>
<p>Notification Finalisation/gazettal of Planning Proposal</p>	<p>2 weeks July 2024</p>

4. Conclusion

The Planning Proposal seeks to amend the *Narrandera Local Environmental Plan 2013* (LEP) by rezoning of land described as Lot 1 in DP1011106 and addressed as 42 Manderlay Road, Narrandera from C2 Environmental Management to E4 General Industrial.

The report has been prepared to address the requirements of the Environmental Planning and Assessment Act 1979 (EP&A Act), as well as satisfying the requirements of the NSW Department of Planning, Infrastructure & Environment's guideline titled: *Local Environmental Plan Making Guideline* (August 2023).

This Planning Proposal provides an analysis of the physical and strategic planning constraints and opportunities of the site and considers the relevant environmental, social and economic impacts of the proposal and its strategic merit.

The Planning Proposal has strategic merit and is in the public interest for the following reasons:

- The proposal is generally consistent with the strategic planning framework including State, Regional, District and local planning strategies for Narrandera.
- The Planning Proposal has been prepared as a direct result of the Narrandera Local Housing and Employment Lands Strategy which recommended the addition of further industrial land to the Shire's supply.
- The resultant development of the land will not create any unacceptable environmental or social impacts.
- There will be a net economic benefit for the Narrandera community in terms of growth and investment via the provision of additional residential allotments.
- The subject land can be provided with all urban services.

The proposed amendment to the LEP is appropriate and well-considered and warrants the support of Council before proceeding to a Gateway Determination.

Attachment A: Scoping Proposal

Attachment B: Consistency with Riverina-Murray Regional Plan 2041

Table 3 – Consistency with Riverina-Murray Regional Plan 2041

Part, Objective and Actions	Relevance to Planning Proposal	Consistency
Part 1 – Environment		
Objective 1 – Protect, connect and enhance biodiversity throughout the region.	The subject land is zoned C2 Conservation Management and will be subject to a Biodiversity Assessment Report (BDAR) to test any impacts.	While acknowledging the land zoning, the proposal seeks to minimise any impacts on undeveloped land. Located adjacent to the existing Red Hill industrial area, this proposal seeks to minimise the clearing or unnecessary fragmentation of environmentally important corridors.
Objective 2 – Manage development impacts within riverine environments	The subject site does not adjoin any waterways, though the town is proximate to the Murrumbidgee River.	Future industrial development on the subject site is not expected to adversely affect the functions of the waterway.
Objective 3 – Increase natural hazard resilience	The subject site is partially covered by a bushfire risk 'vegetation buffer' at the southern boundary. The risk can be mitigated by suitable construction standards. Sited at a high point in Narrandera, the site is subject to minimal overland flood risk.	Future industrial development on the subject site is not expected to increase risk to natural hazards.
Part 2 – Communities and places		
Objective 4 – Support Aboriginal aspirations through land use planning.	Not yet applicable, as the subject land is not known to contain any culturally significant land.	In the absence of any broader strategy for the area, the proposal will adhere to current legislation. Consideration of matters regarding Aboriginal Cultural Heritage is

Part, Objective and Actions	Relevance to Planning Proposal	Consistency
		required under the NSW <i>National Parks and Wildlife Act 1974</i> .
Objective 5 – Ensure housing supply, diversity, affordability and resilience.	Not applicable	Not applicable
Objective 6 – Support housing in regional cities and their sub-regions	Yes, the Planning Proposal seeks to achieve residential outcomes.	<p>Narrandera is not identified as a regional city, but rather forms part of the <i>sub-regions</i>.</p> <p>Although it is not located within immediate commuting distance of these regional centres, the provision/encouragement of employment opportunities and the required housing within an established township is considered to be consistent with the aims of this objective.</p>
Objective 7 – Provide for appropriate rural residential development.	Not applicable, the proposal does not relate to rural residential development	Not applicable
Objective 8 – Provide for short-term accommodation	Not applicable.	Not applicable

Part, Objective and Actions	Relevance to Planning Proposal	Consistency
Objective 9 – Plan for resilient places that respect local character	Not applicable – the planning proposal relates to industrial land at the periphery of Narrandera.	Not applicable
Objective 10 – Improve connections between Murray River communities	Not relevant, as the proposal doesn't relate to connections between Murray River Communities.	Not applicable
Objective 11 – Plan for integrated and resilient utility infrastructure.	The Planning Proposal relates to the provision of industrially zoned land.	<p>The Planning Proposal is consistent with this objective and specifically Strategy 11.1 as it seeks to focus development around existing infrastructure.</p> <p>To better utilise under-developed land, the Planning Proposal seeks to reduce any impact on infrastructure and services by co-locating with the existing Red Hill industrial estate.</p> <p>In addition, Council have confirmed that there is ample capacity within their existing infrastructure to accommodate any expected development that may be achieved as a result of this Planning Proposal.</p>

Part 3 - Economy

Part, Objective and Actions	Relevance to Planning Proposal	Consistency
Objective 12 – Strategically plan for rural industries	This Planning Proposal seeks to provide industrially zoned land, to enable employment generating activity and support rural productivity.	<p>The Planning Proposal will ensure rural lands are not fragmented and industrial land will be consolidated in a preferred location in Narrandera to avoid land use conflicts.</p> <p>The proposal supports employment zones for general industry such as agricultural value-add, transport and logistics supporting the nearby Wagga Wagga SAP and WR Connect.</p>
Objective 13 – Support the transition to net zero by 2050	Not relevant, as the proposal does not relate to energy use.	Not applicable
Objective 14 – Protecting and promoting industrial and manufacturing land	This Planning Proposal seeks to provide industrially zoned land, to enable employment generating activity and support rural productivity.	The proposal supports employment zones for general industry such as agricultural value-add, transport and logistics supporting the nearby Wagga Wagga SAP and WR Connect.
Objective 15 – Support the economic vitality of CBDs and main streets	Wider economic benefits associated with the planning proposal will support the objectives.	The Planning Proposal seeks to allow the growth of employment generating activities in Narrandera, retaining spending power in the local economy.

Part, Objective and Actions	Relevance to Planning Proposal	Consistency
Objective 16 – Support the visitor economy	Not relevant, as the proposal does not relate to tourism.	Not applicable
Objective 17 – Strategically plan for health and education precincts	Not relevant as the proposal does not relate to health and education precincts.	Not applicable
Objective 18 – Integrate transport and land use planning	Yes, as the planning proposal will impact existing traffic networks.	<p>At a local level, the Planning Proposal is consistent with this objective as it utilises and consolidates existing infrastructure.</p> <p>At a regional level the proposal is located in an area beneficial to transport and logistics operations supporting the nearby Wagga Wagga SAP and WR Connect.</p>

Attachment C: Consistency with State Environmental Planning Policies

Table 4 – Consistency with State Environmental Planning Policies

Policy	Applicable to Planning Proposal	Consistency
State Environmental Planning Policy (Biodiversity and Conservation) 2021		
Chapter 2 – Vegetation in non-rural areas	Applies to subject site	No clearing of vegetation is proposed as part of this planning proposal.
Chapter 3 – Koala habitat protection 2020	Not applicable.	Not applicable.
Chapter 4 – Koala habitat protection 2021	Not applicable.	Not applicable.
Chapter 5 – River Murray lands	Not applicable.	Not applicable.
Chapter 6 – Bushland in urban areas	Not applicable.	Not applicable.
Chapter 7 – Canal estate development	Not applicable.	Not applicable.
Chapter 8 – Sydney drinking water catchment	Not applicable.	Not applicable.
Chapter 9 – Hawkesbury-Nepean River	Not applicable.	Not applicable.

Policy	Applicable to Planning Proposal	Consistency
Chapter 10 – Sydney Harbour Catchment	Not applicable.	Not applicable.
Chapter 11 – Georges River Catchment	Not applicable.	Not applicable.
Chapter 12 – Willandra Lakes Region World Heritage Property	Not applicable.	Not applicable.
State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004	Applies to all land in the State.	Not applicable to the current Planning Proposal.
State Environmental Planning Policy (Exempt and Complying Development Codes) 2008	Applies to all land in the State.	The Planning Proposal does not conflict with the aims and functions of this SEPP with respect to exempt and complying development provisions.
State Environmental Planning Policy (Housing) 2021		
Chapter 2 – Affordable housing	Applies to all land in the State.	The subject Planning Proposal does not derogate from the aims and objectives of this State Environmental Planning Policy.

Policy	Applicable to Planning Proposal	Consistency
Chapter 3 – Diverse housing	Applies to all land in the State.	The subject Planning Proposal does not derogate from the aims and objectives of this State Environmental Planning Policy.
State Environmental Planning Policy (Industry and Employment) 2021		
Chapter 2 – Western Sydney employment area	Not applicable.	Not applicable.
Chapter 3 – Advertising and signage	Applies to all land in the State.	Not applicable to the current Planning Proposal.
State Environmental Planning Policy No. 65 – Design Quality of Residential Apartments	Applies to all land in the State.	Not applicable to the current Planning Proposal.
State Environmental Planning Policy (Planning Systems) 2021		
Chapter 2 – State and Regional Development	Applies to all land in the State.	Not applicable to the current Planning Proposal.
Chapter 3 – Aboriginal land	Not applicable.	Not applicable.
Chapter 4 – Concurrences and consents	Applies to all land in the State.	Not applicable to the current Planning Proposal.

Policy	Applicable to Planning Proposal	Consistency
State Environmental Planning Policy (Precincts – Central River City) 2021		
Chapter 2 – State significant precincts	Applies to all land in the State.	Not applicable to the current Planning Proposal.
Chapter 3 – Sydney region growth centres	Not applicable.	Not applicable.
Chapter 4 – Homebush Bay area	Not applicable.	Not applicable.
Chapter 5 – Kurnell Peninsula	Not applicable.	Not applicable.
Chapter 6 – Urban renewal precincts	Not applicable.	Not applicable.
State Environmental Planning Policy (Precincts – Eastern Harbour City) 2021		
Chapter 2 – State significant precincts	Applies to all land in the State.	Not applicable to the current Planning Proposal.
Chapter 3 – Darling Harbour	Not applicable.	Not applicable.
Chapter 4 – City West	Not applicable.	Not applicable.

Policy	Applicable to Planning Proposal	Consistency
Chapter 5 – Walsh Bay	Not applicable.	Not applicable.
Chapter 6 – Cooks Cove	Not applicable.	Not applicable.
Chapter 7 – Moore Park Showground	Not applicable.	Not applicable.
State Environmental Planning Policy (Precincts – Regional) 2021		
Chapter 2 – State significant precincts	Applies to all land in the State.	Not applicable to the current Planning Proposal.
Chapter 3 – Activation precincts	Not applicable.	Not applicable.
Chapter 4 – Kosciuszko National Park and alpine resorts	Not applicable.	Not applicable.
Chapter 5 – Gosford city centre	Not applicable.	Not applicable.
State Environmental Planning Policy (Precincts – Western Parkland City) 2021		
Chapter 2 – State significant precincts	Applies to all land in the State.	Not applicable to the current Planning Proposal.

Policy	Applicable to Planning Proposal	Consistency
Chapter 3 – Sydney region growth centres	Not applicable.	Not applicable.
Chapter 4 – Western Sydney Aerotropolis	Not applicable.	Not applicable.
Chapter 5 – Penrith Lakes Scheme	Not applicable.	Not applicable.
Chapter 6 – St Mary’s	Not applicable.	Not applicable.
Chapter 7 – Western Sydney Parklands	Not applicable.	Not applicable.
State Environmental Planning Policy (Primary Production) 2021		
Chapter 2 – Primary production and rural development	Not applicable as the subject land has not been identified as state significant agricultural land on the draft SSAL Map prepared by NSW DPI.	Not applicable.
Chapter 3 – Central Coast plateau areas	Not applicable.	Not applicable.
State Environmental Planning Policy (Resilience and Hazards) 2021		

Policy	Applicable to Planning Proposal	Consistency
Chapter 2 – Coastal management	Not applicable.	Not applicable.
Chapter 3 – Hazardous and offensive development	Applies to all land in the State.	Not applicable to the current Planning Proposal.
Chapter 4 – Remediation of land	Applies to all land in the State.	Not applicable to the current Planning Proposal. Specific consideration of this SEPP will be undertaken as part of any subsequent Development Applications for infill development.
State Environmental Planning Policy (Resources and Energy) 2021		
Chapter 2 – Mining, petroleum production and extractive industries	Applies to all land in the State.	The Planning Proposal does not conflict with the aims, permissibility, development assessment requirements relating to mining, petroleum production and extractive industries as provided for in the SEPP.
Chapter 3 – Extractive industries in Sydney area	Not applicable.	Not applicable.
State Environmental Planning Policy (Sustainable Buildings) 2022		
Chapter 2 – Standards for residential development - BASIX	Applies to all land in the State.	The Planning Proposal does not conflict with the aims, permissibility, development consent, assessment and consultation requirements,

Policy	Applicable to Planning Proposal	Consistency
		capacity to undertake additional uses, adjacent, exempt and complying development provisions as provided in the SEPP.
Chapter 3 – Standards for non-residential development	Not applicable.	Though not applicable to the planning proposal, consideration of the SEPP may be required when assessing proposed developments for the site.
Chapter 4 - Miscellaneous	Not applicable.	Not applicable.
State Environmental Planning Policy (Transport and Infrastructure) 2021		
Chapter 2 – Infrastructure	Applies to all land in the State.	The Planning Proposal does not conflict with the aims, permissibility, development consent, assessment and consultation requirements, capacity to undertake additional uses, adjacent, exempt and complying development provisions as provided in the SEPP.
Chapter 3 – Educational establishments and child care facilities	Applies to all land in the State.	Not applicable to the current Planning Proposal.
Chapter 4 – Major infrastructure corridors	Not applicable.	Not applicable.

Policy	Applicable to Planning Proposal	Consistency
Chapter 5 – Three ports – Port Botany, Port Kembla and Newcastle	Not applicable.	Not applicable.
Draft State Environmental Planning Policies		
Corridor Protection SEPP	Not applicable.	Not applicable.

Attachment D: Consistency with Section 9.1 Ministerial Directions

Table 5 – Consistency with Ministerial Directions

No.	Title	Applicable to Planning Proposal	Consistency
1. Planning Systems			
1.1	Implementation of Regional Plans	Yes, as this Direction applies to all Planning Proposals that apply to land where a Regional Plan has been prepared.	The Planning Proposal is consistent with the goals, directions and actions as contained within the <i>Riverina Murray Regional Plan 2041</i> . A full response in relation to this Regional Plan has been provided as Attachment B .
1.2	Development of Aboriginal Land Council Land	Not applicable, as the subject land is not identified on the Land Application Map of <i>State Environmental Planning Policy (Aboriginal Land) 2019</i>	Not applicable.
1.3	Approval and Referral Requirements	Yes, as this Direction applies to all Planning Proposals.	The Planning Proposal is consistent with this direction because it does not propose any referral or concurrence requirements or nominate any development as 'designated development'.
1.4	Site Specific Provisions	Not applicable, as the Planning Proposal does not seek to create any site specific provisions.	Not applicable.
1. Planning Systems – Place Based			

No.	Title	Applicable to Planning Proposal	Consistency
1.5	Parramatta Road Corridor Urban Transformation Strategy	Not applicable to the Narrandera Local Government Area.	Not applicable.
1.6	Implementation of North West Priority Growth Area Land Use and Infrastructure Implementation Plan	Not applicable to the Narrandera Local Government Area.	Not applicable.
1.7	Implementation of Greater Parramatta Priority Growth Area Interim Land Use and Infrastructure Implementation Plan	Not applicable to the Narrandera Local Government Area.	Not applicable.
1.8	Implementation of Wilton Priority Growth Area Interim Land Use and Infrastructure Implementation Plan	Not applicable to the Narrandera Local Government Area.	Not applicable.
1.9	Implementation of Glenfield to Macarthur Urban Renewal Corridor	Not applicable to the Narrandera Local Government Area.	Not applicable.

No.	Title	Applicable to Planning Proposal	Consistency
1.10	Implementation of Western Sydney Aerotropolis Plan	Not applicable to the Narrandera Local Government Area.	Not applicable.
1.11	Implementation of Bayside West Precincts 2036 Plan	Not applicable to the Narrandera Local Government Area.	Not applicable.
1.12	Implementation of Planning Principles for the Cooks Cove Precinct	Not applicable to the Narrandera Local Government Area.	Not applicable.
1.13	Implementation of St Leonards and Crows Nest 2036 Plan	Not applicable to the Narrandera Local Government Area.	Not applicable.
1.14	Implementation of Greater Macarthur 2040	Not applicable to the Narrandera Local Government Area.	Not applicable.
1.15	Implementation of the Pyrmont Peninsula Place Strategy	Not applicable to the Narrandera Local Government Area.	Not applicable.
1.16	North West Rail Link Corridor Strategy	Not applicable to the Narrandera Local Government Area.	Not applicable.

No.	Title	Applicable to Planning Proposal	Consistency
1.17	Implementation of Bays West Place Strategy	Not applicable to the Narrandera Local Government Area.	Not applicable.
1.18	Implementation of the Macquarie Park Innovation Precinct	Not applicable to the Narrandera Local Government Area.	Not applicable.
1.19	Implementation of the Westmead Place Strategy	Not applicable to the Narrandera Local Government Area.	Not applicable.
1.20	Implementation of the Camellia-Rosehill Place Strategy	Not applicable to the Narrandera Local Government Area.	Not applicable.
1.21	Implementation of South West Growth Area Structure Plan	Not applicable to the Narrandera Local Government Area.	Not applicable.
1.22	Implementation of the Cherrybrook Station Place Strategy	Not applicable to the Narrandera Local Government Area.	Not applicable.

No.	Title	Applicable to Planning Proposal	Consistency
Design and Place [This Focus Area was blank when the Directions were made]			
Nil			
Biodiversity and Conservation			
3.1	Conservation Zones	Yes, as this Direction applies to all Planning Proposals.	<p>Noting the planning proposal will be subject to a Biodiversity Assessment Report, consideration has been given to the direction and is, on balance, deemed to be of minor significance and an acceptable outcome.</p> <p>While the direction aims to protect land within a conservation zone, industrial land use in the LGA has been increasingly fragmented. The proposal seeks to consolidate industrial land use in Narrandera, in a location adjacent to an existing industrial estate and with access to the relevant services and utilities.</p>
3.2	Heritage Conservation	Yes, as this Direction applies to all Planning Proposals.	The Planning Proposal is consistent with this direction because it does not affect existing provisions within LEP relating to the protection of known European and Aboriginal heritage.
3.3	Sydney Drinking Water Catchment	Not applicable to the Narrandera Local Government Area.	Not applicable.

No.	Title	Applicable to Planning Proposal	Consistency
3.4	Application of C2 and C3 Zones and Environmental Overlays in Far North Coast LEPs.	Not applicable to the Narrandera Local Government Area.	Not applicable.
3.5	Recreation Vehicle Areas	Yes, as this Direction applies to all Planning Proposals.	The Planning Proposal is consistent with this direction as the land will not be developed for the purpose of a recreational vehicle area (within the meaning of the <i>Recreation Vehicles Act 1983</i>)
3.6	Strategic Conservation Planning	Not applicable, as the land is not identified as avoided land or a strategic conservation area under <i>State Environmental Planning Policy (Biodiversity and Conservation) 2021</i> .	Not applicable.
3.7	Public Bushland	Not applicable to the Narrandera Local Government Area.	Not applicable.
3.8	Willandra Lakes Region	Not applicable to the Narrandera Local Government Area.	Not applicable.
3.9	Sydney Harbour Foreshores and Waterways Area	Not applicable to the Narrandera Local Government Area.	Not applicable.

No.	Title	Applicable to Planning Proposal	Consistency
3.10	Water Catchment Protection	Not applicable to the Narrandera Local Government Area.	Not applicable.

Resilience and Hazards

4.1	Flooding	Yes, the township of Narrandera is subject to flooding.	<p>The Planning Proposal is consistent with the aims and objectives of this Ministerial Direction as it does not seek to permit development within a floodway or in a high hazard area.</p> <p>The subject site sits outside of the 1/100 year API as well as the 'Extreme' flood level identified in the Narrandera Flood Study.</p>
4.2	Coastal Management	Not applicable as the subject land is not located in a coastal management area.	Not applicable.
4.3	Planning for Bushfire Protection	Yes, as portions of the main township of Narrandera are subject to bushfire.	<p>A small portion of the subject site is subject to bushfire risk (Vegetation buffer).</p> <p>Any development on the site is not expected to increase bushfire risk and can be built to the relevant construction standard, if affected.</p> <p>Comment was sought from NSW RFS regarding the scoping report and these changes have been reflected in the final planning proposal. As the area has not had Category 3 hazards mapped and endorsed, a desktop hazard site assessment was completed.</p>

No.	Title	Applicable to Planning Proposal	Consistency
			As there is no development proposed, each application will be assessed on an individual basis and bushfire protection measures/construction standards applied according to the relevant legislation.
4.4	Remediation of Contaminated Land	Yes, as the subject Planning Proposal applies to the main urban area of Hay.	The subject Planning Proposal is consistent with the aims and objectives of this Direction. The land is not known to be contaminated from any historical use (NSW EPA Contaminated Land Record, October 2023)
4.5	Acid Sulphate Soils	Not applicable, as the subject land is not identified as containing acid sulphate soils.	Not applicable.
4.6	Mine Subsidence & Unstable Land	Not applicable, as the subject land is not within a Mine Subsidence District.	Not applicable.
Transport and Infrastructure			
5.1	Integrating Land Use and Transport	Yes, as the Planning Proposal relates to urban land.	The land is already urban zoned and developed and the further redevelopment/intensification of this land is not expected to have an adverse impact on the established road network.

No.	Title	Applicable to Planning Proposal	Consistency
			<p>Despite the scarce provision of public/active transport availability throughout Narrandera LGA, the proposal seeks to consolidate industrial land use and support their viable operation in the future.</p> <p>The Planning Proposal does not conflict with the aims or objectives of the two reference Transport studies outlined in this Direction.</p>
5.2	Reserving Land for Public Purposes	Yes, as this Direction applies to all Planning Proposals.	The Planning Proposal is consistent with this Direction because it does not create, alter or reduce any provisions relating to land for public acquisition purposes.
5.3	Development Near Regulated Airports and Defence Airfields	Not applicable, the planning proposal does not seek to create, alter or remove a zone or a provision relating to land near a regulated airport which includes a defence airfield.	Not applicable.
5.4	Shooting Ranges	Not applicable, as the subject land is not located in the vicinity of a shooting range.	Not applicable.
Housing			
6.1	Residential Zones	Not applicable	The planning proposal does not relate to residentially zoned land.

No.	Title	Applicable to Planning Proposal	Consistency
6.2	Caravan Parks & Manufactured Home Estates	Yes, as this Direction applies to all Planning Proposals.	The Planning Proposal is consistent with this Direction as it does not reduce the opportunities for caravan parks and manufactured homes within the Narrandera LGA

Industry and Employment

7.1	Business and Industrial Zones	The planning proposal relates to an Employment Zone (E4 General Industrial Zone).	The planning proposal is consistent with the direction as it seeks to encourage employment growth and industrial land availability in a suitable location identified in the local Strategy.
7.2	Reduction in non-hosted short term rental accommodation period	Not applicable, does not apply to the Narrandera Local Government Area.	Not applicable.
7.3	Commercial and Retail Development along the Pacific Highway, North Coast	Not applicable, as the subject land is not located within proximity to the Pacific Highway.	Not applicable.

Resources and Energy

No.	Title	Applicable to Planning Proposal	Consistency
8.1	Mining, Petroleum Production and Extractive Industries	Not applicable as the Planning Proposal does not impact on mining, petroleum or extractive industries.	The subject planning proposal will not (a) prohibit the mining of coal or other minerals, production of petroleum, or winning or obtaining of extractive materials, or (b) restrict the potential development of resources of coal, other minerals, petroleum or extractive materials which are of State or regional significance by permitting a land use that is likely to be incompatible with such development.

Primary Production

9.1	Rural Zones	Not applicable, as the subject land is does not seek to alter a rural zone.	Not applicable.
9.2	Rural Lands	Not applicable, does not apply to the Narrandera Local Government Area.	Not applicable.
9.3	Oyster Aquaculture	Not applicable as the subject site is not identified as a 'Priority Oyster Aquaculture Area' and is not identified in the <i>NSW Oyster Industry Sustainable Aquaculture Strategy (2006)</i>	Not applicable.

No.	Title	Applicable to Planning Proposal	Consistency
9.4	Farmland of State & Regional Significance on the NSW Far North Coast	Not applicable, does not apply to the Narrandera Local Government Area.	Not applicable.

Attachment E: Scoping Report Comment NSW Rural Fire Service

habitat — Planning Proposal Scoping Report

Planning Proposal Scoping Report

AUGUST 2023

Submitted to NSW Department of Planning and Environment
Prepared on behalf of Narrandera Shire Council

Contact

Ashley Mackey, Planner
David Hunter, Director

Habitat Planning
409 Kiewa Street
Albury NSW 2640
02 6021 0662
habitat@habitatplanning.com.au
habitatplanning.com.au

Habitat Planning Pty Ltd
ABN 29 451 913 703
ACN 606 650 837

Document Control

The information contained in this document produced by Habitat Planning is solely for the use of the person or organisation for which it has been prepared. No section or element of this document may be removed from this document, reproduced, electronically stored or transmitted in any form without the written permission of Habitat Planning.

PROJECT NUMBER				
23059				
REVISION NO	REVISION DATE	VERSION STATUS	AUTHOR	APPROVED
01	10/08/2023	Issue for prelodgement	AM	DH

Contents

1. Introduction	4
2. The Proposal	5
3. Strategic Merit	9
3.1. Overview.....	9
3.2. Riverina Murray 2041 Regional Plan	9
3.3. Narrandera Shire Local Strategic Plan.....	10
3.4. Narrandera Shire Local Strategic Planning Statement	10
4. Site Specific Considerations	12
4.1. Overview.....	12
4.2. Environment	12
4.3. Natural Hazards	14
4.4. Cultural Heritage	16
5. Preliminary Environmental Considerations & Assessments	17
5.1. Overview.....	17
5.2. Engineering and Servicing	17
5.3. Contaminated Land.....	17
5.4. Environmental	17
6. Conclusion	18

1. Introduction

This Planning Proposal Scoping Report has been prepared by Habitat Planning on behalf of Narrandera Shire Council and is submitted to the NSW Department of Planning and Environment ("the Department") in support of a planning proposal to amend the *Narrandera Local Environmental Plan 2013* ("the LEP").

Following the completion of the Narrandera Shire Local Housing and Employment Zone Land Strategy ("the Strategy"), the planning proposal seeks to implement the recommended changes to key investigation sites identified in the Strategy. Specifically, this Scoping Report identifies Council's intention to rezone a portion of industrial land that has been identified as a critical site for short term employment land growth in Narrandera.

The report has been prepared to address the requirements of the *Environmental Planning and Assessment Act 1979* (EP&A Act), as well as satisfying the requirements of the NSW Department of Planning, Infrastructure & Environment's guideline titled: *Local Environmental Plan Making Guideline* (September 2022).

Following this initial Stage 1 Pre-Lodgement phase, a Planning Proposal will be formally prepared and submitted to the Department.

For the purposes of the Guideline, the application is classified as a 'Principal' Planning Proposal as it includes multiple 'housekeeping' amendments or a combination of a number of planning proposals.

This Planning Proposal Scoping Report provides an analysis of the physical and strategic planning constraints and opportunities of the sites and considers the relevant environmental, social and economic impacts of the proposals and their strategic merits.

2. The Proposal

This proposal seeks to undertake the following amendments to the LEP, which have been informed by the Strategy and includes a 'housekeeping' amendments, rezonings to support future residential and industrial growth potential, and amendments to some minimum lot sizes.

For the purposes of the guideline, this application is classified as a Standard or Complex Planning Proposal, as it involves a change in zoning and minimum lot size provisions, but to provisions which are already within the LEP and for which the intended purpose of the land will be consistent with. It is noted that the development of the land for future employment uses will likely result in demand for new servicing and infrastructure.

This scoping report contains the following subject sites and amendments as listed:

Employment Land Amendments

E_01 - E4 General Industrial Zone, Manderlay Road, Narrandera

The key opportunities, constraints, and features of the site are presented in the following.



Figure 1 - Subject Sites

Item E_01

Site Address Manderlay Road, Narrandera

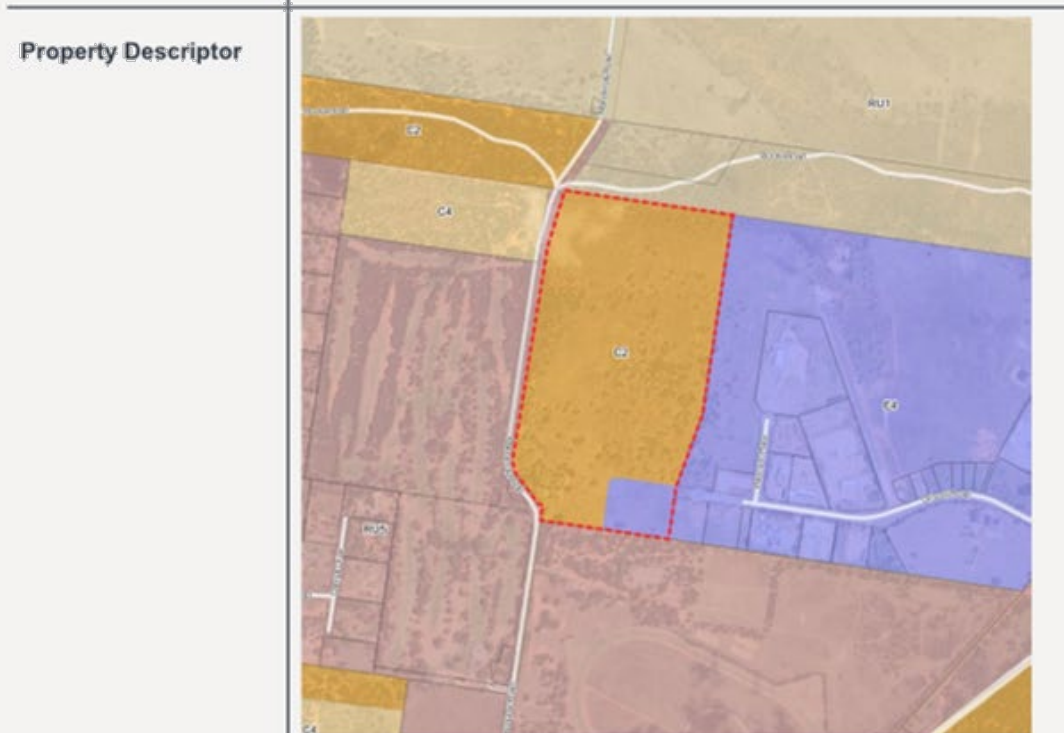


Figure 2 – Area subject to rezoning

Existing Planning Controls
 Land Zoning: C2 Environmental Conservation
 Minimum Lot Size: 400ha
 Height of Buildings: N/A
 Floor Space Ratio: N/A
 Heritage: N/A

Proposed Amendment
 Amend the Land Zoning Map – Sheet LZN_001B, to change Lot DP1011106 from C2 Environmental Management to E4 General Industrial.
 Amend the Lot Size Map LSZ_002A to change lot DP1011106 from 400 hectares to One hectare.

Supporting Technical Studies (anticipated)

Type of Amendment Principal

Key site features The minimum lot size for the subject site is 400ha, which was instigated to deter development on the site via the 2013 LEP. Should the land be

deemed suitable for industrial development, the MLS should be reduced to an area dependent on land and servicing capacity.



Figure 3 - Terrestrial Biodiversity



Figure 4 - Mapped Bushfire Risk



Figure 5 - Minimum Lot Size (400ha)

<p>Key environmental factors</p>	<p>The site was listed C2 Environmental Management at the recommendation of the Office for Environment and Heritage though the reasons are unknown to this report.</p>
<p>Opportunities and Constraints High Level</p>	<p>The site was zoned to C2 Environmental Management following a lengthy deferral, to provide a buffer to residential land uses to the west of the Golf Course. As part of a future planning proposal, the Golf Course is recommended to be rezoned to RE1 Public Recreation Zone and can serve that function.</p>

3. Strategic Merit

3.1. Overview

This section provides a brief overview of how the proposal aligns and gives effect to the strategic planning framework that applies to the site.

3.2. Riverina Murray 2041 Regional Plan

The recently published Riverina Murray 2041 Regional Plan has set out the regional planning and land use priorities for the next twenty years.

At the time of writing, the Strategy was guided by the Riverina Murray 2036 Regional Plan ("the 2036 Plan") which has been recently superseded by the 2041 Plan ("the 2041 Plan"), adopted by the NSW Government in 2022. Nonetheless, this scoping proposal will refer to the 2041 Plan to evaluate the strategic merit.

The relevant objectives underpinning the Plan, which are relevant to this scoping report include:

Objective 1 – Protect, connect and enhance biodiversity throughout the region

The Strategy seeks to minimise impacts on the environment by avoiding areas identified value.

Objective 3 - Increase natural hazard resilience

The Strategy seeks to avoid areas of risk from flooding, bushfire and to encourage compact urban forms.

Objective 5 – Ensure housing supply, diversity, affordability and resilience

The Strategy seeks to further focus housing in established and already zoned areas, where infrastructure is more readily available and affordable to service.

Objective 6 – Support housing in regional cities and their sub-regions

Narrandera LGA is adjacent to Wagga Wagga and probably best identified as a sub-region of the greater Wagga Wagga area. The Strategy seeks to ensure enough supply is available for the next twenty years.

Objective 7 – Provide for appropriate rural residential development

Supply of R5 Large Lot Residential zoned land is plentiful throughout Narrandera LGA. Lots have earlier been zoned throughout the LGA which accord with the criteria set out in Strategy 7.1.

Objective 11 – Plan for integrated and resilient utility infrastructure

The Strategy has considered access to existing infrastructure and utilities to efficiently integrate any new development.

Objective 14- Protecting and promoting industrial and manufacturing land

The Strategy has considered industrial land supply and capacity throughout the LGA and sought to capitalise on existing precincts, de facto industrial land and access to broader strategic transport networks.

3.3. Narrandera Shire Local Strategic Plan

The Narrandera Shire Council Local Strategic Planning Statement (LSPS) sets the framework for the Shire's economic, social and environmental land use needs over the next 20 years by outlining planning priorities that describe what, where and when development will occur in the LGA.

As much as practicable, the Narrandera Local Housing and Employment Zone Land Strategy has aligned with the six Planning Priorities set out in the LSPS. Further information can be found in section 2.3 of the Strategy - Local Policy Framework

3.4. Narrandera Shire Local Strategic Planning Statement

Council has recently completed the Narrandera Local Housing and Employment Zone Land Strategy ("the Strategy"), which sought to identify opportunities for residential and employment land over the next twenty years. Narrandera is the main town within the LGA, and the focus of the Strategy.

Narrandera Shire Local Housing and Employment Zone Land Strategy

The Narrandera Shire Local Housing and Employment Zone Land Strategy ("the Strategy") was completed and endorsed by Council in 2022. It sought to implement the planning priorities and actions of the LSPS and guide planning and land use decisions within the LGA over the next 20 years.

The Strategy identified key investigation sites, many of which were within the existing town boundaries and areas zoned for residential land use. While most of the development could occur within those already zoned areas, small sites at the periphery of urban areas were investigated. The Strategy also sought to encourage infill development by encouraging higher density development in some areas and establishing a sequence for development that would best utilise existing infrastructure and utilities.

In relation to employment land, the Strategy found that the Shire had a limited supply of industrial zoned land to take advantage of possible new employment activities. It identified that a key strategic action of Council was to allow for additional supply of employment lands and identified two areas, one being the expansion of the Red Hill Estate and a new site east of Borellan Road and north of the Newell Highway, adjacent to Council's Waste Management Centre.

The existing Red Hill Estate is partly established, and infrastructure and services have been provided to this location. There is an ability to provide new services with adequate capacity to Red Hill Estate in the short term, whereas the eastern industrial expansion is a longer term outcome that will require greater augmentation of services.

Therefore, the proposed Planning Proposal aligns with the recommendations of the Strategy and represents an appropriate short term opportunity to enable increased supply of employment lands.

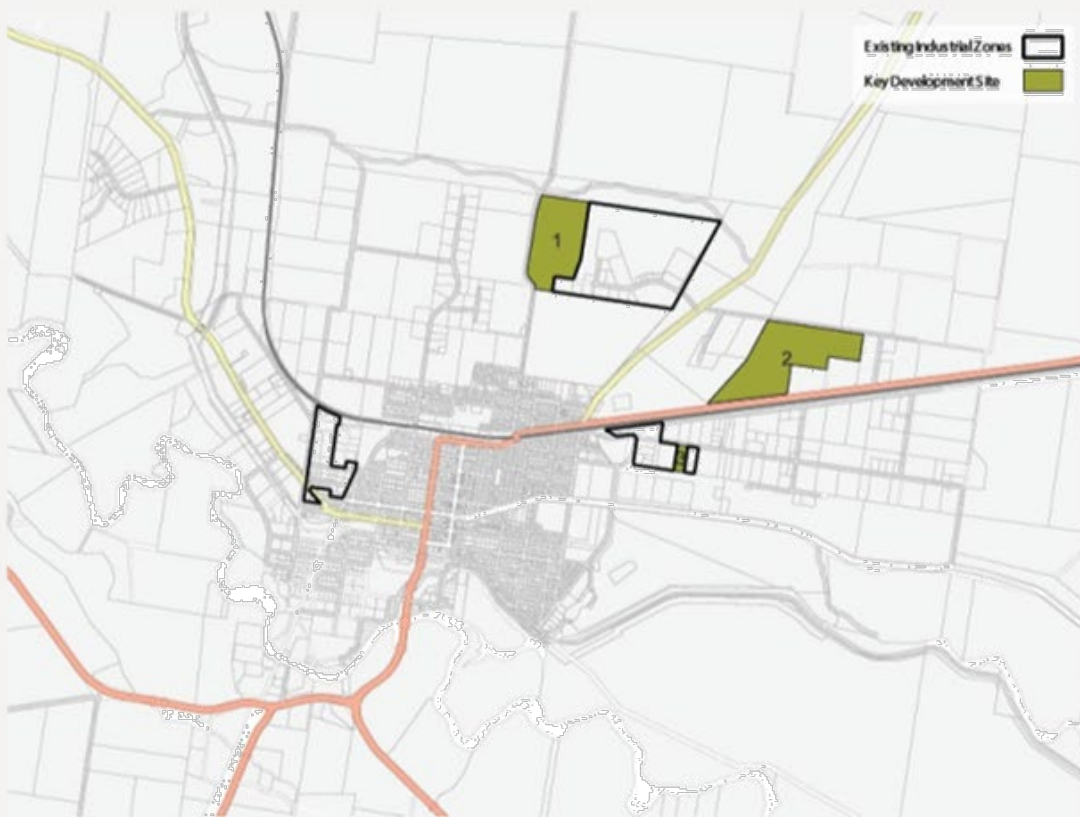


Figure 6 - Key Industrial Investigation Sites within the Strategy

4. Site Specific Considerations

4.1. Overview

This section identifies key site-specific issues that are likely to be relevant to the assessment and evaluation of the proposal. A description of the subject land and surrounds has been provided in Section 2 above.

4.2. Environment

Relevant, mapped terrestrial biodiversity, riparian lands and waterways, flooding and bushfire risk have been addressed earlier in this report.

Depending on the use of the site, required assessments may differ. It is anticipated groundwater assessments and land contamination reports will need to be completed as a minimum. Land Use Conflict Risk Assessment (LUCRA) may also be required.

Biodiversity

Narrandera is located in the NSW Riverina Bioregion, which lies in southwest NSW, extending into central-north Victoria. The bioregion is approximately 9,576,964 ha, with 7,090,008 ha or 74.03% of it lying in NSW. The NSW portion of the bioregion occupies approximately 8.86% of the State.

Common vegetation types comprise of Plant Community Type (PCT) 5 – River Red Gum, PCT 185 – Dwyers Red Gum – White Cypress Pine, PCT 70 – White Cyprus Pine, PCT 75 – Yellow Box PCT 80 – Western Grey Box, White Cyprus Pine, PCT 82 – Western Grey Box – Poplar Box.

Other vegetation comprises exotic vegetation over non-native pasture grasses. The LEP maps areas of “terrestrial biodiversity” within which Clause 6.3 requires Council to consider the impact of development on flora and fauna as well as “any appropriate measures proposed to avoid, minimise or mitigate” those impacts.



Figure 7 - Terrestrial Biodiversity

4.3. Natural Hazards

Bushfire



A small portion of the site at the south-west corner is affected by a mapped bushfire 'buffer' area and Category 1 vegetation. Given the scale of the site and intended industrial use, construction to a required BAL rating should be easily achieved.

Flooding



Figure 8 – Extreme Flood Risk (Narrandera Flood Study, 2019)

Narrandera’s flood study was reviewed and updated in 2019. The site is unlikely to be affected by riverine or overland flooding, or drainage issues. Figure 8 shows modelled extreme flood risk.

4.4. Cultural Heritage

The subject land is a modified rural property which retains little remnant environmental condition. A review of the Aboriginal Heritage Information Management System (AHIMS) database was undertaken and it is confirmed that there are no recorded items of Aboriginal cultural significance within 1km of the subject site and the site has been subject to previous disturbance. (see Figure 9). Therefore, the likelihood of items of Aboriginal cultural significance being found on site is considered to be low.

Previous disturbance has occurred on the property through productive agricultural activities and other landscape modifications.

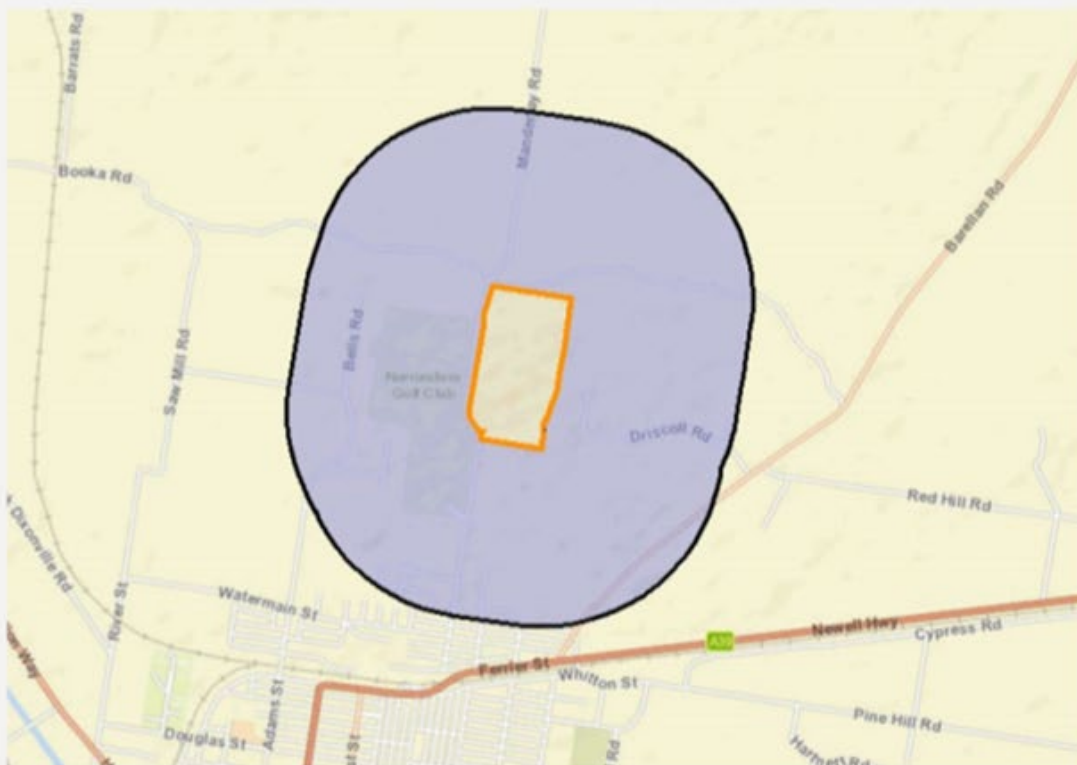


Figure 9 - AHIMS search, 1km buffer from subject site

5. Preliminary Environmental Considerations & Assessments

5.1. Overview

This section identifies the key impact assessment considerations that will in the opinion of the proponent (or council if council-initiated proposal) be addressed as part of the Planning Proposal documentation. This should include what scope and depth of assessment will be undertaken for each specific study or investigation proposed to support the planning proposal.

5.2. Engineering and Servicing

As discussed above, the subject land is located within an area surrounded by industrial and recreation (golf course) and rural-residential properties. The land is also serviced by sealed roads and initial stages of development have access to reticulated water supply and electricity provisions.

The subject land can be serviced by these existing services, subject to upgrade and extension to be determined through further engineering concept.

Having regard to the above, the following studies may be required for the Planning Proposal and/or any future Development Application:

1. Preliminary Servicing Strategy
2. Preliminary Drainage Strategy
3. Geotechnical Report
4. Traffic Impact Assessment

5.3. Contaminated Land

The subject land is not known to be contaminated based in preliminary understanding of the land and details provided by the landowners. There are no structures or storage areas considered likely to be potentially contaminating.

A more detailed assessment of the requirements of *State Environmental Planning Policy (Resilience and Hazards) 2021* will be undertaken in the Planning Proposal to satisfy the provisions an LEP amendment and subsequent development application.

5.4. Environmental

Refer to discussion in earlier sections of the report.

6. Conclusion

The proposal directly facilitates and further scrutinises the recommendations outlined within the Strategy.

The proposed amendments will specifically encourage the development of existing urban areas to contribute to a diversity of housing and employment land types throughout the LGA.

It is anticipated this scoping report will provide the introductory structure for the Department to respond and advise on the necessary technical analysis and reporting required to submit a formal planning proposal.

Ashley Mackey

From: Anna Jones <Anna.Jones@rfs.nsw.gov.au>
Sent: Friday, 17 November 2023 3:56 PM
To: Ashley Mackey
Subject: Planning Proposal - Narrandera Shire Council - Referral [Filed 23 Nov 2023 08:09]

Categories: Narrandera, Filed by Mail Manager

Good afternoon Ashley,

Thank you for referring the draft planning proposal at 42 Manderlay Road Narrandera for preliminary comment.

The current land zone is part C2 (Environmental Conservation) and part E4 (General Industrial). The planning proposal seeks to rezone the entire lot to E4 (General Industrial).

The following preliminary advice is provided:

- Ministerial Direction 4.3 is copied below. The planning proposal report should provide comment to the specifics of the Direction as they relate to the proposal. Chapter 4 and section 8.3.10 of Planning for Bush Fire Protection 2019 should guide this assessment.
- The bush fire prone land map in this location has not yet been endorsed to include Category 3 (grassland) hazards and future mapping is also likely to capture forest and woodland vegetation as shown in your bush fire site assessment plan. In this regard the bush fire hazard site assessment plan should be amended to include grassland vegetation within the site as a Category 3 hazard.
- Future subdivision of the land is unlikely to require a Bush Fire Safety Authority in accordance with Section 46 (1) (h) of the Rural Fires Regulation, however future development (where mapped as bush fire prone) will require assessment in accordance with 8.3.10 of PBP 19.

Kind regards

Anna Jones
A/Supervisor Development Assessment & Planning
Planning & Environment Services - South

**RFS**

P 02 4472 0607 M 0499 845867 E anna.jones@rfs.nsw.gov.au

2/63 Cranbrook Road Batemans Bay 2536

PO Box 35 Batemans Bay 2536

www.rfs.nsw.gov.au



The RFS acknowledges the Traditional Owners of Country throughout Australia. We pay our respects to Elders past and present

4.3 Planning for Bushfire Protection

Objectives

The objectives of this direction are to:

- (a) protect life, property and the environment from bush fire hazards, by discouraging the establishment of incompatible land uses in bush fire prone areas, and
- (b) encourage sound management of bush fire prone areas.

Application

This direction applies to all local government areas when a relevant planning authority prepares a planning proposal that will affect, or is in proximity to, land mapped as bushfire prone land.

This applies where the relevant planning authority is required to prepare a bush fire prone land map under section 10.3 of the EP&A Act, or, until such a map has been certified by the Commissioner of the NSW Rural Fire Service, a map referred to in Schedule 6 of that Act.

Direction 4.3

- (1) In the preparation of a planning proposal the relevant planning authority must consult with the Commissioner of the NSW Rural Fire Service following receipt of a gateway determination under section 3.34 of the Act, and prior to undertaking community consultation in satisfaction of clause 3.34 of the Act, and take into account any comments so made.
- (2) A planning proposal must:
 - (a) have regard to *Planning for Bushfire Protection 2019*,
 - (b) introduce controls that avoid placing inappropriate developments in hazardous areas,
 - (c) ensure that bushfire hazard reduction is not prohibited within the Asset Protection Zone.
- (3) A planning proposal must, where development is proposed, comply with the following provisions that are appropriate:
 - (a) provide an Asset Protection Zone (APZ) incorporating at a minimum:
 - i. an Inner Protection Area bounded by a perimeter road or reserve which circumscribes the hazard side of the land intended for development and has a building line consistent with the incorporation of an APZ, within the property, and
 - ii. an Outer Protection Area managed for hazard reduction and located on the bushfire hazard side of the perimeter road,
 - (b) for infill development (that is development within an already subdivided area), where an APZ cannot be achieved, provide for an appropriate performance standard, in consultation with the NSW Rural Fire Service. If the provisions of the planning proposal permit Special Fire Purposes (as defined under section 100B of the *Rural Fires Act 1997*), the APZ provisions must be complied with,
 - (c) contain provisions for two-way access roads which links to perimeter roads and/or to fire networks,
 - (d) contain provisions for adequate water supply for firefighting purposes,
 - (e) minimise the perimeter of the area of land interfacing the hazard which may be developed,
 - (f) introduce controls on the placement of combustible materials in the Inner Protection Area.

Consistency

A planning proposal may be inconsistent with the terms of this direction only if the relevant planning authority can satisfy the Planning Secretary (or an officer of the Department nominated by the Secretary) that the council has obtained written advice from the Commissioner of the NSW Rural Fire Service to the effect that, notwithstanding the non-compliance, the NSW Rural Fire Service does not object to the progression of the planning proposal.

From: Ashley Mackey <ashley@habitatplanning.com.au>
Sent: Wednesday, 1 November 2023 12:21 PM
To: Planning & Environment Services <CustomerService.Centre@rfs.nsw.gov.au>
Cc: David Hunter <david@habitatplanning.com.au>
Subject: Planning Proposal - Narrandera Shire Council - Referral

You don't often get email from ashley@habitatplanning.com.au. [Learn why this is important](#)

Hello,

I've been provided this address by Tim Collins at DPE to seek comment for a Planning Proposal I'm currently undertaking for Narrandera Shire Council, to rezone a lot for general industrial.

One of the primary considerations will be bushfire hazard and I'm seeking your comments and/or advice on the attached draft proposal.

The NSW bushfire mapping seems inconsistent with the vegetation so I've also provided a brief site assessment that I think better reflects the conditions.

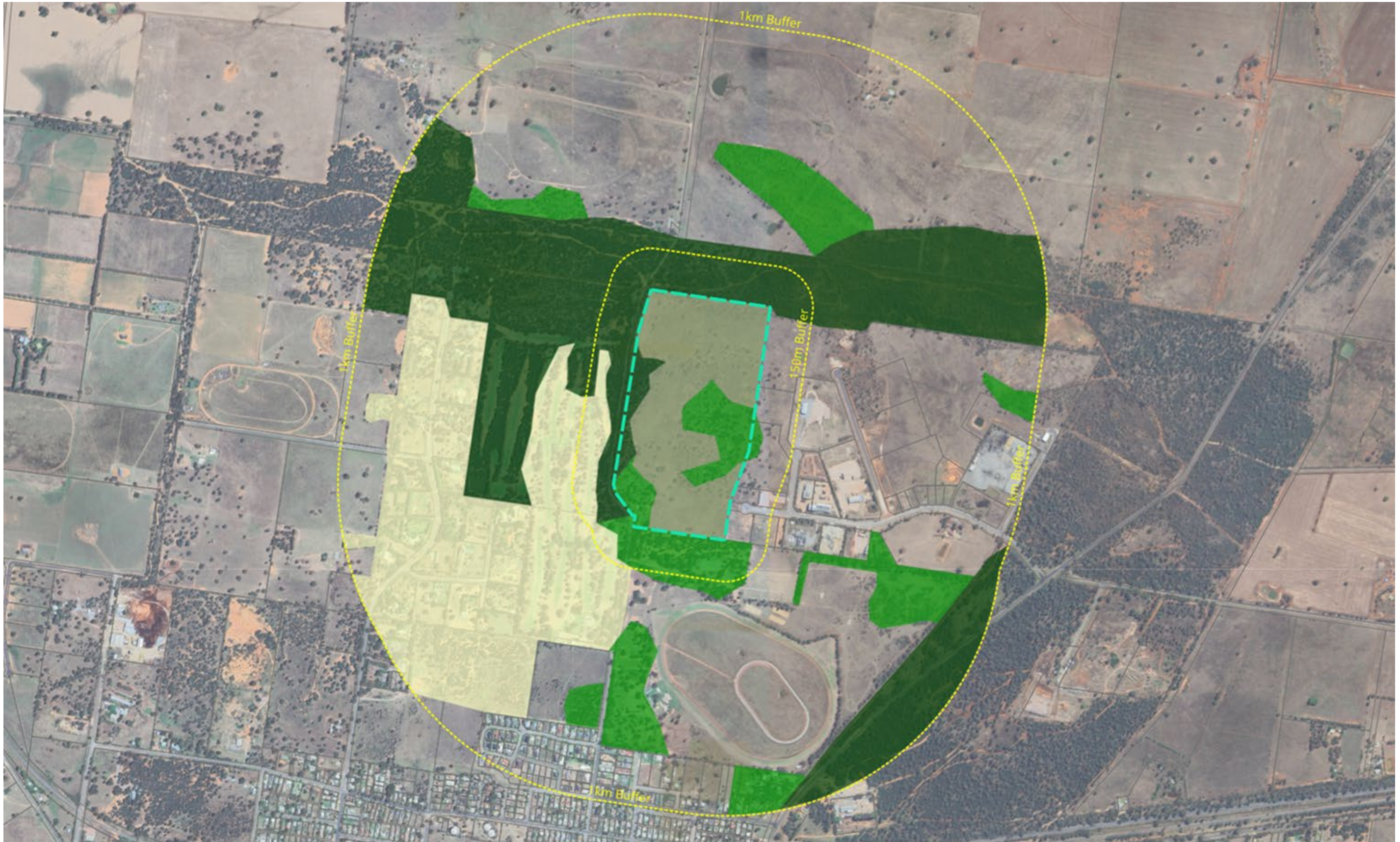
I'd appreciate any comment you have in relation to the planning proposal and am happy to chat anytime.

Warm regards,
Ash Mackey.

habitat 

Ashley Mackey Consultant
ashley@habitatplanning.com.au
409 Kiewa St Albury
02 6021 0662
habitatplanning.com.au

Town planning + Urban design consultants



- Legend**
- Site Boundary
 - Site Buffers
 - Cadastre
 - Forest
 - Woodland
 - Grassland (Category 3)
 - Managed

