



Property Council of Australia
ABN 13 00847 4422

Level 1, 11 Barrack Street
Sydney NSW 2000

T. +61 2 9033 1900
E. nsw@propertycouncil.com.au

propertycouncil.com.au
🐦 [@propertycouncil](https://twitter.com/propertycouncil)

Australia's property industry
Creating for Generations

20 July 2020

Mr Ron Moore
General Manager
Camden Council
PO Box 183
Camden NSW 2570

Attention: Bradley Colling

Email – mail@camden.nsw.gov.au

Camden Council Local Environment Plan 2010 Review Stage 1 Planning Proposal

Dear Mr Moore,

The Property Council of Australia welcomes the opportunity to provide comments on Camden Council's LEP Review Stage1 Planning Proposal.

As Australia's peak representative of the property and construction industry, the Property Council's members include investors, owners, managers and developers of property across all asset classes. We are pleased to provide the following comments for your consideration.

The Property Council understands that Camden Council is one of eighteen (18) councils in Greater Sydney that are participating in the Accelerated LEP Review Program. The identification of certain local government areas for accelerated translation of the relevant District Plan during 2020 (one year ahead of the remaining 15 councils in Greater Sydney) was appropriate. Camden Council's participation in this program is also appropriate.

Camden Council has been given financial assistance from the NSW Government to complete each of the required milestones under the program. The completion of this Planning Proposal is one such milestone. Finalisation of Council's Local Strategic Planning Statement (LSPS) and a Local Housing Strategy (LHS) being other important steps.

According to Council's website, the LEP Review is set to be broken into two stages, with Stage 1 addressing minor updates while Stage 2 will be informed by Council's Housing Strategy; Employment and Centres Strategy; Green and Blue Grid Analysis; Heritage Review; and Scenic and

Visual Analysis. Council describes this as “the technical strategy work required to fully align Camden LEP 2010 with the District Plan and draft LSPS.”

Council would be aware that section 3.8 of the Environmental Planning and Assessment Act 1979 requires a Planning Proposal Authority, when preparing a planning proposal under section 3.33, to give effect to any district strategic plan applying to the local government area to which the planning proposal relates. Also as soon as practicable after a district strategic plan is made, the relevant council must review its local environmental plan for the area and prepare such planning proposals under section 3.33 as are necessary to give effect to the district strategic plan.

It is disappointing that more than two years since the Regional Strategic Plan and Western City District Plan were endorsed by the NSW Government and more than seven months since the Council’s endorsement of its LSPS, it is not in a position to exhibit a planning proposal that will “give effect” to the need to deliver housing for the Camden Council LGA. Council should set out its planned timeframe for completion of the next phase of the LEP update, being the completion of its LHS.

Housing Targets

The Greater Sydney Commission (GSC) issued Council with a letter of support on 5 March 2020 which included a 6-10 year housing target between 10,000 to 12,500 dwellings. This involves the production of more than 2,000 new dwellings annually.

The GSC’s Western City District Plan created a 0-5 year housing target for Council of 11,800 additional dwellings from 2016/17 to 2020/2021 (about 2,360 new dwellings each year). We understand that in the first three years of this period (2016/17 to 2018/19) there were 7,940 dwellings completed in Camden LGA. Council should take necessary action to ensure its policy settings are appropriate for the continuation of new housing supply at or above the current level.

General Comments on the Planning Proposal

The intent of the Planning Proposal is to be achieved by:

- Introduce environmentally sensitive land mapping and additional local provisions;
- Introduce health objectives;
- Allowing appropriate non-agricultural land uses within the RU1 and RU2 zones;
- Allow eco-tourist facilities;
- Strengthen zone objectives for the IN2 Light Industrial zone to discourage land use conflicts;
- Provide appropriate zoning for water infrastructure;
- Make minor amendments to Schedule 5- Environmental Heritage;

These actions are generally considered to be appropriate and, in most cases, supported. Detailed comments on specific actions are provided below.

Environmentally Sensitive Land- Mapping and Part 7 Additional Local Provisions

The Planning Proposal seeks to introduce Environmentally Sensitive Land mapping for terrestrial biodiversity and watercourses and riparian land, as well as introduce two new clauses under Part 7 Additional Local Provisions for environmentally sensitive land.

The Property Council raises no objection to this inclusion.

Inclusion of health objectives

It is proposed to include the following additional aim under Clause 1.2 of Camden LEP 2010:

“to protect and promote the health and well-being of current and future residents of Camden.”

Additionally, the following additional objective is proposed for the B1 zone:

“to encourage a safe, attractive, accessible and efficient pedestrian environment.”

Council states in its proposal that future developments and proposals would need to demonstrate health and wellbeing objectives. While this may have merit at a conceptual level, such an approach will provide more clarity to industry if it is translated into specific built form outcomes through Council’s Development Control Plan.

Supporting the visitor economy in Camden’s rural lands

LEP 2010 currently contains the following objective in both the RU1 and RU2 zones:

“To permit non-agricultural uses which support the primary production purposes of the zone.”

The Planning Proposal seeks to replace this objective with the following:

“To permit non-agricultural uses (including tourism-related uses) that are compatible with the agricultural, environmental and conservation values of the land.”

This change is intended to promote additional tourism-related development within the Camden LGA and has the Property Council’s support.

Eco-tourist Facilities

The Planning Proposal seeks to remove eco-tourist facilities as prohibited land uses within the RU1 and RU2 zone, which would make these uses permissible with consent.

The Property Council notes this move is consistent with Camden Council’s LSPS. We support the proposed change.

Industrial land use conflict

The existing IN2 Light Industrial zone in the Camden LEP 2010 currently contains the following objective:

“To minimise any adverse effect of industry on other land uses.”

Camden Council is proposing to strengthen this objection in an attempt to resolve existing land use conflicts and replace it with the following wording.

“To minimise the impacts of development on surrounding residential or other sensitive land uses.”

The proposal does not clearly spell out what incidents have informed this change, nor does it provide significant additional clarity to the industry going forward. As such, we would propose this matter be deferred to the Stage 2 for further explanation and inclusion in Council’s Employment and Centres Strategy.

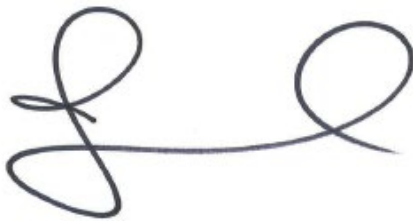
Zoning for water infrastructure

Camden Council has received correspondence from Sydney Water seeking to rezone a number of sites in their ownership to SP2 Infrastructure in order to reflect their ongoing use as vital and permanent infrastructure associated with the provision of water and sewer services to the community.

The Property Council has no objection to this aspect of the proposal.

Should you have any questions regarding the content of this submission, please do not hesitate to contact Troy Loveday, Senior Policy Advisor, on 0414 265 152 or tloveday@propertycouncil.com.au

Yours sincerely

A handwritten signature in dark ink, consisting of a large, stylized 'J' followed by a horizontal line and a loop.

Jane Fitzgerald
NSW Executive Director
Property Council of Australia