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Creating for Generations

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29 August 2019

Mr Ron Moore
General Manager (Att: Louise McMahon)
Camden Council
PO Box 183
CAMDEN NSW 2570

Dear Mr Moore

Camden – Draft Local Strategic Planning Statement

The Property Council welcomes the opportunity to provide comments on council's draft Local Strategic Planning Statement (LSPS).

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 supports the position taken by Council to use the LSPS as a mechanism for the translation and give effect to the land-use based strategies identified in the Camden Council Community Strategic Plan. It has appropriately identified a range of steps Council must take in planning for the city's future and respond to the Greater Sydney Commission's *Greater Sydney Regional Plan* and *Western City District Plan*.

Our members look forward to the finalisation of Council's LSPS by 30 March 2020 and the subsequent process that will involve Council updating *Camden Local Environmental Plan 2010* to give effect to the relevant provisions of the regional and district plans.

Comments on specific parts of the draft LSPS are provided in the following submission.

Should you have any questions in respect to this matter, please contact Troy Loveday, Senior Policy Advisor, on (02) 9033 1907 or tloveday@propertycouncil.com.au

Yours sincerely



Jane Fitzgerald
NSW Executive Director
Property Council of Australia

Local Strategic Planning Statement

Preliminary

Camden Council (Council) has prepared its draft LSPS to provide a 20-year land use vision for the Camden local government area (Camden). It has focused on land-use, transport and sustainability objectives to demonstrate how Camden will change to meet the community's needs over the next 20 years. This approach is appropriate.

The development of the draft LSPS has taken into consideration the relevant context for Camden including the Metropolis for Three Cities, the Western City District Plan, the Western Sydney City Deal and Council's Community Strategic Plan (CSP) in addition to a range of demographic and statistical data. The draft LSPS must address the projected demographic changes in the community.

The structure of the draft LSPS replicates the four themes found in the Sydney Region Plan and the District Plan, namely infrastructure/collaboration, liveability, productivity and sustainability. This format is generally consistent with the suggested formatting contained in the Department of Planning and Environment's *Guidelines for Councils*.

Infrastructure and Collaboration

This theme has focused on the key infrastructure required to support Camden's growing population and identifies opportunities for collaboration with stakeholders to assist in infrastructure delivery. It has identified four local priorities that will support the implementation of this theme. Council has addressed each of the local planning priorities and developed a specific action or actions that enable it to be achieved during the life of the LSPS.

Local Priority I1 – Aligning infrastructure delivery with growth

There are 8 actions that have been identified to assist Council's goal of planning for infrastructure that supports a liveable, productive and sustainable Camden community. The actions are generally supported by the Property Council where they foster better certainty in the planning system and its outcomes.

Currently the contributions regime in NSW is spread across various legislation, regulations, orders, determinations, directions, practice notes, planning circulars and local contribution plans. A clearer and more easily understood method of planning, funding and delivery of infrastructure by State and local government is needed. This should also improve the management of funds between councils and the State Government to deliver improved outcomes for the delivery of local and regional infrastructure.

The outcomes of the collaboration between Camden Council and the various agencies of the State government and other councils should not be to undermine certainty regarding endorsed precinct planning controls or expected development contributions.

Local Priority I2 – Connecting Camden through integrated transport solutions

Local priority I2 involves the linkage of all forms of transport (public, private and active transport) to connect residents within the Camden area. Council has developed 10 actions to implement this local priority. These actions and the associated timeframes are appropriate and supported.

Local Priority I3 – Planning for the delivery of the North South Rail and South West Rail Link Extension

This local priority specifically addresses the provision of new rail transport infrastructure through the Western Sydney Airport precinct. Five actions have been identified by Council to implement this local priority. Each of the actions is supported.

Local Priority I4 – Working in partnership to deliver a more liveable, productive and sustainable Camden

Local priority I4 is focused on the need for greater coordination in the planning and delivery of infrastructure. Council has developed 8 actions that are intended to implement the local priority. The Property Council has considered each of the actions and they are relevant to the delivery of this outcome.

Liveability

This theme has focused on maintaining and improving liveability as it means providing housing, infrastructure and services that meets the community's housing needs. It has identified 5 local priorities that will support the implementation of this theme. Council has addressed each of the local planning priorities and developed a specific action or actions that enable it to be achieved during the life of the LSPS.

Local Priority L1 – Providing housing choice and affordability for Camden's growing and changing population

This local priority aims to deliver both housing choice and affordability to meet Camden's growing and changing population. Three actions, all to be completed in the short term, have been developed to implement this outcome.

It is regrettable that Council does not yet have a completed Housing Strategy to inform the housing section of the draft LSPS. It is unclear whether the Housing Strategy will be completed ahead of the finalisation of the LSPS in March 2020 or LEP update later in 2020. It is imperative that Council's Local Housing Strategy is finalised as soon as possible to allow for Council's 6-10 housing targets to be identified. The targets being necessary to identify the changes to *Camden Local Environmental Plan 2010* to provide for new growth areas.

The Property Council recognises the growing housing affordability problem in Sydney and supports the Greater Sydney Commission targets that have been incorporated into its regional and district plans. It is the Property Council's view that any contribution made towards affordable rental housing should be collected at a regional or State level rather than at a local level. Also the levying of new development should be based on the GSC's target range of between 5-10% of new residential floor space subject to viability.

Local Priority L2 – Celebrating and respecting Camden's proud heritage

This planning priority refers to Camden's heritage and involves 6 actions (three short term, one medium term and two ongoing) intended to implement the outcome. These actions are considered appropriate by the Property Council.

Local Priority L3 – Providing services and facilities to foster a healthy and socially connected community

This planning priority has been developed to provide services and facilities for the local community. Seven actions (four short term and three ongoing) have been identified to give effect to the outcome. These actions are relevant to the achievement of the outcome and are supported.

Local Priority L4 – Encouraging vibrant and connected centres which reflect Camden's evolving character

This planning priority focuses on the development of vibrant and connected centres that reflect Camden's changing character. Eight actions (seven short term and one ongoing) have been identified to implement the local priority. A place-based planning approach is supported and where possible planning for new communities should encourage diversity in housing types to cater for the changing community demographic. Where these actions relate to new planning controls or requirements, we look forward to consultation on those proposals.

Local Priority L5 – Supporting cultural infrastructure to promote cultural and creative spaces

Planning priority L5 has been developed to support cultural infrastructure. Council has identified five actions (two short term, one medium term and two ongoing) to support the implementation of the outcome. The Property Council has acknowledged and supports the actions.

Productivity

This theme has focused on the concept of a 30-minute city to deliver a more productive region and supporting opportunities for investment, business and jobs growth. It has identified 6 local priorities that will support the implementation of this theme. Council has addressed each of the local planning priorities and developed a specific action or actions that enable it to be achieved during the life of the LSPS.

Local Priority P1 – Increasing the quantity and diversity of local jobs and improving access to jobs across the Western City District

This local priority is focused on more local jobs and providing better access to jobs across the Western City. Two actions have been identified to help implement the outcome and both are supported by the Property Council. Where possible, the Economic Development Plan should look at ways to reduce or eliminate instances of red tape and regulatory burden that apply for new businesses looking to invest in the Camden area.

Local Priority P2 – Encouraging successful centres through a clearly defined centres hierarchy

Local priority P2 seeks to encourage successful centres and has identified four actions (three short term and one ongoing) that are intended to implement the outcome. These actions will establish a planning framework intended to create liveable and successful centres. Where they have direct bearing on the development of land, the Property Council looks forward to further consultation and engagement in respect to any proposed policies or planning controls.

Local Priority P3 – Strengthening the Strategic Centres of Narellan and Leppington

This priority has been developed to give support to Camden's two strategic centres, Narellan and Leppington. The LSPS has identified five actions (three short term, one ongoing and another in two stages) intended to strengthen Narellan and Leppington Strategic Centres.

Local Priority P4 – Ensuring a suitable supply of industrial and urban services land

Council has developed this local priority to ensure that there is a suitable supply of industrial and urban services land. It has identified three actions (two short term and one ongoing). The Employment Lands Strategy proposed as part of these actions will play a fundamental role in determining the quantity and location of existing and future industrial land in Camden. It is important that Council make these actions a priority so as to allow it to update its LEP to give effect to the Western City District Plan in the timeframes set by the Greater Sydney Commission.

Local Priority P5 – Leveraging industry opportunities created by Camden's proximity to the Western Sydney Airport and Aerotropolis

This priority identifies a single action (to be completed in the short term) is intended to leverage opportunities arising from proximity to the new Western Sydney Airport. This action is appropriate and accordingly, is supported.

Local Priority P6 – Leveraging Camden's natural and cultural assets to promote local agricultural production and increase tourism

Local priority P6 has been developed to leverage Camden's natural and cultural assets to promote local agricultural production and stimulate opportunities for tourism. It has identified four actions (two short term, one medium term and one ongoing) that will implement the outcome. These actions are appropriate and are supported by the Property Council. Where these actions have a bearing on the development of property, the Property Council looks forward to further consultation on any new policies or planning controls.

Sustainability

This theme has focused on improving sustainability. It has identified 6 local priorities that will support the implementation of this theme. Council has addressed the each of the local planning priorities and developed a specific action or actions that enable it to be achieved during the life of the LSPS.

Local Priority S1 – Improving the accessibility and connectivity of Camden's Green and Blue Grid and delivering high quality open space

Local priority S1 has been developed to improve accessibility and connectivity of Camden's Green and Blue Grid as well as the delivery of high quality open space. Council has identified seven actions (six short term and one ongoing) to implement the intended outcome. These actions are generally supported and where they have an impact on the development of property, the Property Council looks forward to consultation on the specific details.

Local Priority S2 – Protecting and enhancing the health of Camden's waterways, and strengthening the role and prominence of the Nepean River

Local priority S2 is aimed to protect and enhance the health of waterways. Twelve actions (five short term, three medium term and one ongoing) have been identified to give effect to the outcome. These actions are generally supported and where they have an impact on the development of property, the Property Council looks forward to consultation on the specific details of any change to Council's LEP or DCP.

Local Priority S3 – Protecting Camden's rural land

This local priority identifies three actions (two short term and one ongoing) that will contribute towards the delivery of the desired outcome. These actions are appropriate and are supported by the Property Council.

Local Priority S4 – Protecting and restoring environmentally sensitive land and enhancing biodiversity

Local priority S4 identifies seven actions (five short term and two ongoing) that will contribute towards the delivery of the desired outcome. These actions are appropriate and supported by the Property Council. Where any of the actions will have an impact on the development of property, the Property Council looks forward to consultation on the specific details of any changes to Council's LEP or DCP.

Local Priority S5 – Reducing emissions, managing waste and increasing energy efficiency

This priority identifies thirteen actions (eleven short term, one medium term and one ongoing) that will contribute towards the implementation of the desired outcome. These actions are appropriate and supported. Where any of the actions will have an impact on the development of property, the Property Council looks forward to consultation on the specific details of any changes to Council's LEP or DCP.

Local Priority S6 – Improving Camden's resilience to natural hazards and extreme weather events

Local priority S6 of the LSPS has identified three actions (all short term) that will contribute towards the implementation of the desired outcome. These actions are appropriate and supported. Where any of the actions will have an impact on the development of property, such as the review of planning controls for flood prone land, the Property Council looks forward to consultation on the specific details of any changes to Council's LEP or DCP.

Implementation and Monitoring

The Property Council has noted that Council will prepare a Local Housing Strategy and Employment Lands Strategy. These are very important sources of evidence that will inform changes to Council's LEP to give effect to the Western City District Plan. Council must ensure that the timeframes for completion of these studies will ensure that Council meets its obligations to the Greater Sydney Commission regarding giving effect to the regional and district plans.