

# *Camden Residents' Action Group*

*Incorporated*

*Camden – Still a Country Town*

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Attention: Louise McMahon

27 August 2019

Dear Sir,

## **Re: Draft Local Strategic Planning Statement (LSPS) 2019**

We, Camden Residents' Action Group (CRAG), appreciate the opportunity to make input into the Local Strategic Planning Statement (LSPS). As background, CRAG was established in 1973 as a non-party political, non-profit community organization, with heritage and environment objectives of maintaining the special character of the local area, conserving the unique historical Camden Township and other heritage sites and generally improving the environmental amenity of the Camden local government area, and beyond.

We note all Councils are required to review their LEPs and prepare Local Strategic Planning Statements (LSPS) to align with the strategic directions of the District Plans of the Greater Sydney Commission (GSC). The relevant district plan for Camden is the Western City District (WCD) Plan.

Importantly, the LSPS is required to inform evolution of Camden's LEP and DCP, identify any need for additional strategic planning and set out:

- The 20-year vision for land use in the local area;
- The special characteristics which contribute to local identity;
- Shared community values to be maintained and enhanced; and
- How growth and change will be managed in the future.

Whilst CRAG's charter falls mainly within the Liveability and Sustainability priorities and actions, we see the integration and balancing of economic factors with social and environmental factors as a key strength in the approach to the LSPS. We do of course appreciate that Infrastructure and Productivity actions and priorities are economically important, and essential to community welfare and the fundamentals of housing and jobs for residents.

We must first note that our comments on the draft LSPS in a number of areas cannot be detailed or specific. As appended under *LSPS Project Background*, a gap analysis undertaken for a preliminary LEP Review Report, presented at Council's meeting of 23 October, 2018 revealed that further research and investigation was needed to finalise the LSPS. As detailed in the appendix a number of short-term actions in the draft LSPS reflect items from the gap analysis in relation to producing a local housing strategy, a centres strategy, an employment lands strategy, a heritage review and visual analysis and a blue and green grid analysis.

We trust that the consultation feedback and submissions on the draft LSPS will assist in developing the above strategies and analyses and that community consultation and participation will be sought once the additional research and investigation is undertaken and incorporated into the LSPS.

In mirroring the WCD Plan the draft LSPS sets out priorities and strategies under four themes of Infrastructure and Collaboration (I), Liveability (L), Productivity (P) and Sustainability(S) and identifies 21 local priorities to guide land use decisions and actions to be undertaken by Council.

Our comments on the strategies and priorities in the draft LSPS follow under the headings of these four themes.

## **INFRASTRUCTURE AND COLLABORATION**

Council's priorities are listed as:

Aligning infrastructure delivery with growth (I1)

Connecting Camden through integrated transport solutions (I2)

Planning for the delivery of the North South Rail and South West Rail Link Extension (I3)

Working in partnership to deliver a more liveable, productive and sustainable Camden (I4)

### **We agree with these priorities but have the following concerns about timing and implementation.**

The Western Sydney Airport/Aerotropolis and the North South Rail Link have the potential to significantly unlock development potential in Camden, decrease car dependency, improve environmental health, increase job accessibility and impact on housing requirements.

It does appear that there is a timing mismatch in planning the rail infrastructure and the housing.

Although Leppington Town Centre is a Planned Precinct and both Leppington and Oran Park are within the South West Growth Area (SWGA) a train connection to the Aerotropolis is not envisaged in the near future and no time frame is given. Most of Camden's substantial housing growth will occur in the SWGA.

Unfortunately, delivery of rail (I3) is not definite because there is only a State government commitment to investigate funding an extension of rail to Leppington and Campbelltown/Macarthur via Oran Park and Narellan.

As the Aerotropolis, a determinant of the comparatively very large WCD area in which Camden is located, is expected and intended to be an economic focus it would appear that Camden's infrastructure capacity will constrain access to the jobs it creates and the air services it will provide.



We find this inconsistent with achievement of connecting Camden (I2) and the WCD vision of a 30-minute city and its plan to ensure that people have access to a large number and range of jobs and services.

We note that Camden Council will pursue the best interests of Camden by working in partnership (I4) with State government and others to advocate and seek on behalf of the community an alignment of infrastructure delivery with growth (I1).

Of continued concern and uncertainty is planning for the Outer Sydney Orbital and its proposed corridor through and close to Camden's historic cultural landscapes and heritage items, as well as private homes. We note that the route is shown to be partly underground on the Camden Structure Plan Map (p. 23) and that Council plan to continue working with Transport for NSW and be a strong advocate for mitigating its impact on people's lives and surroundings.

We note that Council will review and update the Camden Council Bike Plan 1996. In our view it would be doubly beneficial if a cycleway could be combined with a bush corridor linking all the way from Camden along the Nepean River through to the Australian Botanic Garden via William Howe Reserve. This would provide excellent regional connectivity, assist in establishing the Green Grid and provide habitat for native fauna.

## **LIVEABILITY**

Council's priorities are listed as:

Providing housing choice and affordability for Camden's growing and changing population (L1)

Celebrating and respecting Camden's proud heritage (L2)

Providing services and facilities to foster a healthy and socially connected community (L3)

Encouraging vibrant and connected centres which reflect Camden's evolving character (L4)

Supporting cultural infrastructure to promote cultural and creative spaces (L5)

**We agree with these priorities but would prefer more robust and specific statements and actions about respecting Camden's heritage (L2).**

The LSPP project provides an opportunity to clarify what is meant by conservation and how it may be ensured.

We raise the following specific points.

### **Permanent change to Seniors Housing SEPP**

The WCD Plan indicates that Council must prepare a Local Housing Strategy which will identify how and where Camden will grow to support an increased population, ageing community, and a change in housing structure. We note Council's associated short-term actions of finalising a Camden Housing Market Analysis and developing a Housing Strategy.

We understand that L1 and L2 are not and are not expected to be competing priorities as a growing population, smaller households and an aging population can be accommodated in our large LGA without the need to compromise conservation of our heritage.

In February 2019, an amendment was made to the State Environmental Planning Policy (SEPP) Housing for Seniors or People with a Disability 2004 (the Seniors Housing SEPP) so that it does not apply in Heritage Conservation Areas (HCAs) in Greater Sydney until 1 July 2020. This amendment was made to allow time for a Council to choose how the Seniors Housing SEPP is to apply in its HCAs and align provisions for seniors housing in its LSPP.

We request that Council pursue a permanent change to the Seniors Housing SEPP and not allow it to be employed to override planning controls in HCAs.

This change would be of enormous importance to the community and conservation of our very significant heritage (L2) and promotion of our tourism potential (P6). At this time, an option contract is running to purchase and develop most of the Camden's state listed St John's Precinct (Rectory and the horse paddock or glebe), for seniors housing. The proposal depends on exercise of the Seniors Housing SEPP to override local and state heritage planning controls.

LIVEABILITY cont.

Such a development would not be in the public interest as it would damage the cultural landscape, heritage attraction and tourism potential of the 1840 town and the LGA. There are many other opportunities for seniors housing in the municipality.

### **Land use zoning vs heritage conservation**

The provisions of land zoning can compete with heritage protections. Arguments made by development proponents often cite that a proposal is consistent with the allowable land uses according to the zone even though it may be inconsistent with Burra Charter articles, the LEP especially the HCA height standard and/or DCP controls.

Land use zones within HCAs or those that apply to individual heritage items are not necessarily consistent with heritage conservation and desired future character.

For instance, we see an advantage in reviewing the B2 and B4 zonings of the Camden town centre or applying different zonings to be more consistent with community expectations for the Conservation Area and to promote heritage conservation.

A particular example of inappropriate zoning is the B2 zoning of state heritage listed St John's Precinct. The B2 zoning does not recognise its intended long and traditional surviving use as a Church and Rectory complex or its renowned heritage significance.

**Any changes of course need to be subject to further consultation and input but at a minimum if the B2 Local Centre and B4 Mixed Use zones are to be retained in HCAs we believe the following addition to the zone "objectives" is appropriate and consistent with community expectations and the public interest.**

*To conserve and enhance the unique sense of place of precincts that are also Conservation Areas by ensuring that new development integrates with the distinct existing scale, character, cultural heritage and landscape setting of those Conservation Areas and observes their building height limits and under LEP Clause 4.6 makes no variation to their planning provisions greater than 10% and does not allow development to compromise tourism attraction or intrude on occupants' quiet enjoyment of their properties.*

Zoning issues are further covered in the operationalisation of L2 below.

LIVEABILITY cont.

### **Operationalisation of L2 *Celebrating and respecting Camden's proud heritage***

The SW District Plan which was superseded by the WCD Plan included the following Liveability Priority:

#### **Liveability Priority 7: Conserve heritage and unique local characteristics**

*Relevant planning authorities should:*

- *protect Aboriginal, cultural and natural heritage and places, spaces and qualities valued by the local community*
- *require the adaptive re-use of historic and heritage listed buildings and structures in a way that enhances and respects heritage values*
- ***protect the heritage values of Camden Town Centre and consider how its amenity and character can be maintained.***

***How these matters have been taken into account is to be demonstrated in any relevant planning proposal.***

This wording, reflecting community views, is stronger and more specific than that in the WCD and the draft LSPS. Community engagement in the LSPS project also found that Camden's heritage and cultural landscapes are highly valued, including by communities in new areas, and are what make Camden special and an attraction for new residents, visitors and tourists.

This fact is also apparent in the wording of P6 which is to leverage Camden's natural and cultural assets to promote local agricultural production and increase tourism.

It is important to conservation and the legacy for future generations that planning instruments and protections are specific, objective and inarguable. Too often developers push the envelope and make repeated attempts to maximise private short term returns at the expense of long-term public interest.

We take this opportunity to present the following extended wording suggestion which we believe would capture the spirit of the draft LSPS and faithfully inform possible amendments to the LEP and DCP that concern heritage conservation.

*Relevant planning authorities in relation to heritage conservation must:*

- *protect Aboriginal, cultural and natural heritage and places, spaces and qualities valued by the local community*
- *ensure that all heritage items and areas, and unique local characteristics are identified, including by collaboration with the community*
- *provide mechanisms to facilitate community collaboration such as heritage committees coming under section 355 of the Local Government Act 1993.*
- *provide a list of independent acknowledged heritage and environmental experts to be used on a strict rotation basis, to be used by developers and the authority itself to ensure that reports are truly independent and not influenced by fear or favour about subsequent engagements*
- *ensure that zonings are compatible with protection of identified heritage items and areas, and unique local characteristics*
- *disallow the use of legalistic zoning arguments to override conservation of heritage*
- *disallow the lodgement of development applications that are in contravention of protective provisions of planning instruments*
- *disallow arguments for non-compliance with planning instruments that cite precedents*
- *disallow the use of LEP 4.6 to subvert the spirit and intentions or limit the effectiveness of other LEP provisions including the height standard and DCP objectives and controls*
- *enforce DCP signage controls and the overarching aim of SEPP 64 of ensuring that signage is compatible with an area's desired amenity and character*
- *disallow subjective interpretation of DCP objectives and controls which are to be read and applied at their face value and according to their spirit and intentions*
- *seek additional protection of heritage items and areas through statutory listing*
- *require that any adaptive re-use of historic and heritage listed buildings and structures enhances the sense of place of where they are situated, and respects and does not detract from heritage values including social histories and heritage valued by the community*
- *protect and enhance the heritage values and sense of place of Camden Town Centre, including its:*
  - *amenity, wide streets, old plantings and leafiness*
  - *spacious building curtilages*
  - *traditional street setbacks*
  - *human-scale two-storey height limit*
  - *original village design overlooked by St John's Church Precinct*
  - *views and vistas to and from the town in every direction,*
  - *views and vistas within the town*
  - *original street layout*
  - *hewn sandstone*
  - *sandstone colour palette*
  - *rural characteristics*
  - *abrupt interface with the floodplain*
  - *verdant rural floodplain surrounds*
  - *town entrances and signature locations*

*How these matters have been taken into account is to be objectively evidenced and logically explained in any relevant development application or planning proposal.*

LIVEABILITY cont.

### **Land Use Zone conflicts**

The LSPS Project provides an opportunity to address zoning conflicts.

A particular long running issue involves the Little /Barsden Streets area in Camden. The bungalow at 10 Barsden Street is heritage listed and although the Little Street/ Barsden Street area is near and in parts adjacent to Camden's HCA and contributes to Camden's historical narrative it is not included in the HCA.

The area sits amidst and alongside zones of RU1 Primary Production and R2 Low Density Residential, but is incongruously zoned IN2 Light Industrial. The IN2 zone is not consistent with existing residential use of the area, or of nearby zones which leads to inappropriate outcomes despite the usual zoning objective of minimising conflict of land uses of adjoining zones.

Zoning change is the solution that would see inappropriate uses gradually disappear from amongst residential areas and into designated industrial areas.

At a minimum the consent conditions of existing industrial DAs need to be looked at to ensure that they are still complied with and compatible with the roads used.

We note also that in our opinion this area should be researched for inclusion in Camden's HCA and its buildings for possible local heritage listing in the LEP, or potential heritage listing in the DCP.



LIVEABILITY cont.

### **Nominations for Heritage Listing**

We believe it is in the interests of both heritage conservation and our tourism economy that our significant heritage be acknowledged at the local, state or national levels.

We suggest the following nominations:

#### ***Little /Barsden Streets Area Camden***

Inclusion in adjoining Camden's HCA  
Investigation of building stock for individual listing or potential listing

#### ***Heritage Conservation Area Camden***

Nomination for State Listing and/or National Listing

This area, which also includes state listed St John's Precinct and Nant Gwylan, is the subject of a comprehensive study<sup>1</sup> which explores Camden's uniqueness in Australia's European history and addresses criteria for statutory heritage listing. Camden's history is strongly connected aesthetically, socially and culturally to St John's Precinct and the Macarthur family influence and contribution. This study, which was corroborated by testimonials of eminent historians, who concur that the town is highly significant and worthy of state listing.

The Study includes a comparative analysis of Braidwood, the only town that is state listed, which shows that Camden is more historically significant. National listing would have the advantage of capturing St John's Precinct and be only the second town after Broken Hill to be nationally listed. A comparative analysis of Broken Hill with Camden would almost certainly show Camden to be at least as historically significant in the story of Australia.

#### ***St John's Precinct Camden***

Nomination for National Listing.

Precinct is integral to and an important landmark within the deliberative picturesque landscape plan of the Macarthur family for Camden Park Estate and its privately founded Camden town. Heritage architects, Clive Lucas, Stapleton and Partners (2004)<sup>2</sup>, supported by NBRIS and Partners (2010)<sup>3</sup>, provide professional extensive and detailed information on the

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<sup>1</sup> CRAG (2016) *HERITAGE STUDY CAMDEN NEW SOUTH WALES Documentary Evidence addressing criteria for statutory heritage listing*

<http://www.crag.org.au/camden-township-heritage-study/>  
<http://www.crag.org.au/wp-content/uploads/2016/06/Camden-Heritage-Study-April-2016.pdf>

<sup>2</sup> Clive Lucas, Stapleton and Partners *St John's Anglican Church Precinct, Menangle Road, Camden CONSERVATION MANAGEMENT PLAN March 2004*

<sup>3</sup> NBRIS and Partners *CONSERVATION MANAGEMENT PLAN ADDENDUM 2010 St John's Anglican Church Precinct, Menangle Road, Camden 15 December 2010*

heritage value of the Precinct, and have prescribed conservation policies and assessed the Precinct as highly significant. The Precinct is listed by the NSW National Trust<sup>4,5</sup> which is monitoring the process of the above-mentioned potential sale of much of the Precinct and is strongly advocating national listing to better protect the site.

St John's Precinct, aesthetically intrinsic to the landscape and Camden's sense of place, is greatly valued by the community and visitors and has strong connections to the founding Macarthur family. The Precinct is a fixture in the cultural and social life of the community and has been since its inception. The Macarthur family gifted the entirety of the Precinct to Camden "for ever" and it was never their intention, as borne out by wording in the original trust deeds, that it be used for purposes other than those stipulated. It is very clear from our contacts with community members, including long-standing Parishioners, that the Precinct was entrusted by the Macarthur family for the people of Camden in perpetuity, as were many other significant assets such as Macarthur Park and Onslow Park.

Development of the Precinct would breach the Greater Sydney Commission's original draft plan for Camden town and its landscapes, published in November 2016, which featured St John's Church on its cover page and prioritised protection of the heritage values of Camden. Further an important precedent<sup>6</sup> was set in 1996 by the NSW Land and Environment Court which judged against development, not within the Precinct as currently foreshadowed, but in the vicinity of the Precinct. The Honourable Chief Justice M L Pearlman AM, stated:

*"It is abundantly clear that the Camden Township represents a particularly significant and sensitive heritage site in which conservation, involving reuse of buildings or land, must necessarily be approached with considerable care."*

National listing would assist in protecting against current and future developer approaches to purchase parts of the Precinct, thus destroying the whole.

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<sup>4</sup> The National Trust of Australia (NSW) *St John's Anglican Church Camden* 30 January 2017

<sup>5</sup> <http://www.camdenadvertiser.com.au/story/4611663/heritage-expert-dismayed-at-possible-st-johns-sale/>

<sup>6</sup> Land and Environment Court (1996) *Gledhill Constructions Pty Limited V. The Council of Camden NSWLEC 120 (19 April 1996)* Available at: <http://www.austlii.edu.au/cgi-bin/sinodisp/au/cases/nsw/NSWLEC/1996/120.html?stem=0&synonyms=0&query=1996%20gledhill%20camden>

## **PRODUCTIVITY**

Increasing the quantity and diversity of local jobs, and improving access to jobs across the Western City District (P1)

Encouraging successful centres through a clearly defined centre hierarchy (P2)

Strengthening the Strategic Centres of Narellan and Leppington (P3)

Ensuring a suitable supply of industrial and urban services land (P4)

Leveraging industry opportunities created by Camden's proximity to the Western Sydney Airport and Aerotropolis (P5)

Leveraging Camden's natural and cultural assets to promote local agricultural production and increase tourism (P6)

### **We agree with these priorities in principle.**

It is difficult to comment on these priorities in detail as much is unknown, especially key information about when rail transport infrastructure will be provided.

Also, in relation to P2 and P3 we note that the Camden Centres Study and how centres will be defined and strengthened has yet to be completed. Similarly, in relation to P4 further information is to be provided through an Industrial and Employment Lands Study, which will inform an Employment Lands Strategy.

In relation to P1 and P5, the high-level vision of a 30-minute city seeks to improve productivity, but relies on efficient transport for employees and between businesses. Until Camden is connected it will be not be able to fully leverage opportunities created through the Aerotropolis and a growing population in the SWGA. Delivery of employment opportunities in Camden that serve Camden's population, particularly knowledge intensive work, will be important in the lead up to the delivery of rail transport to the Aerotropolis.

In relation to P6 it is difficult to predict the advent of future agribusinesses within the Aerotropolis and what opportunities they will create for farming in Camden. However, Camden is well placed to provide fresh food into the greater Sydney market and capitalise on future synergies and transport efficiencies.

As an agricultural area, the birthplace of the nation's wealth and where many early agricultural industries began there is a natural connection between tourism and fresh food. Tourism of course is already happening and that will increase with the Western City Airport, especially if the unique characteristics of Camden rural history and cultural heritage and our natural assets and landscapes are protected and enhanced.

National and State heritage listings wherever possible will improve the marketability of the area and leverage productivity and economic opportunities.

## SUSTAINABILITY

Improving the accessibility and connectivity of Camden's Green and Blue Grid and delivering high quality open space (S1)

Protecting and enhancing the health of Camden's waterways, and strengthening the role and prominence of the Nepean River (S2)

Protecting Camden's rural land (S3)

Protecting and restoring environmentally sensitive land and enhancing biodiversity (S4)

Reducing emissions, managing waste and increasing energy efficiency (S5)

Improving Camden's resilience to natural hazards and extreme (S6)

### **We agree with these priorities and make the following comments.**

In relation to S1 we note that an analysis of a Blue and Green Grid has yet to be undertaken. Physical and visual accessibility to green spaces and waterways can be improved by mindful development controls. The long-held wisdom of minimal development on the floodplain and in flood areas needs to be observed. In particular protection of the existing open plain flood green belt surrounding Camden township, including its views and vistas, needs to be strengthened through the planning instruments of the LEP and DCP.

In relation to S2 we agree that opportunities to access, enhance and activate the Nepean River, an underused and under-appreciated natural asset, should be explored. We of course believe in clean water and healthy creeks and rivers. These can only improve the Blue Grid.

In relation to S4 we agree with all of the associated actions, fully support restoring environmentally sensitive land and increasing biodiversity. Biodiversity outcomes are of course related to the success of the Blue and Green Grids. In relation to S1 and S4 CRAG has been active in the conservation of local endangered ecological communities such as Eucalypt River Flat Forest and Cumberland Plain Woodland over several decades along the Nepean River, and recognises the importance of native vegetation connectivity.

This strategic planning level of the LSPS is the best opportunity to connect areas of biodiversity and establish a Green Grid or network of native vegetation through our landscape to protect the future viability of endangered native vegetation communities and native fauna habitat. It is important that the Green Grid link important remaining green space areas such as William Howe Reserve, Gundungurra Reserve, Australian Botanic Garden Mount Annan, etc and be wide enough for future development of native vegetation connections and fauna movement.

As covered under Infrastructure and Collaboration, in our view there are synergies in providing a cycleway that is also a bush corridor. We suggest linking all the way from Camden along the Nepean River through to the Australian Botanic Garden via William Howe Reserve. The bush corridor/cycleway would contribute to the Green Grid and its connectivity, provide habitat and improve the health of our flora and fauna and increase opportunities to enhance biodiversity.

We request that Council seek expert advice on establishment of the Green Grid and its connectivity.

In relation to S3, protecting our rural lands is critical to other aspects of the LSPS and also to improving the Green Grid. Our agricultural heritage and beautiful rural landscapes are essential to Camden's identity. An important element of protecting the landscape and respecting our agricultural legacy is maintenance of appropriate curtilage to European colonial homesteads. Old farmlands are being transformed by new housing estates. Pressure is often applied by owners and developers of these lands to minimise the original homestead's curtilage to maximise one-off development profits.

It is well understood that conservation outcomes for landscapes can be achieved more efficiently and directly at the strategic planning level. Whilst the need for housing is important it need not be met at the expense of landscapes that can be enjoyed by everyone and contribute so much to the area's distinctiveness and sense of place. We believe that the protection of ridgelines from development is essential to protecting scenic landscapes and that the views and vistas that they create are of invaluable benefit to the community. Unfortunately, the Scenic Hills, so important as a green scenic backdrop for both Campbelltown and Camden municipalities continue to be subject to development pressures and proposals.

We request that the LSPS consider including strategies and planning controls designed to protect our ridgelines and scenic hills.

The actions listed for S6 are important initiatives which will be assisted by a focus on improving our urban tree cover and establishing a connected Green Grid and healthy Blue Grid.

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Yours sincerely,



Glenda Davis

President  
0415 617 368

cc CRAG Committee

## **Appendix LSPS Project Background**

In Camden's case a grant was received from the State government in June 2018 to accelerate the LEP 2010 review and present an LEP Review Report to the Department of Planning and Environment by 31 October 2018.

The LEP Review Report, prepared and approved by Council at its meeting of 23 October 2018, provided a snapshot how Camden's LEP, policies and programs align with the GSC's Western City District (WCD) Plan and a gap analysis of research and investigation needed to underpin the review of planning controls and finalise the LSPS.

The gap analysis identified the need for:

- A new housing strategy to support location of a growing population in the right places. The LEP Review Report noted that with the trend of housing approvals and the current and planned supply of residential land that Camden Council will meet the 5-year WCD target of 11,800 new dwellings, but that the Camden Residential Strategy (2008) is to be updated to reflect changes in population, demographics and market trends.
- A centres strategy to analyse the capacity of different centres to accommodate local jobs, businesses, housing and social infrastructure.  
The LEP Review Report notes that:
  - with population growth and delivery of rail infrastructure a Centres Study is needed to evaluate their role and hierarchy;
  - growth in tourism is prioritised by Council's Economic Development Strategy and Community Strategic Plan and an objective supported by the Camden Destination Management Plan, the Camden Region Economic Taskforce's Strategic Plan 2018-2021 and the Macarthur Destination Management Plan.
- A strategic review of industrial and employment lands. The LEP Report notes that the strategic review is an expansion of its current considerations of issues at the interface of industrial and residential uses and of initiatives to manage land use conflicts with residential amenity.
- A traffic and transport review to test specific scenarios identified through the centres, housing and employment strategies.
- A review of heritage including a review of current and potential heritage listings; The LEP Review Report noted that heritage makes up an important part of the character of the municipality and is highly regarded by the Camden community. In particular the Camden Urban Design Framework (2018) recognizes the historical significance of the Camden town centre.

- A visual analysis to inform conservation and management of cultural and heritage impacts; The Camden Rural Lands Strategy (2017) identifies priorities and actions to protect Camden’s remaining rural lands and retain Camden’s valued scenic and cultural landscapes and the need to undertake a visual study in conjunction with key stakeholders.
- An analysis of Camden's Blue and Green Grid to increase public access (where ecological values are not compromised), and to connect residents to the natural landscape and enhance amenity and liveability. The LEP Review Report notes the existing management and protection framework of the Camden Riparian Areas Plan of Management (2002) and Biodiversity Strategy (2014) and the opportunity to undertake further analysis.

It is understood from the LEP Review Report (pp.19-20) that the sequence of steps in the LSPS project are:

1. Submission of LEP Review Report to the State government
2. Undertake the relevant studies as referred to in the above gap analysis to inform the following strategies and programs:
  - A local housing strategy
  - A centres strategy
  - An employment lands strategy
  - A traffic and transport review
  - A heritage review and visual analysis
  - A blue and green grid analysis
3. Prepare and exhibit a draft LSPS
4. Finalise the draft LSPS
5. Prepare a planning proposal and submit to state government for gateway determination
6. Exhibit the planning proposal in accordance with the Gateway determination
7. Review submissions and prepare a report explaining how the issues raised in the submissions have been addressed
8. Submit draft LEP to give effect to the WCD Plan

We note that the relevant studies and analyses (Step 2) are not included in the Draft LSPS (Step 3) but are listed to be completed as short-term priorities as follows.

DRAFT LSPS SHORT TERM LOCAL PRIORITIES  
LISTED FOR INVESTIGATION AND RESEARCH

The priorities in the draft LSPS (Step 3) indicate that the following additional research and analysis (Step 2), as identified in the gap analysis, remains to be undertaken in the short-term to finalize the LSPS (Step 4):

**A local housing strategy:**

Under Liveability Local Priority L1:

- finalise the Camden Housing Market Analysis which will provide the evidence base analysis of the existing Camden housing market supply and potential demand;
- develop a Housing Strategy which will use the Camden Housing Market Analysis to develop the vision and evaluate options for housing growth within the Camden LGA;
- investigate the development of an Affordable Housing Strategy and Affordable Housing Contribution Scheme.

**A centres strategy:**

Under Productivity Local Priority P2:

- finalise the Camden Centres Study, which will evaluate the role and hierarchy of centres, and analyse the capacity and viability for different centres to adopt a place-based approach and accommodate local jobs and commercial services, additional housing and recreational infrastructure
- investigate the recommendations of the Camden Centres Study

**An employment lands strategy:**

Under Productivity Local Priority P2:

- undertake an Industrial and Employment Lands Study which aims to retain the economic viability of industrial and urban services land, manage Camden's industrial lands, and if necessary, identify potential new precincts;
- prepare an Employment Lands Strategy which will inform future land use controls in the Camden LEP to ensure that there is a sufficient amount of zoned and serviced employment land available to meet demand.

**A heritage review and visual analysis:**

Under Liveability Local Priority L2:

- review non-indigenous heritage items and update the Camden LEP and DCP;
- undertake a scenic and visual analysis with neighbouring Councils to identify and protect ridgelines, scenic and cultural landscapes, and enhance and protect views of scenic and cultural landscapes from the public realm;
- investigate the development of local character statements to be incorporated within planning controls.

**A blue and green grid analysis:**

Under Sustainability Local Priority S1:

- prepare a Green and Blue Grid Analysis for Camden and identify mechanisms to implement the Green and Blue Grid

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