

Camden Residents' Action Group

Incorporated

Camden – Still a Country Town

Website: <http://www.crag.org.au/>

Face Book:

<https://www.facebook.com/CRAGcamdenresidentsactiongroup/>

PO Box 188

Camden NSW 2570

Email: admin@crag.org.au

Phone: 0415 617 368

General Manager
Camden Council
Oran Park 2570

19 May 2022

Email: mail@camden.nsw.gov.au

Dear General Manager

Re: *Connecting Camden Community Strategic Plan (CSP) and accompanying programs and plans*

Thank you for the opportunity to make the following comments on plans that shape the environment and liveability of Camden's community into the future.

Community/Civic Catalyst Site

The Long-Term Financial Plan (p. 13) shows two years of proposed borrowings of \$27.3M in 2025/26 and 2026/27, i.e., \$54.6M, to fund this project. As Council's projected loan liability as at 30 June 2022 is \$43.4 million and is expected to be \$96.4 million by the end of 2031/32, this is a project that contributes most to that liability and associated interest payments.

We note that in the 2022/23 - 2025/26 Capital Works Program (p. 9) the amount of \$27.3M for 2025/26 for the Catalyst site is included in the General Fund & Reserve Funded Programs 2022/23 - 2025/26. Included alongside this budgeted amount is a scoping study in the coming financial year for scoping study for a Community Cultural and Administration Centre, and as would be expected regular yearly amounts for maintenance of Council Chambers.

It is not clear whether the Cultural and Administrative Centre refers to and is the same as the Catalyst site project.

It is not clear what the Catalyst project is, where it is located, why it is needed and how it would benefit the community.

The draft documents need to clearly articulate what this very high level of borrowings and expenditure is for and what benefit to the community it represents. The future impact on rates paid by the community in relation to servicing this loan must also be considered, especially as interest rates are predicted to increase significantly.

Climate change and flooding

We note the CSP objectives (B3, B3.1) that climate impacts and risks in Camden are well managed and to build community resilience to climate change impacts.

We are familiar with Camden Council Flood Policy (2006), the 2005 NSW Flood Manual and the latest directives of the NSW flood-prone land package (14 July 2021) ¹. Development of flood prone land is a current and major issue for NSW. A fundamental principle of flood policy is that

Case-by-case decision making cannot account for the cumulative impacts on flood behaviour and risks, caused by individual developments or works. This form of ad hoc assessment contravenes the principles of the manual.

We can cite at least three recent examples² of Council staff recommending approval to the Local Planning Panel to allow development on flood prone land without reference to cumulative effects. We submit that this approach is in violation of these objectives of the draft CSP, as well as NSW policy. For the CSP to have meaning and be operationalised, Council's planning staff also need to follow the objectives in assessing development applications.

The flooding in Lismore is a salient reminder that climate change is not only real but accelerating to the extent that flooding history is not a reliable guide to future rain impacts. Recent flooding in Camden with its road closures and evacuation limitations illustrates the risks of development on a flood plain, and indicates that its development should be severely limited, particularly below what is perhaps wrongly documented as the 1 in 100-year flood level.

¹ <https://www.planning.nsw.gov.au/-/media/Files/DPE/Circulars/planning-circular-21-006-flood-prone-land-package-2021-07.pdf?la=en>

² 11 Mitchell Street Camden, 20 Elizabeth Street Camden, 19 Edward Street Camden

Heritage and culture

Although the CSP and all council policies acknowledge Camden's rich and unique heritage the only specific objective (LB2.3) is to identify and maintain city heritage and culture. More specific objectives to be acted upon are required.

We do not believe that Camden's heritage is fully identified. Wollondilly Council for example has more Heritage Conservation Areas (HCAs), listed items and archaeological sites than Camden, although Camden is one of the most historically and culturally significant areas in Australia.

We despair at the loss of cultural significance in the Camden HCA. Clearly contributory cottages according to the HCA listing have been approved for demolition without justification, as required under the Burra Charter and Planning Principle of the Land and Environment Court. This approach does not satisfy even the one proposed CSP objective of maintaining heritage and culture. Council staff at least need to operationalise the objective of maintaining heritage if the CSP, as well as the LEP and many other Council policies, are to be at all meaningful and useful.

Heritage conservation is an important issue in the community which expects Council to honour its policies of valuing and protecting Camden's rural sense of place and Macarthur legacy.

The CSP needs to be more explicit and specific in its wording of objectives about protecting Camden's irreplaceable built heritage and agricultural history.

Camden's heritage also includes many significant trees. Making a properly researched list of such trees and putting it in the public domain is an important heritage protection. We also request that an objective to that end be included in the CSP.

Yours sincerely



Glenda Davis

President