

Camden Residents' Action Group

Incorporated

Camden – Still a Country Town

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Local Planning Panel 18 October 2022

Re: DA NO: 2021/1941/1 at 186 Cawdor Road, Cawdor

Construction and use of a football training facility including site preparation works, dam dewatering, 4 x football training fields, main facility building, storage building, amenities building, associated civil infrastructure including car parking, vehicular access roads, intersection upgrades, onsite detention and water quality treatment, and perimeter and internal landscaping works including revegetation of the riparian corridor and construction of a BBQ area.

I speak on behalf of Camden Residents' Action Group. We appreciate the proposed changes in the Agenda Report including improved screening, no PA system or lighting, restrictions on usage times and numbers, car park reduction and the need to demonstrate that the Cawdor Road intersection will work.

Football at this level is big business. This proposal is for non-agricultural development on land zoned for primary production¹.

The argument is that the training facility can be categorised as outdoor recreation which the zone does not specifically prohibit. Indoor recreation and major recreation facilities are prohibited as are car parks, and other land uses such as health and education services which could arguably be used in a description of this training facility.

The word *recreation* is defined by various dictionaries to always include the concepts of leisure time and voluntary relaxation activities as refreshment from work. The LEP dictionary definition of a *recreation area* is *a place used for outdoor recreation that is normally open to the public* which can include ancillary buildings. All of the examples provided in the LEP definition are open to the community, freely or through membership or payment of a fee.

The proposal emphasises that it is not open to the community. Our understanding is that the players are paid. It is their job to train during normal working hours and they will by definition not be using the facility for recreation.

¹ RU1

We also point out that the use of the proposed main building, which is much larger and grander than any found on recreations fields, is not ancillary. It is an inherent and necessary facility for training. Its footprint is of course much smaller than the area of the training fields. If the common facility costs are omitted, the costing shows that the investment is predominantly in indoor facilities including offices, a substantial gymnasium and aquatics room.² Arguably, if the building could be defined as being for recreation rather than as a workplace, it would come under *recreation facility (indoor)* which is a prohibited use in the primary production zone.

We cannot agree that the primary production zone objective³ of a being a non-agricultural use that is compatible with agricultural, environmental and conservation values is met. Our understanding is also that the development would be visible from many points and approaches to Camden.

As Camden's Local Strategic Planning Statement⁴ emphasises rural and scenic landscapes are most valuable and intrinsic to our local identity and are to be protected. *Camden's Rural Lands Strategy*⁵ is to protect remaining rural lands and minimise non-agricultural development. This proposal is also not necessarily consistent with the Metropolitan Rural Lands Area and blue and green grids planned by the Greater Sydney Commission. We note that Council is currently undertaking a Green and Blue Grid Analysis, as part of its LEP Review. This development has the potential to compromise connections and green corridors.

The community is very concerned that this proposal is a foot in the door, with subsequent modifications to come that will exacerbate its impact on Camden's renowned rural and cultural landscapes.

Flood events already this year emphasise that this proposal is at high risk for financial losses due to damage and inability to use the training facilities. Using the site for agriculture, consistent with its zoning, is common-sense. A condition for any development should be to preclude any public funds or concessions in compensation for flood events.

We respectfully request that this DA be refused.

579 words (excl. footnotes)

² 73% compared to 27%

³ *To encourage sustainable primary industry production by maintaining and enhancing the natural resource base.*
To encourage diversity in primary industry enterprises and systems appropriate for the area.
To minimise the fragmentation and alienation of resource lands.
To minimise conflict between land uses within this zone and land uses within adjoining zones.
To permit non-agricultural uses (including tourism-related uses) that are compatible with the agricultural, environmental and conservation values of the land.
To maintain the rural landscape character of the land.

⁴ Camden Council March 2020 *Camden Local Strategic Planning Statement* Available at <https://www.camden.nsw.gov.au/assets/Uploads/adopted-LSPS.pdf>

⁵ Camden Council November 2018 *Rural Lands Strategy* (p. 3) Available at <https://www.camden.nsw.gov.au/assets/pdfs/Council/Plans-and-Strategies/ADOPTED-Rural-Lands-Strategy-as-amended-November-2018-pdf.pdf>