

5th July 2020

The General Manager
Camden Council
PO BOX 183
CAMDEN NSW 2570

Via email: mail@camden.nsw.gov.au

Draft Camden Centres & Employment Land Strategy

Dear Mr Moore

I write in relation to the *Draft Camden Centres & Employment Land Strategy (draft Strategy)* prepared by Camden Council (Council), for comment until 5th July 2021.

The Urban Taskforce has been vocal in our calls for much-needed improvements to planning systems and policies to support economic growth and productivity. This remains particularly important in this fast-changing COVID-19 world.

The Urban Taskforce supports Council's vision of "*Camden's retail centres and industrial and urban services lands offer a range of local job opportunities and access to services for residents*" and the four proposed directions to deliver on the vision. We note a number of actions that will improve the flexibility of planning provisions in employment areas and support Council in these proposals.

However, Urban Taskforce is concerned that a number of remaining actions are over-prescriptive, anti-competition and development restrictive proposals.

The NSW Productivity Commission's White Paper is clear in stating that "*to boost productivity we need a more responsive and flexible planning system*". When specifically referring to unlocking the potential of employment and industrial lands the paper states "*If the planning system is going to enable higher productivity, it must give business centres the greatest possible capacity and flexibility to do this.*"

As such, **Urban Taskforce recommends** that the draft Strategy be reviewed with a view to delivering greater flexibility across centres and employment areas and the greatest possible development capacity.

In relation to the draft Strategy's proposed actions and draft guiding criteria for planning proposals Urban Taskforce provides the following comments and recommendations:

Draft Action 12: "*Protect and retain the industrial and urban services land at Smeaton Grange, Gregory Hills and Narellan.*"

In the delivery of productivity benefits and local employment opportunities it is important that all industrial and urban services land cater to the widest range of land uses and the changing needs of investors and employers. The limitations of this overly-restrictive "retain and manage policy" is why the Greater Sydney Commission (GSC) has now been tasked

with its review. The Government has committed to the outcomes of the GSC's review "informing future approaches to the management of industrial and urban services land" across Greater Sydney.

Accordingly, **Urban Taskforce recommends** Council deletes the draft action of "Protect and retain the industrial and urban services land at Smeaton Grange, Gregory Hills and Narellan" pending the outcome of the GSC review.

Draft Action 23: "Investigate opportunities to support the medical and health care precinct at the northern B5 Business Development zoned land within Gregory Hills"

While Council's efforts to support opportunities for medical and health care facilities are acknowledged, these efforts should be extended across the LGA. Accordingly, Urban Taskforce recommends the action be amended to read "Investigate opportunities to support the medical and health care facilities across the LGA".

Draft guiding criteria for planning proposals: Urban Taskforce objects to the following two draft criteria:

- "Planning proposals for new centres and the expansion of existing centres should be supported by an economic impact report, detailing potential economic impacts on current and planned centres", and
- "Planning proposals to expand or develop industrial and urban services land should not adversely impact on the viability of other industrial and urban services land".

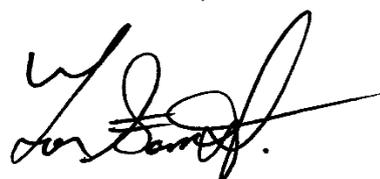
Both of these criteria are anti competition, outside the remit of the Environmental Planning and Assessment Act 1979 and contrary to Council's vision to offer a range of job opportunities and services to residents. The historic protection of an outdated centres policy and the associated exclusion of competition will fail to generate much valued new employment opportunities and activation of emerging and planned centres. Further, this narrow approach will not drive the investment needed to deliver improvements to underperforming existing employment areas.

Accordingly, **Urban Taskforce recommends** that these draft criteria are removed from the final strategy.

Urban Taskforce urges Council to consider our recommendations in finalising the draft Strategy.

Table 1 includes a summary of Urban Taskforce recommendations.

Yours sincerely



Tom Forrest
Chief Executive Officer

Table 1:
Summary of Urban Taskforce recommendations

	Urban Taskforce recommendation
1.	In the context of the Productivity Commission's White paper, Urban Taskforce recommends that the draft Strategy be reviewed with a view to delivering greater flexibility and the greatest possible development capacity across centres and employment areas.
2.	Urban Taskforce recommends Council deletes the draft action of "Protect and retain the industrial and urban services land at Smeaton Grange, Gregory Hills and Narellan" pending the outcome of the GSC review.
3.	<p>Urban Taskforce recommends that the draft guiding criteria for planning proposals:</p> <ul style="list-style-type: none"> • "Planning proposals for new centres and the expansion of existing centres should be supported by an economic impact report, detailing potential economic impacts on current and planned centres", and • "Planning proposals to expand or develop industrial and urban services land should not adversely impact on the viability of other industrial and urban services land" <p>are removed from the final strategy.</p> <p>The historic protection of an outdated centres policy and the associated exclusion of competition will fail to generate much valued new employment opportunities and activation of emerging and planned centres.</p>