

# *Camden Residents' Action Group*

*Incorporated*  
*Camden – Still a Country Town*

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

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## **Re: McDonald's DA 2017/1159/1**

We thank you for forwarding our questions on the above DA to McDonald's.

We thank McDonald's for their first response to our questions, and very much appreciate the offer to answer our further questions which follow.

### **HERITAGE IMPACT**

Camden township is the subject of much research brought together in a recent study<sup>1</sup> and was also most recently recognised by the NSW Heritage Council<sup>2</sup> as very significant in the triumvirate of key elements in the design of the regional Camden landscape created by the Macarthur family along with St John's and Camden Park. The Camden Township, which originated as a private town on Camden Park, is an important visitor destination close to Australia's largest city and is important for future generations as a window into early European settlement. Whilst this DA may be viewed by some as minor it has potentially major ramifications to heritage value.

**We appreciate the references by McDonald's to its location within Camden's Heritage Conservation Area, legislated through CLEP 2010 and described in the DCP B3 as ...more than a collection of individual heritage items. It is an area in which the historical origins and relationships between various elements creates a sense of place that is special and therefore worth keeping.**

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<sup>1</sup> <http://www.crag.org.au/wp-content/uploads/2016/06/Camden-Heritage-Study-April-2016.pdf>

<sup>2</sup> <http://www.environment.nsw.gov.au/heritageapp/ViewHeritageItemDetails.aspx?ID=5053423>

**DCP B4.2 refers to compatibility of new work and states:**

*10. Ensure development is based on, and sympathetic to, an understanding of the heritage significance of the place.*

*11. Ensure that any development within a heritage conservation area is compatible with and sympathetic to the significant characteristics of the conservation area as a whole and make a positive contribution to the area.*

*12. Ensure that the development in the vicinity of a heritage place is undertaken in a manner that does not detract from the heritage significance of the place.*

An overarching aim of **SEPP 64** is to ensure that signage is compatible with the **desired** amenity and visual character of an area and it refers to special areas: it specifically notes heritage conservation areas, and signage being of visual quality that is appropriate to its setting and of a scale, proportion and form appropriate for the streetscape, setting or landscape

We would particularly appreciate more detail on the heritage aspects of the proposal.

The SOE states

"The signage proposed is consistent with McDonald's modern store branding which is simple, concise and uncluttered in appearance. Replacement business identification signs are proposed to substitute existing signage with like for like equivalents.

The new building signage is consistent in scale, bulk and size with that existing. Blade wall signage will be consistent with the site and surrounding built form. The proposed pylon sign has been designed with consideration for the surrounding site context and heritage nature of the locality. Accordingly, a contemporary pylon design of a conservative height has been proposed to integrate into the surrounding streetscape and character. It is considered the signage scheme is sympathetic to the heritage conservation area."

We submit that modern store branding and a 6m pylon sign cannot be argued to comply with DCP B4.2 objectives of

- *Encourage well designed signage which complements and enhances the character of heritage items and heritage conservation areas.*
- *Encourage new signage that makes reference to traditional advertising methods such as painted signage, lettering style, location and style and **spot lit illumination.***

or its specific controls which include

13. *Internally illuminated signage is restricted to under awning signs only.*
18. *Corporate and franchise signage is not appropriate unless it is in harmony with the character of the heritage item or conservation area. Standard corporate signage is usually not considered appropriate in the context of the character of heritage items and heritage conservation areas, and may require some modifications to suit the location.*
19. *The development application will be required to demonstrate that the proposed signage will complement the historic character of the building or conservation area in terms of colour, material, proportion, positioning and font. Pole and pylon signs, if appropriate, shall not exceed the predominant roof height of the conservation area or item.*
20. *Reference should be made to the heritage provisions of chapter B3. Environmental Heritage.*

Signage in Edward Street surrounds is mainly for agricultural products which is not pretty but is consistent with Camden's renowned farming heritage. McDonald's is an American modern fast food franchise with no connection to Australian rural life and colonial history. Therefore arguably when a McDonald's is permitted to locate in a Heritage Conservation Area it should be as unobtrusive as possible, because by its very nature it has no positive contribution to make to heritage value. McDonald's located in heritage areas of Europe for instance must be housed in existing heritage buildings with signage kept traditional and/or minimalistic.

**Changes to be made to the positioning, fabric, lighting and overall obtrusiveness of signage are of particular concern.**

We note that mentions of the DCP and SEPP 64 in the previous response to our questions are not referenced and that there are no specific references to the provisions of DCP B3 *Environmental Heritage*. Unfortunately a close reading of the response reveals that our original question, "how does McDonald's substantiate the claim that the changes to the signage scheme are sympathetic with the heritage conservation area?", has not been explained in terms of the planning provisions.

Unfortunately we are still not clear about what is proposed. Perhaps photos and scale drawings would help, preferably of before and what it would look like after. Note: we believe a HIS as referred to below would clarify, as this is its purpose, the impact of what is proposed on the heritage conservation area.

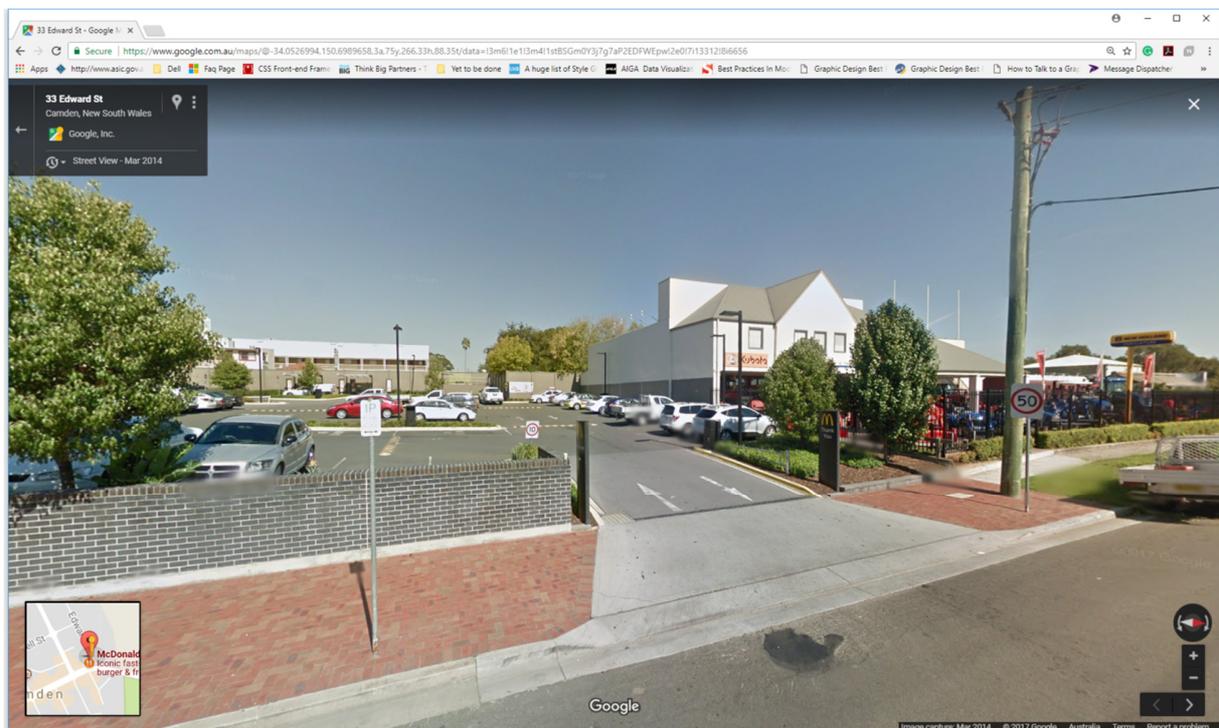
**QUERY 1: Could picture documentation of the changes to the streetscape and signage be provided please?**

**QUERY 2: How is the pylon sign to be illuminated and what other illumination of signage will be installed?**

The SOE states that signage is to be **upgraded to McDonald's standard corporate signage**. This is clearly inconsistent with the spirit and letter of the DCP 4.2(18) as cited above (and SEPP 64 in relation to heritage conservation areas).

**QUERY 3: How does McDonald's substantiate compliance with DCP 4.2 (18)?**

Whilst it may be arguable in a narrower sense that the proposed 6m pylon sign is not entirely incompatible with other signage in the vicinity it would be very difficult to argue that it is compatible with a heritage conservation area and that it is not more obtrusive than what is there now at the entrance.



In any case it is of course not a valid argument to point to other signage that also may be inappropriate. As addressed above this is not the wording or intention of the DCP and SEPP. It is also not clear what signs are being referred to as being compatible with a 6m tall, 1.524m wide pylon sign. The sign that is specifically mentioned in the response is assumed to be the tall thin sign at Camden Tractors to the right in the above photo.

We are yet to be convinced that this sign is as obtrusive as that proposed by McDonald's.

**QUERY 4: How does McDonald's substantiate a claim that the changes to the signage scheme are sympathetic with the heritage conservation area in terms of the planning instruments, in particular relevant sections of CLEP 5.10, DCP B3 and B4.2 and SEPP 64 Schedule 1 assessment criteria?**

**Heritage Impact Statement:** We accept of course that according to the CLEP there is not necessarily a mandatory requirement for a Heritage Impact Statement if a DA is judged to be minor. However given the original controversy over allowing a McDonald's in the valued historic town and the focus on its potential obtrusiveness in the original community debate and final approval we consider that an HIS would be in the public interest. We feel it is important to allay fears of McDonald's signage being obtrusive and corporately generic as in new areas, which would be seen as destructive to the rural and historic amenity of the town. We are also as yet unconvinced that the proposed changes are minor.

**QUERY 5: Could McDonald's submit an independent HIS per LEP 5.10. 4 and 5 please?**

## VEGETATION

We also note that there seems to be no mention of the need to remove at least one tree and probably both trees at the site of the proposed pylon sign. The preservation of vegetation in a heritage conservation area is particularly addressed in CLEP 2010 5.9 (7) and the DCP 2011 at B1.5, B2. If we have missed this aspect of the DA we are happy to be directed to it, but it does appear that vegetation is to be removed.

**QUERY 6: How are the vegetation provisions in the planning instruments to be addressed?**

## TRAFFIC

The community has raised traffic and queuing concerns with us, and we take the opportunity to note that a traffic study was considered unnecessary. Communications with us would suggest that the traffic into and out of McDonald's at busy times, especially with queuing congestion within the site placing pressure on drivers, can be dangerous. Being close to Edward St roundabout McDonald's patrons are sometimes not allowing sufficient space to egress safely. The DA would seem to suggest that McDonald's is expanding within the site, providing more space for food windows. Parking is to be reduced by 10 spaces, a 17% decrease. The implication is that additional drive-through patronage is planned and expected.

**QUERY 7: Could an independent traffic study be provided please.**

## RUBBISH

Whilst not a matter for this DA, could we also take the opportunity to raise another consistent community concern: McDonald's containers and wrapping littering gardens and streets. A condition of consent in the original DA was that staff would regularly and frequently ensure that rubbish was collected from surrounding streets.

**QUERY 8: Is rubbish being collected? If so where and how often?**

We thank you and look forward to receiving replies to these queries so that we can understand what is proposed.

Original Queries 28 Sept 2017 forwarded by N Clarke Senior Planner to McDonald's

Signage and building design were heritage issues addressed in the original DA and its approval on 26 May 2009. Since then of course the Camden Township has been gazetted as a heritage conservation area.

The SOE states

*The signage proposed is consistent with McDonald's modern store branding which is simple, concise and uncluttered in appearance. Replacement business identification signs are proposed to substitute existing signage with like for like equivalents.*

*The new building signage is consistent in scale, bulk and size with that existing. Blade wall signage will be consistent with the site and surrounding built form. The proposed pylon sign has been designed with consideration for the surrounding site context and heritage nature of the locality. Accordingly, a contemporary pylon design of a conservative height has been proposed to integrate into the surrounding streetscape and character. It is considered the signage scheme is sympathetic to the heritage conservation area.*

However it does seem that the signage will be more intrusive. It seems

- a 6m sign, which is not of conservative height and not of similar scale, bulk and size, is to replace the modest Edward St one in attached photo
- that some changes, unspecified, will be made to the most obtrusive current sign at cnr of Argyle and Edward as per attached plan
- that possibly some other unspecified changes will be made to other signage

A McDonalds in Camden had been knocked back a number of times and was highly contentious at the time of its approval - see attached SMH article. There was no need for a new generic building at a signature location as there were at the time vacant shops in Argyle Street being in the midst of the GFC. The community put in a lot of effort and mitigated the outcome somewhat but it was predicted that McDonalds would gradually make itself more visible.

Would it be possible to ask McDonalds to provide a heritage impact statement please (LEP 5.10.4 and 5)? If not could they state clearly

- what changes are to be made to the positioning, fabric, lighting and overall obtrusiveness of signage.
- how they substantiate the claim that the changes to the signage scheme are sympathetic with the heritage conservation area (DCP B4.2)