

Camden Residents' Action Group

Incorporated

Camden – Still a Country Town

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

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The General Manager
Camden Council
70 Central Avenue,
Oran Park, NSW 2570

21 September 2016

Attention: Mr William Jones

Dear Mr Jones,

Re: Development Application 105/2016:
Proposed Medical Centre No. 7 Park Street, Camden.

Although Camden Residents' Action Group, as a long standing community group is usually notified of proposed developments that affect the Heritage Conservation Area of Camden, we did not receive any letter about the above proposal. As we have serious reservations about it we are hereby lodging this objection, which we trust you will acknowledge and take into account.

This proposal is relying on the development type not being prohibited by B4 zoning. The introduction of this new zoning around 2012 would seem to have incorrectly captured the residential areas of Park Street, including the site of the proposed development and Menangle Road and most extraordinarily St John's Church Precinct.¹

Further the approval of this development application would breach objectives and policy controls articulated in DCP 2011 for the heritage conservation area as designated in LEP 2010.

The introduction of a B4 zoning was a blanket change across NSW instigated by the State government, seemingly without notification to affected residents, or consideration of heritage

¹ Office of Environment and Heritage *St John's Church Precinct*
<http://www.environment.nsw.gov.au/heritageapp/ViewHeritageItemDetails.aspx?ID=1280070>

conservation areas although the foreshadowed potential of a *Suburban Character Zone* may have explicitly precluded development adversely impacting on an area's local character. Park Street, characterised by low-scale, single residential allotments, is a quiet family street and a rezoning to B4 was clearly mistaken. This zoning change was undertaken it seems without input from, or the knowledge of, existing residents. It presents the possibility, as seen with this development proposal, of impingements on their rights to quietly enjoy their properties.

CRAG suggests that an urgent review be undertaken of how Park Street and the other nearby areas as mentioned in the opening, were abruptly incorporated into a B4 zoning. This change is clearly inappropriate and the zoning should be revised. It is unimaginable that telling explanations could be provided for a B4 zoning that would satisfy the residents and be consistent with the heritage conservation area provisions and protections.

Nevertheless the development proposal in question also breaches objectives of the B4 zoning:

- To provide a mixture of compatible land uses and
- To minimise conflict between land uses within the zone and land uses within adjoining zones.

Park Street is adjacent to historic Macarthur Park and is in close proximity to the iconic St John's Church. The site of the proposed development is also adjacent to a heritage listed building and within a heritage conservation area of particular valued character. The use of a proposed medical centre, more aptly described as a medical day surgery facility, is not compatible with existing residential, recreational, social and cultural uses and would introduce a conflicting different character into what is a unique place within the heritage conservation area.

The development proposal conflicts with DCP 2011 objectives (Section B3.1.2) of retaining the cohesive character of each street and retaining and promoting evidence for interpretation of its historical development since its inception as a Macarthur private town on Camden Park.

Lack of compliance with the heritage provisions of DCP 2011 (Section B3.1.1 (10, 11) on compatibility is also apparent in that the development proposal:

- does not demonstrate an understanding of
 - the heritage significance of the place as an important residential element of the conservation area;
 - how moving the new building towards its neighbour compromises the streetscape character by presenting a different than expected distance between buildings;
 - impacts of day surgery business activities on the passive, historic recreation area of Macarthur Park.
- does not argue to, nor can it, make any positive contribution to the area;
- does not recognise that the nature of day surgery activities, signage, traffic movements and so on

- will detract from the heritage significance of Park Street as an established residential street of character contributing to the heritage value of the legislated Heritage Conservation Area.
- will have an impact on all living in the supportive and cohesive community in Park Street.

Indeed the concept of establishing such as facility within a quiet area of residences on a small land parcel of narrow width is in itself extraordinary. It is difficult to see how the constraints imposed by a residential lot

- can accommodate the minimum required size of a theatre;
- how expected traffic movements into and within the land area can be accommodated;
- how cars can safely exit the parking area in a forward direction;
- how the number of parking spaces can comply with council requirements;
- how any requirement for an ambulance on top of other traffic and parking requirements can be accommodated;
- how safety evacuation procedures can be managed, particularly for patients.

It is suggested that the plan and design of this facility do not meet minimum technical and regulated requirements.

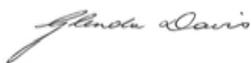
Also Park Street as its name suggests provides parking for entrants into Macarthur Park, an important and well-used public space endowed by the Macarthur family to the people of Camden. This bequest never anticipated that business activity at its perimeter would compromise access to and enjoyment of the Park.

We note that Council did have concerns about the proposal and asked for additional reports. Having reviewed the original and new information, it is our conclusion that the proposal for the Park Street location is poorly conceived.

Certainly the amenity of the residents in Park Street, users of Macarthur Park and the heritage conservation area generally would be degraded if this development proposal were to be approved. It would also set an inappropriate and dangerous precedent.

Further we suggest that Council suitably rezone the area as the residential conservation area that it is, so that inappropriate development proposals are not encouraged and do not reach application stage.

Yours sincerely,



Glenda Davis
President