

Camden Residents' Action Group

Incorporated

Camden – Still a Country Town

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The General Manager
Camden Council
Oran Park
CAMDEN 2570
27 June 2017

Dear Sir,

***RE: Objection to Submission to Amend Camden LEP (2010)
re: Lot 1, DP1121907, 2 Richardson Rd, Narellan***

CRAG objects to this planning proposal to amend the LEP to permit the development of a car wash fronting Camden Valley Way with vehicular access off Richardson Road.

Heritage conservation

The original 'Conservation Plan (CP)' prepared by Paul Davies (n.d.) prepared for this area including Lot 1, DP 1121907 – 2 Richardson Rd, identified the openness of the land fronting Camden Valley Way and the suitability of the development of a 'child care centre' and the schools. The CP clearly identifies the area proposed for this LEP amendment as open space with a 'primary view corridor' to St Thomas Chapel and includes an enhancement provision to "regrade corner and bank along street fronts to gentler slope, remove high fences, brick walls, trees and shrubs".

The St Thomas Church Chapel Group (including church school) is heritage listed (Item 1136) in Camden LEP (2010).

The CP identifies the "Historic Open Character of the Town of Narellan" stating that the land between St Thomas' Church and Camden Valley Way, including the site on the corner of Camden Valley Way and Richardson Street (now the Macarthur Anglican oval), has

remained open ground since the initial survey and establishment of the village of Narellan. This land has been a significant part of the open space linking the main buildings of the village.

The CP includes the following specific objectives and recommendations:

1.1 These open spaces are significant elements of the historic township of Narellan and should be conserved as such.

1.3 No development should occur on the land at the corner of Camden Valley Way and Richardson Street. This land should be retained and used as public open space, **visually linking the church buildings to the town of Narellan.**

1.4 The land between Camden Valley Way and the existing building line of Narellan Public School should be retained as open space or **playground, so that the open feel of this site and its relationship to the church is retained and respected."**

As Narellan becomes commercially larger and subject to increasing developer pressure it is most crucial to respect its heritage as identified and highlighted above.

The Heritage Impact Statement submitted with the proposal is minimalistic and its assessment of impact on heritage values (5.2; 6.0) questionable:

- It cherry picks Article 22 of the Burra Charter claiming that the proposed new work does not distort or obscure the *cultural significance* of the place, or detract from its *interpretation*, and ignores the foundational articles for conservation in the Burra Charter such as 2, 3 and 5;
- The CP makes it clear that development of this site would detract from the heritage value of St Thomas Church group and the interpretation of early Narellan. Protection of the view corridor and open space is clearly set out in Camden DCP section B3.1.4 which states

The buildings, surrounding open space and the significant view corridors between St Thomas Chapel, the School Church, Narellan Hotel, cemetery and Camden Valley Way, shall be retained;

- This proposed development exacerbates, not excuses, the impact of the Police Station development which was argued against at the time for similar reasons - it should never be used as a precedent;
- No negative effects, only positive effects, on heritage value are listed. However the proposed development clearly contravenes the DCP 2011 and contradicts the CP recommendations and its analysis of heritage value.



Photos taken from the corner of Camden Valley Way and Richardson Road. The Police station is to the right.

The proposal to amend the LEP zoning to allow more commercial development in this view corridor area is totally inappropriate. As stated in the CP the most important view of the St Thomas' Church is that from the intersection of Camden Valley Way and Richardson Road. This view allows the church to be seen in its semi-rural setting, as the church on the hill, the historical spiritual focus of the town. A car wash would clearly detract from the semi-rural setting and would do nothing towards interpretation of the early history of Narellan, a concept articulated throughout the principles of the Burra Charter.

CRAG cannot accept the Tropman & Tropman position that there would be no negative effects from this development, which so clearly contradicts the position of Paul Davies, author of the CP, who presents an in depth evaluation and one that has been adopted into Camden's DCP.

Both heritage assessments cannot be correct.

The proposed car wash or any commercial development of the site would adversely impact on the heritage value of the overall site, in particular on the view corridor.

There is insufficient evidence presented in the Heritage Impact Statement accompanying this proposal to support a change to the current LEP. The proposed change has not been argued convincingly and is open to challenge.

Traffic

The proposed vehicular access off Richardson Road for the car wash is impractical. The access and egress are close to the very busy and awkward intersection of Richardson Road and Grahams Hill Road with Camden Valley Way, a main thoroughfare. A high volume of traffic turns into and from and across Camden Valley Way at this intersection. The two turning and straight ahead lanes are narrow with poor visibility.

An entry and exit to a car wash in Richardson Road would increase the number of movements and exacerbate the difficulties already experienced because of the high volume of traffic at this intersection and the chances of accidents. There is a similar situation at the entrance to the Shell Service station, Graham Hill Rd, on the other side of the intersection.

Exiting from the car wash onto Richardson Rd would often be difficult because of the build-up of traffic at the lights.

This causes real problems in heavy traffic and can only get worse with more and more vehicle movements.

Schools: Health and Safety

The proposed development is inappropriately situated very close to Hope School and Narellan Public School. The subject land is currently appropriately zoned - Low Density Residential (R2).

It is healthier and safer to educate children in leafy spacious surroundings rather than breathing traffic fumes and negotiating vehicular movements. A leafy stand of Spotted Gums would need to be removed.

The additional vehicular traffic will create congestion around school times and be detrimental to their safety.

It is well known that car exhaust fumes, which include carbon monoxide and nitrogen oxides, can affect both the health and wellbeing of children as well as negatively impact their learning.

Any proposal that would increase vehicular movements near schools suggests a lack of social awareness and is counter intuitive.

CRAG therefore objects to any change of LEP 2010 for 2 Richardson Road, Narellan.

Yours sincerely,



Glenda Davis

President

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