

Camden Residents' Action Group

Incorporated

Camden – Still a Country Town

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

Face Book: <https://www.facebook.com/CRAG-Camden-Residents-Action-Group-Inc-1805705173088888/>

PO Box 188
Camden NSW 2570
Email: admin@crag.org.au

General Manager
Camden Council
70 Central Avenue
Oran Park 2570

Email: mail@camden.nsw.gov.au

11 December 2018

Dear General Manager,

RE: DA 2018/775/1

18 - 20 Broughton Street, Camden

We note that this submission is for an amended DA to that which was the subject of our submission of 31 July 2018, which is attached as relevant and for reference.

The original proposal was stated as

Alterations and additions to existing building to create a 99-place centre-based child care centre, car parking, tree removal, landscape works, drainage works

This proposal is stated as

Alterations, extensions and use of an existing building as a 91-place centre-based child care facility, display of a sign and associated site works

The key amendments to the originally proposed development are listed as

1. reduction of child care places from 99 to 91,
2. reduction of on-site car parking spaces from 25 to 23,
3. provision of a pedestrian entry/exit path separated from the on-site car park,
4. additional tree removal and compensatory landscaping,
5. amendments to the facility's internal layout, and
6. amendments to the design of the facility's outdoor spaces.

We understand that the development must comply with a number of regulations including the relevant SEPP¹ and companion NSW guideline² which also address national requirements. The Guideline (p. 2) states: *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 (the SEPP) determines that a consent authority must take into consideration this Guideline when assessing a development application (DA) for a centre-based child care facility ('child care facility')*. The Guideline (p. 2) notes that it is aimed at delivering quality childcare, maximising safety and health of small children and providing premises that are sympathetic to the streetscape, setting and minimising impacts on surrounding areas. We note, as referred to in the SEE (p. 8), that under Clause 22 of the SEPP the application needs to be referred to the Department of Education for concurrence.

We make the following comments under the headings of the Guideline (p.8) of matters to be considered relating to assessment of site compatibility:

- **Site selection and location**

The location of the development within the Heritage Conservation Area (HCA) would impact on the streetscape and devalue the heritage of the area and properties, including heritage listed properties, one of which the site backs onto in Park Street.

We note that the Guideline (p. 32) states that a minimum of 7.0m² of unencumbered outdoor space must be provided for every child being educated and cared for within the facility (National Regulation 108). It is not clear to us from the accessible documents whether the proposal is compliant but the play areas appear to be inadequate for 91 children. One play area is to be provided at the front of the building and adjoining Broughton Street, which is worrying. If the development requires this front area to be used it would seem to be an indication that the site is too small for the development as proposed.

¹ NSW Government *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017* <https://www.legislation.nsw.gov.au/~:/view/EPI/2017/494/full>

² NSW Government (August 2017) *Child Care Planning Guideline* <https://www.planning.nsw.gov.au/-/media/Files/DPE/Guidelines/child-care-planning-guideline-2017-08.ashx>

- **Local character, streetscape and the public domain interface**

The Proposal is not sympathetic with and makes no contribution to the character of the area, or Camden’s identity as a heritage town with dominant mature leafiness and small country town features and characteristics as set out in Camden’s DCP.

No revised Statement of Environmental Effects (SEE) has been submitted. The SEE (p. 43) maintains that the domestic imagery of the property is to be retained and that changes will be sympathetic to the conservation area. This is not correct. The front fence is to be much higher than a domestic front fence and even the artist’s impression below is devoid of softening vegetation, in stark contrast to the surrounds of other businesses and residences in the street. Further the large hard stand area is unusual within the area, is not of a domestic and cottage character.

The removal of older vegetation and trees would create a jarring contrast with the character of the immediate vicinity and the greater HCA, and create privacy issues with adjoining properties to the sides and back of the site as well as for the play area fronting the public domain of Broughton Street.

The Guideline (p. 12) states that front fences should respond to and complement the context and character of the area and not dominate the public domain, and also that where the site is listed as a heritage item, adjacent to a heritage item or within a conservation area front fencing should be designed in accordance with local heritage provisions. The front fence, an interface with the public domain in Broughton Street would not be consistent with the character of the streetscape or HCA.



No revised Heritage Impact Statement (HIS) has been submitted and concerns raised in our original submission as appended remain, and are increased by the proposed removal of more trees.



As stated previously, the front garden will almost be non-existent with the creation of a play area at the front of the house and enlarging the driveway.

Camden is renowned for its leafiness and mature vegetation, and these changes necessarily degrade the heritage value of the property, streetscape and the conservation area.

We expressed concern in our original submission at the number of trees to be removed, and the revised DA proposes even more to be removed (amendment 4). We could not understand the reasoning behind the removal of so many trees as originally proposed, unless the site was too small for the scale of the proposed operation. The revised arborist report indicates the proposed removal of 31 trees and the possible loss of another 5 and concludes their removal will have a moderate impact on the amenity of the area. This is not acceptable.

The needs of the proposed business for hard stand and play areas are clearly problematic. The “necessity” to remove so much vegetation and so many trees clearly compromises the character of the area and indicates that the site is not large enough to accommodate the day-care centre in the form proposed by the applicants, whether it be for 99 or 91 children (amendment 1).

Although the artist’s impression above shows the windows and doors as squarer than currently exist which would seem consistent with Streamline modern architecture and style of the 1950s, it is not clear whether the integrity and heritage value of the building is to be conserved.

The current three sets of windows within the façade are described in the HIS as double hung sash windows in timber-framed fenestration. The alterations proposed include replacement of these with “new fenestration incorporating multi-panes sashes, similar to the older houses in the conservation area”.

Whilst older houses in the HCA may have multi-paned windows, this house is later and multi-paned windows are not reflective of the era and are therefore not appropriate. Also, material specifications of proposed new windows and doors have not been provided. Timber is historically correct. For instance, replacement of wood with aluminium would not be a sympathetic change within the HCA and would degrade both the heritage value of the area and the building.

Overall the proposal would degrade the character of the street and the HCA.

- **Building orientation, envelope, building design and accessibility**

The envelope of the site appears too small to appropriately accommodate the Centre in terms of health and safety of the attending children. The play areas appear small, and one inappropriately fronts Broughton Street as mentioned above. Accessibility in terms of parking and egress within the envelope are problematic and quite possibly very frustrating for parents and dangerous for small children.

- **Landscaping**

The proposed landscaping does not offset the impact on amenity of removal of established and mature vegetation and trees which are character elements of the HCA to be conserved, as submitted above.

- **Visual and acoustic privacy**

The current garden contributes to visual and acoustic privacy. Neighbours have expressed serious concerns about the impact of the proposal on their privacy and amenity, and their right to quietly use and enjoy their properties.

- **Noise and air pollution**

It is not clear whether measurements taken on noise impacts have accounted for a subsequent lack of alleviating vegetation. Common sense indicates that the concentration of additional traffic movements early in the morning and evening must contribute to noise and air pollution.

- **Hours of operation**

The hours of operation mean that residents would experience noise and car lights early morning and evening, especially in the winter. Residents of the heritage property that backs on to the site would be particularly affected as the plan is to remove almost all of the softening and screening vegetation at the back of the property. The proposed acoustic wall at 2.1m would seem too low to be effective given the slope of the land.

- **Traffic, parking and pedestrian circulation**

The additional concentration of traffic movements at certain times would create congestion particularly at the Broughton/Murray Street intersection.

It is unrealistic to claim, as the Traffic Report does, that parents would not park in Broughton Street, particularly given the overall lack of parking on site at usual drop off and pick up times, and likely concerns about the unpredictability of children, prams and parents when backing out of a car space into the confined hard stand area in order to egress.

The number of spaces the site can accommodate and the overall hard stand space seems insufficient considering the scale of the proposal.

The Amended Traffic Report (p4) states that the NSW Planning and Environment Guidelines for Childcare Controls indicate that stacked parking will be restricted to two vehicles only. However, the proposal in the Report (p5) is for 6 stacked car parking spaces, and they will be marked as staff parking only. This would reduce the number of spaces available to parents to 17 (23-6), which seems quite insufficient for drop off and pick up times. The Report (p5) also claims that *the majority of car spaces will be vacant for most of the day so that on site turning should not be a problem, in the rare event that all spaces are occupied, then given the frequent turn over times*

and short space occupancy duration any vehicle on site should not have to wait long, 1-2 minutes, to find a vacant space to turn into or occupy.

Queued cars in a child care centre would seem quite impractical and problematic.

Also, Council's DCP requires all vehicle access/egress to be in a forward direction at all times, but cars will need to back out of the parking space, potentially with queued cars blocking views and turning areas, in order to egress in a forward direction. This is dangerous in a confined area with small children. With many parents driving large four-wheel drive vehicles with limited visibility when backing this situation would seem to be an accident waiting to happen.

Our objection to the original proposal is appended below and as the issues raised in it are not solved by the amended proposal it should be read in conjunction with the matters raised or expanded upon above. Overall, we would be surprised if the Department of Education found that the proposal achieved concurrence with the SEPP. In essence we regard the proposal as an overreach and an over development for the site and its location within Camden's HCA, and one which would result in a problematic child care facility and negative impacts on heritage and amenity of other property occupants.

Yours sincerely,



Glenda Davis
President

0415 617 368

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General Manager
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70 Central Avenue
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31 July 2018

Dear General Manager,

RE: DA 2018/775/1

18 - 20 Broughton Street, Camden

The subject site, 18-20 Broughton Street, has an area of approximately 2,024 square metres and contains a building that was most recently used as a medical centre, with 12 car parking spaces.

This DA proposes the construction of additions to the existing building and establishment of a Child Care Centre to operate between 7:00 am and 7:00 pm, Monday to Friday. This business would employ 18 staff (excluding administrative staff) and cater for 99 children of the following ages.

- 0 years – 2 years: 32 children;
- 2 years – 3 years: 27 children;
- 3 years – 5 years: 40 children

HERITAGE IMPACT

The site within the Camden's Heritage Conservation Area (HCA) is located within the vicinity of a number of listed heritage items and is adjacent to and backs on to the heritage listed property of 9 Park Street, Camden.

The Heritage Impact Statement (HIS, p. 31) states that the development proposal includes the minor partial demolition of the following built fabric:

- *removal of the circa 1960s rear veranda, as altered to its present condition;*
- *removal of internal walls;*
- *removal of recent timber picket fence;*
- *enlarging of an existing door and window in the front elevation to insert double doors.*

A reading of the documents submitted with the proposal indicates that partial demolition relating to the enlargement of an existing window and door in the front elevation applies to enlargement and replacement of all two doors and three windows in the façade. Other changes to how the property would present within the HCA include removal of the usual domestic gate to the entrance, a new front fence and an expanded hardstand driveway addressing 25 parking places and a shared pedestrian zone. The proposed addition at the back of the existing building does not appear to impact on the streetscape, except to the extent that it necessitates removal of mature trees and diminishes softening green curtilage and leafiness of the property.

The HIS (p. 13) states that no important features of the building are to be removed and its contribution to the streetscape would remain essentially the same.

The current building on the site was originally constructed as a home in c1950s and has been added to and modified internally over the years. It is identified as a Potential Heritage Item in Table B4 Built Environment in *Camden DCP 2011*.



The façade of the house has curved corners reflecting Streamline Moderne architecture³ that emerged as an offshoot of the earlier Art Deco movement after the depression of the 1930s. This style was founded on optimism that modern transport and communications technology provided the means for a democratic and affluent future. Being of fibrous cement the veneer reflects the austerity and difficulty of obtaining building materials in the early post war period.

The rounded corners of the house are historically representative and are to be retained, although they are not clearly evident in the drawing below from the cover of Statement of Environmental Effects (SEE).



³ Michael Bogle and Charles Pickett (2014) *Fibro Moderne Mid-20th Century Fibro Housing in Monterey NSW Visitor Guide* Available at <https://www.rockdale.nsw.gov.au/development/Pages/pdf/Heritage/FibroModerneHousesGuide.pdf>

The current three sets of windows within the façade are described as double hung sash windows in timber frames.

The SEE drawing above shows the windows and doors as squarer suggesting that all openings within the façade are to be enlarged. Squarer windows and doors would seem consistent with the 1950's austerity style as shown opposite.



The HIS (p. 32) maintains that the proposed new windows and doors and replacement of new front fence are to replace deteriorating timber-framed fenestration with new fenestration incorporating multi-paned sashes, similar to the older houses in the conservation area.

Specification of the replacement material of the windows and doors could not be found in the DA documents, but timber is historically correct. Aluminium as a material is not appropriate. It is difficult to determine the size of the panes from the drawing, but obviously they should be of appropriate 1950s size.

The replacement fence of brick plinth and timber pickets is more appropriate to the 1950s than the current fence, and the lack of a domestic gate to the entrance stairs is minor and not necessarily permanent.

The SEE (p. 43) concludes that the new windows and doors and replacement of the front fence retain the domestic imagery of the property and are a sympathetic change in the conservation area.

The SEE drawing above presents the development as stark with no softening vegetation compared to its current leafy presentation. The large hard stand area of course heralds the property as commercial rather than domestic.

The proposal involves the removal of three high category trees and nineteen low category trees (SEE, p. 45).



The Plan included at the end of the Arborist Report indicates that the trees at the rear backing onto Park Street properties are to be retained but appears to indicate that all other trees are to be removed except one in the front garden.

The HIS (p.33) seems to suggest that not removing all trees reduces the starkness of the enlarged hardstand area stating: *Mitigating factors include the retention of the large tree on the verge, the trees along the southern boundary adjacent to the driveway, and the trees near the eastern boundary.* However, the plan in the Arborist Report would seem to show that all trees that would be adjacent to the hardstand and enlarged driveway are to be removed.

The garden setting will necessarily be diminished by creating a play area at the front of the house and enlarging the driveway. It is clear that more of the house and the larger hard stand area will be immediately apparent in the streetscape.

No reason is given or apparent for the need to remove the following trees. No reasons are provided as to why protective measure cannot be undertaken to preserve them during construction:

- No 4, Callery Pear of medium size at very corner of front garden does not seem to be intrusive to the planned play area;
- Nos 8, 9, 10, 11, 12, Cyprus trees along the driveway. They would seem to be on the boundary, not intrusive to the driveway and being slim Cyprus create an attractive architectural border;
- No 14, a Box Elder Maple which could be pruned if it overhangs excessively;
- No 15, a Canary Island Date Palm which given its size and being typical of Federation era planting is probably significantly older than the existing house. It does not seem to be intruding on the driveway/parking plan. Quite arguably it is worthy of being retained as historically and culturally significant.

The retention of these trees would reduce the heat island effect of so much driveway and hard stand area.

The HIS (p. 33) maintains that trees near the eastern boundary and replacement planting will be sufficient to provide a garden setting around the house in public views from Broughton Street. Replacement planting would, of course, not create a softening garden in the short to medium term. It would also not reduce the unpleasantness of heat from the hard stand in the short to medium term.

NOISE AND TRAFFIC

Residents and business occupants have voiced concerns about the effect on their amenity of noise and additional traffic associated with parking movements and exits and entrances to the facility. They are concerned that additional noise and traffic are likely to be intrusive and detract from quiet use and enjoyment of their properties.

The SEE (pp.53-55) states:

With 99 children engaged in outdoor play on the site, the predicted maximum LAeq(15minute) noise levels are expected to be in the order of 54 dBA to the south, 53 dBA to the east and 46 dBA to the north and west site boundaries. Actual levels may at times be expected to vary from these projected levels depending upon the locations of the children and the activities in which they are engaged.

A design limit of 55 dBA is recommended at outdoor play areas and based upon the ambient noise survey results, this level will be achieved with the design proposed. Based on a daytime road traffic (and other environmental sources) noise level LAeq(1 hour) was 57 dBA, predicted noise intrusion to the outdoor play area is 50 dBA at the front play area and 40 dBA at the rear play area.

Perhaps the diagram below is deceptive but the outdoor play area seems small for potentially 99 children. All else being equal it would seem that the smallness of the play areas at the front and rear of the property would contribute to more intense noise.

As indicated in the SEE (p. 52) it seems it is not envisaged that children are not to spend much time outside in outdoor play:

Noise generated by the children outside in the play area will occur generally after morning arrival, continuing until commencement of the indoor programme (likely to be around 9:00 am), possibly for short periods during the day after morning tea and lunch and again in the later afternoon prior to departure. The number of children involved in outdoor activities outside these main free-play times may vary and would be generally be in smaller groups managed by the centre staff.

It seems the free play times are mainly early morning after arrival and late afternoon awaiting departure, and otherwise in shifts depending on activities. Whilst noise would be lessened by this plan it does not seem enough outdoor free play to be healthy for a child who may be in care five days a week for 12 hours a day. To exacerbate the situation the SEE (p. 54) also includes the recommendation that windows be closed to control noise emissions from the centre when capacity is 70% or greater.

The remark has been brought to our attention that given the residents and business premise occupants in the immediate locale and the proposed small play area, that perhaps the Centre staff will be required to take children for walks and use Macarthur Park. However, it is understood that it is not usual to take small children outside the boundaries of Child Care Centres. In any case with no pedestrian crossings and busy roads walking excursions with active young children are unlikely to be sufficiently safe even if parents were to agree.

Concern has been expressed that it is not usual or reasonable to restrict children's access to outdoor space and fresh air to the extent described and that noise generated by children at play would actually be greater than indicated in the proposal.



As shown in red in the above diagram a 2.1m solid continuous barrier is recommended to be constructed to the boundary of the proposed rear external play area to mitigate noise (SEE, p. 55).

Concern has been expressed that the barrier in the above diagram may not be high enough to screen noise especially for residential neighbours, including in Park Street.

Intrusion of car lights in the early morning and evening has also been raised by affected residents as car movements associated with the centre will begin around 6.30 am and not finish until after 7 pm.

The SEE (p. 54) claims that within the existing environment:

- vehicles arriving and leaving the site are comparable with any typical situation and on-street events will not be discernible above the prevailing vehicular activity;
- there will be no appreciable change to existing traffic noise levels currently experienced;
- the maximum noise levels due to individual vehicular events currently perceived at surrounding residential properties will remain unchanged.

These claims are difficult to believe and are clearly arguable. They are contradicted by the statement in the SEE (p. 56) that at worst an additional 48vph or on average 1 vehicle every 1.2 minutes would use Broughton Street, in the morning peak hours.

This proposal would seem to be predicated on stacked parking being an acceptable means of making up the required 25 spaces necessary on-site for the Child Care Centre.

However, the required number of 25 would seem to already account for the drop-off and pick-up nature of child care.

How the parking is to be arranged is difficult to picture ⁴. The Traffic Report (p. 5) states: *At 25 spaces 9 of the stacked car parking spaces will be marked as staff parking only. The remaining 9 spaces may be utilised as staff during the day 10am – 3pm and short- term parent/visitor spaces at pick up drop off times 7am – 9am and 3pm – 7pm. The remaining 7 spaces including 1 disabled will be designated as short term, high turnover parent/visitor spaces at all times.*

The proposed centre will have up to 20 staff including the centre director, administrative support and teaching staff (SEE, p.57). As 10 staff will be on duty during the peak arrival and departure times (Traffic Report, p.3) 15 (not 16) spaces remain for drop-off and pick up, of which one is for disabled parking.

The parking survey reported that 1 or more kerbside parking spaces are available at all times between 7.30 and 9.30am and mostly in the afternoon from 3.15pm (SEE, p. 56). Broughton Street now has majority of business premises: doctors, dentists, accountants and so on with clients/patients coming and going. There is almost never any parking, although business operators are all required to have off-street parking.

The SEE (p. 56) counters this issue, as well as the logistical issue of stacked parking by claiming that parents with children at the Child Care Centre will have little need for on-street parking because

- in peak morning and afternoon times only 10 on-site staff parking spaces are likely to be in use and 15 on site spaces are likely to be vacant (out of 25);
- these 15 on site spaces would be utilized periodically every 15 minutes and therefore 60 vehicles per hour would be accommodated;
- therefore, on-site parking is sufficient and no off-street parking is likely to be required.

⁴ The statement that on-site parking is in the basement (SEE p. 54) is not understood. Parking for the previous medical centre was at grade and the diagrams provided suggest that the increased parking area is also at grade.

Logically the conclusion that on-site parking will be sufficient is questionable and suggests congestion as many parents would be dropping off and picking up at a similar time due to similarity of school and work hours.

Broughton Street, between Menangle Road and Murray Street, is a heavy traffic area which has recently become more so with drivers using it to avoid traffic lights recently installed in Argyle Street. Simple observation indicates that Broughton Street is narrow, is a bus route and has little available parking. The road is too narrow to cope with parked vehicles each side, a bus and another vehicle which necessitates drivers pulling over to the left across a driveway.

Given the situation in Broughton Street there would be little choice for parents but to enter the site to ascertain whether a space is available in stacked parking and then await a space if none are free.

Parents accessing the Centre's driveway and finding that there is no drop-off or pick-up space available will face a decision: back out if no cars are behind in a similar circumstance, try to turn-around and exit front ways or queue for a space to become available. The proposed driveway is described variously as 5.5 or 6 metres, which includes a 1 metre wide marked pedestrian crossing. For a Child Care Centre these measurements seem inadequate for both ingress and egress and accommodation of turning manoeuvres as well.

With a walkway shared between parents, children and cars the hard stand area may become congested and a frustrating place for parents in hurry because of other commitments. Shepherding small children is never easy. The idea of stacked parking with its possibility of vehicles entering and waiting on site for a space, with vehicles backing out and possibly making other car manoeuvres in a small area to exit the Centre seems a poor one.

The marked walkway behind the stacked parking area, to be used by parents and children means that they will be walking behind reversing vehicles. The concept of shared space between pedestrians including small children and cars, many of which will be high four-wheel drives, that are backing and turning seems like a recipe for disaster. This is evidenced by the number of accidents with small children in home driveways.

Logically it is difficult to accept the statement in the Traffic Report (p. 8) that *Due to low vehicle speeds and relatively low expected volumes of traffic, the marked pedestrian crossing at the entry to the site or behind the car spaces marked 1 to 7 and 8-24 is not expected to create any operational or concerns for pedestrians accessing the site from Broughton Street or within the site.*

The stacked parking area is not necessarily large enough over the whole 12-hour period for easy drop off/pick up of children. Even at its least busy, backing and turning are required rather than smooth movement out of the facility. Car movements will be concentrated at particular periods of the day and evening. This must also increase noise.



The site is also very close to the busy intersection with Murray Street.

The SEE (p 56) states that: *The proposed 6m wide access driveway located some 35 metres west of the Murray Street intersection, where exit speeds are likely to be around 25km/h and traffic volumes on Broughton Street peak times are low.* It is not clear how the traffic volumes in Broughton Street can be described as low for the whole peak period of drop-off and pick-up as these are 7-9 am and 4-6 pm.

It is not clear how the 35 metres from the Murray Street corner is measured as the corner in question is rounded and does seem close to 18-20 Broughton Street.

Also, it is possible that additional vehicle movements will be created by garbage collection, which may need to be quite frequent due to the number of children because of:

- use of “disposable” nappies
- all meals being prepared and provided on site in very small kitchen (as planned and indicated by applicant)

The site really seems too small for the Child Care Facility.

Whilst Child Care Centres are needed the location of this one is questionable. The Applicant correctly states there is need for childcare in Municipality. However, it is needed in the growth areas, to the north and east. Population growth in Camden itself is either stable or may be declining. Property prices near to the town mean that most young families reside in newer areas such as Spring Farm and Oran Park. If we consider the traffic in Camden generated by two schools next to the main shopping centre, is this a good idea?

Property information that is publicly available, which may not be complete and up to date, suggests that the property was last sold on 29 January 2016 and that it is not currently for lease or sale⁵. If the property has not yet been purchased by the applicant, a greater public benefit would be achieved by locating the centre in an area of greater need. This would also help to retain the amenity of other property occupants and the conservation area.

In summary our concerns with this proposal are as follows:

- that replacement windows and doors are to be of appropriate 1950s design including wooden frames and fenestration and pane size;
- that changes to the existing garden be minimised with no trees removed unless strictly necessary and no removal of trees to be undertaken simply to reduce the need to protect them during construction;
- that new plantings be as advanced as possible to recover a leafy presentation at least similar to other properties in Broughton Street and the HCA;
- that noise mitigation measures will be inadequate;
- that the additional noise will be intrusive to other businesses, residential neighbours and others in the vicinity;
- that additional traffic (and car lights) will be potentially intrusive to residents;
- that site is too close to the busy Murray Street corner;
- that the additional traffic to be generated by the Centre is not desirable in an already busy area;
- that overflow parking in Broughton Street for parents is not always available;

⁵ <https://www.domain.com.au/property-profile/18-20-broughton-street-camden-nsw-2570>
<https://www.realcommercial.com.au/property-medical+consulting-nsw-camden-501735094>

- that parents parking in Broughton Street would reduce parking for established professional practices in the street;
- that the site is too small to reasonably accommodate a child care centre business of the proposed scale;
 - that the play areas are not of sufficient and healthy size;
 - that the driveway and hardstand area is too small;
 - that the drop-off and pick-up arrangement is intrinsically problematic because
 - the stacked parking arrangement is not practical and potentially dangerous;
 - the shared walkway is dangerous;
 - parents need to access the site to establish if parking is available with the potential for the drop-off and pick-up area to become congested and frustrating to parents
- that there is a greater need for Child Care in new areas and a child care facility would provide a greater public benefit if it were located in these areas that have more young families.

Yours sincerely,



Glenda Davis
President