

# *Camden Residents' Action Group*

*Incorporated*  
*Camden – Still a Country Town*

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8 November 2018

Dear Sir,

Re: DA 2018/1192/1

Alterations/additions to an existing service station including installation of underground tank for fuel storage, construction of a new canopy over the diesel pump area and installation of a replacement ID sign

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We note that this DA relates to DA 2018/397/1 lodged in April 2018, and that it addresses additional information required by Council as set out in its letter of 26<sup>th</sup> April 2018.

The requested additional information includes a Heritage Impact Statement (HIS) detailing finishes including material and colour specifications, visual impact analysis and dimensions and luminescence of proposed signage, with reference made to the Camden Heritage Conservation Area and DCP lighting controls (B4.2.13)<sup>1</sup>. We thank Council for pointing out and requiring compliance with this policy for the conservation area.

Small businesses, particularly family enterprises are and have always been the economic backbone of the township and are consistent with its history and scale, and therefore its conservation. Of

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<sup>1</sup> See Appendix for an extract of wording of DCP 2011 B4.2 *Signs on Heritage Items or in Heritage Conservation Areas*

course, their proposals must be assessed objectively according to the planning instruments, but so must the proposals of big business. Corporate giants and franchises can be appropriately accommodated in existing building stock but their loud corporate signage, colours and building styles otherwise are contrary to the Burra Charter principles and are arguably fundamentally inconsistent with conservation of a privately founded 19<sup>th</sup> century country town.

It is relevant to draw attention to DA 257/1/2018 for a large state of the art two storey BP service station at 12 Argyle Street, which is located next door to the small-scale service station lodging this DA. The proposal for 12 Argyle St as well as being clearly and completely inappropriate for the conservation area and as an introduction to the old town includes internally lit, obtrusive and non-compliant corporate signage (as covered in our objection <sup>2</sup>). If allowed this development would dominate and be in direct competition with and probably see the demise of the small operator at 8 Argyle St. The DA for 12 Argyle St only addressed signage consistency with SEPP 64 and not DCP 2011, and we trust that Council has required that the Applicant also address this omission, as well as provide a visual impact analysis and explanation of how the finishes, materials and colours are compatible with the planning controls for the conservation area.

In relation to small business, heritage conservation and the main gateway to the historic town, we must in fairness also refer to the recent assessment of a DA (2017/1159/1) for nearby McDonald's for which we specifically requested that a HIS be supplied by the Applicant. However, we were told that the DA was minor and a HIS was not required. The reasons for our request were that the proposed illuminated signage did not comply with the DCP for the conservation area (and quite possibly its initial consent conditions in 2008/2009) and that its installation did not address the need for tree removal. We were informed that as there was other precedent non-compliant signage nearby and within the HCA that the additional proposed 6m tall, 1.524m wide internally lit pylon signage could be allowed.<sup>3</sup> As the DA did not go to Council the consent conditions, as referred to in the letter of decision of 26 March 2018, are not easily accessible. However, we note that no changes have as yet been undertaken to the signage and trust that the policy was enforced similarly and that the obtrusive internally lit pylon signage was disallowed.

We note that the Applicant for the DA at 8 Argyle St has not provided the requested HIS. Preparation of a HIS may of course be comparatively costly for a small business compared to one for McDonald's or for the applicant of the large BP service station proposed at 12 Argyle Street.

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<sup>2</sup> Available at <http://www.crag.org.au/wp-content/uploads/2018/11/CRAG-submission-12-Argyle-St-22-April-2018.pdf>

<sup>3</sup> Available at <http://www.crag.org.au/wp-content/uploads/2016/06/1-February-2018-McDonalds-DA-queries.pdf>

Specific additional information on the DA for 8 Argyle St to be included in the HIS, as requested by Council on 26 April 2018, and the Applicant's responses are commented on as follows:

- a. Detailed schedule of finishes including material and colour specifications.

The Applicant responds that the only above ground works proposed are the erection of a new diesel canopy designed to match the existing petrol area canopy, with steel posts, and cottage green (the preferred colour suggested by Council) metal fascias and the new main identifying sign.

CRAG comment: there is little that is aesthetically pleasing in modern service station design, and with that proviso the metal material is functional and reasonable. Cottage green is possibly the best available metal colour choice for the HCA.

- b. Visual analysis or visual survey of site and assessment of potential for visual impact.

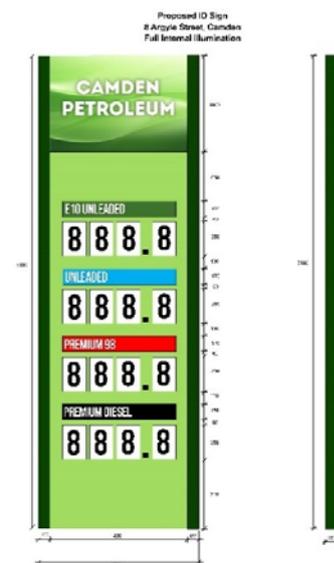
The Applicant responds that the new canopy has a setback of over 15m, and will pose no visual obstruction or impact on the site or surrounding area.

CRAG comment: it is understood that the awning over the diesel pumps is an environmental requirement to prevent rain causing spillage and contaminated water entering the wetlands and billabong. A setback of 15 metres should not cause visual obstruction and also obviate much visual impact on the character of the HCA.

- c. Dimensions of proposed wording and numerical display on pole sign.

The Applicant responds that 2 similar designs for a 5.1m tall, 1.7m wide sign, have been presented:

1. an internally digitally illuminated sign which complies with all requirements of Work Cover and involves no manual price changes;
2. an internally illuminated brand panel with externally illuminated price board beneath which would provide an older feel to the sign, but also involve manual price changes, which are argued to be unsafe, especially in wind or rain.



CRAG comment: The proposed new sign installation is the replacement of an externally illuminated price board, which has been in place for many years. A discreetly and fully externally spot lit sign is fully compliant with DCP B4.2.11, which suggests that Design 2, although not fully compliant, would be preferred.

Although Design 1, the fully internally lit sign option is not compliant there is merit in the argument that manual changes to prices may not be as safe for workers. Patrons of the business report that being a small business there is often only one person on site to make the changes, and that price changes are frequent.

**However, we would question the size of the sign, particularly in its positioning in replacement of the existing much smaller sign.**

The proposed sign, particularly as it is positioned, is too large to complement the HCA (DCP B4.2.1;7;19) and the DA has not demonstrated that its location would not dominate the main entrance into or obscure views to the old town (DCP B4.2.3).

- d. The luminescence level of the proposed sign and details of why internally illuminated signage is required (Note: internally illuminated pole signs are not permitted in the conservation area DCP B4.2.13 lighting controls)

The Applicant responds that illumination of both sign choices would not exceed 10 lux at 1m.

CRAG comment: It is beyond our expertise to make any comment on whether this level of luminescence would be inappropriate within the HCA, but note that the level is stated to be similar whether spot lit or internally illuminated.

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We have previously requested (in our discussions with staff and in our submission on the Urban Design Framework for Camden Town Centre) a compliance audit of signage within the HCA, especially in relation to DCP B4.2 (see Appendix). We believe this is necessary in the interests of fairness and as a matter of respect for Camden's significant heritage value, which is also often used within small business models as a point of difference and competitive advantage over the convenience of undercover shopping malls.

At this point prior to an audit, we submit that the Applicant has presented a reasonable application, especially in light of the DA for 12 Argyle St and the dispensations allowed McDonald's in 2008/2009 and its recent DA for a corporately unsubtle and internally lit 6m tall pylon sign.

Only one sign is proposed in the DA for 8 Argyle Street. We see little difference in impact between Design 1 and 2, both of which are subtle compared to corporate signage that usually sits in jarring contrast to the 19<sup>th</sup> century townscape (and is inappropriate according to DCP B4.2.19).

**However, as we have argued in the case of the recent McDonald's DA the proposed signage is too big and can only have a detrimental impact on the character of the HCA. A visual impact analysis is necessary, as requested in Council's letter of 26 April 2018.**

**We request that the size and positioning of the proposed sign be re-examined in the context of impact on the HCA and the main entrance of welcome to the old town.**

We also submit that if discretion is applied in this case and approval given for an internally lit sign (which we trust would be much smaller and in a less obtrusive location than proposed) that the approval not create any recognised precedent in DA assessments and that pre-DA meetings make this clear. We make a point of this because we unfortunately find that the most contentious DAs refer to other DA approvals as reasons why the planning parameters can be exceeded, which makes a lot of additional work for all involved.

Again, we thank you for enforcing the HCA policies and look forward to their consistent application in the future.

Yours sincerely,

A handwritten signature in cursive script that reads "Glenda Davis".

Glenda Davis

President

## **Appendix DCP 2011 Extract**

### **B4.2 Signs on Heritage Items or in Heritage Conservation Areas**

#### Objectives

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

#### General Controls

1. New signage should have minimal impact on the character of the heritage item or conservation area. The number should be limited and design of signs should be subtle.
2. Signage should be appropriately designed and located, to allow the character of the building or conservation area to remain prominent.
3. The design and location of new signage should not dominate or obscure the architectural details of a heritage item. For example, signage should not break the parapet or roofline of a building or buildings, be placed on cast iron balustrades or in front of cast iron verandah frieze work or on top of awnings.

#### Location Controls

4. Signage should be located in areas of the building which have been traditionally used for signage. If such areas do not exist, signage may be considered inappropriate.
5. Opportunities for new signage located on the side of a building are limited, and may only be considered where it is surface painted and of a complementary design.
6. Painted signs on windows should be discreet, and not clutter or dominate the shop window.

#### Design Controls

7. The design of new signs should complement the heritage item or conservation area.
8. The design should incorporate traditional materials, colour, fonts and size.
9. Materials for new signage should be sympathetic to the character of the heritage item or conservation area, and preferably be of a painted surface finish.
10. Fixings for new signage should be designed to allow for easy installation and removal, causing minimal damage to building fabric.

#### Lighting Controls

11. External surface illumination should be discreet or concealed, and is the preferred method for signage illumination.
12. External surface illumination fittings should have minimal impact on the external fabric and character of the building.
13. Internally illuminated signage is restricted to under awning signs only.
14. Neon, flashing, pulsing or moving signage are not permitted.

Other Controls:

15. Original and early signs should be conserved and not be covered or painted over by new signs.

16. Building name signs on the pediments and parapets of the facades are to be encouraged where appropriate, and historically accurate.

17. Temporary signage such as promotional or 'special offer' signage is to complement permanent commercial signage and the character of the heritage item and/or conservation area.

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.