

# *Camden Residents' Action Group*

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*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](mailto:admin@crag.org.au)

Camden Local Planning Panel

17 September 2019

Re LPP Determination 16 April 2019

*Alterations, extensions and use of an existing building as a child care facility, display of a sign and associated site works*

**SUBJECT: DA/2018/775/2 - MODIFICATION OF AN APPROVED CENTRE-BASED CHILD CARE FACILITY - 18 AND 20 BROUGHTON STREET, CAMDEN**

I speak on behalf of Camden Residents' Action Group which has lodged three submissions on this DA.

The LPP deletion of the play area in the front setback to Broughton Street, which reduced the number of allowable child care places, was a determination that was welcomed by the community as being in the interests of child safety and conservation of Camden's heritage value. The front veranda was not included in the outdoor space calculations in the assessment of the DA by Council or the LPP.

This modification application, which represents the fifth change in the proposed number of places, seeks to include the front veranda as outdoor space, and increase the number of places by 6.

To do this it adjusts the plans for outdoor and indoor spaces and off-street car parking to meet the minimum requirements for each.

We submit that the front veranda should not be included in outdoor space for the following reasons:

- Children would be visible from the street particularly as the veranda is raised off the ground
- It is segregated from the back outdoor play area
- There is no continuous freedom of movement to the outdoors as would be expected from an undercover area counted as outdoor space.

- Being segregated and exposed it does not promote consistency with best practice for child educational welfare under the National Standard<sup>1</sup>.
- Play equipment on the veranda, which is an important element of the design of the building, would lessen its contribution to the streetscape and Heritage Conservation Area.
- A front veranda play area is not consistent with the character of the local area and would detrimentally impact on the public domain and the amenity of neighbouring buildings. (CCPG 2017 (3.2))

We request that the front veranda not be permitted as outdoor space.

Also, we are not convinced that even if the front veranda is included that the site is adequate for 84 children. The calculation in the application works out to be exactly the minimum of 7m<sup>2</sup> of unencumbered outdoor space per child with no tolerance and no room for error.

The calculation would seem to include most or all space up to the building edge and the site boundaries.

The 2017 Childcare Guideline on *Landscaping (3.4)* states the importance of integration with the streetscape and contextual amenity and that planting should be provided along the boundaries. This is particularly the case in a Heritage Conservation Area, and at a site that backs onto a heritage listed property. The Guideline's *Outdoor Space Requirements (4.9)* states that unencumbered space must not include areas of dense hedges, screenings or plantings along boundaries, nor pathways, storage areas or other space not suitable for children.

We request that the calculation of outdoor space per child be clarified and checked. The landscape plan clearly shows a path around the exterior of the building, large plants, feature garden elements and dense plantings along the boundary fences. Whilst the definition of "unencumbered" is somewhat subjective we do not think it should include heavily landscaped areas, which are necessary, but not suitable or available for play.

We also continue to have serious concerns about the proposed on-site parking and manoeuvring arrangements, particularly the turning bay which is minimal and cannot accommodate a smooth forward turn. We consider the traffic plan to be inadequate and dangerous in a place of small children. We believe that parents will find they need or prefer to use narrow and busy Broughton Street for drop-offs. An additional 6 children will exacerbate the problem.

We request that the front veranda be deleted from the outdoor space calculation and that the increase in the number of child care spaces be denied.

## **617 words**

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<sup>1</sup> Quality Area 3 Physical Environment

<https://www.acecqa.gov.au/nqf/national-quality-standard>

[https://www.acecqa.gov.au/sites/default/files/2018-01/STR0008\\_Decision\\_notice\\_de-identified.pdf](https://www.acecqa.gov.au/sites/default/files/2018-01/STR0008_Decision_notice_de-identified.pdf)

<https://wehearyou.acecqa.gov.au/2015/10/24/physical-environment/>