

Camden Residents' Action Group

Incorporated
Camden – Still a Country Town

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23 January 2020

Attention: Mr N Clarke

Dear General Manager,

Re. DA 2018/1437/1 – 23 Harrington St., Elderslie

Demolition of existing structures and construction of a function centre with capacity for 737 persons, construction of 200 car parking spaces, landscaping, drainage works and other associated works

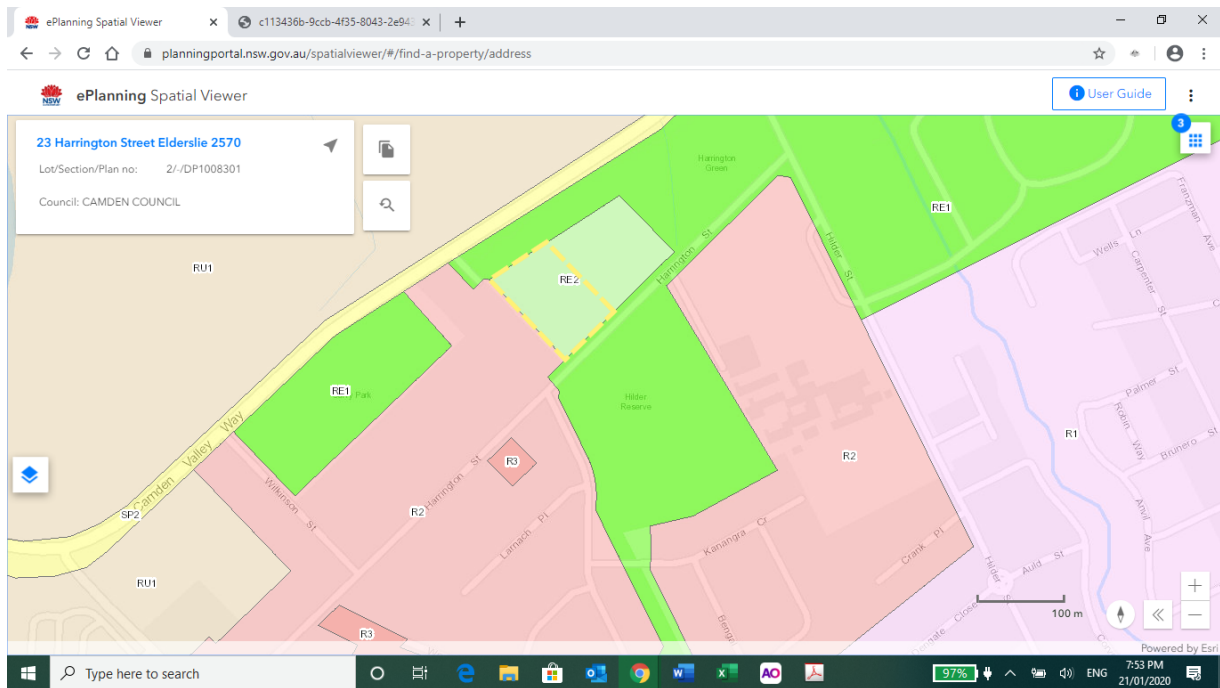
The current proposal is for a large function centre with access via two one-way driveways off Harrington Street. A Function Centre is defined in the LEP as a place used for the holding of events, functions, conferences including receptions, exhibitions and conventions. With a capacity for 737 persons, 40 staff and 200 cars the level of activity and intrusiveness and general incompatibility with the character and existing uses of the area is potentially very considerable.

The number of similar proposals for 23 Harrington Street, dating back to at least 1995, is indicative of fundamental issues with the site's location:

- zoning compatibility
- it is within a high hazard flood area.

ZONING COMPATIBILITY

As shown in the zoning map below, we note that Harrington Street is zoned R2 Low Density Residential, and RE1 Public Recreation with an island of RE2 Private Recreation^{1,2} which includes 23 Harrington Street. It is significant that this island of RE2 is bordered and surrounded by low density residential and public recreation.



¹ <https://www.planningportal.nsw.gov.au/spatialviewer/#/find-a-property/address>

² **Zone RE2 Private Recreation**

1 Objectives of zone

- To enable land to be used for private open space or recreational purposes.
- To provide a range of recreational settings and activities and compatible land uses.
- To protect and enhance the natural environment for recreational purposes.

2 Permitted without consent

Nil

3 Permitted with consent

Aquaculture; Camping grounds; Car parks; Caravan parks; Community facilities; Environmental facilities; Environmental protection works; Flood mitigation works; Function centres; Kiosks; Recreation areas; Recreation facilities (indoor); Recreation facilities (major); Recreation facilities (outdoor); Registered clubs; Roads; Signage; Water recycling facilities; Water supply systems

4 Prohibited

Any development not specified in item 2 or 3

We also note that a special clause has been inserted in Camden LEP Schedule 1 for the site which reads:

- 6 Use of certain land at 23 Harrington Street, Elderslie*
- (1) This clause applies to land at 23 Harrington Street, Elderslie, being Lot 2, DP 1008301.*
 - (2) Development for the purposes of function centres, landscaping material supplies, plant nurseries, restaurants or cafes and serviced apartments with or without strata subdivision is permitted with development consent.*

As a permissible use of the RE2 Private Recreation zoning includes function centres anyway, this clause would seem to make no difference for this latest proposal for the site.

The zoning incompatibility in Harrington Street stems from:

- the objectives of the RE2 Private Recreation zoning of 23 Harrington Street:
 - to provide compatible land uses
 - to protect and enhance the natural environment for recreational purposes.
- CLEP 5.3 (4) which requires that consent may only be granted if the development is
 - consistent with the objectives for development in adjoining zones,
 - desirable due to compatible land use planning and infrastructure capacity

RE2 Private Recreation Objectives: to provide compatible land uses and to protect and enhance the natural environment for recreational purposes.

We note the building design that was first notified has changed somewhat, mainly through redesign of the front entrance and inclusion of more pronounced vertical elements.



However, the design remains sharply modernistic as a boxlike monolith which is inconsistently oversized. It bears no resemblance to any other building in its vicinity and cannot be argued to be compatible with or to enhance its neighbourhood of low-density residential dwellings, educational facilities and sporting fields. It would sit in very sharp contrast to John Oxley cottage as well as the general cottage character of the area (as is expected within its largely residential zoning of R2).

The design cannot be argued to enhance the natural environment and it can be argued to be inharmonious and aesthetically incompatible with Camden Valley Way and Harrington Street

Access for all vehicular movements to the site relies on use of Harrington Street which is narrow and not designed to take traffic in large volumes or commercial scale. It is a main pedestrian and vehicular thoroughfare for the nearby High School and playing fields.

The width of Harrington Street is such that it is not comfortably practical for two cars to pass each other if two cars are also parked. It already accommodates a significant level of parking and pedestrian and vehicular traffic associated with sports venues and educational facilities.

The risk of accidents with the increased traffic volume would be much higher than currently.

Acoustically the potential for music, the activity of 737 patrons, car park behaviour and traffic movements to disrupt the lives of residents is significant.

Residents of Harrington Street have contacted us with fears about how this development would impact the quiet enjoyment of their properties. They raise the following issues:

- Harrington Street is too narrow to accommodate the additional traffic generated.
- A yet to be determined proposal for 15 self-contained senior housing dwellings at 64 Harrington Street would exacerbate its level of activity.
- Harrington Street is already overburdened with traffic noise and activity associated with
 - Hilder Street (Elderslie High School, Day Hospital, BMX).
 - Operating hours of two preschools, one in Harrington Street and the other nearby in Lowe Crescent.
 - The sports fields and Water Park in summer.
 - A local bus route.

Elderslie is a long established quiet residential community which identifies strongly with the 1840 town of Camden and the historic Macarthur area. Elderslie is home to the nearby tourism office of historic Oxley cottage and provides an appropriate welcoming introduction to the Heritage Conservation Area of Camden. In contrast this proposal would present as a jarring introduction and send a quite different message to that of Oxley Cottage and nearby farmlands.

The natural environment of Elderslie within greater Camden, plays a very significant role in Camden's attractiveness and liveability. The environment is one of trees and openness which contributes to the municipality's sense of place and difference compared to other areas of Sydney.

The area around Harrington Street is one of strong community focus and provides important facilities for families with children, schools and sporting clubs. Its low-rise open nature is intrinsic to its traditional function and is consistent with the renowned country town and natural environment characteristics of Camden. New developments are expected by the community to be, and should be according to the zoning objectives, compatible with this character and function.

The community does not consider the proposal to meet these objectives of the site's zoning of RE2 Private Recreation. A land use that requires such a building and large carpark cannot be argued to be compatible with its neighbourhood or to protect and enhance the area's natural environment for recreational purposes. The proposal would present as an intrusive major change to the liveability of residents and the area's character and sense of place.

CLEP 5.3 (4) consistency with the objectives of development in adjoining zones

The objectives of Zone R2 Low Density Residential zone are

- *To provide for the housing needs of the community within a low-density residential environment.*
- *To enable other land uses that provide facilities or services to meet the day to day needs of residents.*
- *To allow for educational, recreational, community and religious activities that support the wellbeing of the community.*
- *To minimise conflict between land uses within the zone and land uses within adjoining zones.*

This proposal is not consistent with low-density residential and does nothing to meet the day to day needs of residents.

Far from supporting the well-being of residents this development has the potential to detract from their well-being considerably.

The operating hours of the Function Centre are long and present significant opportunity for

- Noise and rowdy behaviour.
- Alcohol induced anti-social behaviour

Direct feedback from affected residents about the incompatibility of this proposal is also outlined above.

*The objectives of **RE1 Public Recreation** zone are*

- *To enable land to be used for public open space or recreational purposes.*
- *To provide a range of recreational settings and activities and compatible land uses.*
- *To protect and enhance the natural environment for recreational purposes.*

This proposal, as also covered above, is not consistent with the community use of the public recreation spaces and their expectation of access to the natural environment, which would not be enhanced but degraded by this development. A Function Centre as proposed in this island location, relying on Harrington Street for access, would present as an anomaly within an at grade public recreational setting.

CLEP 5.3 (4) desirability due to compatible land use planning and infrastructure capacity

As also covered above, the infrastructure of Harrington Street is not designed for, nor suitable for providing access to this development. As a largely residential and narrow street that is used by the community for accessing preschools, the high school and sporting grounds it is not consistent with the capacity required for a large function centre.

Local buses use the street, but it is not acceptable that buses servicing the venue crowd the street and provide no service to residents.

Whilst the proposal suggests that a median strip be installed to prevent right turns from the venue into Harrington Street, this makes no difference to the increase in overall traffic and impact on community accessibility to schools and sporting fields.

HIGH HAZARD FLOOD AREA

The site is subject to flooding and is classified as high hazard in which:

- all building types are vulnerable,
- stability of vehicles to withstand the depth and velocity must be demonstrated.

As such a comprehensive evacuation plan is required and flood level restraints and vehicle barriers must be provided to prevent floating vehicles from leaving the site.

The evacuation plan relies on the necessity for an effective and sufficient warning time. The plan must demonstrate that evacuation to a communal refuge is possible and that the evacuation will not significantly add to the overall cost and community disruption caused by a flooding event.

The proposed evacuation route is through narrow streets within Elderslie as shown below in the diagram within the 2018 Flood Assessment submitted with the DA.



The trigger level for evacuation, assuming that the trigger is reliable, allows approximately 2 hours to evacuate

- 750 people all walking to the safe point, or
- 375 people walking and 200 vehicles.

The Flood Assessment does not address the impact of such an evacuation on Camden residents, emergency services or how it would not add to the cost and disruption in a flood scenario.

Logically the concentration of people and vehicles in one location, all needing to evacuate over a short period, would be disruptive and impact on others in the area who are likewise responding to the same flood event.

With climate change it is not possible to predict future flooding events or warning time for them with any accuracy. What happened in Picton in June 2016 is a case in point.

The restraints on building on and traditional uses of flood prone land such as sporting fields is wise. Given the opportunity for investment in function centres within the Municipality that are not flood prone, there is no value from the community's perspective for a function centre in this very compromised location.

In summary, this proposal is clearly incompatible with its own and adjoining zone objectives. It presents as an overdevelopment and imposition on residents and the sense of place of Elderslie. It is not acceptable or even workable that the access is from Harrington Street. The proposal's incompatibility with the area is exacerbated by its being within a high hazard flood area. The scale of the proposed centre and its means of access in an evacuation scenario would necessarily be disruptive to others dealing with the same flood event.

We sincerely request that this proposal be refused.

Yours sincerely,



Glenda Davis
President