

Camden Residents' Action Group

Incorporated

Camden – Still a Country Town

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11 November 2020

Dear General Manager,

Re: DA 2020/702/1

**16 Old Hume Highway, 40 and 42 Macquarie Avenue
Camden**

Demolition of existing structures, tree removal, lot consolidation and construction of a multi-dwelling housing development comprising of 22 units across 3 storeys, basement car parking, stormwater drainage works, landscaping, servicing and associated site works

Thank you for the opportunity to comment on this proposal.

Many residents have contacted us about it and all have grave concerns about its detrimental impact. We too cannot see any merit in what is proposed, and it is certainly not what is expected as appropriate in Camden, especially this part of Camden being within easy walking distance of and identifying strongly with Camden's heritage conservation area.

We set out the reasons for our main objections below.

Camden LEP 2010 compliance

LEP 4.3 *Height of buildings* includes the objectives of compatibility with the height, bulk and scale of the existing and desired future character of the locality and minimising visual impact, loss of privacy and solar access to existing development.

The proposed development does not meet the objectives of compatibility with the existing and desired future character of the locality, as expressed in Camden Local Strategic Planning Statement¹ (LSPS) and DCP 2019, and minimising visual impact. The reasons are explained below under *Camden DCP 2019 compliance* and subsequent headings.

The shadow diagrams provided in the architectural plan show significant overshadowing of other properties, and no doubt loss of privacy. We trust that affected owners and residents have been given every opportunity to understand the impacts of this development on their rights to quiet enjoyment of their properties, and to have input into the assessment and determination process.

LEP 2020 also requires that the height of buildings in the site's zone do not exceed 9.5 metres.

We consider that the building facing Murrandah Avenue (as depicted under *Camden DCP Compliance* below) may be over-height which would be in contravention of the maximum height specified by LEP 4.3. We ask that this be checked.

Camden DCP 2019 compliance

DCP 4.6 *Multi Dwelling Housing* on image and legibility requires that the proposed development

- blend in with its surroundings and/or be in keeping with the character of the area.
- be designed to be compatible with the streetscape
- create an appearance of a single or grouped dwellings that are separated by gardens and ancillary structures

¹ Camden Council March 2020 *Camden Local Strategic Planning Statement* Available at <https://www.camden.nsw.gov.au/assets/Uploads/adopted-LSPS.pdf>



The above artist's impression particularly demonstrates that the proposed development does not comply with image and legibility requirements of DCP 4.6.

It is not in keeping with the character of the area and streetscape and presents as a grey monolith, contemptuous of its older neighbours, with little separation between dwelling units. The design, proportions, colours, materials and massing are extremely incompatible with the streetscape and older Camden in general and are disruptive to the sense of place.

This section of the development also presents as three-storey, in an area that is largely single storey, or at most two- storey.

DCP 4.2.5 on height states at Control 1:

In those areas which have a maximum height of 9.5m under CLEP 2010, the height of a dwelling house must not exceed two storeys above existing ground level.

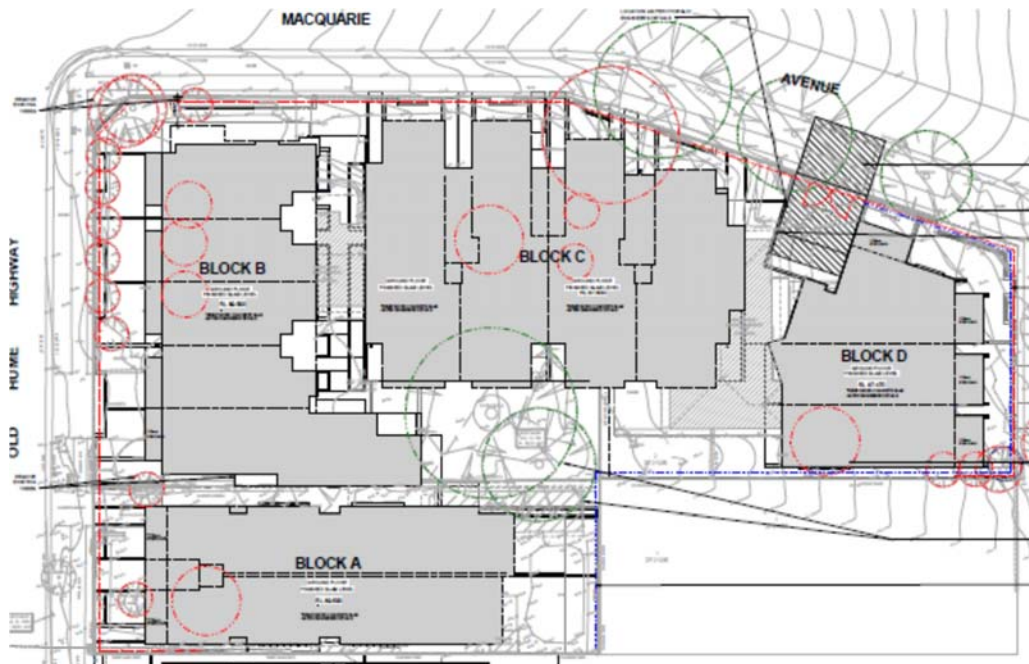
The proposed three-storeys contravenes DCP 4.2.5.

DCP 4.6 site requirements include minimum setbacks. Our calculations indicate that the setbacks do not allow for protruding verandas on the Old Hume Highway and for porches on the Macquarie Avenue frontage.

Also, the DCP side setback requirement is 4.0m minimum for a second storey. It would appear that the proposed buildings do not comply with this. No side setback requirement is specified for the third storey as this is not meant to exist.

The proposed buildings do not seem to be compliant with the set-back requirements. This has ramifications for neighbourhood amenity and privacy. We request that the setbacks be carefully checked.

The site requirements also state that the site coverage must not exceed 50%.



The proposed site coverage. (Source Architectural Public Plans - 16 Old Hume Highway Camden)

The Statement of Environmental Effects (SEE) (p. 11) states the site coverage as 50.8%. The diagram of proposed site coverage above suggests that the proposed site coverage is significantly greater than 50%.

We find it difficult to believe that the site coverage is not excessive and ask that compliance with the site requirements of DCP 4.6 be specifically assessed.

Incompatibility with Camden's character

The Statement of Environmental Effects (SEE) (p. 5) claims that the proposed development adopts the traditional form of dwellings and has been designed to complement the existing character of the area. No evidence has been provided to justify this claim. Feedback to us, as well as our view, is that the design is unsympathetic and completely inconsistent with the character and amenity of the outskirts of the old town.

This proposal requires the demolition of three houses and removal of at least 23 trees, that do contribute to the historic fabric and low-rise amenity of Camden, and their replacement with a development that does not reflect Camden's special character.

The LSPS sets out a 20-year vision for Camden and makes reference to housing in Camden as being diverse but still reflecting the characteristics that make Camden so special and promoting Camden's place in history (p. 22). The site in question is within close proximity to Camden's Heritage Conservation Area, and Camden Hospital which opened in 1902. The area of the site and its housing stock reflects how Camden's community expanded over many decades. There is nothing special about this generic multi dwelling design, which would be quite at home in a new suburb, and further it removes a significant amount of reflective and character contributory building stock, trees and gardens.

Whilst over the next 20 years, Council will need to plan for new homes, jobs and services for an additional 140,000 people, overwhelmingly in the South West Growth Area (SWGGA), it also plans to protect and enhance Camden's distinctive local character and natural environment (LSPS p. 14).

In the short term, Council will be undertaking a visual analysis of landscapes and ridgelines, presumably including the ridgeline in this area just south of the original settlement, to ensure that Camden's valued identity and heritage is protected from the impacts of development (Local Priority L2 LSPS, p.44). The site of this proposed development is on a ridgeline position, and the development proposed is massive and disdainful of Camden's esteemed character.

Priority 3 (p. 63) of the Draft Housing Strategy², which articulates with the LSPS, is

Delivering the right housing in the right location and its Objective 7 is Housing growth in established areas is incremental, and preserves character and heritage values.

The Draft Housing Strategy (p. 84) reiterates Council's approach:

Any housing growth in established areas will need to preserve local character and heritage values.... There is an opportunity to review land use and development controls in the residential land use zones of the Camden LEP to ensure any infill development is appropriate and respects neighbourhood character and amenity.

The proposed development does not respect the neighbourhood character and amenity.

² Camden Council October 2020 *Draft Camden Local Housing Strategy* Available at <https://www.camden.nsw.gov.au/council/matters-on-exhibition/draft-camden-local-housing-strategy/>
<https://www.camden.nsw.gov.au/assets/pdfs/Council/Matters-on-Exhibition/Camden-Draft-Local-Housing-Strategy/Final-Draft-Housing-Strategy-exhib-October-2020.pdf>

Over-development of the site

The proposed development's incompatibility with the area and inconsistency with the LSPS as covered above exacerbates the sense of its intrusion as an overdevelopment within its surrounds.



Existing surrounds

In justification of the proposal, the SEE (p.5-6) nevertheless cites the LSPS. It claims alignment with the goals and priorities of the LSPS, but only cites Local Priority L1 *Providing housing choice and affordability for Camden's growing and changing population*. However, in relation to L1, the LSPS (p.38) elaborates that the vast majority of future housing to be delivered in the precincts of the SWGA and states that there is no intention of creating additional housing capacity in established centres and suburbs without *commitment to further catalytic infrastructure provision*.

The LSPS (p.40) further states as a *Principle for Housing Growth* in Camden that additional housing growth in existing suburbs and centres outside of the SWGA is incremental with additional growth only initiated by additional infrastructure delivery.

This proposal for 22 multi-dwelling units on what were lots containing three single dwellings is an overdevelopment in terms of the LSPS, especially as it relies on existing infrastructure.

It is also an overdevelopment in terms of its surrounds. It is a much denser development than what currently exists.

Tree removal

The LSPS aligns with the Greater Sydney Commission (GSC) District Plan³ and its delivery of the Blue and Green Grid. The LSPS (p. 12) states that key components of the District Plan that relate to Camden include recognition of its heritage and identity and a focus on delivery of urban canopy tree cover.

LSPS (p. 68) on Local Priority S1 referring to the Green Grid states that Council will investigate opportunities to improve urban tree canopy cover in established areas and that tree cover on private land is an important component as buildings and other hard surfaces absorb and store heat.

This proposal removes at least 23 trees and three associated gardens, and largely replaces them with built form and hard stand. The comparison is clear between the exiting tree canopy and breathing space shown below and the proposed site coverage diagram included above.

This is a backward step in fostering the urban tree canopy and combating the effects of increasing urban heat (LSPS p. 21).



The existing tree canopy and open space.

³ GSC *Western City District Plan* Available at <https://www.greater.sydney/western-city-district-plan>

Traffic

Safety

Vehicle ingress and egress for most of the units (1 – 20) is via Macquarie Avenue. Many residents have raised the fact that Macquarie Avenue is not a quiet street, but services many of the surrounding properties.

The artists impression included under *Camden DCP 2019 compliance* shows a car entering the proposed development which is at the same access point indicated in the Traffic Report provided as supporting documentation with the DA.

Residents consider that this one main egress point in Macquarie Avenue provides poor visibility and is potentially dangerous due to:

- the slope and bend when looking towards the Old Hume Highway
- the likelihood of parked cars in Macquarie Avenue
- close proximity to Murrandah Avenue corner

It is also of concern that street trees will need to be removed to improve visibility. This is unacceptable.

Parking

Parking within the complex is inadequate also because:

- Many residents will have two or more vehicles
- All service and delivery vehicles will have to park in the street (Traffic Report 7.2).

The requirement is for five visitor parking spaces for general visitors. Six are provided in total including one accessible space.

According to the Traffic Report:

- ❖ Four visitor spaces are located within the basement parking for units 1 – 20
 - ❖ One of the four in the basement is the only accessible space in the whole complex
 - ❖ Two visitor spaces are located on the driveways to units 21 and 22 off Murrandah Avenue
- The visitor parking is inadequate because two of the general visitor spaces are in the driveways of units facing Murrandah Avenue, which cannot be regarded as being for any visitor. It is not clear how parking in the disabled visitor space makes the overall complex accessible.

According to the Traffic Report

- ❖ All overflow requirements of the complex, are expected to utilise unrestricted, on-street parking on Macquarie and Murrandah Avenues.
- ❖ There will be many bins on the kerbside periodically as household waste of the complex will be collected by the normal kerbside waste collection service

This proposal creates an unacceptable burden on the road system and other properties which are also entitled to free use of and unrestricted parking on the roads surrounding the proposed development.

Congestion is inevitable. Overdevelopment of the site with lack of utility space on-site means that the overflow requirements of the complex will be very considerable.

The proposed development is not compliant with LEP 4.3 as it is incompatible with the bulk and scale of the existing and desired future character of the locality and has an intrusive visual impact. It does not comply with the DCP 4.6 control on image and legibility that requires it blends with its surroundings and be in keeping with the character of the area. It is highly questionable whether it complies with DCP 4.6 site requirements. It contravenes DCP 4.2.5 as it proposes three-storeys.

The proposal is also not consistent with the vision of retaining Camden's special character and plans for new housing in established areas as expressed in the LSPS, which implements the GSC's District Plan, and its companion Draft Housing Strategy.

We respectfully request that this development be refused. If it is to proceed it needs to be modified very substantially and include many fewer dwelling units and more open space and trees. The architectural elements also require very significant modification to be compatible with Camden's special and highly valued character.

Your sincerely,



Glenda Davis
President