

Camden Residents' Action Group

Incorporated

Camden – Still a Country Town

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General Manager
Camden Council
70 Central Avenue
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25 January 2022

Dear General Manager,

RE: DA 2021/1875/1
45 Oxley Street CAMDEN

Erection of new storage shed and front entry awning with corporate signage

We strongly object to the corporate colours and signage proposed in the above DA.

It is well known that the community highly values Camden's heritage, which is of much documented and unquestionable high significance. Its valued significance is reflected in legislation and all Council policies including the Camden Local Strategic Planning Statement which aligns with the GSC district plan.

As we explain below, the proposal is not consistent with the spirit and is non-compliant with the letter of the LEP and DCP. The DCP compliance table in the SEE shows that the DCP controls have for the most part been regarded as a tick a box exercise, one that provides no evidence for claims of compliance and glosses over the impacts on the sensitive heritage location.

Heritage context

Although the proposal is within the Camden Town Centre Heritage Conservation Area (HCA), a Heritage Impact Statement was not lodged. We strongly refute the unsubstantiated claims of negligible heritage impacts made in the accompanying Statement of Environmental Effects (SEE).

The SEE (p. 20) claims that the development should be supported because the building “.... is not located in a sensitive heritage precinct within the overall Camden Urban Conservation zone”. Conservation areas are by definition sensitive and Camden’s HCA is subject to many development controls. The building is in close proximity to many heritage items and very visible within the original Macarthur town layout.

In relation to LEP 5.10 *Heritage conservation* the proposal does not conserve the heritage significance of the HCA (1b) and the effect on the heritage significance of the area is detrimental (4).

It also does not comply with the DCP for the town centre (5.3.1 *Camden Town Centre Development Controls, B2 Local Centre*) which requires specific regard to environmental heritage (DCP 2.16) and consistency with the Camden Town Centre Urban Design Framework (UDF).

In particular under DCP 2.16.3, the materials, finishes and colours are non-compliant with development controls as the colour scheme and loud and large signage are unsympathetic with the historic context and surrounding development. They certainly do not contribute, as required, to the cohesiveness of the HCA, but instead deliberately seek attention by being very different to what is expected in the historic town.

What is proposed is contrary to the present and desired future character of the renowned rural and heritage town as expressed in the UDF. It is clearly not consistent with the Built Form Place Principle¹ of the UDF as it does not protect or enhance Camden’s unique character.

It is also not consistent with the Camden Local Strategic Planning Statement which aims to preserve the HCA and heavily references the UDF.

¹ *Protect and enhance the unique character of Camden’s heritage, it’s human scale and network of urban fabric ensuring all built form contributes to Camden’s identity as a rural town. (UDF, p. 33)*

Bright blue colour

The bright blue as shown in the artist's impressions below is not a heritage colour.



Source: Macarthur Signs and Graphics May 2021 *Architectural Plans Front and Rear Facades*

We find it extraordinary that this DA would present something that is clearly so unacceptable in the HCA.

The SEE (p. 9) states

Whilst the painted external finish (“Deep Ocean”) is a contemporary colour, it supports the corporate advertising scheme of the dental surgery operation and being of a darker toned and recessive colour, does not highlight the building and does not detract from the character of the streetscape and the significance of the adjacent heritage items.

The colour as depicted is not recessive. It makes a bold statement particularly when combined with the orange and white of the very unusual, over-large and brash signage.

Signage

At the outset we take issue with the SEE (p. 9) discounting the obtrusiveness of the signage as “ephemeral”. All signage is more or less temporary so that its not a valid argument.

As noted at the outset we do not accept that the DCP compliance table seriously addresses the compliance with the relevant development controls. We provide our own analysis of non-compliance with signage controls in the DCP below

- **DCP 2.17.1 General Requirements for Signage:** Does not comply as quantity, type, colour and size detracts from amenity and character and is not consistent with the scale of the building.
- **DCP 2.17.2 Commercial and Mixed-Use Zones:** Does not comply as more than 20% of the front elevation is signage visible from a public place, the total window signage exceeds 20% of the visible window area.
- **DCP 2.17.4 Signage on Heritage Items or in Heritage Conservation Area:** Does not comply with:
 - General controls
 - Control 2: does not complement historic character of the HCA.
 - Control 3: does not comply as there are **many more than 2 signs visible** from a public place.
 - Control 4: does not comply as does not have minimal impact on HCA.
 - Control 5: does not comply as the signage is not appropriately designed to allow character of HCA to remain prominent.
 - Location controls
 - Control 1: Does not comply as signage in windows is not located where traditionally used.
 - Control 3: Does not comply as signage should be discreet and not clutter or dominate the shop window.
 - Design Controls
 - Control 1: Does not comply as the new signs are not in harmony with character of HCA.
 - Control 2: Does not comply as the signage design does not incorporate traditional materials, colours, fonts and size.
 - Control 3: does not comply as the use of the windows and the signage therein is not sympathetic to the character of the HCA.
 - Other Controls
 - Control 4: Does not comply as **corporate and franchise signage is not appropriate**

The SEE (p. 20) acknowledges non-compliance with the numeric control of DCP 2.17.4 (general control 3): *The number of signs permitted must not exceed two per elevation that is visible from a public place.*

The SEE (p. 20) contends that the 5 signs are acceptable because:

- they are part of the overall corporate advertising scheme, rather than stand-alone signs;
- the building is not located in a sensitive heritage precinct.

We strongly refute these arguments:

- as stated in DCP 2.17.4 and noted above (control 4 of *other controls*):
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;
- the legislated HCA, a small area planned in 1836, is by definition sensitive. No evidence has been provided that it is not and there is any amount of evidence that it is highly sensitive.

As shown in our DCP analysis above, the window signage is non-compliant with the DCP for many reasons including that it is not traditional, is unsympathetic, clutters and dominates the windows and does not incorporate traditional materials, colours, fonts and size.

We reject these concluding claims made in the SEE as they without any foundation:

- that the development is in in the public interest (SEE 5.8) because it is in keeping with accepted heritage principles.

CRAG comment: It certainly does not achieve a positive improvement in the streetscape. No evidence is provided and objectively the proposal is non-compliant with the heritage provisions as covered above.

- that no unreasonable external impacts will result from the development proposal (SEE 6.0).

CRAG comment: Clearly the location is sensitive, as evidently recognised in Camden's planning instruments. What is proposed is without reference in the HCA and is intended to draw attention to itself. It is non-compliant with both general and specific heritage controls.

Our understanding is that inappropriate colours have been disallowed and removed at 30 Argyle Street, the Camden Healthcare Centre in the old Council Chambers nearby at 37 John Street and Camden Central Family Practice at 70 John Street.

In this case authorisation is sought for corporate colours and signage intended to emphasise each other and to loudly stand out as a business identifier.

We respectfully ask that this proposal go back to the drawing board to be made compliant with the planning instruments and to make it consistent with community expectations for the HCA.

Yours sincerely,



Glenda Davis

President