

Camden Residents' Action Group

Camden – Still a Country Town

(Incorporation reservation No. 8477 under the *Associations Incorporation Act 2009*)

PO Box 188
Camden NSW 2570
Email:
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28 April 2016

The General Manager
Camden Council
37 John Street
CAMDEN NSW 2570

Dear Mr Moore,

**Comments on the Camden Contributions Plan 2011
Draft Amendment (Camden Town Centre Car Parking Facilities)
File reference SC3649**

As Council is well aware, concerned Camden citizens and community groups have campaigned at great length against the proposed Oxley St development, on grounds amongst others that it not needed, outrageously expensive, inappropriately located, inappropriately designed for the heritage precinct in which it is located and with the addition of the second story will contravene the 7m height limit established by the Local Environment Plan (LEP) legislated in 2010. Camden Residents' Action Group's (CRAG's) opposition to the Oxley Street Car Park is well known, and a comprehensive submission opposing the DA has already been made to Council. A copy is appended for your convenience and to avoid repeating the same comments. Please review the many Letters of Objection about this matter forwarded, during the recent short period for public comment, by concerned constituents.

Interestingly this proposed Draft Amendment finally spells out in very clear language, at 4.6.2 'Camden town centre', the Council's intentions for the second stage of the Oxley St site: "Stage 2 to provide a further 68 spaces in a 2 storey configuration". Council's determination to exceed the legislated LEP height restrictions, in contravention of the explicit values and requirements established when Camden town centre precinct was declared a Heritage Conservation Area in 2010, is now unambiguous. However Council's intention to contravene provisions, set out to protect Camden's heritage and arrived at by process of democratic consultation, is not on the radar of the wider community, which begs the question of how the community has been consulted and provided with full information.

The opening of the Narellan Town Centre in 1995 announced Narellan's arrival as the local hub of shopping mall style development. Setting out in competition with its more distant but initially larger nearest available competitor, Macarthur Square, this mall is presently undergoing its third massive expansion.

Narellan's dramatic growth over the last two decades has presented neighbouring Camden with challenges. These have been discussed, at times with some disagreement or even acrimony in the process, and responses formulated. As the behemoth of Narellan grew it became apparent that to endeavour to compete on the same playing field was not only doomed to failure, but would also destroy in the process the very fabric of the vital lived community of Camden.

This Draft Amendment correctly identifies at 4.6.1 that "The Narellan and Camden town centres are two key nodes for the provision of business and commercial services". Crucially, however, it does not go on to indicate nor reflect in its recommendations, that Camden's role as a hub of activity is of a very different nature and must be realised through a very different strategy.

The strategy that will secure Camden town centre's vitality as a contemporary community and its future prosperity, is to maintain, cultivate and exploit our 'point of difference'; to foster development that is in keeping with and responsive to our unique historic built environment and landscape while keeping pace with the contemporary needs and expectations of residents, businesses and visitors alike. This is the hymn sheet from which concerned individuals, significant community groups (including CRAG, Camden Community Alliance and the Historical Society), as well as the Camden Chamber of Commerce are now singing in unison. Unfortunately for Camden, should this document be passed by Council, it will yet again be revealed that the body out of tune with our community choir is Camden Council.

Narellan is now, beyond doubt, the retail centre of our Local Government Area, being the location of a thriving and growing commercial centre with its predominantly shopping and entertainment focussed mall in the midst of new developments. The ever increasing need for additional car parking facilities is incontrovertible.

The studies upon which the recommendations at 4.6 'Public car parking facilities' are based date from 2002 in relation to Camden (Haliburton study) and 1995 in relation to Narellan (Christopher Stapleton Consulting). Neither of these studies can reasonably be regarded to be of contemporary relevance given changes that have occurred in both communities in the intervening years.

In the context of Narellan's meteoric growth and the infrastructure demands this continues to place on the erstwhile township of Narellan, any study dated 1995 is surely next to totally irrelevant. The above mentioned 2002 Haliburton study predates key changes that have significantly impacted Camden, calling into question whether it is of any relevance at all.

This Draft Amendment should have very much more appropriately referred to the more recent Brown 2013¹ and 2014² Reports on traffic and car parking issues in the town centre, which post dates Camden's 2010 Heritage Conservation Area listing. That Report addresses the issues within the context of the highly important heritage designation, is more current, and very significantly recommends against the present need for the proposed decked car park. Camden's public car parking needs can be addressed, as they arise, by other infinitely less expensive and far more appropriate means. **The inappropriate use of the outdated 2002 study, predating the town's legislation as a conservation area, begs the question of cherry picking, distorting the outcome of what Council's constituents should reasonably expect to be a dispassionate assessment.**

The supporting document to this Draft Amendment refers, under 'Narellan town centre' at 4.6.2., to the Kann Finch Group 2007 report, which addressed the need for 'Public car parking facilities' in Narellan. Observation and common sense both counsel immediate attention to this matter, as it relates to amenity, convenience, access and safety issues for the town centre and its community and visitors. However the document goes on to say that the preferred option is to be approached with "a staged method of construction", citing as a major constraint that the decked car park will be constructed "when sufficient development contributions have been collected and subject to demand".

THE DEMAND IS ALREADY VERY EVIDENT and the issue of funds could be significantly addressed by Council NOT endeavouring to divert funds to the proposed decked car park in Oxley St Camden. Surely this draft amendment to provide for pooling of contribution funds, to take money from a fund, that Narellan businesses have contributed in good faith and which have a self-evident and demonstrable need for additional parking and to allocate it to Camden conservation area is illogical, and at best unethical if Narellan businesses have not specifically agreed to it. In any case Camden has been shown in recent reports not to have any intrinsic shortage of parking and not to need a decked car park (Brown 2013, 2014), and certainly not a car park that would detrimentally impact on heritage amenity and hence the viability of Camden businesses. This illogical proposal to divert funds again begs a question, whether Council's constituents can rely on Council making a dispassionate assessment about the car park area that is immediately adjacent to Council buildings.

The proposed transfer of funds outlined in this Draft Amendment is entirely inappropriate and unnecessary. It is recommended that the relevant section 94 contribution funds be left

¹ Brown (2013) Camden Town Centre Traffic and Transport Study September 2013 Reference Number: X13060. Available at <http://www.camden.nsw.gov.au/assets/pdf/Major-projects/2015/Camden-Town-Centre/Camden-Town-Centre-Traffic-and-Transport-Study-September-2013.pdf>

² Brown (2014) *Multi Storey Car Park Study April 2014 Reference Number: X13060.01*. Available at : <http://www.camden.nsw.gov.au/assets/pdf/Major-Projects/2015/Camden-Town-Centre/Camden-Town-Centre-Multi-Storey-Car-Park-Study-April-2014.pdf>

with Narellan where they are so sorely needed. Render unto Narellan what is Narellan's. It is recommended that Camden Council NOT assent to this document.

In expressing our opposition and making our position crystal clear, CRAG also makes the following additional comments about elements of the draft amendment to Camden Contributions Plan 2011, Section 4.6- Public car parking facilities (pages 68-70) and the vexed issue of why Council is intent on proceeding with a car park that would not seem to be in the public interest and not compatible with the heritage precinct.

- **All mention of Stage 2 decked car park should be deleted from the Contributions Plan.** An extra deck would be contrary to the height restrictions of the Camden Local Environment Plan, and could not therefore be legally built. It is inappropriate to be including car parking additions in a Contributions Plan which would require an illegal structure to accommodate them.
- The plan claims that Stage 1 would provide an **additional** 51 car spaces. However, this does not include car parking spaces that have been lost due to the Camden Town Centre upgrade. By CRAG's calculation, this figure is 11 car parking spaces lost. The correct figure for **additional** car parking spaces for Camden Town Centre is therefore only 40, and this figure should be included in the contributions plan.
- Council has not conducted a public, independent cost-benefit analysis on why it thinks the Oxley Street car park site is appropriate value for public money. CRAG has noted in its submission opposing the Oxley Street car park DA that the approximate cost per additional car space is not value for public money at between \$63,000 and as much as \$81,000 depending on how the additional number of spaces is calculated. A plan to allocate public funds this way must be accountable and justified. Research³ suggests that the following are typical construction costs for different types of parking spaces:
 - Basement parking: \$46,100 – \$49,700 per space
 - Open parking areas: \$ 2,925 – \$3,155 per space
 - Multi deck parking: \$19,700 – \$21,200 per space

In 2016 terms, even at a typical cost of \$30,000 per space, the difference for this car park even at \$63,000, the lowest estimate per space calculated, is extraordinary. The differential requires explanation and justification.

If a reason for the differential is related to economies of scale, that would provide another strong reason why Camden should NOT proceed with the decked car park because such a structure in a small area in a small town does NOT deliver value for public money.

³ Coath, C. (2011) *Parking: A Basis or Burden to Liveable and Accessible Communities* . Australian Institute of Traffic Planning and Management Incorporated (AITPM) 2011 National Conference. Accessed 28 April 2016. Available at :<http://www.gta.com.au/data/sites/1/pdffiles/parking---chris-coath.pdf>

- Council has not conducted a public justification on why additional parking is needed, and why parking is not efficiently patrolled to discourage long term parking in prime spots.
- If additional parking was independently found to be needed Council has not explained why the following alternative options suggested by CRAG (as set out in the appended objection) are not more appropriate, given that they do not have the same heritage impacts as the current proposal, nor would they be costly.
 1. Onslow Park has potential for long term parking;
 2. The site at the corner of John and Mitchell Streets, already owned by Council (see attached photos). This site is obviously surplus to Council requirements, since it was recently put up for lease. The red brick house on site has no heritage value, and the house could be demolished and the site converted to a street level car park, yielding some 40 car spaces. A couple of the larger trees could be retained for landscaping purposes. The site would be perfectly positioned to provide additional parking for the Camden Civic Centre without destroying the ambience and utility of the Civic Centre curtilage as the current car park proposal would do.
 3. The provision of a free mini bus circulating continuously around the town and between the existing and ground level car parks suggested above would encourage their use and aid the elderly.
- Why have these alternative options not been subject to a public cost benefit analysis process?
- CRAG believes that it is also important to the cost-benefit parking debate that any assurances made to the future lessees of the Camden Council building re parking availability should be made public in the interests of transparency.

CRAG requests that Council account to the public on the questions raised in this submission.

Yours sincerely,



Glenda Davis

President, CRAG



Camden Residents' Action Group

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12 April 2016
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The General Manager
Camden Council
37 John Street
CAMDEN NSW 2570

Dear Mr Moore,

RE: DA 248/2016/1 – Oxley Street Deck Car Park – Objection

Camden Residents' Action Group (CRAG), established in 1973 as a non-political, non-profit community organization, is objecting to the proposed development for a decked car park in the heritage conservation area, as set out in the above application.

The following objections are made about Council process:

- The community is outraged about the community consultation process, which is regarded by the electorate as an undemocratic sham and a blatant abuse of regulatory power. Decisions were taken behind closed doors⁴ before the consultation period from 23 July to November 2014. Camden township, a small defined leafy oasis, laid out in 1836, within a large municipality area undergoing rapid development, is the only extant town of private origin in NSW and one which is highly valued by the community and visitors. It is also still associated with its founders, the pioneering Macarthur family who remain at Camden Park on which Camden was founded. The community, which was democratically consulted about the town being designated as a conservation area, has been denied true input into plans to modernise and "develop" the historic and rural town with inappropriate works, including this proposed decked car park;

⁴ Camden Council (10 July 2014) *Media Release Camden Council Launches Major Camden Town Centre Upgrade*. (Accessed 6 April 2016) Available at http://www.camden.nsw.gov.au/assets/pdf/Council/AboutCouncil/2014/MediaReleases/2014/Camden_Town_Centre_Improvements.pdf

- The exhibition period is very short, too short given the magnitude of the proposal and given the Easter period. The period must be extended to allow interested people time to understand the proposal and comment because
 - This proposal represents a very large outlay of other people's monies, that is, this project is a public not a private project. It involves a very large amount of public funding and as such the public are morally entitled to be given time to consider it properly and not in a rushed fashion;
 - Camden Council in advertising the Oxley Street Decked Car Park Development stated that full details would be available on Council's website. This has not been found to be the case.
 - Nor have the documents been available at Council, with counter staff knowing nothing about them, and the documents at the library were mixed with other documents and located at the very back of the library. This is not acceptable as an "exhibition" and the full documents must be made readily accessible.

- It seems that a decision has been predetermined as responses to the Contributions Plan and contract proposals have been invited before the public has its say. Council are requested to provide the citation of the authority under which it has acted in this way. It seems highly irregular and to fly in the face of democratic and due process.

- It is understood that there is approximately \$1m in the Camden Parking Contribution Fund. Have the contributors agreed to Council spending their contributions on this proposed car park? What are the views of the contributing businesses? It is also understood that the Camden Chamber of Commerce is against the proposed decked car park. The proposed car park would seem to be mainly for the benefit of the lessees of the Council building. Use of small business's contributions to parking for this purpose seems immoral and unethical. What justification is Council employing?

The grounds for objection about the proposed decked car park follow.

1) Heritage

Research undertaken by historian Helen Proudfoot indicates that Camden is the only extant original private town in NSW, and probably Australia.⁵ Camden is unique in its

⁵ Proudfoot, Helen 1996 *Town plans and their impact on the settlement process of Australia, 1788-1849* Available at:
http://www.researchonline.mq.edu.au/vital/access/manager/Repository/mq:25453?f0=sm_creator%3A%22Proudfoot%2C+Helen%22

history, as an unofficial town situated on Camden Park, designed by James and William Macarthur in 1836 with the help of Surveyor-General Thomas Mitchell to the first town planning principles of NSW established by Governor Darling in 1829. The grid pattern of streets is exactly as laid out in 1836 and the human nineteenth century scale of the town with its village profile remains intact. Much of the Cumberland Plain is now suburbanised which has left little remnant within easy distance of Australia's largest city to exemplify the colonial past and the agricultural way of life.

Camden has a unique place in the history of the colony of NSW and an important role in the foundational story and development of Australia. It has a strong and special association with the pioneering family of the Macarthurs, the foundation of the wool, wine and horticultural industries and strong visible connections to the dairying industry, including within the township itself.

Camden with its heritage listed buildings, with its abrupt interface with rural land and floodplain and environmental setting adjacent to the Nepean River provides a rare window into the colonial past, and a significant opportunity for tourism, especially being so close to Sydney, and competitive advantage for local businesses.

Brown (2014)⁶ in their Multi-Storey Car Park Study specifically refers to the Clive Lucas Stapleton heritage study undertaken for the aborted proposal for a decked John-Murray car park and warns that the heritage issues that were raised in that report need to be carefully considered for the proposed Oxley Street car park. The Car Park Study presents no answer regarding the suitability of the Oxley St car park, stating that an investigation into the suitability of the site needs to be undertaken by an architectural firm with heritage experience which will appropriately address the heritage design guidelines as set out for Camden Town Centre (p.45). This has not happened, and the design principles are not addressed.

The Land and Environment Court in times of an enlightened Camden Council (April 1996) ruled in favour of Council against an unsympathetic development application by Gledhill Constructions in the vicinity of heritage listed St John's Church. The Honourable Chief Justice M L Pearlman AM, stated:

"It is abundantly clear that the Camden Township represents a particularly significant and sensitive heritage site in which conservation, involving reuse of buildings or land, must necessarily be approached with considerable care."

The town was laid out with its current dimensions on the assumption that buildings would never go beyond a certain height, customary for the period. Height and distances were carefully balanced, and are integral to its heritage value. Therefore to introduce buildings and structures of a different scale would seriously compromise in an overall physical sense the original harmony of the town within itself and within the surrounding landscape. It is to make do with bits, instead of trying to retain the

⁶ Brown 2014 *Multi Storey Car Park Study April 2014 Reference Number: X13060.01*. Available at : <http://www.camden.nsw.gov.au/assets/pdf/Major-Projects/2015/Camden-Town-Centre/Camden-Town-Centre-Multi-Storey-Car-Park-Study-April-2014.pdf>

whole, and so shows an ignorance as to what the whole really signifies. The proposed decked car park is antithetical to Camden's sense of place and rural history as it is out of scale with the heritage townscape. Its size and horizontal structure over a long length is unsympathetic to any architectural heritage principle. The car park is designed to take more storeys in the future which would of course contravene the 7 m height and two storey limit of the conservation area. The footprint of the car park is very large and can only be of a scale and fabric incompatible with the human scale of a 19th century town.

It has no place in a conservation area (legislated through the Camden Local Environmental Plan 2010) which protects the townscape through heritage provisions and a height limit. It has no place on a block that contains our most significant heritage buildings. As the car park is designed to take additional decks in the future it would contravene the height limit and present an eyesore that detracts from the whole that is the Camden conservation area, a major asset in the municipality and in NSW. There is ample opportunity and already significant construction of modern structures in other areas such as Narellan, a very short distance from the old town, and Oran Park. It would be unconscionable to wreck what has stood for over 175 years with this folly.

2) Need

The need for a decked car park, estimated cost over \$3.3m for around 50 car spaces, and designed to take additional decks in the future, was not supported by consultant's studies. Brown (2014) found that that at this stage additional decked car parking is not required to accommodate current demands (p. 109) and that there appears to be minimal need for an increase in overall parking provision within the Camden Town Centre as capacity can be increased with both increased enforcement of existing restrictions and conversion of parking restrictions to 'Seven Day' restrictions (p.90). Further, given a reasonable shift of existing long-stay parkers to more peripheral locations, through enhanced enforcement, additional off-street car parking capacity is not likely to be required in the short to medium term (p. 111).

Indeed as also pointed out by Brown (2014) other much less expensive options exist to improve parking availability such as monitoring time limits (currently business owners and employees take up car spaces for the working day).

Also, as presented under *Alternatives* below, council owned land could be utilized. For instance the corner of John and Mitchell Street, on which a small 1960s red brick bungalow inappropriately sits, could easily be converted to provide another ground-level car park that is consistent with parking everywhere else in Camden. This alternative would save approximately \$3m, and be a win for heritage and the public purse.

3) Cost

No cost-benefit analysis has been made public. What is the present value of expected on-going costs? What is the opportunity cost in loss of business to the town due to loss of ambience and point of difference?

The cost per additional car space in money terms, not to mention heritage and environmental costs, is extraordinary.

Outlaying more than 3.3 million dollars for a car park that will yield a net 41 additional parking spaces to Camden's CBD could not be considered appropriate spending of public and/or contributor funds.

Our calculations indicate:

Council estimates spaces created in decked car park to be	150	
Parking spaces currently available on the proposed site	98	
Resulting in new parking spaces	52	
Less spaces lost to traffic lights 8, and left turn at lights 3	11	
TOTAL NEW PARKING SPACES		41
Approximately cost per additional space		\$81,000

Even if an extra 52 spaces were provided the cost is extraordinary, at least in the vicinity of \$63,000 per space. How can Council consider this without a public and accountable cost benefit analysis? Where is the explanation to the people whose funds you intend to spend?

Also, what needs to be considered are the yearly on-going maintenance costs that such a structure will entail. Lifts are notorious for creating expensive on-going maintenance costs. Cleaning would be more than for the existing open, ground level car park. The car park would be more than likely an invitation for graffiti artists to decorate the walls and internal structures such as lift, lighting and any surveillance equipment. It is not good management to create ongoing maintenance issues unless absolutely necessary. This car park is not necessary according to the consultant's report. The Chamber of Commerce do not need it or want it as it will detract from the competitive advantage that small businesses enjoy in the leafy heritage town.

4) Safety

CRAG is greatly concerned about the potential danger to the public that this proposed development would create. The present car park is currently a safe, high use area, has good surveillance as it is well lit and highly visible, day and night.

The current open pedestrian path from John Street to Oxley Street is an aesthetically pleasing thoroughfare sympathetic to the overall ambience of the town. The proposed car park would be an obstacle to the pleasant, regular movement of foot traffic utilizing this connection to and from the two streets and the civic centre. The DA indicates that the Oxley Street end of this connecting pathway is to pass through the car park. It appears there are also stairs to negotiate in the area of the proposed internal lift. Apart from losing the valued ambience of this pathway as it exists, under this proposal it would become a hindrance to parents with prams, and the elderly. It is probable that people, particularly women, would rightly feel uneasy utilizing this pathway alone at night, or even perhaps, during quiet times.

Likewise, the proposed new pathway around the side of the proposed car park, past the back of the Forester's Hall (Treasures on Argyle) and the Post Office and around a corner past the back of Enzo's is equally, a significant safety issue. It is out of sight and surveillance cameras will not increase 'safety', nor a sense of it.

5) Landscape

The proposal will involve removal of 18 mature trees and the seriously compromise the leafiness, openness and pleasant way-finding to, from and through the existing car park.

The decked car park to be located behind and near heritage listed buildings in John Street and Argyle Street will affect the landscape surroundings of these buildings.

Council argues that it will benefit patrons of the Civic Centre but there are no discernible parking issues to overcome, and it comes at the expense of trees, garden surrounds and way finding. Indeed it is much more pleasant for congregating and for taking photos at functions for patrons of the Civic Centre to have open and treed surrounds as a backdrop and for ease of movement. The proposed car park will completely destroy the current pleasant ambience of the Camden Civic Centre precinct, and this may have an effect on its business.

The development will obviously also be highly detrimental to the landscape and vistas in Oxley Street.

6) Alternative Solutions

Town centre parking should be efficiently patrolled to ensure people are not parking all day in two and three hour parking zones. Council should seek the cooperation of the business community to encourage employees to park in the outer zones and walk the short distance to work, in the interests of the township and their businesses (the Chamber of Commerce may be a useful ally in achieving this).

Has Council considered alternative solutions to address any evidenced need for additional parking without building a decked car park, with all its problems of heritage impact, cost, maintenance and safety?

If more parking is needed CRAG offers these solutions:

Firstly, Onslow Park has the potential for long term parking, if it were more structured, which would free up the current parking which is more central to the shops. More disabled parking may be required in the town centre at various locations, but for most people, including employees and business owners, a short walk is good exercise. In any case Onslow Park is not significantly further than walking from the proposed decked car park.

Secondly, CRAG believes the optimum solution for additional parking for Camden Town Centre is the site on the corner of Mitchell and John Streets, which Council owns, which currently has on it a cottage it seeks to lease. With the demolition of the cottage, this site of 1,416m² is ideal for ground level parking for over 40 car spaces – within the same order of magnitude as the yield of new spaces created in the proposed car park. The cottage is not of heritage value and its removal would improve the significant heritage vista along John Street and not detract from the uniformity of heritage value buildings within the block. It would also complement the adjacent Memorial Park; provide direct access to the Civic Centre as well as provide better parking for St Paul's when funerals are held. With additional landscaping, parking on this site would certainly be an added benefit to the streetscape of John Street and the Town Centre of Camden

Thirdly, The provision of a free mini bus circulating continuously around the town and between these suggested sites would encourage their use and aid the elderly. Sought after employment opportunities would also be enhanced, requiring driver/s and parking ranger. Improved signage and a parking map available at convenient locations and on Council's website would also assist.

These alternatives would cost a great deal less than the estimated cost of more than \$3.3m that Council is prepared to spend on the proposed decked car park, and significantly allow improvements to all other existing car parks in Camden Town Centre such as the landscaping of the car park behind Whiteman's which had its trees removed in the 1970s.

Conclusion

CRAG strongly objects to the proposed decked car park development in Oxley Street or elsewhere in the Camden Heritage Conservation Area, and seriously hopes that Council will consider the suggested alternatives so that Camden Town Centre can retain its significant heritage so much enjoyed by our community and the large number of tourists who will continue to visit our unique town, as they have done in the past for many decades.

Yours faithfully,

Liz Stephenson

Hon. Secretary CRAG