

# *Camden Residents' Action Group*

*Incorporated*

*Camden – Still a Country Town*

**Website:** <http://www.crag.org.au/>

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The General Manager  
Camden Council  
Oran Park  
CAMDEN 2570

6 July 2017

Dear Sir,

Re: DA 411/1/2017

Construction of a new service station to operate 24 hours, 7 days per week, including convenience store with toilets, 4 pump bowzers with awning above, outdoor lighting, service yard, bin storage, widening of the site access, installation of 3 new underground fuel storage tanks, retaining walls, signage, landscaping, removal of 12 trees, car parking, drainage and associated site works.

CRAG is aware that at this time a Traffic Report and an updated Arboricultural Report are pending and that the date for submissions had been extended to 6 July. As discussed with Council's Town Planner today these Reports are as yet unavailable and CRAG will likely make a follow-up submission when they are provided.

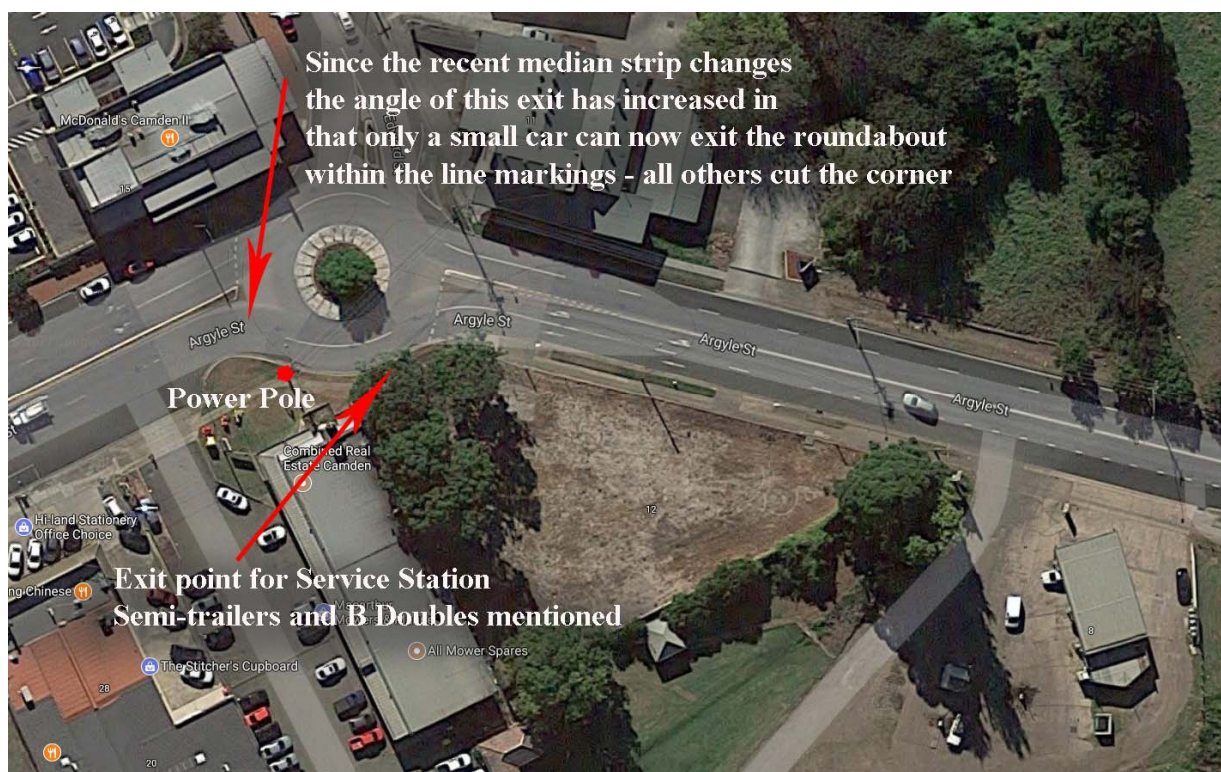
At this point CRAG has very considerable concerns about this development proposal.

## **1. Safety: Traffic movements and paths of 19 metre B -Double and 17.25 metre semi-trailer trucks**

The Statement of Environmental Effects (p. 4) states that operational efficiency will be enhanced within the site by making use of the local road network. Vehicular movements will be facilitated and traffic conflicts minimised through all vehicles to entering and leaving the premises in a

forward direction. The proposal is that both trucks and cars enter from a single driveway off Argyle Street and exit at the Edward Street roundabout.

The paths for patrons' cars and wide and very long B-Double and semi-trailer trucks involves negotiating a safe way directly into the existing Edward Street roundabout. The public roundabout is necessary to this development application because no safe right turn is possible into Argyle Street back towards Camden Valley Way. Delivery trucks in particular may be expected to make a 360 degree turn at the roundabout.



The two lanes of this roundabout are narrow and busy, especially with patrons of McDonalds' now using it.

No documentation is provided to show how many truck movements are expected nor how the trucks would remain in their lanes in negotiating the roundabout. Buses find the roundabout overly small and cars and particularly larger vehicles commonly encroach into the second lane. This site has already been shown to be dangerous with an accident involving a truck, school bus and car in November 2012. Some primary school age children on the bus suffered minor injuries

and the driver of the car was airlifted to hospital with serious injuries. The truck driver was unhurt. The roundabout is now much busier.

This proposed development would increase traffic movements and the likelihood of accidents especially those involving heavy vehicles.

Although it is stated that according to Schedule 3 SEPP Infrastructure this proposal does not require referral to the RMS this would defy common sense. Clearly this application requires very careful scrutiny from a safety perspective and it would be remiss of Council not to require at the very least a traffic report. This has been acknowledged by the Town Planner involved and Council's Traffic Engineer has required that a detailed Traffic Report be submitted including an assessment of impacts upon the surrounding road network (the report is to be uploaded to Council's website for viewing and CRAG may make further comment when the report becomes available).

## 2. Heritage conservation

The site is within the Camden Heritage Conservation Area (LEP 2010) and subject to Liveability Priority 7 of the Greater Sydney Commission's draft plan to conserve the Camden Township.

The built form principle according to the current Urban Design Framework Project for the town is to

*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.*



As can be seen in this analysis of community feedback from this project the heritage and green rural and country character of Camden and its preservation are key concerns.

This proposal is antithetical to conservation and enhancement of Camden's unique heritage and rural attributes.

- its footprint is large and does not reflect the fine-grained character of Camden
- it is to provide an uncharacteristic modern 24 hour freeway like stop
- it is not of rural or heritage character
- it would present an inappropriate bald stark gateway at and into the conservation area
- seemingly all trees would be removed thus detracting from the leafy entrance ambiance of the town expected by residents and visitors alike

A dedicated heritage impact report has not been provided. Heritage conservation is addressed at 4.5 of the Statement of Environmental Effects (SoEE), in which it is claimed that the development would provide a perfect blend from the traditional rural feel to the urban settlements of the adjoining towns and would likely provide a positive heritage outcome for the benefit of the community.

It would be very difficult to substantiate this position and no serious attempt has been made to do so. It is appreciated that the SoEE recognises the importance of the tree lined avenue into the old town, the benefit of single story in relation to the nineteenth century village profile and a Northern facade window to complement that of the Milk Depot opposite.

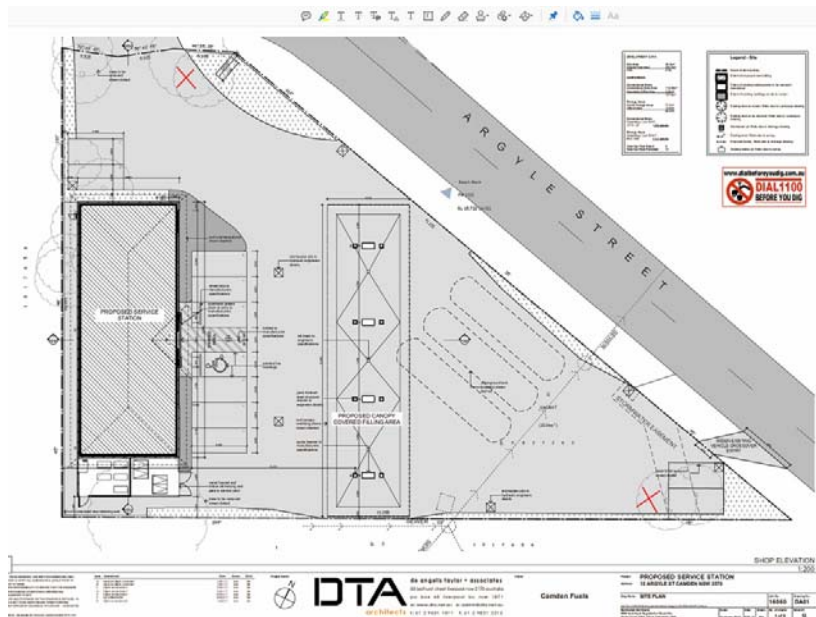
However there cannot logically be any serious argument that this proposal would do anything but detract from Camden's much valued character. This is a most important gateway into Camden from the Sydney direction and the main entrance that will set the tone of the town for tourism.

If the Greater Sydney Commission's and Council's commitment to Camden's heritage and the Camden community is to be honoured this development cannot be approved.

This proposed service station could only be appropriately located outside the Heritage Conservation Area and its view lines.

### 3. Tree removal

Obviously the removal of 12 trees and a modern service station design with 7 metre monolith signage can never be in harmony with the valued character, amenity and heritage of the township. Whilst this application recognises the importance of the tree lined gateway into the township, it also proposes to remove 12 mature trees, mainly tallowwood with one spotted gum and one Chinese elm to facilitate construction.



The proposed removal of trees outside the site boundary has been referred to the Town Planner involved who has sought clarification from the Applicant and asked the Landscape and Vegetation Management Officer to assess their removal.

The Arborist Report does not indicate which, if any, trees will be saved and from the diagram (p. 3) it appears that all trees including 3 on the road reserve will be removed.

The only justification provided for removal of so many trees, including mature trees, is that they are in the way of the proposed development. Large tallowwoods are to be removed to widen the proposed vehicular entry including for B-double trucks which arguably have no place in a conservation area.



Although the report indicates that the trees should be replaced, it also states

"Trees to be removed are to be replaced with appropriate shrub and smaller tree specimens being mindful of the space limitations of the new use of the site."

This recommendation is vague and provides no guarantee that the leafiness of the site will ever be recovered and it will certainly never be able to be enhanced.

#### 4. Flooding

The flood report accompanying the application claims the site is within a high hazard flood storage area but lived experience indicates that the site is located in or very close to a high hazard floodway which follows an apparent natural watercourse following through beyond the wetland to the site and the Milk Depot opposite on Argyle Street.

Even so the report is considered dismissive of the impacts of this development in its statement that high hazard flood storage areas have only a very minor contribution to the conveyance of floodwaters and any effect of the encroachment on the flood depth and velocity is not significant, and can be ignored.



Camden Council gives no certainty that redevelopment on land below the 1% AEP flood level will be permitted. The Flood Risk Management Policy No 3.19 (at 4.6) states that Council will consider an application for the redevelopment of sites on land below the 1% AEP flood level within areas zoned commercial on its merits having regard to flooding, evacuation, environmental, streetscape and heritage factors.

For all development sites, the Policy is that the total flow rate and concentration of stormwater runoff in the post-developed state is to be no more than that which exists in the pre-developed state. On-Site Detention Basins are required and must be designed to mitigate flows up to and including the 1% AEP Storm Event (at 4.12). The flood report does not address the use of detention basins and glosses over the potential impact of the development on other properties.

The Flood Report accompanying this proposal does not contain sufficient analysis and detail for neighbouring land owners to be assured that flooding to their properties will not be exacerbated by this proposed service station.

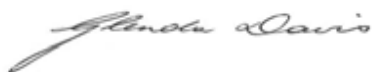
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This gateway into Camden is a visual signal to all of how Camden as a renowned heritage and rural town close to Sydney values its uniqueness. If there was ever a time for Council to show leadership and make a stand on what the old township represents this is it.

The community and future generations will thank Council for sending the message to developers that there is ample opportunity elsewhere in the municipality for this type of development but that the heritage conservation area can only accommodate new projects that are sympathetic to the amenity, scale and fabric of the nineteenth century townscape.

We ask that Council demonstrate foresight and integrity in denying this proposal.

Yours sincerely

A handwritten signature in cursive script, appearing to read 'Glenda Davis', written in dark ink.

Glenda Davis

President