

Camden Residents' Action Group

Incorporated

Camden – Still a Country Town

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

Face Book: <https://www.facebook.com/CRAG-Camden-Residents-Action-Group-Inc-1805705173088888/>

PO Box 188
Camden NSW 2570
Email: admin@crag.org.au

The General Manager
Camden Council
70 Central Ave, Oran Park 2570
PO Box 183, Camden 2570
Email: mail@camden.nsw.gov.au

22 April 2018

Dear Sir,

Re: Development Application (DA) 257/1/2018

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

Thank you for extending the submission period for this proposal, for which notification was not initially provided, to 24 April, 2018¹. We trust that all interested community groups and objectors to the original proposal (DA 411/2017) for this site have been notified of this new DA.²

¹ In 2017 CRAG was notified of and lodged an objection on a DA (411/1/2017) for a 24-hour service station on this same site. As this DA was inadequately documented it did not proceed and was passed back to the developer. As an objector to the 2017 DA and as a long-serving community organisation founded in 1973, we were not notified of this latest proposal. This is particularly salient as the number of unique objections determines whether a DA is to be referred and assessed by the newly created Independent Hearing and Assessment Panel (IHAP) instead of Camden Council. We found out about it accidentally and sought the extension. Excluding a change in applicant as there is no recent sale history for this site, it is assumed that this DA is being treated as an entirely new proposal with a new DA reference because a double storey building is proposed including upstairs offices, instead of a single storey building.

² We believe that the mandatory elements of the current policy of notification and advertisement of proposed developments (Camden DCP 2011 A2 Notification and Advertising) within sensitive areas and valued by the general public falls short of community expectations and what is in the current and future public interest.

This proposal provides more detail than the previous one, and although some changes have been made we continue to have considerable concerns, many similar to those raised in our 2017 objection³.

Our objections follow.

1. Heritage Impact

The site is at an important gateway to the historic town of Camden and is within its legislated Heritage Conservation Area (HCA). Overarching objectives for the HCA include conservation of its heritage significance, including associated settings and views and protection from adverse effects of developments on its amenity (LEP 2010 (5.10)). Camden township is well renowned for its strong sense of place, which is fundamental to the identity of the Macarthur area. The town is a place of cultural significance which connects to the past and to lived experiences over generations. It has and does inspire and inform research into European settlement, early colonisation of Australia and its fledgling economic base. This sense of place is important to the residents of the region and is perceived and enjoyed by many visitors.

Eminent historians support the significance of Camden's heritage and its key place in Australia's story and have endorsed a recent collation of research into Camden's heritage significance that addresses the NSW State heritage criteria.⁴

As shown in the diagram opposite, the importance of Camden's heritage and green rural and country attributes and preservation of its unique character were key themes demonstrated in recent analysis of community feedback from Camden's Urban Design Framework Project.⁵



The Project arrived at the following built form principle for the town:

*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.*⁶

³ Camden Residents' Action Group Inc objection at <http://www.crag.org.au/wp-content/uploads/2016/06/CRAG-submission-12-Argyle-St-6-July-2017.pdf>

⁴ Camden Residents' Action Group Inc (April 2016) Heritage Study <http://www.crag.org.au/wp-content/uploads/2016/06/Camden-Heritage-Study-April-2016.pdf>

⁵ Camden Council at <https://www.camden.nsw.gov.au/assets/pdfs/Major-Developments/Camden-Town-Centre-Urban-Design-Framework/eneews/Framework-Overview-web.pdf>

⁶ Camden Council at <https://www.camden.nsw.gov.au/assets/pdfs/Major-Developments/Camden-Town-Centre-Urban-Design-Framework/eneews/Built-Form-web.pdf>

Further the original South West District Report published by the Greater Sydney Commission (GSC) in November 2016⁷ chose Camden for its cover, and specifically earmarked Camden township and its landscapes as a priority for conservation (Liveability Priority 7, p.115). The Report (p.113) stated:

Camden Town Centre enjoys exceptional heritage significance and a distinctive local character that has long been valued by the community. Its town centre is a highly attractive location for local businesses and new residents from the growing communities elsewhere in the South West District, who are drawn to Camden's heritage, character and high amenity. The popularity of Camden Town Centre means that the pressure to develop new homes and businesses needs to be managed carefully, so that the heritage values, amenity and the unique character of the centre are maintained.

The recent findings of the Urban Design Project and the GSC underscore principles of Burra Charter 2013 and heritage protection policies of DCP 2011.

Particularly pertinent is the Burra Charter on new work (Article 22.1):

New work such as additions or other changes to the place may be acceptable where it respects and does not distort or obscure the cultural significance of the place or detract from its interpretation and appreciation.

The DCP policy in relation to compatibility of new work is particularly pertinent:

Ensure that any development within a heritage conservation area is compatible with and sympathetic to the significant characteristics of the conservation area as a whole and make a positive contribution to the area. (B11, p. B46)

The character elements of the HCA include a topographical village form which rises from the surrounding rural floodplain with a unique roofscape of smaller roof forms dominated by St John's spire visible from all directions and with distinct tree lined visual gateways as viewed from rural hinterland. (DCP B3.1.2). An examination of specific DCP objectives and controls indicates that a number, as listed below, have not been sufficiently addressed or are breached in this proposal.

⁷ Greater Sydney Commission at https://gsc-public-1.s3.amazonaws.com/s3fs-public/dp_south_west_access_amends_2016_12_21.pdf?0_IMGp5LeKV3WYsO5PmKOTwzs9Jqnk1c

DCP B3.1 European Heritage

Compatibility of new work

10. Ensure development is based on, and sympathetic to, an understanding of the heritage significance of the place.

12. Ensure that the development in the vicinity of a heritage place is undertaken in a manner that does not detract from the heritage significance of the place.

Design:

5. New development must be designed reflecting the general form, bulk, scale, height, architectural elements and other significant elements of the surrounding heritage items and heritage conservation areas.

DCP B3.1.2 Camden Heritage Conservation Area

Objectives:

1. Retain the unique heritage significance of Camden town, recognising it as a rare and distinctive area

3. Retain the cohesive character particularly evident in the scale of development in each street.

4. Retain distinctive features which unite the place. Such as parapets, chimneys, verandahs, the mixture of roofs, the road network, subdivision patterns, pathway connections, consistency of colours and the limited building material palette.

Controls:

1. Views associated with the St John's Church Spire shall not be compromised.

2. The tree lined "gateway" entrances to the township shall be retained and embellished.

3. The rural-urban interface shall be sensitively addressed in new development proposals.

11. The development of the flood affected fringes of the town shall not compromise the prevailing character.

DCP B4.2 Signs on Heritage Items or in Heritage Conservation Areas

Objectives

2. Encourage new signage that makes reference to traditional advertising methods such as painted signage, lettering style, location and style and spot lit illumination.

Controls

1. New signage should have minimal impact on the character of the heritage item or conservation area. The number should be limited and design of signs should be subtle.

8. The design should incorporate traditional materials, colour, fonts and size.

11. External surface illumination should be discreet or concealed and is the preferred method for signage illumination.

13. Internally illuminated signage is restricted to under awning signs only.

18. 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.

19. The development application will be required to demonstrate that the proposed signage will complement the historic character of the building or conservation area in terms of colour, material, proportion, positioning and font.

The Heritage Impact Study (HIS) (5.1; 5.2) claims that

- *the proposed development will improve significant views, vistas and streetscapes.*
Comment: this comparison is to the current unkempt site rather than its wider potential for development. The appropriate comparison is to the valued views, vistas and streetscapes of the overall HCA.
- *the two-storey building height is appropriate as it assists to frame the gateway entrance to the township and reflects the two-story height of the Milk Depot heritage item.*
Comment: the roofline of the Milk Depot is pitched and varied and as can be seen below contrasts starkly with the proposed flat-roofed and unrelieved box shape of the service station.



Source: Tropman & Tropman Architects (February 2018) *Heritage Impact Statement: Proposed Petrol Filling Station & Offices 12 Argyle St Camden Figure 4*



Source: Tropman & Tropman Architects (February 2018) *Heritage Impact Statement: Proposed Petrol Filling Station & Offices 12 Argyle St Camden Figure 23*

The above representation of the proposal shows St John's church spire in the background and obscured roofscape of the town behind the proposed service station. The lack of mature trees and leafiness, in stark contrast to vegetation throughout the HCA, is also evident.



The Statement of Environmental Effect (SoEE) accompanying the 2017 DA recognised 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.

Even so it appeared that no mature trees were to be retained. The Representation (Figure 23) above suggests that most or all trees are to be removed, the justification for which in the Aboricultural Report being that 10 are in the way of the proposed development. History and the token landscaping of other service stations suggest that the construction of this service station will see the demise of the leafiness

of this part of the “tree lined” avenue.

The SoEE⁸ (p. 22) accompanying the 2018 DA states *proposed signs are considered to be compatible with the existing and future visual character of the area. The proposed signs are not positioned within an environmentally sensitive area and do not dominate or visually clutter the streetscape.* CRAG disagrees. By its very nature the HCA is an environmentally sensitive area.

Only consistency with SEPP 64 was addressed although DCP 2011 addresses signage in the HCA.

As covered in the above table of DCP provisions not addressed by the DA: *Internally illuminated signage is restricted to under awning signs only and corporate and franchise signage is not appropriate unless it is in harmony with the character of the heritage item or conservation area.* Further, an overarching aim of SEPP 64 is to ensure that signage is compatible with the **desired** amenity and visual character of an area and it refers to special areas: it specifically notes heritage conservation areas, and signage being of visual quality that is appropriate to its setting and of a scale, proportion and form appropriate for the streetscape, setting or landscape.

In CRAG’s assessment the corporate signage of a multinational giant is not consistent with the Australian heritage and agricultural character of the town or its desired amenity. The site is part of a most important gateway into Camden from the Sydney direction and the main entrance that will set the tone of the town as a relaxing alternative destination for residents and for tourism. The competitive advantage and economic base of the old town increasingly relies on attracting out of area visitors and a strategy of differentiation to experiences offered by Narellan, Oran Park and Campbelltown.

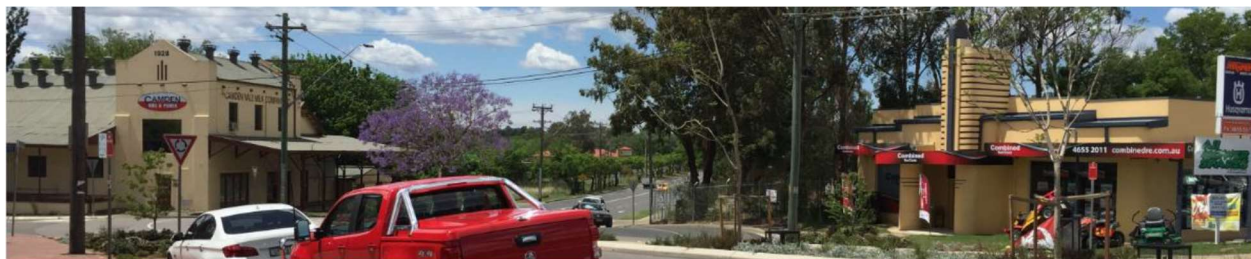
⁸ The applicant company is usually consistently described within the 2018 DA reports, but it is also noted as 7-Eleven Stores Pty Ltd in Appendix 15 of the Statement of Environmental Effects.

The representation (Figure 23) above offers no point of difference to the picture opposite of what is common elsewhere.

A notable and concerning exception is that service station buildings are usually one storey and do not include a large second storey providing a kitchen and bathroom unconnected to the everyday activity of a service station.



The HIS (5.2) claims that the proposed development is sympathetic with the adjacent building form of the Art Deco heritage item, stating that the existing and proposed parapets are of similar height. However, the reason for this is that the ground rises. As shown below, the adjacent building is single storey, less bulky and architecturally very different.



Source: Tropman & Tropman Architects (February 2018) *Heritage Impact Statement: Proposed Petrol Filling Station & Offices 12 Argyle St Camden Figure 9*

The above photos and representation which are drawn from the HIS itself illustrate the likelihood of detracting from existing views and vistas, and Camden's unique character.

The Milk Depot proposal for a large additional building has been referenced in the HIS. Its recent approval was and is highly contentious as it contravenes a number of HCA protections and is also, based on local knowledge, demonstrably in the path of a floodway. Arguably it will detract from the special character of Camden and its heritage significance.⁹ Its surprising approval should not of course be used as any sort of precedent or justification for overriding the heritage protections of the HCA.

The Summary of Impacts in the HIS at 5.3 presents an assessment according to NSW heritage guidelines of a new development adjacent to a heritage item. This is presented below with

⁹ Camden Residents' Action Group Inc objection at <http://www.crag.org.au/wp-content/uploads/2016/06/CRAG-Milk-Depot-objection-20-April-2017.pdf>

CRAG's comments. It should be noted that the guidelines in referring to "heritage item" are also referring to a place including a conservation area.¹⁰

New development adjacent to a heritage item

Question	HIS Response	CRAG comment
<i>(a). How is the impact of the new development on the heritage significance of the item or area to be minimised?</i>	<p><i>The current site is vacant, underutilised and does not contribute to the streetscape as an entrance of the Camden township.</i></p> <p><i>The proposed development will have a positive impact upon heritage significance.</i></p> <p><i>The new building form is two storeys in height to match the height of the Old Dairy Farmers Co-op Depot (Item I3).</i></p> <p><i>The roof parapet respects the parapet form of the adjacent former Clinton's Motor Garage faced (Item I4).</i></p>	<p>Agreed</p> <p>This statement is not supported with any evidence that a modern 24hr freeway style service station can contribute to the heritage significance of an historically agricultural town laid out by James and William Macarthur and Sir Thomas Mitchell around 1840</p> <p>The proposed building is of greater width and bulk and thereby relatively diminishes the Clinton's Garage. The SOEE of the 2017 DA stated "Views associated with the St John's Church will not be compromised as the development is only single storey in height and on the lower side of the town centre outskirts." The heritage impact on the HCA as a whole and its important village profile, views and vistas has not been addressed.</p> <p>The proposed parapet is stark and unsympathetically competes with, rather than respects, that of the adjacent heritage building.</p>
<i>(b) Why is the new development required to be adjacent to a heritage item?</i>	<i>The current site is vacant, underutilised and does not contribute to the streetscape as an entrance of the Camden township.</i>	Agreed. However, the proposed two storey modern freeway style service station in corporate colours is visually prominent and dilutes the leafiness, fine grained ambiance and contradicts and diminishes Camden's unique sense of place.

¹⁰ NSW Office of Environment and Heritage *Statements of Heritage Impact* (p. 1 footnote) at <http://www.environment.nsw.gov.au/resources/heritagebranch/heritage/hmstatementsofhi.pdf>

(1) Heritage items can be buildings, structures, places, relics or other works of historical, aesthetic, social, technical/research or natural heritage significance. 'Places' include conservation areas, sites, precincts, gardens, landscapes and areas of archaeological potential.

<i>(c) How does the curtilage allowed around the heritage item contribute to the retention of its heritage significance?</i>	<i>The curtilages of the adjacent heritage listed properties form part of the streetscape, of which the subject site is a part.</i>	The proposed curtilage of the site is concrete with few if any established trees, a prominent and well-loved feature in Camden's streetscapes. The streetscape of the site will be relatively bare and add nothing to the expected leafy welcome into the old town.
<i>(d) How does the new development affect views to, and from, the heritage item? What has been done to minimize negative effects?</i>	<i>The new development assists to reconnect the vacant site to the existing 'main road' streetscape of Argyle Street as it turns the corner towards Camden Township.</i>	This statement simply refers to the site no longer being vacant. The heritage item that should be addressed is the HCA. Negative effects on the HCA and Camden's sense of place of this modern-day corporate chain building are arguably considerable.
<i>(e) Is the development sited on any known, or potentially significant archaeological deposits? If so, have alternative sites been considered? Why were they rejected?</i>	<i>Archaeological potential is unknown</i>	Being close to the river, important in Aboriginal life and culture, and in Chinese market gardening, the site could be a source of archaeological deposits.
<i>(f) Is the new development sympathetic to the heritage item? In what way (e.g. form, siting, proportions, design)?</i>	<p><i>Yes. The new development is respectful of the existing townscape streetscape and urban fabric.</i></p> <p><i>In particular the building height respects the height of Item I3 and the roof parapet form of Item I4. The new shopfront detailing is contemporary so as not to confuse interpretation of early adjacent buildings.</i></p>	<p>Disagree. No evidence is presented to support this statement. Most would consider that siting a two-storey service station is highly inappropriate in the HCA.</p> <p>Disagree. The building height proposed is the maximum allowable. It creates a bulky building that is inconsistent with the finer grained human scale buildings of the town.</p>
<i>(g) Will the additions visually dominate the heritage item? How has this been minimised?</i>	<i>No. The new development is respectful of the existing building height of Item I3 and the roof parapet form of Item I4. The proposed shop front detailing reinforces and improves the gateway entry to the Camden township.</i>	Disagree. The 21 st century materials, form and scale of are not consistent with the character of Camden and will detract from its sense of place and tourist potential. What is proposed is generic and would be at home in any newer suburb, or busy urban road or freeway.
<i>(h) Will the public, and users of the item, still be able to view and appreciate its significance?</i>	<i>No. The new development is respectful of the existing building height of Item I3 and the roof parapet form of Item I4. The proposed shop front detailing reinforces and improves the gateway entry to the Camden township.</i>	Disagree. No evidence is provided to support these statements. The material, form and scale of what is proposed are not similar or sympathetic to the adjacent heritage item or the HCA. Its visual prominence will create a jarring note and dash expectations of what Camden has to offer in the way of an authentic historic experience.

The HIS (p. 7) observes that the recently upgraded service station located next to the subject site is an example of a building form that is recessive and small in scale. Its signage is minimal, reducing its impact on the streetscape. Obvious questions are:

- why does Camden need two service stations side by side?
- why does the proposed service station need to be two-storeys with offices above, especially as this is not the usual business model of the industry?
- if the small scale of the existing service station is appropriately small how can the scale and impact of the proposed service station be acceptable?

Unfortunately, the HIS does not address the impact on the streetscape and the HCA of a two-storey building, modern in form and function sporting corporate colours and unsoftened by mature trees. This type of service station could only be appropriately located outside the Heritage Conservation Area and its view lines. This proposal is antithetical to conservation and enhancement of Camden's unique heritage and rural attributes.

- its footprint and scale are over-large and do 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 or most trees would be removed thus detracting from the leafy entrance and ambiance of the town expected by residents and visitors alike.

In short new work in the heritage conservation area should address and observe its heritage protections and be compatible with, not detract from, and preferably enhance its cultural significance.

CRAG objects to the proposal for the reasons of heritage impact presented in the above discussion and analysis.

Traffic Impact

CRAG is concerned about the Traffic and Parking Assessment¹¹ accompanying because:

At 12.2, p.14 the assumption is made that *Future traffic growth on the road network is predicted using a 2 % per annum background*. No evidence has been presented to support this assumption. With Camden Council¹² predicting an approximate doubling of the population between 2016 and 2026 it would seem unrealistic, which in itself brings the traffic analysis and its conclusions into doubt.

At 6.0, p.8 the analysis of Argyle St mid-block capacity refers to Table 4.4 indicating the relevant level of service as D (2200 vehicles per hour) but seems to then use level of service E (2800 vehicles per hour) to inform the assessment.

As the study (6.0, p.7) states the *capacity of the road network is generally determined by the capacity of intersections*. Traffic flow is interrupted at the Macarthur Road intersection where traffic lights are currently being installed and at the Edward Street roundabout, a matter of metres from the subject site. The 2002 source of Table 4.4, *Urban Road Peak Flows per Direction*¹³ states that the typical one-way mid-block lane capacities on urban arterial roads under interrupted flow conditions are 900-1000 veh/hr/lane.

The above figures of 2200vph and 2800 vph would seem to be based on two lanes. However,

- there is only a single lane each way over Cowpasture Bridge and this is to be the case unless a new bridge is built;
- Argyle Street is one lane until nearing the Edward Street roundabout, very close to the subject site. Using these parameters its maximum capacity would fall somewhere between 900 and 2000 vph, but presumably closer to 900. Peak traffic on Argyle Street, 200 metres east of Edward Street, was counted in November 2017 and found to be 1,857 (5.0, p.7).

No mention is made that the Cowpasture Bridge was built when the maximum truck and trailer weight was 36 tons. Currently a B-Double can be 90 tons. The weight of the fuel tankers, the capacity of the bridge and any potential impact on the bridge needs to be addressed.

¹¹ Intersect Traffic (February 2018) *Traffic and Parking Assessment 12 Argyle St Camden*

¹² Camden Council *Population, Households and Dwellings* at <https://forecast.id.com.au/camden/Population-households-dwellings>

¹³ RMS at <http://www.rms.nsw.gov.au/documents/projects/guide-to-generating-traffic-developments.pdf>

Even accepting the study's

- assumption (6.0. p.8) that a satisfactory level of service (D) for Argyle Street is 2200 vehicles per hour
- estimates (9.0, p. 11) of 166 vehicle trips per hour with the additional traffic to be generated by the development of 69 vehicle trips per hour

CRAG cannot accept the study's conclusions that the proposal will not have an adverse impact on the road network efficiency (12.1, p.13) and that the development will not adversely impact on the operation of the Argyle Street / Edward Street roundabout (12.2, p.14).



Source:
Intersect Traffic
(February 2018)
Traffic and Parking
Assessment
Photograph 3 –
Argyle Street near the
site.

Proposed access to the recently approved Milk Depot development opposite the subject site, for safety reasons, is left in only, requiring a central 900 mm wide raised concrete median strip on Argyle Street to prohibit vehicles travelling west turning right into it.

Therefore, a right turn from Argyle Street for vehicles travelling east into the proposed service station presumably will not be possible. Even so, as the above picture from the study (p.7) shows, this manoeuvre would be difficult across two lanes of traffic, one of which cars are quickly moving into, perhaps to enter the service station as the second lane becomes available, and across a public footpath.

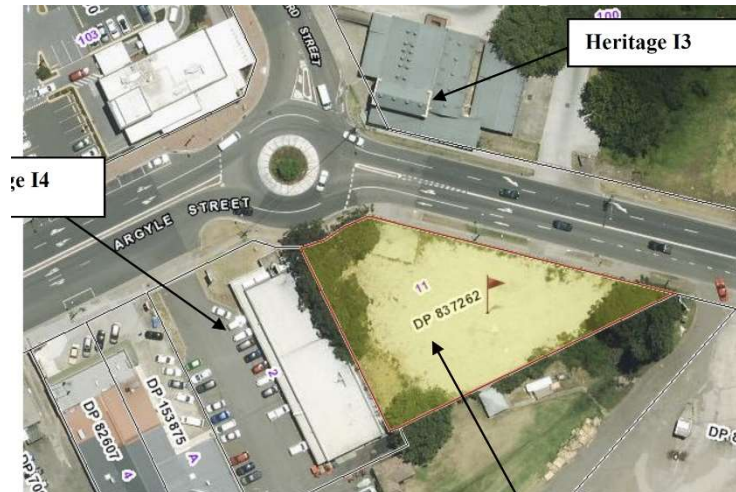
However, the traffic study (4.0, p.6) states *This has little impact on the development at 11 Argyle Street as motorists would be able to utilise the Edward Street (sic)*. It is unclear what this means.

The traffic study does not address how a right turn is to be accommodated into the proposed service station or the effect that this foreseeable difficulty will have on traffic manoeuvres of frustrated drivers.

The existing roundabout at Edward Street is necessary to this proposal as no safe right turn is possible into Argyle Street from the site back towards Narellan.

Measurements of peak traffic volumes (p7) taken in November 2017 for the Edward Street intersection/roundabout were

- Argyle Street between 1,748 vtpd and 1,857 vtpd.
- Edward Street between 426 vtpd and 454 vtpd



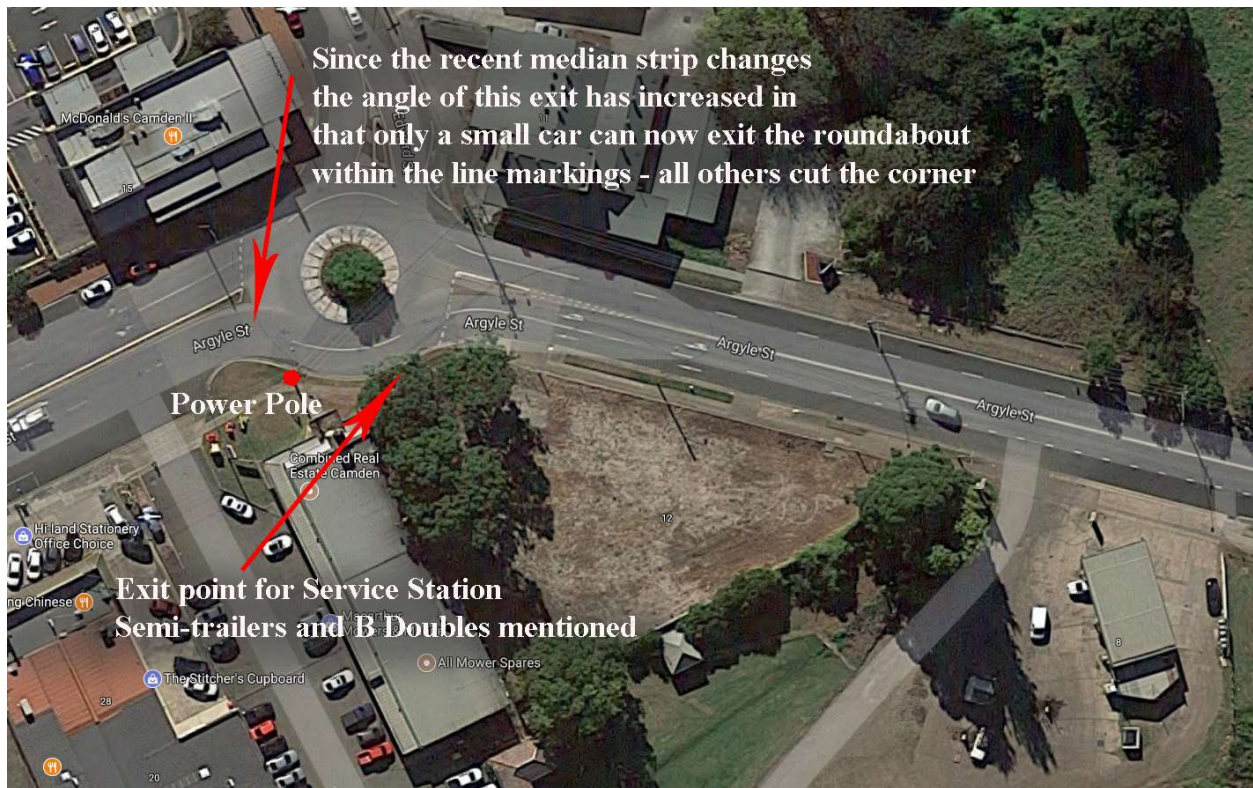
The traffic study (p. 14) ¹⁴ states *modelling shows that the ...roundabout will continue to operate satisfactorily post development and through to at least 2028 with the average delay, level of service and 95 % back of queue lengths all well within the recommended thresholds..... Even in 2028 the degree of saturation prediction indicates the roundabout is still operating at 50 % capacity.*

CRAG does not accept this analysis. No user of this roundabout at this time would consider that it is always operating at less than or equal to 50% capacity.

The lanes of the roundabout are narrow. Two cars cannot safely travel through it side by side. The fuel tanker of course would need to use both lanes to turn successfully, which in itself reduces the capacity and increases the difficulty of using the roundabout.

The additional traffic that the Milk Depot development is likely to generate has not been factored into the traffic assessment.

¹⁴ Intersect Traffic (February 2018) *Traffic and Parking Assessment 12 Argyle St Camden*



Anecdotally the roundabout is at times already at capacity and subject to near collisions due to difficult sight lines and pressures of queuing at McDonald's. Communications with CRAG would suggest that the traffic into and out of McDonald's at busy times, especially with queuing congestion within the site placing pressure on drivers, can be dangerous. A recently approved DA¹⁵ for McDonald's suggests that this situation is to be exacerbated with McDonald's expanding its drive-through within the site, providing more space for food windows and a 17% decrease in parking.

No documentation is provided to show how many delivery and customer 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.

¹⁵ DA 2017/1159/1 appears to have been approved under delegated authority, rather than by Councillors. However, verbal advice indicated it would be decided in the public arena when CRAG raised questions about original conditions of development approval in 2008/2009 and consistency with DCP policies.

Flooding impact

The Flood Risk Management Report February 2018 (2.3, p.6) accompanying the application claims the site is located in a flood storage zone, which has only minor contribution to the conveyance of floodwaters and that as such the effect of the building on floodwater velocities and depth is not significant.

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. 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.

CRAG accepts the lived and long experience of residents and previous business owners in this area and therefore cannot accept that the Flood Report contains 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.





June 2016



June 2016

In summary, CRAG objects to this DA because it:

- is inconsistent with the character of the HCA;
- fails to satisfactorily address all of the heritage provisions of the DCP especially in relation to building design, tree removal, signage;
- is not needed (a service station operates next door to the site) and others are located within a few kilometres in Cawdor Road and Camden Valley Way, Narellan;
- does not explain why a two-storey building with large office space is required;
- is detrimental traffic management and creates potentially dangerous traffic conditions;
- is considered to be in a floodway and the building could divert floodwaters and cause detrimental impacts on other properties.

There is ample opportunity elsewhere in the municipality for this type of development but the heritage conservation area can only accommodate new projects that are sympathetic to the amenity, scale and fabric of a townscape which retains its original nineteenth century design. 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 for current and future generations to learn from and enjoy as a different experience.

CRAG requests that this proposal be denied.

Yours sincerely

A handwritten signature in cursive script, reading "Glenda Davis".

Glenda Davis

President