

Camden Residents' Action Group

Incorporated

Camden – Still a Country Town

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10 May 2021

Dear General Manager,

**RE: DA 2021/356/1
10-12 View Street CAMDEN**

Alterations and additions to commercial premises including rear addition with storage undercroft, additional at grade car parking, tree removal and associated works

This proposed development site is zoned B4 Mixed Use and is within Camden's Heritage Conservation Area (HCA) and the View Street cottage precinct which is heritage listed as an item in the LEP¹ with both general and specific heritage controls in the DCP². Also, as well as adopting the Burra Charter, the DCP³ states that development within the B4 Mixed Use zone of the HCA must be consistent with the Camden Town Centre Urban Design Framework (UDF).

¹ Camden LEP 2010 Schedule 5 View Street workers cottages Lot 2, DP 797645; Lot 1, DP 995935; Lot 1, DP 1009303; Lot 11, DP 1064302; Lot 14, DP 1105471 Local I78

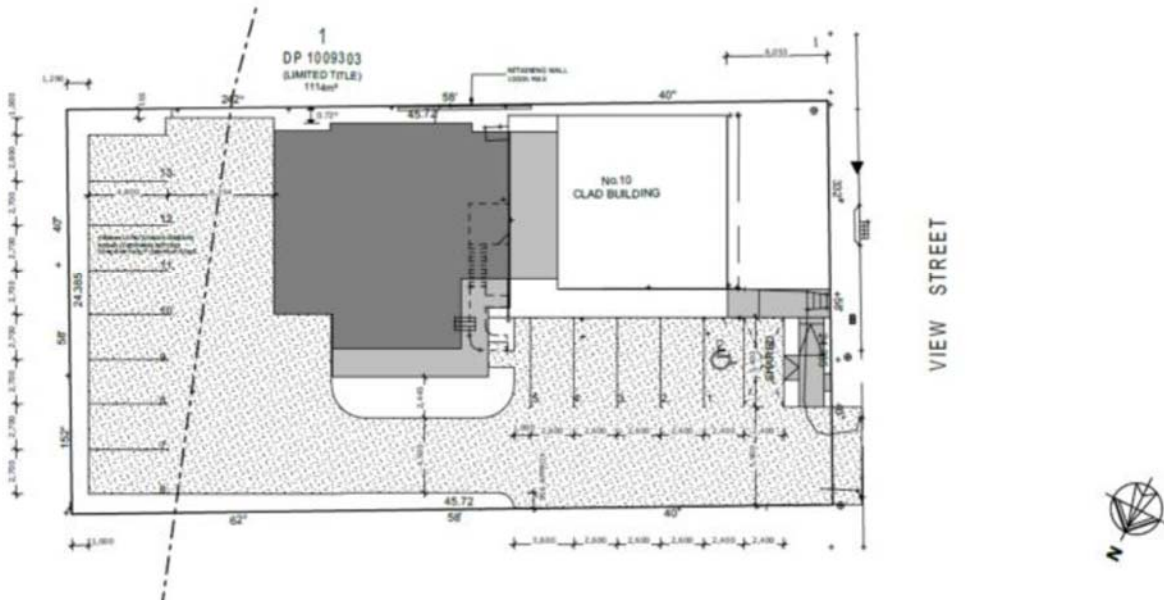
² Camden DCP 2019 2.16.4 Camden Heritage Conservation Area; 2.16.5 View Street Workers Cottages

³ Camden DCP 2019 5.3.3 Camden – B4 Mixed Use Heritage and Character

We object to this proposal. It is non-compliant with many controls and provisions of the LEP and DCP. Whilst referencing the LEP, DCP, Burra Charter and NSW Guidelines, the Heritage Impact Statement (HIS) does not address them in any detail and makes no attempt to justify the addition that is proposed.

The only justification provided relates to retention of the cottage (HIS, 6.3), not the proposed addition which is very substantial. Its relative scale and form, as demonstrated in the architectural extracts below, cannot be referenced in View Street or other cottage dominated areas of the B4 zone of the HCA.

Source: Macarthur Architectural Drafting Services



We surprisingly note that the HIS does not address **DCP 2.16.5 View Street Workers Cottages**. Non-compliances with its Controls are evident in the architectural extracts above and include:

Control 1 Any additions or alterations to the original cottages must be of a minor nature and appear subservient to the original sections.

Objection: the proposed addition being of greater scale and footprint than the original cottage cannot be described as subservient

Control 2. Additions must only occur at the rear of the cottage and not be visible from the street.

Objection: the proposed addition extends beyond the side of the cottage and would be visible from View Street.

Control 5. New development on a site must be approved only where the faithful restoration and conservation of the existing cottage is assured and supported by appropriate heritage management documentation.

Comment: compliance with this control is not clear from the documentation provided.

Control 6. New development will contribute to the streetscape by interpreting features of the prevailing character, including roof pitch and form, materials, bulk and scale, fencing styles, and front and side setbacks.

Objection: there is no evident attempt to contribute to the streetscape through interpretation and referencing of any of these features. The new addition and carpark would be visible from View Street. In particular its roof form, bulk and scale are not compatible with the finer-grained and domestic character of the workers cottage precinct.

Control 12. All car parking is to be provided behind the front building line.

Objection: Additional car parking is provided at the side of the cottage building, not behind the front building line and would be visible from View Street.

Objection: We are also concerned as to how View Street which is exceptionally narrow is to cope with the additional traffic suggested by the amount of parking. Again, we find the omission of documented analysis unusual and concerning.

Objection: we also take this opportunity to point out that the large hard stand areas for car-parking are highly inconsistent with the character of the View Street workers cottages precinct.

Control 15. All other general heritage provisions must be complied with.

Objection: General provisions are set out in **DCP 2.16.3**. As similarly covered above the proposal is not compliant with a number of its controls for example: Design 5; Siting 1, 2, 3, 5; Roofs and Roofscape 1, 2⁴.

As noted at the outset the View Street Workers Cottages heritage item is within Camden's HCA. Protection of the Precinct is thereby reinforced by additional controls in **DCP 2.16.4 Camden Heritage Conservation Area** which include:

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

Objection: the visibility and impact of the large addition on vistas of the townscape, and its interface with the rural floodplain and views along Camden Valley Way and from the bike track are not addressed in the documentation. As covered further below the impact is insensitive and detrimental.

8. Existing cottage dominated streetscapes must be retained, new development such as extensions/additions should be compatible with the existing streetscape.

Objection: what is proposed is not compatible with the heritage item of workers cottages and would degrade their collective heritage significance with a carpark and non-traditional shaped addition that is significantly bulkier than the original cottage.

⁴ DCP 2.16.3 *General Heritage Controls*

DESIGN

5. New development must be designed to interpret and complement the general form, bulk, scale, height, architectural detail and other significant elements of the surrounding heritage place.

SITING

1. Alterations and additions to a heritage item or within a conservation area will be sited and designed to retain the intactness and consistency of the streetscape and the significance of the conservation area;

2. Additions to buildings in the conservation area are to be predominantly to the rear of the existing building. Additions should not visually dominate the existing building.

3. Additions to the side of existing buildings will be considered where it is substantially set back from the front building alignment and the style and character of the building or conservation area will not be compromised.

5. The existing informal and irregular pattern of rear property building alignments is to be retained.

ROOFS AND ROOFSCAPE

1. The existing pattern, pitch, materials and details of original roof forms within the Heritage Conservation Area must be retained.

2. Secondary roof forms should be subservient in form, scale and location to the main roof.

10. Large built forms in cottage dominated precincts must be avoided through the use of various roof forms and pitches, wall openings and recesses, materials, recessive colours and landscaping

Objection: What is proposed is a large built form compared to the fine-grained modest cottages. The roofline of the proposed addition is referred to as “skillion” but is of a large mass and does not contribute to the Camden’s mainly hipped and gabled roofscape. Traditional skillion additions to cottages are always subservient.

11. Development of the flood affected fringes of the town must not compromise the prevailing character.

Objection: the site is within the flood affected fringe of the town and the large scale and form of what is proposed is not compatible with the prevailing character of the heritage item or the HCA.

The existing and desired future character of the historic town has been most recently recognised and reinforced in the UDF, which is a statutory document under **DCP 2019 5.3.3 Camden – B4 Mixed Use Heritage and Character**. The 2020 Camden Local Strategic Planning Statement repeatedly refers to the UDF and the importance of its observance and the protection and enhancement of its unique attributes and history which are also reflected in its priorities.

Objection: No reference to the UDF was found in the HIS or Statement of Environmental Effects, although the DCP states all development must be consistent with it. What is proposed is not consistent with its emphasis on the town’s development pattern, rural character and the fine grain of its building stock. The proposal is not consistent with its Built Form Principle: *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* (p. 33).

There is no argument presented as to how what is proposed contributes to Camden’s identity as a rural town, which is fundamental and intrinsic to its cultural significance. Arguably it does the opposite.

The Burra Charter's *Article 22 New Work*⁵ and its Practice Note make it clear that cultural significance must be respected and not distorted. The supporting Practice Note explains what this means for the design of new development in a heritage place (i.e. View Street Workers Cottages, Camden's HCA). It states that:

- *Being readily identifiable does not automatically make new work sympathetic to the place*
- *the Burra Charter should always be read as a whole as many articles are interdependent all work should comply with the Charter as a whole,*
- *while new work should be readily identifiable, it should also:*
 - *not adversely affect the setting of the place (Article 8)*
 - *have minimal impact on the cultural significance of the place (Article 21.1)*
 - *not distort or obscure the cultural significance of the place, or detract from its interpretation and appreciation (Article 22.1)*
 - *respect and have minimal impact on the cultural significance of the place (Article 22.2).*

This means that new work should respect the context, scale and character of the original cottage and the streetscape, and should not overpower or change them.

View Street and its cottages are documented as culturally significant elements of the town. They demonstrate its early development of residential housing, with original built forms of smaller one storey cottages with simple hipped roof forms and gables. As stated in their NSW heritage listing, the View Street Workers cottages *play a major role in the visual aesthetic that makes Camden so valued, particularly in the close streetscape context, and broader townscape when viewed from the main entrance along Camden Valley Way Important visual separation and articulated forms combined with prominent vegetation of garden and tree plantings have been maintained to preserve the individualities within the grouping.*⁶

This net effect of not respecting cultural significance is that sense of place is eroded. Whilst one more or less non-compliant development may not irrevocably destroy that sense, incremental non-compliances with the planning instruments produce a cumulative negative outcome.

⁵ Article 22. New work

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.

22.2 New work should be readily identifiable as such, **but must respect and have minimal impact on the cultural significance of the place.**

⁶ NSW Heritage Office *Group of Workers Cottages*

<https://apps.environment.nsw.gov.au/dpcheritageapp/ViewHeritageItemDetails.aspx?ID=1280177>

This negative outcome is specifically warned against in *Local Government Heritage Guidelines*⁷ which requires (5.3 (7)) that the cumulative effect, on heritage significance of items and the area's heritage resources, of individual planning decisions be taken into account. Otherwise, the cumulative effect of dispensations for non-compliances and liberal interpretations of planning objectives means that cultural significance and heritage character is eventually and irrevocably lost.

Objection: As shown in the photo below the proposed addition would be highly visible in the View Street setting. It would impose itself into the vista of the broader townscape including when viewed from the main entrance along Camden Valley Way, which as noted in the heritage listing is an important consideration of significance that is to be conserved. Whilst obscuring of the old Clinton's workshops looking towards Narellan may not in itself be of great concern, what is proposed does not enhance the setting and would be aesthetically detrimental to the cottage precinct and the rural and fine-grained historic township and their cultural significance.



⁷ NSW Heritage Council *Local Government Heritage Guidelines* Available at <https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Heritage/local-government-heritage-guidelines.pdf>

Objection: We note that at least three mature trees would be removed with this proposal. The community also highly values the leafy and varied canopy of mature vegetation that is intrinsic to the identity of the old town.

The community expects that every effort is made to retain older specimens and is cynically tired of commercial developments promising “landscaping” that does not eventuate or takes forever to compensate for the loss of vegetation and contribute to the leafy character of the town. DCP 2.4 *Trees and Vegetation* would indicate that removal of trees, especially in the HCA, requires analysis documentation and assessment. This DA does not acknowledge the impact of removal of mature vegetation on heritage significance and sense of place, or describe or justify any mitigation of that impact.

This proposal for View Street, in its current form, would inarguably be detrimental to the extant modest urban fabric within the rural town and so compromise the documented highly valued character and cultural significance of the View Street cottage precinct and the town’s HCA.

Adherence in letter and spirit to the heritage controls is fully supported by the community, which repeatedly expresses, as recorded and reflected in council studies and policies, that Camden’s heritage, special character and sense of place is highly valued and to be preserved.

This proposal is non-compliant with many planning controls, and we do not believe, for the reasons explained, that this proposal can be approved as it has been presented. It needs to be rethought and proper documentation provided to substantiate compliance, which would include how it enhances the unique character of the historic town.

We respectfully ask that it be refused.

Yours sincerely,



Glenda Davis

President