

# Camden Residents' Action Group

*Incorporated*

*Camden – Still a Country Town*

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## **Local Planning Panel 19 October 2021**

### **Re. DA 2020/335/1 – 64 Harrington St., Elderslie**

*Demolition of existing outbuilding and pool and construction of a seniors housing development comprising of 13 self-contained dwellings and associated site works including stormwater drainage, landscaping and civil works.*

I speak on behalf of Camden Residents Action Group.

We have lodged two submissions on this DA<sup>1</sup> which was first exhibited in mid<sup>2</sup> 2020 and included a Torrens title subdivision<sup>3</sup>.

The DA was re-exhibited in mid<sup>4</sup> 2021 and re-notified as a 2 lot Torrens title subdivision with 15 seniors' units. The greater curtilage to the original house and increase in the number of trees were welcomed. However, as there were inconsistencies in the details provided, our second submission<sup>5</sup> specifically asked a number of questions including about the number of units and an isolated reference to strata title<sup>6</sup>.

We have since found that the DA was re-notified on 14 July 2021, after the exhibition period, as a strata title subdivision with 13 units. We did not receive the renotification. If we had we would have amended our submission.

Now it seems there is no sub-division proposed in this DA<sup>7</sup>, although we are unaware of any renotification of the change.

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<sup>1</sup> We note that a senior's housing proposal was first lodged in August 2018<sup>1</sup> and withdrawn in March 2020, partly due to issues of site access and landscaping.

<sup>2</sup> 26 June to 9 July 2020

<sup>3</sup> Our first submission dated 9 July 2020 raised concerns about the need for better access and parking, the retention and planting of more trees and greater curtilage to the original house.

<sup>4</sup> 24 June to 7 July 2021

<sup>5</sup> 7 July 2021

<sup>6</sup> In the Statement of Environmental Effects

<sup>7</sup> Agenda (p. 22)

The matter of subdivision is important as it affects whether the requirements of direct public road frontage for multi-dwellings under the DCP<sup>8</sup> and the minimum site frontage of 20m for seniors housing under the SEPP<sup>9</sup> are met. We assume the change to strata was to avoid the Torrens title issue of frontage created by a battle axe block.

As the DA is being assessed under the SEPP, it seems the original house must be included as seniors housing to achieve the required frontage, and it would need to meet a number of SEPP standards, particularly those in Schedule 3. We note that the development would not be of the unified design required for multi dwelling housing under the DCP.

The DA documentation does not address these matters.

We also note that if the original house is to be included in the strata subdivision, it is not of the usual smaller form of seniors housing and its garden would become a responsibility shared with all of the strata owners on the block. Use of the potential heritage item for seniors housing would be an odd outcome.

We also raise major concerns about the practicality of parking and access.

There is no visitor parking provided as would be required under the DCP (3 spaces). We understand that the SEPP does not specify a quantum for visitor parking but it does under Accessibility<sup>10</sup> require convenient access and parking for residents and visitors.

The only parking is in garages, and this is certainly inconvenient for visitors.

It also puts undue pressure on Harrington Street which is busy and narrow. Street parking is required for the businesses and their customers. It is not in the public interest that visitor parking must rely on this public thoroughfare.

The swept paths for larger vehicles connecting with Harrington Street, are at best very tight and may well be disruptive to normal traffic especially with further narrowing caused by parked cars. We submit that all the swept path analyses are not necessarily practical or achievable.

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<sup>8</sup> DCP 4.6

<sup>9</sup> SEPP (40, 3)

<sup>10</sup> SEPP (38 (b))

For instance, instead of showing the swept paths of two parked vehicles in the double garages of units 1 to 4, only the swept path of one car positioned in the middle of the space is shown. It needs to show the swept paths with two vehicles if the parking requirement is to be met. The larger garages are smaller than the usual double standard of 36 sqm. Also, Unit 9 has 3 bedrooms but a single garage and it is not clear whether this complies with the .5 spaces per bedroom as required under the SEPP.

It is also human nature that residents will not always park in their garages and visitors will try to park on site. There is limited manoeuvrability and this will clearly block swept paths.

Access to and from the site is tight, the driveway is narrower than required and access for emergency vehicles is difficult. Essentially the site is too narrow for what is proposed.

We consider that the practicality and compliance of this DA is not demonstrated. There is confusion about what the DA is proposing and it is only fair that it be re-exhibited with accurate information.

We sincerely request that it be refused in its current form.

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