

# *Camden Residents' Action Group*

*Incorporated*

*Camden – Still a Country Town*

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16 December 2021

Dear General Manager,

**RE: DA 2021/1691/1**

**1-3 View Street CAMDEN**

*Construction of a 2 storey office premises including at grade car parking,  
landscaping and associated site works*

At the outset we wish to emphasise that the presence of the Applicant, Macarthur Credit Union, in Camden is much appreciated. This local financial institution is well respected for its support of Macarthur and Wollondilly communities and for looking after its staff.

The community also highly values Camden's unique heritage and wishes it conserved. This fact is reflected in all Council policies.

It must be acknowledged that the site of the proposed development is sensitive, as evidently recognised in Camden's planning instruments. Development of the site is subject to both general and specific heritage controls.

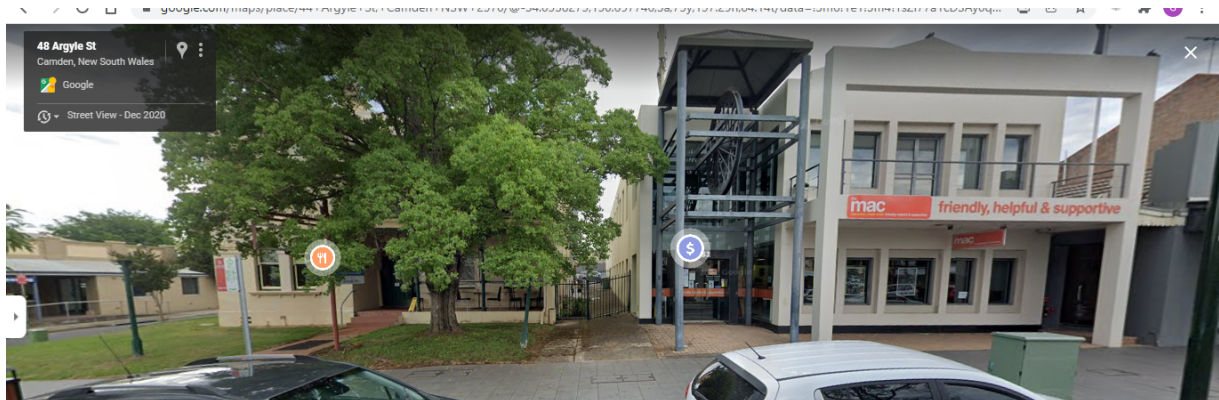
## Proposal background

The Statement of Environmental Effects (SEE) (3.3) explains that the objective of the proposal is to provide a new and contemporary commercial office space for the Macarthur Credit Union to serve as a replacement to the existing building fronting Argyle Street.

Currently a redevelopment of the existing building is being undertaken, and its website states: *Over the coming months there will be significant works occurring at our Camden site that will provide a modern branch for our members, a fit for purpose head office as well as a number of commercial spaces that will be available to lease.*<sup>1</sup>

A complying development application<sup>2</sup> for new Macarthur Credit Union retail premises was determined by a private certifier on 21 December 2020. The 2021 Macarthur Credit Union Annual Report<sup>3</sup> (p. 3) further confirms that: *a major redevelopment of the Camden site will culminate in a new Branch and a new “fit for purpose” Head Office. Our current Head Office of 30 years standing will be “reimagined” as tenanted office suites which will provide an alternative source of income.*

The purpose built 1995 development was somewhat contentious as it was considered unsympathetic in the old heritage town and many questioned how such a conflicting architectural style could be proposed and approved, especially being adjacent to Reeves House, the heritage listed late Victorian original residence at 44 Argyle Street.



Source: Google Maps

From that perspective, it is now disappointing that the streetscape has been compromised to generically accommodate a variety and passing parade of tenants.

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<sup>1</sup> <https://themaccu.com.au/about-us/changes-at-the-mac/>  
<https://themaccu.com.au/media/2365/camdenupdate.pdf>

<sup>2</sup> <https://planning.camden.nsw.gov.au/Application/ApplicationDetails/012.2020.00001505.001/>

<sup>3</sup> <https://themaccu.com.au/media/2458/annualreportfy21.pdf>

From the various statements above we gather that the proposed development at 1-3 View Street is to house the Head Office and that the everyday banking functions will remain in a small part of the existing building, which is being refitted, and that the remainder of the existing Argyle Street premises, purpose built in 1995, will be leased out.

## **Heritage Impact**

There are a number of relevant development controls in Camden's LEP

### **LEP 4.3 Height**

LEP 4.3 limits the height of development in the HCA to 7m. The proposed maximum height is 8.450m, an exceedance of over 20% which seems to be largely caused by the slope of the land and the design of the building. Height exceedance cannot usually be considered without a s4.6 variation request to justify it, but we note that the application relies on the gables being considered as an architectural roof feature under LEP 5.6.

We request that Council consider whether a 4.6 Variation is required. As covered below we do not consider that the current architectural plans for the roof line and its integration into the building are of a design that is appropriate in Camden's Heritage Conservation Area (HCA).

We are concerned about the overshadowing of the heritage listed cottages at 5 View Street and 12 Hill Street. We ask that this be carefully investigated as to whether it is excessive, and if so, what can be done to mitigate it to an acceptable level.

### **LEP 5.10 Heritage conservation**

Camden LEP 5.10(a) requires that the environmental heritage of Camden is conserved.

The LEP<sup>4</sup> confirms that the proposed development site is within the HCA and is adjacent to the listed items of Reeves House at 44 Argyle St, on the corner of View Street, 12 Hill Street and View Street Worker's Cottages at 5-13 View Street. It is also located opposite or in close proximity to the listed heritage items of 6-20 View Street, and other listed items particularly in Hill and Argyle Streets.

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<sup>4</sup> Camden LEP 2010 *Schedule 5 Environmental Heritage* Available at <https://legislation.nsw.gov.au/view/whole/html/inforce/current/epi-2010-0514#sch.5>



Source: *Dingo Partners Architectural Plans View Street façade*

We appreciate the idea of the saw-tooth roofline and its potential resemblance to heritage roofscapes and the uniqueness of Camden's HCA roofscape of smaller roof forms as expressed in the DCP (2.16.4). However, as shown in the architectural drawing above the shallow gables connect and sit oddly above a disproportionate boxlike structure that bears no resemblance to traditional architecture. The gable ends are also proposed to be comprised of glass with coverings of wooden slats which is completely different to a traditional roofline.

No evidence is provided that this design reflects Camden's built heritage. As shown in the picture of the site below, the proposed design is quite dissimilar to the surrounding architecture and roof forms.



Source: *Heritage Impact Statement, Edwards Heritage Consultants*

The gables could be designed to integrate more traditionally into the building which may potentially lower the building height, especially if all the ceilings are designed to be vaulted and raked. A more traditional architectural approach would result in a more aesthetic and sympathetic contribution to the HCA.

## DCP

Camden's DCP supports the above LEP provisions with specific development controls.

Camden DCP 2.17.4<sup>5</sup> includes the lighting control: *Internally illuminated signage is restricted to under awning signs only*. We note the proposed large 6 x 4-foot halo illuminated sign proposed for the front of the building and suggest it is not compliant or appropriate in the HCA.

The DCP (5.3.3.3)<sup>6</sup> also states that the development in the B4 Mixed Use zone of the HCA, must be consistent with the Camden Town Centre Urban Design Framework (UDF). The UDF defines the HCA's unique character and desired future character. The proposed development needs to be shown to be consistent with the Built Form Principle of the UDF:

***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*** (p33).

Surprisingly the UDF is not addressed in the documentation accompanying the DA. We take this opportunity to emphasise that the Macarthur's deliberately designed Camden as a country village with early substantial civic buildings. The use of materials reflecting farm buildings is historically inappropriate, and not what is implied by the term "rural town".

There are a number of specific DCP development controls for View Street and the HCA, which support this Building Principle, that we consider particularly relevant as set out in the Appendix. We comment on them as follows.

DCP 2.16.5 ***View Street Workers Cottages***<sup>7</sup> describes View Street with its workers cottages as an important street with a smaller one-storey built form of regular character. As shown in the map below, the proposed development at 1-3 View Street falls under its development controls.

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<sup>5</sup> Camden DCP 2019 2.17.4 *Signage in Heritage Conservation Areas* Available at <https://dcp.camden.nsw.gov.au/general-land-use-controls/signage/signage-on-heritage-items-or-in-heritage-conservation-areas/>

<sup>6</sup> Camden DCP 2019 5.3.3 *Camden – B4 Mixed Use Heritage and Character* Available at <https://dcp.camden.nsw.gov.au/centres-development/camden-b2-local-centre/camden-b4-mixed-use/>

<sup>7</sup> Camden DCP 2019 2.16.5 *View Street Workers Cottages* Available at <https://dcp.camden.nsw.gov.au/general-land-use-controls/environmental-heritage/view-street-workers-cottages/>

Certainly, the development, being well set back from View Street, has the potential to positively improve the streetscape because it is not competing with the development pattern of the cottages.

However, it is not apparent that any consideration has been given to how this new development could contribute to the streetscape by interpreting features of the prevailing cottage and garden character.

The roof style, materials, bulk and scale and side setbacks are quite different to that found in View Street. We consider that more attention could be given to this aspect of the design of the building and carpark.



*Camden DCP Environmental Heritage 2.16.5 View Street Workers Cottages*

Similarly, under **DCP 2.16.3<sup>8</sup> General Heritage Provisions** this new development does not reflect *the general form, bulk, scale, height and architectural detail of its surrounds*. As covered above the roof form and non-traditional proportions of the architectural design are not consistent with the building stock of the HCA including that adjacent to and in close proximity.

The proposed materials and finishes are highly inappropriate and non-reflective of the traditional and expected materials and palette of the HCA. They cannot be found in View Street or the adjacent heritage listed buildings. They have not been justified.

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<sup>8</sup> Camden DCP 2019 2.16.3 *General Heritage Provisions* Available at <https://dcp.camden.nsw.gov.au/general-land-use-controls/environmental-heritage/general-heritage-provisions/>

We object to use of the material of Zinalume as side cladding, particularly its vertical profile and colour palette, all of which are non-traditional and do not reflect or complement the streetscape or contribute to the cohesiveness of the HCA. The lighter grey colour of “steel” is potentially obtrusively reflective within the surrounds and the dark grey colour of “monument” cannot be supported because of its effect on building temperature.

We appreciate the ecological use of recycled timber and also suggest that the number of solar panels be increased to provide a more sustainable footprint.

It is noted that the whole car park is to be redone. We appreciate that the existing trees are being retained but the opportunity should be taken to increase the vegetation on the site. The DCP requires that hard stand areas be kept to a minimum. Hard stand also contributes to the heat bank effect. The opportunity exists to create a more ecologically sustainable, more welcoming and more aesthetically pleasing area.

No landscape plan is provided and our understanding is that one is required.

**DCP 2.16.4<sup>9</sup> *Camden Heritage Conservation Area*** also requires that additions be compatible with the existing streetscape and that large built forms in cottage dominated precincts be avoided through various roof forms and pitches, wall openings and recesses, materials, recessive colours and landscaping. Given the set back from View Street, the size of the proposed building does not necessarily compete with the streetscape pattern. However, we submit that the roof form, materials, colour palette and landscaping need careful attention as they do not complement or enhance the cottage streetscape.

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<sup>9</sup> Camden DCP 2019 2.16.4 *Camden Heritage Conservation Area* Available at <https://dcp.camden.nsw.gov.au/general-land-use-controls/environmental-heritage/camden-heritage-conservation-area/>

In conclusion, we wish to be clear that we do not object in principle to the proposal and believe it has the potential to make a positive contribution to View Street and the township.

We do feel, for all the reasons covered above, that it can be more thoughtfully and specifically designed in terms of the LEP and DCP controls and its ecological footprint.

The proposal has the potential to enhance the HCA, but as detailed the architectural design, materials, palette and landscaping need more careful consideration to ensure its compatibility and contribution. It would be a wasted opportunity and a sad loss for the town and its valued heritage significance if that was not required.

We respectfully ask that this proposal go back to the drawing board to make it more consistent with community expectations for the HCA.

Yours sincerely,

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

Glenda Davis

President

## APPENDIX

**DCP 2.16.5 View Street Workers Cottages:** relevant development controls include:

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

**DCP 2.16.3 General Heritage Provisions:** relevant development controls include:

### 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.*

### Roof and Roof-scaping

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

### Materials and Finishes

2. *Materials, finishes, and textures must be sympathetic to the historic context of the original significant buildings within the streetscape.*

### Vehicle Access

3. *Hard stand areas should be kept to a minimum.*

**DCP 2.16.4 Camden Heritage Conservation Area:** relevant development controls include:

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