

Camden Residents' Action Group

Incorporated

Camden – Still a Country Town

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5 September 2022

Attention: Graham Matthews

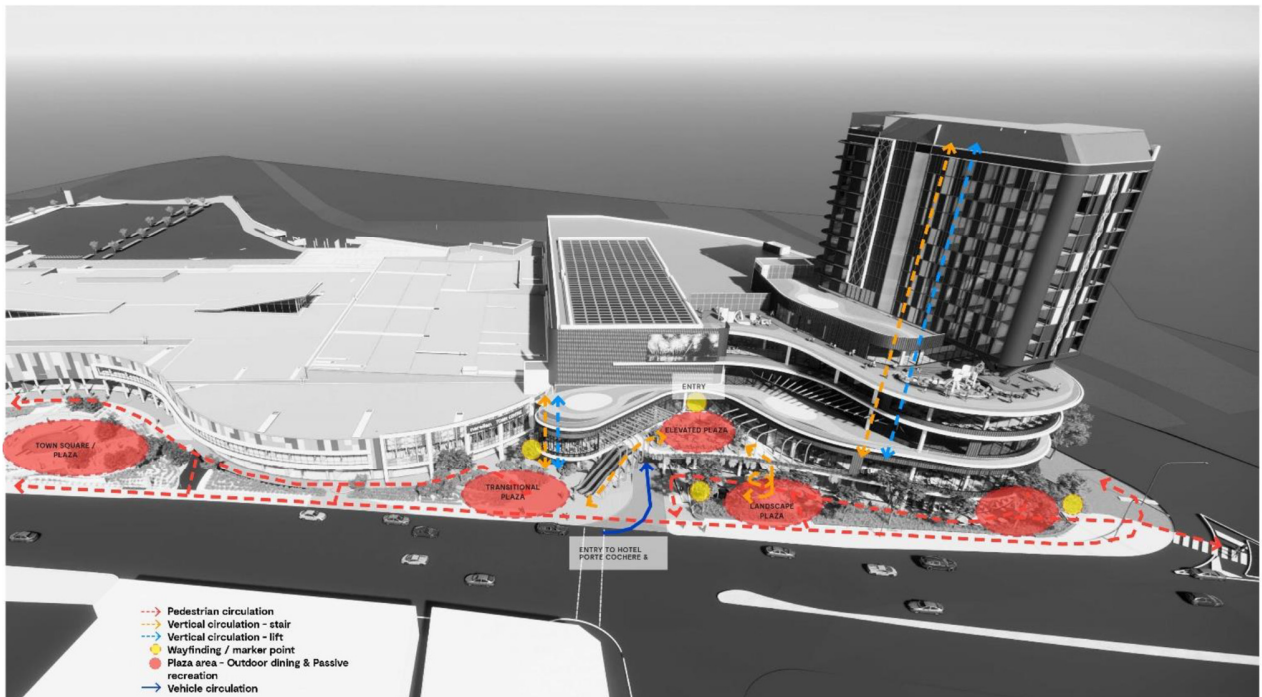
Dear General Manager,

***Re: Planning Proposal - PP/2021/12/1
Proposed Narellan Town Centre hotel and entertainment precinct
321-339 Camden Valley Way, Narellan***

We object to the above Planning Proposal to amend Camden Local Environmental Plan to accommodate the height and scale of this proposed hotel and entertainment precinct located adjacent to the Narellan Town Centre and in close proximity to Struggletown Heritage Conservation Area.

Our reasons for objecting are as follows.

- It is not part of Project Narellan and therefore has not been integral to or subject to community consultation on any new vision for Narellan. This is not fair to the community and as such is unacceptable.
- This Planning Proposal would see an enormous leap in Narellan's growth rather than a planned stage. As stated in Camden's Local Strategic Planning Statement (Local Priority P3, Actions 68, 69, p. 60-61) Council needs to investigate a staged approach to the master planning of Narellan particularly because of the lack of certainty around the delivery, timing and location of the proposed rail line to Narellan. This uncertainty means that a holistic vision for Narellan and an understanding of its capacity to support additional growth cannot yet be determined. The location of this proposed development may not be suitable and compromise future planning.



Source Buchan Master Planning Strategy and Design Concept

- As shown in the diagram above, the interface with the public domain and pedestrian connections are unnecessarily minimal.
- What is proposed is not consistent with the Desired Future Character of Narellan as set out in the DCP (5.4.1).
 - It is not pedestrian friendly or display a cultural and civic as well as a built form of human scale at street level (j).
 - It is not designed to provide a sense of openness and space (n).
- As stated in Camden’s Local Strategic Planning Statement (Local Priority P3, p. 60) realising the full potential of Narellan is difficult due to limitations of the current road network, fragmented land, limited pedestrian and cycle connectivity and the general design of the public domain. This proposal is not conducive to free movement within a welcoming space. It exacerbates the lack of pedestrian connectivity and open public space, and creates an urban island within a busy road system.
- Also as shown in the diagram above, what is proposed is excessively taller and bulkier than Narellan Town Centre which creates an unbalanced and surprising aesthetic.
- The height variation of the standard maximum from 25m to 75m is an extraordinary exceedance that will change the profile and character of Narellan beyond recognition, and not necessarily in accordance with the yet to be determined vision for Narellan.

- The proposal seeks a maximum building height of RL158 which is the absolute obstacle limit confirmed by Sydney Metro Airports. The Proposal pushes the boundaries of what is safe.
- The exceedance to the currently permissible Floor Space Ratio, to increase available floor space on the site, by a factor of 3 will create a density that is incompatible with its surrounds.



Source: ae design partnership April 2022 Visual Impact Assessment

- As clearly shown in the above diagram, the design does not reflect the history of Narellan or promote heritage items as assets (DCP 5.4.1(i)).
- The Struggletown Heritage Conservation Area, which is comprised of early examples of small-scale domestic housing, is one of the last remaining intact areas in Narellan. As can be seen in the above diagram, like the proposed development it is located predominantly and most prominently at the junction of Camden Valley Way and The Northern Road.

Despite the Heritage Impact Statement (5.3.5) claiming that there will be no impact on Struggletown, this is clearly not true. We do not agree and as depicted above, no evidence is provided that the *impacts of a tower within its wider setting are mitigated by the visual separation of the main road and can be further mitigated by good articulation and material choices.*

The vast difference in height and scale, as well as the 21st century construction methods and space-age design, mean that the modest 19th century conservation area is completely dominated.

Being in such close proximity to Struggletown, what is proposed presents as a blatant anomaly that is not consistent with conservation or necessarily consistent with the DCP (2.16.6) objectives and controls of the Struggletown conservation area.

Quite arguably what is proposed does not meet the DCP objectives of retention of cohesive character and balance between historic character and sensitive contemporary development.

Arguably what is proposed is not consistent with the DCP controls that large built forms in cottage dominated precincts must be avoided, that new built forms are to be sympathetic in terms of scale and form and impacts reduced through architectural detail, materials, recessive colours and landscaping.

We respectfully request that this Planning Proposal be refused.

Yours sincerely,



Glenda Davis

President