

# Camden Residents' Action Group

*Incorporated*

*Camden – Still a Country Town*

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General Manager  
Camden Council  
70 Central Avenue  
Oran Park 2570  
Email: [mail@camden.nsw.gov.au](mailto:mail@camden.nsw.gov.au)  
9 March 2023

Dear General Manager,

Re: 2-4 John Street, Camden

**DA s4.56 Modification: 2008/644/9<sup>1</sup>**

***Section 4.56 Modification - Consolidation of buildings 4 and 6 into one building, addition of 3 seniors living units and related design amendments.***

We object to this, the ninth application to modify the consent for this DA which dates from 2008.

The original consent (dated 8 September 2009) was for:

*Redevelopment of the Former Camden High School Site comprising: Demolition of disused School Buildings, Remediation of Contaminated Land, Earth Works, Refurbishment of 1 Existing Building, the Erection of 57 Multiple-Unit Dwellings, 108 Self-Contained Seniors Living Dwellings, 76 Bed Residential Care Facility, 51 Bed Motel, Restaurant, Cultural & Community Centre, Medical Centre, Ancillary Shops, Under Croft Car Parking and Landscaping Works.*

This approval was modified in 2012 to reduce the number of approved multiple-unit dwellings from 57 to 26, to increase the number of approved self-contained seniors living dwellings from 108 to 162, to replace 5 shops on the ground floor of Buildings 1 and 2 at the corner of John Street and Exeter Street with residents' facilities and also make other various layout and design changes.

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<sup>1</sup> To approved development: *Staged redevelopment of the Former Camden High School Site comprising: demolition of disused school buildings, remediation of contaminated land, earthworks, staged subdivision, the erection of 26 multiple-unit dwellings, 162 self-contained seniors living dwellings, 76 bed residential care facility, 51 bed motel, restaurant, cultural & community centre, medical centre, ancillary shops, under croft car parking and landscaping works*

Other modifications have since occurred and it seems that as each building stage is approached there is another application to modify the original consent.

**Objection: Not all relevant information is made publicly available despite significant public interest**

Similar to this application to consolidate buildings 4 and 6 and increase the number of living units, the fifth modification in 2021 was to consolidate buildings 3 and 5 and add living units. We found when making our submissions on the 2021 consolidation modification that we could not reconcile what the community understood was then approved with the newly submitted plans and what was appearing as Buildings 1 and 2 in Exeter Street.

Our two submissions (dated 9 and 21 April 2021) on modification 2008/644/5 to combine buildings 3 and 5 referred to our attempts to access information and understand how this development has transformed from what was originally described and recommended for approval in the Agenda Report to Council on 8 September 2009.

As detailed in Appendix 1 we sought additional information and lodged a GIPA on 11 April 2021. The original 2009 stamped approved plans were then made available on the DA Tracker, but public access to other information sought was denied. Advice from the Privacy Commissioner was that as such information was for public research (not commercial use) it should be made publicly available. With other DAs such information is normally automatically provided on the DA Tracker despite copyright restrictions.

At this point it is not clear to the community what is approved to be constructed and how the continually evolving plans relate to the original 2009 consent. What is clear is that the development no longer can be described as the same as that Council originally approved.

The Agenda Report (8 September 2009) to Council states:

*The proposed buildings will not unnecessarily or unreasonably intrude upon significant streetscapes or vistas The proposed buildings have been designed to be compatible in scale with the surrounding built form and their layout on the site has been carefully planned having regard for the surrounding natural and built environment so that significant streetscapes and vistas are not compromised.*

*Furthermore, the retention of mature trees and the provision of additional landscaping will ensure that significant view corridors are enhanced by the proposed development.*

*The proposed redevelopment of the site will bring an important part of the Camden Town Centre back into use and will make a positive contribution to the streetscape by reactivating the street frontages with the provision of retail and commercial space at ground level.*

*Views to and from the State heritage listed item (Nant Gwylan) including those from the Town Farm towards the house and garden and vice versa will not be adversely impacted by the proposed development.*

*Indeed both the setting of Nant Gwylan and the views and outlook available from within the property will be enhanced by the development which will involve the demolition of the surrounding school buildings, the provision of increased landscaped setbacks between the proposed buildings and Nant Gwylan's boundaries, the creation of more open space around Nant Gwylan, the creation of new view corridors between the proposed buildings and additional landscaping opportunities, particularly along the southern side of Exeter Street (on either side of Nant Gwylan).*

And concludes:

*It is considered that the design of the proposed development has minimised the appearance of bulk and scale well, it provides an appropriate built form to the surrounding public streets and that overshadowing has been reduced. Activation of the John and Exeter Street corner is a positive planning outcome and the potential benefit to the community by providing residential care facilities, additional medical practices and on-site community facilities for use by the occupants are all positive aspects of the development. An increase in the permanent population within the Camden Town Centre has the potential to introduce more customers for businesses in Camden, will provide both economic and social benefits to the community as a whole.*

Clearly this development is transformative for the cultural identity of Camden and its Heritage Conservation Area.

The community was given to understand that Council consented to this development, although non-compliant with the LEP and DCP especially height (7m) and storey (2) limits, because:

- the community and Council deemed it valuable infrastructure for an aging population including residential care and medical facilities;
- the site needed major and costly decontamination works<sup>2</sup> that would be a drain on the public purse;
- the former high school already included a non-compliant three-storey building, the shell of which was to be retained;
- the development was to complement the building pattern of the heritage town with smaller buildings and setbacks that did not detract from its human scale.

The community has always been extremely protective and interested about what happens on this site. It expects to be provided with all relevant information and be kept fully informed about the rationale for modifications put up for approval and how they benefit the community and residents of the complex. Although what is appearing on site is met with incredulity, it has become too difficult for community members to understand, raise concerns and object when modifications are exhibited.

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<sup>2</sup> Liberty Industrial, description of works available at <https://libertyindustrial.com.au/portfolio-item/former-camden-gasworks-remediation/>

This is not in the public interest, and we again ask that all relevant information be made publicly available.

### **Objection: Unacceptable heritage impacts**

The last reason listed above, regarding the development complementing the heritage town, was supported by a Heritage Impact Statement (HIS)<sup>3</sup> of what was then proposed (see Appendix 2). The Agenda Report and its recommendation to Council that the development be approved, relied on this HIS as well as a HIS supplement and Addendum Planning Submission which have not been made publicly available<sup>4</sup>.

Salient reasons in the HIS (see Appendix 2) for supporting the development included:

- the proposed development would use similar materials and finishes to those currently found in the conservation area;
- the roof form, and vertical and horizontal articulation of the proposed buildings would be sympathetic to the variety of buildings found in John, Elizabeth, Exeter and Mitchell Streets;
- an obvious effort has been made to break up the bulk of the facility by the increased number of smaller buildings as opposed to fewer larger buildings. This is more consistent with the general development pattern of the existing heritage stock within Camden town Centre;
- the buildings along street alignments have been given a variety of setbacks which reduce the overall bulk of the development when viewed from the street and give the appearance of several development of a smaller scale which is sympathetic to the historic sub-division pattern of the town centre;
- the street facades of the proposed buildings are designed to read as two storey edifices consistent with the surrounding heritage stock generally. This is achieved by setting the third storey back behind the facades and also through the use of attics within roof forms.

Despite what the community understood and the HIS assessment:

Exeter Street: very large and imposing buildings are now constructed. Contrary to the HIS that informed the original approval, they are of non-sympathetic materials and palette and dominate view-lines including from the Town Farm and towards Nant Gwylan. A modification application (2008/644/8) to convert part of the ground floor of Building 2 to, among other changes, accommodate corporate offices and reduce visitor parking is pending.

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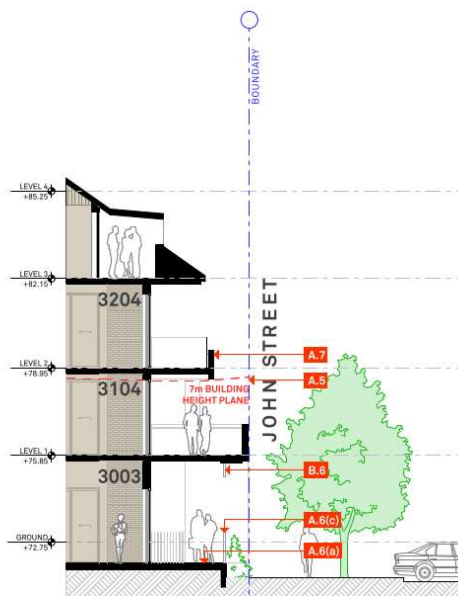
<sup>3</sup> Rappoport Pty Ltd Conservation Architects and Heritage Consultants 8 July 2008 Statement of Heritage Impact Available at <https://planning.camden.nsw.gov.au/Application/ApplicationDetails/010.2008.00000644.003/>

<sup>4</sup> These two documents were requested under GIPA in 2021 but were not made available.





John Street: The consent has changed to allow Buildings 3 and 5 to be consolidated with an enlarged footprint, the replacement of two shops with two additional living units and reconfiguration to include another two units (2008/644/5). Contrary to the HIS that informed the original approval, the third storey is not set back, set-backs from the street are not varied and second floor verandas align too closely with the footpath. A further modification (2008/644/7 was approved on 9 December 2022 which included converting a four-bedroom unit into 2 units.



*Artist's Impression Source: Extent Heritage Sydney March 2021 Statement of Heritage Impact Building 3+5, 2-14 John St, Camden (p. 29)*

This latest modification application relates to consolidation of Buildings 4 and 6. The Statement of Environmental Effect (SEE; also headed up s4.56 Modification Report) summarises the changes for which the application seeks consent<sup>5</sup> which include additional building mass to link Buildings 4 and 6, three additional independent living units and a new rooftop open space and plant area.

<sup>5</sup> SEE 1.1: Specifically, the section 4.56 application seeks consent for

- Reconfiguration of the basement layout;
- Reduction of the basement footprint, improving the interface with retained trees and maintaining Tree Protection Zones;

Compatibility with the fine-grained building stock and development pattern of the HCA is further compromised by a larger foot-print, increased bulk and scale, an unusual flat connecting roof and loss of landscaping.

**Objection: We contend that what is eventuating on the site is not the same development.**

Under the Act<sup>6</sup>, a consent authority must be satisfied that a modification to a consent, such as this one, is substantially the same development as originally granted. The SEE (4.1) claims, as do previous modification applications, that what is now proposed under DA 2008/644/9 is substantially the same development as that approved in 2009 under the original DA 2008/644.

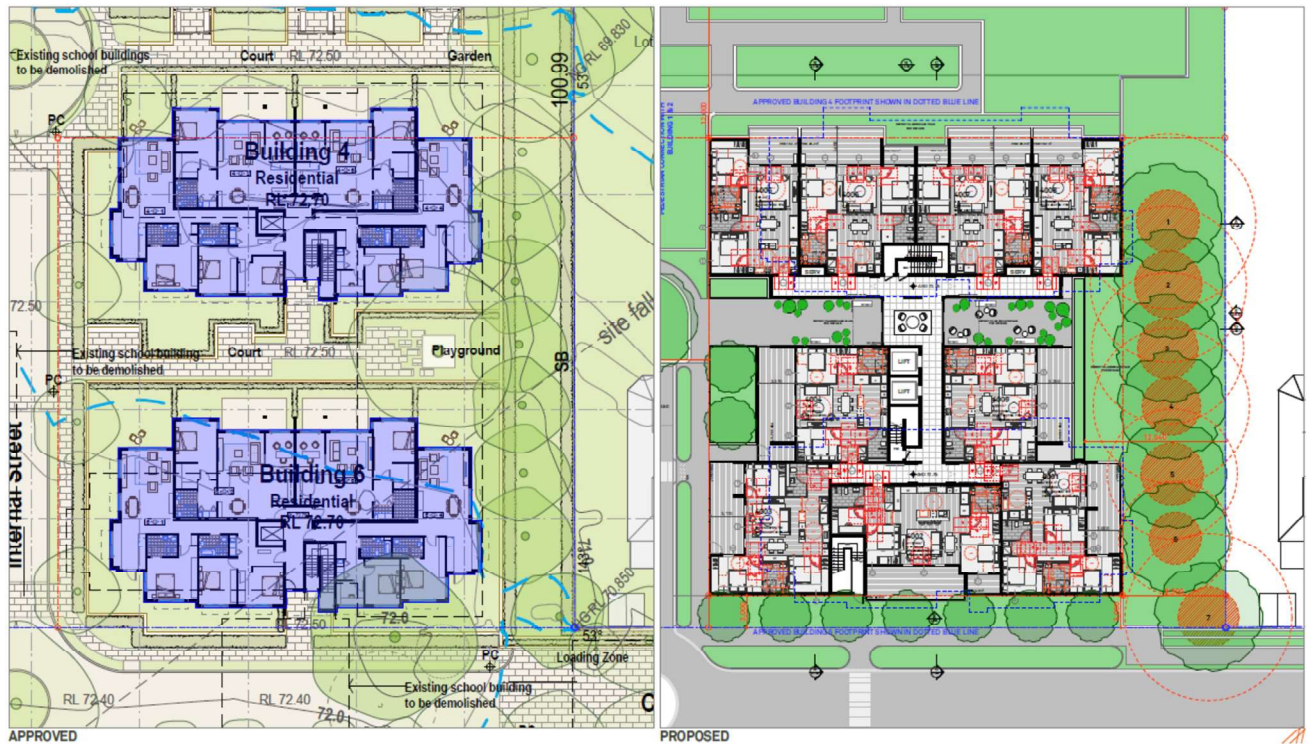
It has become illogical to claim that the development is substantially the same. With so many modifications the original rationale for approval has been lost.

- The staged development and the stream of modification applications provide no guarantee that benefits cited in the 2009 Agenda Report will eventuate (such as on-site residential care facilities and medical practices)
- The three storey High School building that was to be refurbished and used as a justification for exceeding the DCP storey limit in the original DA has long been demolished.
- The concept of smaller buildings reflecting the development pattern of the HCA has been conveniently ignored by applications to consolidate buildings and increase footprints. The bulk and scale of buildings has been and is being sought to be increased. As can be seen in the diagram below, the plan for consolidating buildings 4 and 6 results in a loss of open space and a building mass significantly greater than what was approved in 2009.
- The buildings do not read as two storey edifices.
- The buildings bear no relationship in architectural form, materials or palette to the building stock of the HCA.
- Set-backs to the public streets are not varied and are minimal.
- View-lines and the open feel within the HCA are detrimentally impacted.

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- Reconfiguration of building cores to facilitate connection of Building 4 with Building 6;
  - Additional building mass (linkage) between Building 4 and 6;
  - Improved interface with Central Avenue, with living areas oriented to provide passive surveillance onto Central Ave;
  - Additional setback from common site western boundary with Nant Gwylan;
  - New internalized common entry area;
  - Overall improvement of unit internal layouts, to comply with SEPP (Housing) 2021 Chapter 3 Part 5, as well as Apartment Design Guide;
  - New rooftop communal open space; and
  - New rooftop plant area.

<sup>6</sup> Environmental Planning and Assessment Act s 4.56

[http://classic.austlii.edu.au/au/legis/nsw/consol\\_act/epaaa1979389/s4.56.html](http://classic.austlii.edu.au/au/legis/nsw/consol_act/epaaa1979389/s4.56.html)



**Buildings 4 and 6: Approved and proposed ground floor footprint. Source: Benson McCormack Architecture**

The SEE/ s4.56 Statement (4.1) claims that what is now before us is substantially the same development that was approved in 2009. Whilst we accept that this latest modification relates to buildings situated behind consolidated Buildings 3 and 5 it nevertheless exacerbates the mass and density of the overall development, and also changes the roofline. This modification takes the development further from the original concept approved in 2009.

Claims to the contrary are unsupported. For instance, the SEE (5.6) claims that the proposed plant and communal area located on the roof will have a minimal visual impact on surrounding development, with a planted barrier proposed on the eastern wall of the communal area. At a height far in excess of the original building stock of the HCA, it is likely that the privacy of the other properties will be affected and that the edifice will be visible from them.

The claim (SEE 5.6.2) that the proposed modification will help to achieve visual consistency when viewing the site as a whole is an admission that this is intended to be a dense development which is contrary to the character and development pattern of the HCA.

As shown in the artist's impressions provided and copied in below, far from demonstrating that the view from Nant Gwylan will be improved the approved and proposed views from it show a reduced skyline and a greater urban mass.





LOCATION 01 - APPROVED



LOCATION 01 - PROPOSED

Our

Our conclusion from the image below is that this rooftop open space will overlook Nant Gwylan. This is unacceptable.

We do not accept that screening trees, including jacarandas (which in any case lose leaves) and palms, will ever reach a height that will prevent overlooking from this rooftop or windows.



**Source: Google Maps**

This is not the same development proposed in 2008 which detailed how the State listed property would not be adversely affected.

Our reading indicates that Section 4.56 requires that the modified development be of essentially or materially the same essence and that the original development consent must be viewed as a whole, particularly in circumstances where the application involves several elements. This means that the proposed modified development must be compared against the development as originally approved in its entirety. This is particularly so in circumstances where the application involves several elements and environment impacts.

In this case there are several elements including increased footprint, increased scale, mass and density, change in roof form, additional communal rooftop area, potential impingement on privacy of surrounding properties, adverse effect on Nant Gwylan, changes in view lines and addition of three living units. These elemental changes in themselves are contrary to the concept that was approved in 2009.

Moreover, this modification further builds on previous modifications that have changed many elements to the extent that the cumulative effect is that what is now before us cannot be argued to be substantially the same development.

## Conclusion

We submit that this modification must be refused. The community has not been informed as to how this development is so different to what was approved in 2009, the heritage impacts are unacceptable and it cannot be argued, as it must be, that the modification to the 2009 approval is substantially the same development.

Yours sincerely,

A handwritten signature in cursive script that reads "Glenda Davis".

Glenda Davis  
President

## **Appendix 1 Request for information (redacted)**

**From: Camden Residents' Action Group**

**Sent:** Wednesday, 7 April 2021 9:56 AM

**To: Principal Planner**

**Cc:** admin@crag.org.au

**Subject:** High school site DA 2008/644/5

We would like an extension for our submission on the above DA. The exhibition period covered the public holidays of Easter and the due date was Easter Monday, and we do feel that the complexity of this DA and the extent of public interest in any case requires exhibition of four weeks rather than two.

The community really needs a master plan of what is proposed on the site as there have been many changes since the DA was first lodged in 2008, and the situation is quite confused and difficult to envisage.

Having now had a chance to look at the available documentation we find we need access to at least the following:

- Stamped approved plans September 2009.
- Addendum Planning Submission dated 15 May, 2009 that also includes the supplement to the Statement of Heritage Impact prepared by Rappoport Pty Ltd Conservation Architects.
- Any other heritage report lodged in relation to DA modifications since 2009– we have found the original HIS dated 8 July 2008, and of course have the one prepared by Extent dated March 2021 (no others were found on the DA Tracker).
- Documentation showing sight lines, especially to St John's Church including the (original Macarthur/Mitchell planned) sight line from lower John Street to the church.
- Measures of the planned street façade setbacks.

Can this information be made available please? Many thanks

Kind regards

President

Camden Residents' Action Group Inc

Cc CRAG Committee

**From: Principal Planner**

**Sent:** Friday, 9 April 2021 4:16 PM

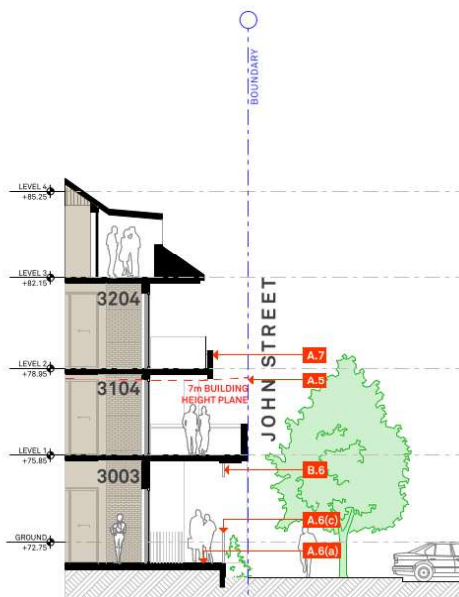
**To: President CRAG**

**Subject:** RE: High school site DA 2008/644/5

The 'Former Camden High School Site Redevelopment' webpage on Council's website (Former Camden High School Site Redevelopment » Camden Council (nsw.gov.au)) provides all of the information regarding the originally approved development application that is freely available to the public.

To access any additional information that Council may hold you will need to lodge an application under the *Government Information (Public Access) Act 2009* with Council. Information on how to make an application is available at GIPA Applications » Camden Council (nsw.gov.au).

Regarding the proposed John Street setbacks for the modified buildings 3 and 5, these will range from approximately 3.48m - 3.5m to the main building façade line at the ground, first and second floor levels. The third-floor level has a greater setback as depicted below:



The above is part of the architectural plans which are available on Council's website at <https://planning.camden.nsw.gov.au/Application/ApplicationDetails/010.2008.00000644.005/>.

Council is happy to give you a two-week extension to make any further submissions on modification application 2008/644/5.

Regards,

**Principal Planner**



**Sent:** Sunday, 11 April 2021 6:12 PM  
**To:** mail@camden.nsw.gov.au  
**Cc:** admin@crag.org.au  
**Subject:** GIPA High school site DA 2008/644  
**Attachments:** GIPA 11 April 2021.pdf

Dear General Manager,

Please find attached our GIPA request for information in the Former Camden High School Site. There is not sufficient information made publicly available to make informed and detailed comment on the latest iteration 2008/644/5. Camden Residents' Action Group Inc has an extension until Friday 23 April. If it not possible to provide any of the information quickly, could you please advise. Thank you.

Kind regards  
President  
Camden Residents' Action Group Inc  
Cc CRAG committee

**From:** mb.GovernanceTeam <mb.GovernanceTeam@camden.nsw.gov.au>  
**Sent:** Thursday, 29 April 2021 11:19 AM  
**To:** Camden Residents' Action Group  
**Subject:** GIPA Application 2021 Informal - Information supplied - 2-14 John St CAMDEN  
**Attachments:** 17 336678 DA 2008 644 2 - DA Consent - Redacted.pdf

**RE: YOUR APPLICATION FOR ACCESS TO GOVERNMENT INFORMATION**

Your Application for Access to Information under the *Government Information (Public Access) Act 2009* ('GIPA Act') was received by Council on 12 April 2021.

You asked for the following information:

- Development consent, plans, stamped approved plans 2009, statement of environmental effects addendum planning submission 15/05/2009 including supplement to statement of heritage impact, proposed plans as referenced as attachments to Council report 08/09/2009 (Pg 71) submissions table, all documents that would usually be available on DA Tracker for DA/2008/644/2.

Unfortunately, I have not been able to locate a copy of the submissions table within Council's records.

Please find attached the following documents:

- DA/2008/644/2 – DA Consent.

The attached document contains the personal information of third parties and in order to comply with Council's obligations under the *Privacy and Personal Information Protection Act 1998*, this information has been redacted.

## Copyright Restrictions

Due to Council's obligations under the *Copyright Act 1968 (Cth)*, Council is unable to provide copies of the following documents:

- DA/2008/644/2 – Stamped Approved Plans.
- DA/2008/644/2 – Proposed Plans.
- DA/2008/644/1 – Addendum Planning Submission.

However, we can provide you with view-only access at the Council Administration Centre. Please note that the documents will only be available for viewing within one month of the date of this email and an appointment is essential.

If you would like to make an appointment to view the documents, please indicate your preferred time by return email, at least 24 hours in advance. A response will be sent to you to confirm your appointment.

**From:** mb.GovernanceTeam <[mb.GovernanceTeam@camden.nsw.gov.au](mailto:mb.GovernanceTeam@camden.nsw.gov.au)>

**Sent:** Tuesday, 4 May 2021 1:43 PM

**To:** Camden Residents' Action Group

**Subject:** GIPA Application 2021 Informal - Information supplied 2 - 2-14 John Street CAMDEN

### **RE: YOUR APPLICATION FOR ACCESS TO GOVERNMENT INFORMATION**

Your Application for Access to Information under the *Government Information (Public Access) Act 2009* ('GIPA Act') was received by Council on 12 April 2021.

In addition to the information previously sent to you on 29 April 2021.

Please find attached the following documents:

- DA/2008/644/1 – DA Consent.

The attached document contains the personal information of third parties and in order to comply with Council's obligations under the *Privacy and Personal Information Protection Act 1998*, this information has been redacted.

**From:** Principal Planner

**Sent:** Tuesday, 4 May 2021 4:48 PM

**Subject:** DA/2008/644/5 - Modification Application Regarding the Former Camden High School Site Redevelopment

Dear Sir/Madam,

I write regarding the above modification application that you have recently made a submission to Council on.

I advise that Council has added a consolidated set of the approved architectural and landscaping plans for the development to its website. These are the originally approved plans for the development and include the modified plans that were approved as part of a previous modification application in 2012.

The plans are available to view on Council's website via the following weblink: [Camden Council - Application Tracker \(nsw.gov.au\)](#). After clicking on the weblink please scroll down to the 'Documents' tab where the plans are available to view in two parts.

Further information regarding the former Camden High School site redevelopment is available on Council's website via the following weblink: [Former Camden High School Site Redevelopment » Camden Council \(nsw.gov.au\)](#).

**Sent:** Monday, 10 May 2021 9:27 AM

**To:** mb.GovernanceTeam <mb.GovernanceTeam@camden.nsw.gov.au>

**Cc:** **Principal Planner**

**Subject:** GIPA Application 2021 Informal - Information supplied 2 - 2-14 John Street CAMDEN

Thank you for your email of 4 May 2021 and providing this additional DA (644/1) consent document in response to the attached GIPA request. We also thank you for the consolidated architectural plans of 2009 (original 2008/ 644) and 2012 (modification) that were uploaded to the DA Tracker on Tuesday afternoon.

As you know we attended an appointment in the Council foyer on Tuesday to view documents that were available at the time as per our attached GIPA request.

We are particularly interested in the 2009 Addendum Planning submission (15 May 2009). Unfortunately, much of this document was blurred and fairly unreadable.

Is it possible to obtain a good copy of this document? In particular we would like a copy of the 2009 Heritage Impact Statement (Rappoport Mascot, Appendix D in this 2009 Addendum).

My understanding (please correct me if wrong) is that if and as the information is to be provided, that access is to be as requested and unconditional unless there is an overriding public interest against disclosure of the information (GIPA Act 6.72,73).

The DA tracker of course is clearly the most efficient means of disclosure.

There is significant public interest in this transformative DA and modifications to the 2009 consent are likely to continue for a number of years. It is very difficult to understand and comment on what is proposed without all of the detail of the original DA and documentation of modifications to it.

I do hope that the information requested in the GIPA, including a fully readable 2009 Addendum, can be provided in electronic and easily accessible form preferably on the DA tracker (rather than having to take notes in a limited timeframe).

Thank you for your consideration, and I look forward to your response.

**From: Principal Planner**

**Sent:** Wednesday, 12 May 2021 7:51 AM

**To: Camden Residents' Action Group**

**Subject:** RE: GIPA Application 2021 Informal - Information supplied 2 - 2-14  
John Street CAMDEN

I wanted to clarify that just the approved plans for DA/2008/644/1 (as modified) have been added to Council's website. This was in response to community interest but is also consistent with how Council adds the approved plans for all development applications approved in recent years to its website.

Any further material sought will have to be applied for via the GIPA process and will not be placed on Council's website.

## Appendix 2: 2008 Heritage Impact Statement Extract

- An objective of the Camden DCP is to ensure that the heritage listed Nant Gwylan and Gardens at 33A Exeter Street are sensitively integrated with the open space precinct and adjoining development generally. In our opinion, this has been achieved in the following ways;
  - a) The views from the Town Farm towards the heritage listed house and garden would be preserved and the mature plantings along the property boundary would be retained. This would seek to maintain the rural setting of the place;
  - b) The mature trees along Exeter Street would be retained by the proposal and the proposal also seeks to plant larger trees along the southern side of Exeter Street. In this way, the landscaped setting of the Nant Gwylan garden would be enhanced and the additional plantings would seek to sensitively integrate the open space of the Town Farm, the new development and the heritage listed house and garden in a sympathetic manner;
  - c) The adjacent proposed buildings that would surround Nant Gwylan have been sympathetically designed so that they would not dominate the landscaped character of the place when viewed from Exeter Street. This has been achieved by ensuring that the new buildings are sufficiently set back

from the heritage listed house and garden and the pitched roof form scales the proposed four storey buildings down to having a three storey appearance (similar to the existing building on the corner of John and Exeter Streets);

- The row of Jacaranda trees on the Camden High School site that contribute to the historic landscaped setting of the place would be conserved and integrated with the landscaping of the new design;
- The proposed development would comprise a variety of finishes, which include sandstone, brick, glass, Colorbond and render. All of these finishes are currently found within existing buildings within the proposed Town Centre Conservation Area. The proposed development would therefore use similar materials to those already evident in the street without attempting to copy a particular style of building;
- The roof form, and vertical and horizontal articulation of the design of the proposed buildings would be sympathetic to the variety of building styles found in John, Elizabeth, Exeter and Mitchell Streets, where development ranges from the mid nineteenth century to the late twentieth century;
- The heritage listed buildings along Mitchell Street would be respected by the proposal as the proposed development adjoining the properties would be set back by 8 metres with landscape buffers and building heights of only two storeys adjacent to the properties. Similar roof forms to those found in the existing buildings and roof forms that pitch away from the houses would also ensure that the historic setting of the dwellings along Mitchell Street is respected;
- An obvious effort has been made to break up the bulk of the facility by the increased number of smaller buildings as opposed to fewer, larger buildings. This is more consistent with the general development pattern of the existing heritage stock within the Camden Town Centre;



- The proposal would respect the historic setting of the Wesleyan Church House at Elizabeth Street as the proposed design seeks to separate the single storey cottage from the development with a green park that acts as a buffer and the landscaped entry roadway would also maintain the green space next to the house. The scaled down building element to Building No. 11 that is closest to the property boundary also seeks to maintain streetscape continuity and respect the scale of the dwelling as much as possible;
- Camden Council's Town Centre Strategy recognises that Post-War development within the town centre, which includes the Camden High School, generally falls outside the period of significant heritage buildings and are contrary to the predominant pattern of development. The demolition of the existing buildings on the site would therefore not remove a key element that provides evidence of the historical development of the town;
- The proposed contemporary design of the new development would respect the setting and details of significant buildings which surround it. In particular, the buildings along the street alignments have been given a variety of setbacks which reduce the overall bulk of the development when viewed from the street and give the appearance of several developments of a smaller scale which is sympathetic to the historic subdivision pattern of the town centre;
- The proposed buildings engage a design that uses materials that make the buildings easily identifiable as contemporary development rather than using faux heritage details on the new buildings. This approach to new development in the proposed conservation area is in keeping with the principles of the Burra Charter;
- The proposed additional plantings along Exeter Street would assist in creating a 'buffer zone' between the rural character of the Town Farm and the proposed new buildings;
- The street façades of the proposed buildings are designed to read as two storey edifices consistent with the surrounding heritage stock generally. This is achieved by setting the third storeys back behind the façades and also through the use of

attics within roof forms. This allows the streetscapes to be compatible in form and height to the surrounding area;

- The proposed feature signage wall and sculpture at the corner of Elizabeth and Exeter Streets would contribute to the creation of a landmark entrance to the new site which is a strategy for the Camden High School precinct outlined in the Town Centre Strategy. This space also presents opportunities for interpretation of the site in accordance with a future Interpretation Plan. The opening up of this plaza area would also act as a transitional space between the rural character of the Town Farm and the proposed residential and commercial development on the site;
- The proposed redevelopment of the site would bring an important part of the Camden Town Centre back into use and make an overall positive contribution to the streetscape by reactivating the street frontages with the provision of commercial space at ground level and this would also act as a transitional space between the rural character of the Town Farm and the Town Centre;
- The proposed redevelopment of the Camden High School site ensures the ongoing economic viability of the Camden Town Centre, which is a key principle of the Camden Town Centre Strategy; and
- Although none of the existing buildings on the Camden High School site embody sufficient local heritage value to warrant their retention, we recommend that the buildings and their setting be recorded through photographic archival recording in accordance with the most recently published guidelines set by the Heritage Branch of the NSW Department of Planning prior to their demolition;

Finally, to complete this assessment, we are encouraged by the Heritage Branch of the Department of Planning to address the following three questions;

- What aspects of the proposal respect or enhance the heritage significance of the item or conservation area?



**Response:** The proposed redevelopment of the Camden High School site respects the significance of the surrounding heritage items and the proposed heritage conservation area by; ensuring that the new development is sensitive to the adjacent heritage listed Nant Gwylan as well as the other surrounding listed heritage items; ensuring that the landscaped setting of the place is preserved by maintaining mature trees on the site as well as providing a sensitive landscaping strategy; ensuring that the contemporary design of the new development would respect the setting and details of significant buildings which surround it in terms of materials, bulk, heights, form and scale; allowing space for interpretation of the site in the open plaza area; and by allowing for the continued use of the site.

- What aspects of the proposal could detrimentally impact on the heritage significance of the item or conservation area?

**Response:** Ordinarily, any modification to an item located in the vicinity of other heritage items would incur some loss of integrity to the heritage items. However, if executed in an appropriate manner such that the modifications are made to clearly respect the heritage significance of the items, then the potential loss of integrity can be mitigated. We are of the opinion that the proposed redevelopment of the Camden High School site has been executed in a manner that is sympathetic to the heritage features of the surrounding heritage items, as well as the proposed heritage conservation area.

- What sympathetic solutions have been considered and discounted and for what reasons?

**Response:** Rappoport Pty Ltd was not involved in the design development phase of the subject proposal, however, for the reasons enunciated in this report, supports the scheme in heritage terms. It also recommends that the buildings on the site in their current setting

be recorded by means of photographic archival recording using the guidelines provided by the Heritage Branch of the NSW Department of Planning.