

# *Camden Residents' Action Group*

*Incorporated*

*Camden – Still a Country Town*

**Website:** <http://www.crag.org.au/>

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6 July 2023

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Dear General Manager,

**Re: DA 2022/1089/1**

**16 Old Hume Highway, 40 and 42 Macquarie Avenue  
Camden**

*Demolition of existing dwellings, construction of 10 x 2 storey townhouse  
development and strata subdivision*

This is our third submission on proposals to develop the corner site of Old Hume Highway and Macquarie Avenue. Our first submission was on previous DA 2020/702/1, withdrawn on 28 April 2021, for 22 units across three storeys on a larger site including the whole of 40 Macquarie Avenue (at the corner of Murrandah Avenue).

Our previous objection on this DA (24 January 2023) was for 10 two-storey townhouses. Our submission concluded that the number of dwellings on the development area was maximised at the expense of amenity and sustainability. We were also concerned about non-compliances with Camden DCP. The re-notified DA description still refers to 10 two-storey townhouses but we understand that what is now proposed is 8 townhouses, 7 with 4-bedrooms and 1 with 5 bedrooms. We also note other amendments to the proposal including variations in sizes of the townhouses and their siting, and separate access to Unit 8 from Macquarie Avenue.

We are pleased to see the reduction in density and what we perceive as probable compliance with most if not all DCP controls. Whilst we appreciate the housing shortage in NSW and that the zoning is medium density residential, it is very unfortunate that the DA involves removal of two interwar and substantial brick homes and their mature gardens. Such a loss of Camden's history and character is not in the community's longer-term interest.

Our concerns about sustainability and compliance with some DCP provisions remain.

- The proposal replaces 2 dwellings with likely less than 8 bedrooms with 8 dwellings with 33 bedrooms, thus increasing density, traffic volume and noise on site and within the area. Increased population and corresponding infrastructure are planned for the SW Growth Sector, not South Camden where additional population pressure will never be mitigated. The amenity of current residents of the area would be reduced by this proposal and the amenity of future residents of the multi-dwelling housing is questionable.
- The tree canopy and leafiness need to be restored as soon as possible. It is indeed unfortunate that a number of very mature trees are to be removed.

No new landscape plan for revegetation of the site is publicly available. It is important to the highly valued Camden township, both streetscapes, the carbon footprint and mental health of residents that restoration of canopy cover and leafiness be expedited with maximum plantings using the largest pot-sizes available.

- The landscaping and build coverage of the site, according to the amended architectural plans, complies with the DCP (4.2.6 and 4.6). However, the plan makes
  - no provision for onsite parking of service vehicles
  - no accessibility for people in wheelchairs and lesser mobility as required to be considered under DCP 4.6. There is no provision for disabled parking.
- The new architectural plans state that the proposed proportion of landscaped area is 31.08%, slightly in excess of the minimum of 30% (DCP 4.2.6). Although reduction in number of townhouses and amended configuration of site coverage has allowed for additional landscaping, we request that Council check that this percentage calculation does not include any hardstand or landscape areas of less than 1.5 metres in width, as the landscaping still appears insufficient for 8 dwellings.
- DCP 4.6 Multi-Dwelling Housing (11) requires that bedrooms be located away from driveways. As shown in the amended architectural plans this is clearly not the case, and given the number of units and number of bedrooms proposed it is unclear how compliance with the DCP could possibly be achieved.
- The Acoustic Report identifies traffic noise as an issue and concludes that all kitchen, dining, living areas and all bedrooms of townhouses 1-6 closest to Old Hume Highway must keep windows closed to achieve indoor target noise levels. This is another indicator that the site layout and number of dwellings needs to be reconsidered.

- Ratings achieved for all the townhouses under the Nationwide House Energy Rating Scheme (NatHERS) were less than 7-star which means they will not be comfortable without heating and cooling. We understand that the National Construction Code has already or is about to introduce a minimum 7-star rating, so there may be an issue of compliance. In any case as this is a new build the architectural plans should be aiming for a high star rating. This is the socially responsible approach from a cost-of-living perspective of future residents and a sustainable carbon footprint perspective (solar may not be an option, or may not provide the energy required for 4- and 5-bedroom homes given the roof sizes and aspects).
- Future residents also need assurance of the sustainable build quality of the townhouses. We suggest that any development consent restricts building contractors used to those demonstrating a minimum 3-star rating under the Independent Construction Industry Rating Tool (iCERT).

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We are not fully convinced that the amended architectural plans comply with the spirit and letter of all Camden DCP provisions and we ask Council to use its expertise to ensure that it does.

Overall, whilst we appreciate that this is the third iteration and attempt to comply with the DCP, the overriding driver remains maximisation of return rather than a quality contribution to housing and community. The number of bedrooms proposed is clearly an overreach.

We see little merit in the proposal from the viewpoints of its future residents, the Camden community or environmental sustainability.

Please refuse this iteration of the proposal.

Your sincerely,



Glenda Davis  
President