

Camden Residents' Action Group

Incorporated

Camden – Still a Country Town

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27 September 2023

Dear General Manager,

RE: DA 2023/483/1

9 Broughton Street CAMDEN

Construction of a new commercial building, carparking and rectification work to a partial demolished building

This proposal is for a commercial development, within Camden's Heritage Conservation Area (HCA), of an original single storey cottage and the addition of a two-storey new build behind it. As such it needs to meet the conservation and heritage objectives and controls in Camden LEP and DCP. Unfortunately, we see little attempt to meet them in the design of the new build addition.

There is no doubt that the streetscape, and although not individually listed, the original cottage and its site contribute to the integrity of the HCA. Certainly, what is proposed is an inappropriate infill design for the HCA and presents a jarring contradiction in relation to the original cottage, its neighbours, and within view lines from the adjacent public carpark.

We strongly disagree with claims in the Heritage Impact Statement (HIS) that the proposed building works will not adversely impact the heritage significance of the HCA and surrounding heritage items. Assertions in the HIS that the new build at the rear of the site would be minimal in size, of appropriate scale, form and colour and material palette are not substantiated and clearly wrong.

The HIS provides no supporting evidence or reasoning that the new build is compliant with the planning instruments and will not degrade the heritage significance of the area.

Non-compliance with LEP and DCP

We are not convinced that even with the completely anomalous flat roof that the height of the new build does not exceed the LEP 4.3 height of building standard plus 10%. The Statement of Environmental Effects (SEE) claims that the height is 7.39m. The HIS (p. 39) states that the maximum height is 7.48m. Although not all measurements are clearly included, the Architectural Plans (G elevation) indicate the maximum height of the building above natural ground level¹ to be in excess of 7.9m. An automatic referral of the DA to the Local Planning Panel would seem to be required.

This height exceedance may also be the reason for trying to minimise the height with an anomalous flat roof which is completely out of character and does not comply with the DCP 2.16.3 control of retaining the original character of the HCA roofscape.

We submit that this DA does not comply with LEP 5.10 to conserve the environmental heritage of Camden and conserve the heritage significance of heritage conservation areas, including associated fabric, settings and views.

Camden DCP (2.16.3; 2.16.4) requires that new work in the HCA ensure its integrity, including its visual catchment, and make a positive contribution. In particular the DCP requires that

- new build design interprets and complements the HCA's general form, bulk, scale, height, architectural detail and other significant elements;
- new build additions are compatible with the existing streetscape;
- design, materials, finishes and detailing are appropriate to architectural style, building type and historic context;
- the existing unique pattern, pitch, materials and details of original smaller roof forms be retained, and that secondary roof forms should be subservient in form, scale and location to the main cottage roof;
- colour schemes are sympathetic to the character of the historic context;
- the rural character of Camden town centre be retained.

The last point is reiterated in DCP 5.3.1 which requires that development must be consistent with the Camden Town Centre Urban Design Framework (UDF) which states as its built form place principle-*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.* There is nothing about the design of the proposed new build that contributes to Camden's unique character or its identity as a rural town.

¹ *El Khouri v Gemaveld Pty Ltd* [2023] NSWCA 78 determined that if the proposed building exceeds the height limit above any point in the existing ground level on which it is to be built, it exceeds the maximum height for the purposes of the height development standard.

The proposed boxlike new build bears no similarity to the architecture of the building stock of the HCA, the extant cottage or the streetscape and would degrade their integrity. We object on the grounds of non-compliance with all the above development control points.

Anomalous Infill

The development currently in progress at the rear of No 7 next door, as shown below, attempted to be sympathetic to the original cottage and HCA, particularly in relation to materials and roof form.



7 Broughton Street Camden



Source: *M.A.D.S. 25 June 2020 Architectural Plans*

In contrast, clearly the artist's impression of the architectural design for a building at the rear of No 9, as shown below, bears no similarity to the original cottage or to any characteristic of the HCA. The proposal has also ignored the Camden Material and Colour Guide² for undertaking works to heritage places.



9 Broughton Street Camden

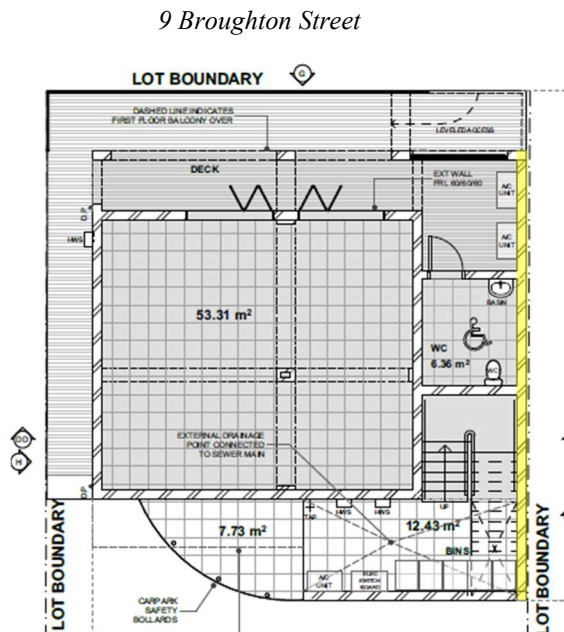


Source: *FJA Designs 8 Aug. 2023 Architectural Plans*

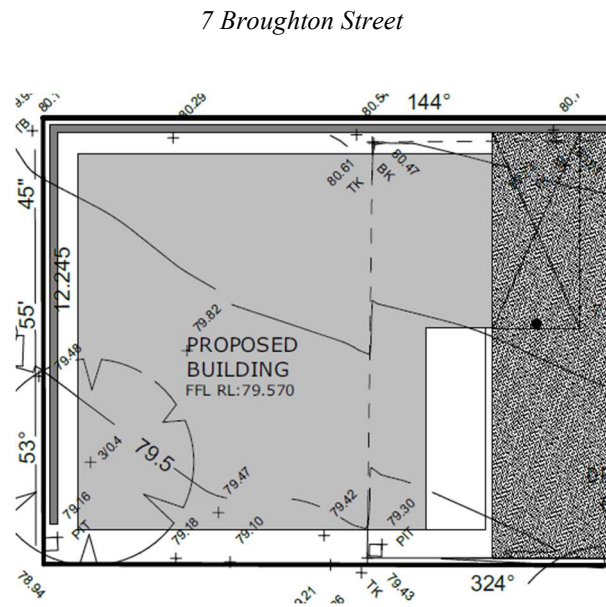
The proposed new build makes no attempt to be compatible with its neighbour and dominates the fine grain of the original cottages and the human scale streetscape. With its uncharacteristic flat roof, height limit exceedance and looming non-traditional form, there is nothing about the design that contributes to Camden's renowned heritage and rural town character. Quite the opposite.

² <https://www.camden.nsw.gov.au/assets/Uploads/Camden-Council-Material-and-Colour-Guide-2023-17.06.23-Final-Version.PDF>

As shown below the proposed new build at No 9 is very close to the boundary of No 7 and its new build currently under construction.



Source: FJA Designs 8 Aug. 2023 Architectural Plans



Source: M.A.D.S. 25 June 2020 Architectural Plans

This close juxtaposition of two very dissimilar buildings is inharmonious, unexpected and aesthetically unfitting under even the most subjective criteria. The designs of the neighbouring additions to the original cottages are completely different and would be anomalies in the streetscape, and as viewed from the back areas of the two cottages and from the public car park.

We find no reasoned justification in the documentation accompanying the DA for the flat roof, the overbearing monolithic box form, the choice of material and colour palette, non-traditional window shapes with black aluminium framing, selected vertical black aluminium façade feature, proximity to No 7 boundary and so on as covered above. The design is extraordinarily inappropriate within the HCA and streetscape, in such close proximity to a much different neighbouring new build and as viewed from the adjacent public carpark.

This DA provides absolutely no evidence that this design is complementary to the original cottages or the HCA. Indeed, it would be detrimental to Camden’s renowned heritage significance and rural town sense of place.

We sincerely request and trust that this DA will be refused and sent back to the drawing board.

Yours sincerely,

Glenda Davis, President