

Camden Residents' Action Group

Incorporated

Camden – Still a Country Town

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24 April 2023

Dear General Manager,

Re: 2023/153/1

Carrington 90 Werombi Road Grasmere

Construction of a four-storey building and use as seniors housing comprising 42 units, undercroft carparking, landscaping and associated site works.

The Statement of Environmental Effects (SEE) describes this proposed seniors' living development as serviced self-care housing over four storeys, to be known as Woodland Assisted Living Apartments, including redesign of the Mary McKillop Facility carpark and tree removal.

Although, as stated in the SEE (1.6), assisted living apartments usually take the form of smaller one-bedroom apartments with a kitchenette, this proposed new housing is comprised of 13 x 1 bedroom, 20 x 2-bedroom, 5 x 2 bedroom plus study and 4 x 3-bedroom apartments (SEE 1.6).

Camden LEP permits development of residential flat buildings and seniors housing on the site (Schedule 1(8)). The inclusion of residential flat buildings is odd given the rural area, and it is not clear what it means. SEPP (Housing) 2021 does restrict building height to 9.5m, which is also the maximum height under Camden LEP, and stipulates design principles to ensure visual and acoustic privacy and solar access. We note that the SEPP no longer precludes seniors housing in the Metropolitan Rural Area (MRA) which includes the Carrington site.

The development site is located in the central area of the Carrington Campus which includes Mary Mackillop residential aged care facility and single storey independent living homes. It is a major development affecting the Carrington community and their amenity, particularly the amenity of those with homes closest to the construction site.



Source: Jackson Teece Architectural Plans

ISSUES:

Carrington Community Participation

Planning authorities are required to under their Community Participation Plans to have regard to certain principles (EP&A Act 2.23(2)). These include that a community has a right to be informed about planning matters that affect it, that community participation methods should be inclusive and appropriate having regard to the significance and likely impact of the proposed development.

The Camden Community Participation Plan commits to tailoring its approach to account for diverse communities and providing alternative means for people with additional needs to provide feedback. As well as Council's responsibilities, the proponent of a major development should actively seek views that are representative of the affected community before lodging a DA (EP&A Act 2.23 (2f)).

As advised by Camden Council on 21 April 2023:

- in meetings between Council and Carrington management, Carrington was tasked with doing due diligence in letting its residents know and seeking their views;
- the only participation opportunity provided by Council itself was a notice on the perimeter fence, to be visible to neighbours and passers-by and not necessarily for the benefit of Carrington residents. The notification map shows that affected residents within the Carrington campus were not notified, only the surrounding property owners.

By all accounts Carrington management did not do due diligence by informing residents of plans and timeframe or seek their views. Residents have not participated in this proposal although they are the most directly affected by it. Whilst some residents may have seen a sketch and attended a Carrington presentation last year, many are completely unaware of the timing of this public exhibition, and their right to object.

In fact, there has been little opportunity for residents to become aware of the actual proposal and educated about it without help from outside the campus.

Comments to us include:

The notice on the fence - yes I saw that early am of 13 April, UPSIDE DOWN! By late morning, that had been rectified, but no one admitting fault. The notice is right at the middle 1 of 3 entries to Carrington, so creating a serious hazard to anyone reading it. It is effectively remote to anyone using a walker or wheelchair, and there's lots of them here.

The only written communication to the whole of Carrington on this project was in the October edition of the Carrington Courier - 4 sketches and absolutely no narrative. That's 7 months ago! A timeframe was never set as I recall.

The CEO should be well aware of residents' being 'not happy'. I've written 5 letters to him, and only response was a site visit with the appointed Landscape, and relating only to the laneway diversion, and the effect of that on my adjacent Unit. I was given a detailed landscape plan only for the laneway diversion. I'm not aware of anyone else knowing about it until now. Carrington has not directly communicated with all affected residents.

As well as the restaurant, which is under cover, there is an outdoor open area. That is shown on the plan given to me by a community non-resident which is tagged 'Floor Plan Level 02'. Level 2 in a 4-storey building? The Architects are surely misleading with that description. As to claims that it 'should not overlook homes', I don't agree with that despite vegetation said to block that.

These comments indicate that residents have been given little opportunity to know about the proposal or have been misled regarding timing of this development and future developments that are already flagged.

It is extraordinary that surrounding properties were individually informed, but Carrington residents, some living in single storey units within metres of the proposed new build were not given the same courtesy, and certainly no effort was made to explain to them how their amenity would be affected during and after construction.

This lack of consultation and information is not acceptable by any standard.

The DA must be shelved until appropriate and inclusive methods are employed to ensure that proper Carrington community participation to which they are rightfully entitled takes place.

Quiet enjoyment of homes

As explained above Carrington residents are either unaware or stressed about how their amenity is to be affected by this development proposal. Those who are aware are subjected to stress and the unknown of how such a large development will affect their lives.

Residents signed up for retirement in peaceful surroundings of low density, and that is potentially to be destroyed without consulting them.

Everyone is entitled to quiet enjoyment of their homes.

The documentation accompanying the DA does not provide any assurance. The SEE briefly refers to “mitigation measures” but apart from acknowledging there will be an increase in traffic and noise and some reference to careful landscaping does not explain how existing residents will actually be affected during construction and after it is completed.

Height

Both the SEPP and the LEP restrict the building height to 9.5m. At 15.62m and four storeys the height exceedance is extreme. Arguably it requires consideration under a planning proposal, not a DA 4.6 variation request.

It is not explained in the documentation why the building needs to be higher than permitted but instead makes the claim that it will *not result in any adverse environmental impacts, in terms of amenity impacts, overshadowing nor will there be any adverse impacts given the nature of the departure and the location of the building within the Campus...As such the development offers a level of amenity suitable to the proposed development* (Clause 4.6 Variation, 4B).

This is a claim that is not evidenced and has not been tested by engagement with the Carrington community. It is clear that the amenity of those living closest to the proposed development will be adversely affected.

Visual and acoustic privacy

The SEPP requires appropriate site planning, including considering the location and design of windows and balconies, the use of screening devices and landscaping, and ensuring acceptable noise levels in bedrooms by locating them away from driveways, parking areas and paths.

The SEE (5.6.6.2) claims that the proposed development has been designed to maintain visual and acoustic privacy to adjoining dwellings within the site but fails to address the looming presence, multiple viewing points over four storeys. The site design and 42 living units in the area must create additional traffic and associated noise as the number of residents and vehicle movements are increased many-fold.

The diagram below clearly shows the towering character of the proposed building. It shows the proximity to existing residences, one of which is shown and how they will be overlooked and subjected to additional noise, including from the large outdoor area of the restaurant at the top.



Source: Jackson Teece Architectural Plans

Clearly the visual and acoustic privacy of the residents of nearby single storey homes must be adversely affected.

Landscaping cannot possibly protect their visual privacy or necessarily sufficiently mitigate their acoustic privacy.

Overshadowing

The SEPP requires that the design not adversely impact the amount of daylight on neighbouring buildings.

The shadow diagrams provided in the SEE (6.3.5) clearly shows varying adverse impacts on the single storey homes.

Evacuation during fire and floods

Evacuation of a four-story building if there is a fire is problematic when the residents are not necessarily able-bodied. Lifts cannot be used. It is not clear how fire safety is guaranteed. This is probably a factor in the SEPP limiting the height of buildings.

The recent Camden floods demonstrated that roads are cut and that by road Carrington is isolated. Residents needing, for example, urgent medical care during those times would need to be airlifted.

It is not clear how staff are to attend for work at Carrington as they too will be cut off.

The Carrington campus requires the facility to be able to safely evacuate residents in all circumstances. This not only means providing for air transport but also designing building in a way that residents can be quickly reached and taken to safety. The greater the number of storeys the greater the risk of not managing to guarantee safety for residents of upper floors.

Visual prominence

Although seniors housing is no longer excluded in the MRA the area is rural and low density residential. The proposed development is incompatible with the character of the area, and sets a precedent for would-be developers to argue for further inappropriate and unwelcome erosion of the character of the MRA.

Heritage and environment impacts

The Heritage Impact Statement (HIS) claims that the proposal will cause an acceptable level of heritage impact on the heritage significance of Carrington Hospital because views from the main hospital building will be limited to the upper extent of the new structure which represents a minor amplification of an existing heritage impact.

The HIS further claims that despite the increased massing and height, and being taller than surrounding buildings that the new apartment building will sit comfortably within the existing landscape.

The proposed height exceeds the SEPP and Camden LEP height limit by nearly 65%. Topography cannot successfully hide a four-storey 15.62 m tall building of stark angular lines with a large footprint.

The Carrington landscape is being transformed piecemeal with large contemporary buildings that do not complement the heritage listed buildings of Carrington Hospital, Grasmere, gardener's and Masonic cottages, and see loss of the rural landscape that contributes to the identity and character of Carrington.

The HIS assesses that overall, the proposed works have no impact to the built heritage, and a negligible impact on the views and settings of the Carrington Hospital. The maximum height standard is set to limit development to a scale that is appropriate to its location. Given that the Carrington site contains heritage listed buildings and is within the MRA's semi-rural low-density landscape of Grasmere it is illogical to assess that there is no impact.

Conclusion

We are appalled that the residents of Carrington, those most directly affected, have not been properly informed and consulted about this proposal. They are either unaware or stressed about how their lives are to change if this proposal is approved. Camden Community Participation Policy must be followed and appropriate methods of engagement found.

We find no compelling arguments why the proposed building needs to exceed the SEPP and Camden LEP height limit so excessively. One reason is economic return, but that is an argument that can be used by any developer and insults the planning framework system which all good citizens respect. Such an excessive height exceedance should at least be pursued through a planning proposal so that it can be assessed broadly in the context of Camden's LEP and strategies.

Please refuse this DA as it stands. The height and proximity to existing homes need to be reduced. Carrington residents must be properly consulted and their fears addressed.

Yours sincerely



Glenda Davis
President