Camden Residents' Action Group Incorporated Camden – Still a Country Town

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Camden Local Planning Panel 14 December 2023 Re: DA 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.

Thank you I speak on behalf of Camden Residents' Action Group.

We find this DA for a four-storey building of assisted living apartments to be disturbing and submit that it should not be before us for both equity and planning reasons.

On equity grounds we are astounded by reports from residents of Carrington about lack of consultation and notification of this DA although the amenity of many will be affected by it including during construction.

Under the EP&A Act 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). It is understood in speaking with Council that Carrington management were tasked with informing and consulting with residents. By all accounts this did not happen.

The council notification map shows that properties immediately surrounding Carrington were officially notified of this DA, but the residents themselves were not. Camden Community Participation Plan commits to accommodating diverse communities and providing alternative means for people with additional needs to provide feedback. This is especially important given the varying levels of incapacity of Carrington residents and their lack of access to internet and email. Those who were informed of the DA by community members and did manage to lodge a submission were advised of the panel hearing by letter which was dated Monday 4 December,

but did not reach them until Friday, at which time they still had to somehow arrange access to the agenda report at council offices. Similarly, they find it difficult to attend and speak at this panel hearing.

Although Carrington is their home they have been kept in the dark.

Surely this cavalier exclusion of the more vulnerable in our community from information and the means to defend what it important to them is unworthy of us and should not be possible within the planning process.

It also seems that there is less consideration than society would expect to the health and safety of the future 80+ year old residents in the assisted living apartments. The SEPP for seniors housing effectively limits the height of buildings to two storeys, which also limits reliance on lifts. Obviously, there must be a workable plan for evacuation of many with varying mobility if there is a fire in an apartment. In times of flood carers will find that Carrington is cut off and access to hospitals and other services is extremely difficult with current road and bridge infrastructure. We could find no plan for how residents will be assured of the living assistance they require.

On planning grounds, this DA heralds a major divergence from what is expected in this metropolitan rural area which is zoned large lot residential. The height variation sought for this building is extreme at 16.2m. It is grossly inconsistent with both its location and the SEPP seniors housing height limit of 9.5m.

The Agenda report states that *The existing residential density and dwelling typology at Carrington Care is currently undergoing change and being replaced by new higher and denser forms of Seniors Living.* The DA documentation clearly shows that this DA is only stage 1 of five stages.

We submit that this planned transformation through a series of rolling DAs needs to be included in a planning proposal to ensure alignment with existing planning strategy.

From the community perspective this one DA is already regionally significant. We also question the capital investment value dated January 2023 being less in December than the \$30m threshold particularly as some costs have been excluded.

We request that the DA be refused because the residents have not been consulted and because it is part of a much larger staged development that rightly requires a planning proposal.

610 words