

Camden Residents' Action Group

Incorporated

Camden – Still a Country Town

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Face Book:

<https://www.facebook.com/CRAGcamdenresidentsactiongroup/>

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General Manager

Camden Council

70 Central Avenue

Oran Park 2570

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4 November 2024

Dear General Manager,

**Re DA 2024/142/2
3 Exeter Street Camden**

Division 8.2 Review - Demolition of existing dwelling, construction of a shed (for the storing of machinery & vehicles for hire & sale), small office within shed, regularisation of completed land forming and use of property as a vehicle sale and hire premises, four at-grade car parking spaces and hardstand area

We were concerned to read in the documentation about the unauthorised use of this site since 2020 including widening of the driveway, reducing width of a road hazard sign, uncontrolled filling and its potential contamination. The site was purchased in 2019 presumably for its current operations of purchase and sale of any size commercial vehicles including trucks, prime movers, buses, coaches, farm machinery and commercial fleets¹. Whilst we are supportive of appropriate small business and entrepreneurship in historic Camden, we do not support this type of operation especially when it has been undertaken without the community safeguards of assessment and approval.

The first application, DA2023/181, seeking to regularise what was occurring on site was lodged on 30 March 2023 and was withdrawn on 20 April 2023 requiring additional information. DA 2023/430 was lodged on 7 August 2023 and was comprehensively refused by the Local Planning Panel on 14 December 2023. The current DA 2024/142, was again comprehensively refused by the Local Planning Panel on 20 August 2024 for many similar reasons.

¹ IMMS <https://www.immspl.com.au/truck-sales>; <https://www.tradefarmmachinery.com.au/search/dealer-5209692>
Accessed 19 October 2024

We note that additional documentation for the 8.2 LPP review of the determination against current DA 2024/142/2, has been provided to attempt to obviate the issues raised in the refusals. In examining these we find that the issues raised in our previous two objections stand. They are appended and we ask that those objections be included with our following rebuttal of the arguments contained in the responses to the reasons for refusal.

Clearly the proposal on this site has many planning impediments including:

- being largely in a floodway which normally prohibits any development,
- the type and intensity of land use within the MU1 zone,
- ecological concerns,
- being located within Camden's Heritage Conservation Area (HCA) with controls against development that would detract from its character and significance.

Flood Risk Management Response

This response headed as *Flood Risk Management Plan for proposed Commercial Development [Rev#2]* is dated 19 July 2024 and we assume would have been available before the LPP refusal on 20 August 2024. It acknowledges that the site is mainly within a floodway which is entirely categorised as H6 hydraulic hazard in the 1%AEP event (high hazard) and is therefore unsafe for vehicles and people with all building types considered vulnerable to failure.

No development in a floodway is permitted under Council's 2023 *Flood Risk Management Policy*. The Response claims that the development is minor and that Council should assess it on its "merit". *NSW Flood risk management manual*² does advise that councils adopt *a merit-based approach for all development decisions in the floodplain, taking into account social, economic and ecological factors, as well as flooding considerations*. However, "merit" is defined from the community perspective, not that of a would-be developer. Development in a floodway not only diverts the natural flow of water but is hazardous to people and property. No building, no matter how constructed is safe in a floodway. The Response does not suggest what possible merit may be associated with the proposal. Council has not seen any merit in floodway development, and has prohibited it.

The other consideration is the heavy vehicles on site, many requiring special licences to drive, and how they can be moved in good time and not make necessary evacuations and road congestion more difficult for the community. We also note that some items currently for sale would need to be transported by loading onto another large flat tray truck or connected to another vehicle to be towed.

Vehicles must be moved as being in a floodway they can be dangerously swept away as occurred in 2022 flood event in Camden.

² <https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Water/Floodplains/flood-risk-management-manual-2023-230220.pdf>



As stated in the Response the flood depths are large at over 4m in the 1%AEP flood event and flow velocities are 0.5 to 1.0m/s. As shown below in the graph below sourced from *NSW Flood risk management guideline FB03*³ the risk of storing any sized vehicle, machinery or trailer on this site is unacceptably hazardous to the community.

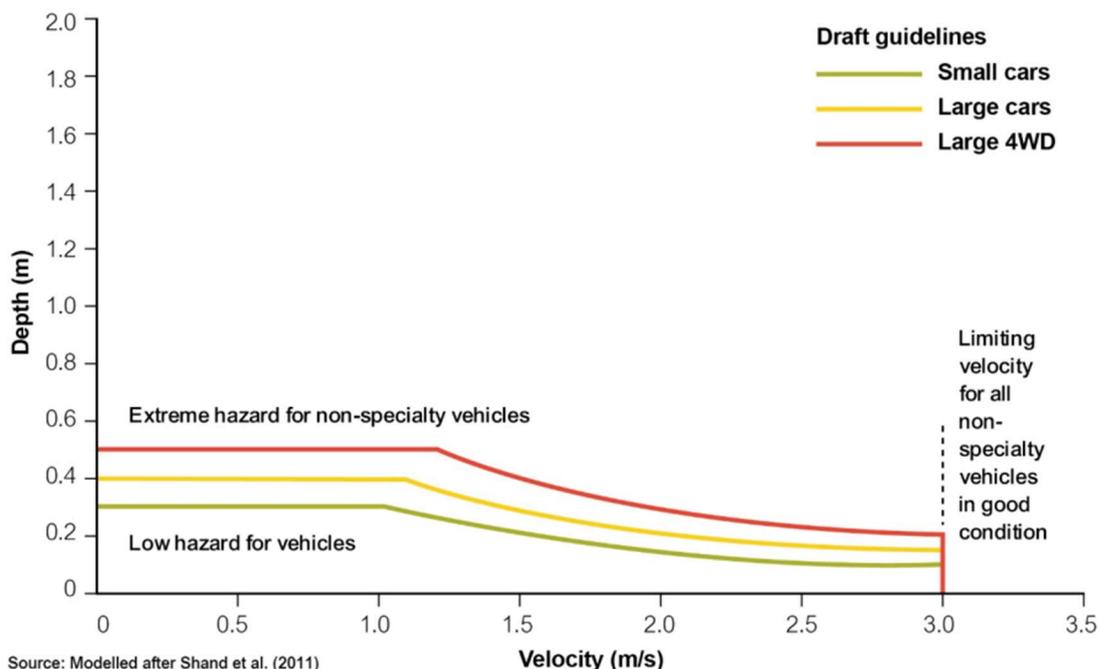


Figure 3 Thresholds for vehicle stability in floods

Source: Figure 9 AIDR 2017b; modelled after Shand et al. (2011).

On flood risk grounds we submit that this business cannot be permitted.

³ NSW Department of Planning and Environment June 2023 *Flood hazard NSW Flood risk management guideline FB03*
<https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Water/Floodplains/flood-risk-management-flood-hazard-230231.pdf>

Land use in MU1 zone

Appended is a printout at 19 October 2024 from *Interstate Motor Marketing Services P/L - New & Used Farm Machinery for sale or hire*⁴ of items for sale at Camden.

As well the site being clearly too small for a heavy vehicles and machinery premise, or even traditional vehicle sales and hire activity, we question whether this business operation is permitted in the zone. Given the heavy nature of the vehicles and machinery, we consider that rather than Vehicle Sales and Hire, it is more accurately described as an Industrial Retail Outlet or even a Transport Depot when including the water carting business⁵, both of which are prohibited uses.

The proposal certainly does not meet the zone objective of ensuring an active street frontage to attract pedestrian traffic or contribute to vibrant, diverse and functional streets and public spaces. Instead, it is a jarring anomaly at a main gateway into the HCA and with the rural serenity of the Camden Town Farm and human scale cottages. It detracts from pedestrian amenity associated with heritage walks, Louella Davies walkways, the fresh produce market and the substantial rural public spaces at the north of the town. It also does not meet the zone objective of minimising conflict between land uses. Instead, it conflicts with the land uses of many businesses relying on the country character of the 1840 Macarthur town and is also not compatible with many cultural activities that take place in the town including the nearby Town Farm.

Ecological concerns response

Whilst not finding overwhelming evidence of contamination, the site contamination assessment dated August 2024 refers to contaminants of potential concern as asbestos and Total Recoverable Hydrocarbons (TRH). The assessment states that the TRH findings are most likely from storage of vehicles and machinery on site and unauthorised filling. The continuation of the heavy vehicle operations on site provide potential for more TRH seeping into the ground, into the ground water or being flushed into waterways in flood events, particularly as the site is largely within a floodway.

Contamination risk is another reason why this land use should be prohibited.

⁴ Trade Farm Machinery 19 October 2024 *Interstate Motor Marketing Services P/L - New & Used Farm Machinery for sale or hire* <https://www.tradefarmmachinery.com.au/search/dealer-5209692> accessed 19 October 2024

⁵ IMMS <https://www.immspl.com.au/water-carting> accessed 19 October 2024

Heritage Impact Statement Response

It is understood the response is in defence of the author's Heritage Impact Statement (HIS) lodged with the DA. The HIS was criticised because it was a cherry-picked and superficial desktop exercise with many inaccuracies. The response to criticisms repeats the errors about the HCA listing and the significance of the heritage town as follows.

The listing for the HCA indicates that all fabric up to the mid- 20th century is contributory. It tells the story of the 1836 town design of the Macarthur Brothers and Sir Thomas Mitchell, as its grid became infilled. The response shows a lack of understanding of Camden's very significant history within that of NSW. The interpretation of the wording in the HCA listing provided in the response is clearly incorrect. A reasonable reading of the listing indicates that demolition of fabric and new construction since mid-20th century is much more likely to be non-contributory within the original town plan.

The HCA was gazetted in 2010. The author refers to irrelevant non-contributory items such as Mitre 10 (founded in 1959) which took over the hardware business existing on site before 1985. The example of the development of the former high school site, which was approved in 2009, was a special case of contamination from the old gas works and government wanting a private developer to clean it up. Its approval was based on Council's acceptance that it is not to be used as a precedent.

Council should note that support of this particular development applicant does not create a precedent for all future development in Camden as the qualifications to consider variations under Clause 14(1) of the LEP is site specific and that every application should be assessed on its individual merits.⁶

The author makes another telling error in making no attempt to reconcile the proposal with 2018 Camden Town Centre Urban Design Framework (UDF), the outcome of a major project of Council. Consistency with it is required through Camden DCP. The UDF confirmed the high value of the town and the community's desire to retain its rural character as well as reaffirming the heritage protections in the LEP and DCP.

The author attempts to justify demolition of the extant cottage by referring to a NSW Land and Environment Court case and its Planning Principle⁷ on demolition within conservation areas.

⁶ Camden Council 8 September 2009 *Ordinary Council Meeting Report ORD04* (p.13) Available at <https://www.camden.nsw.gov.au/assets/pdfs/Development/Former-Camden-High-School-Site-Redevelopment/Camden-High-School-Site-Council-report-and-resolution-from-the-Ordinary-Council-meeting-of-8-September-2009.pdf>

⁷ NSW Land and Environment Court 2006NSWLEC66 *Planning Principle Demolition of contributory item in conservation area* Helou v Strathfield Municipal Council paras: 43-47 Available at <https://www.caselaw.nsw.gov.au/decision/549f84273004262463abec2e>

The author wrongly states that the first question posed in the Planning Principle is *What contribution does the individual building make to the significance of the conservation area?*

The first question to answer is in fact: *What is the heritage significance of the conservation area?* As stated in the Planning Principle the starting point is the Statement of Significance of the conservation area, and this indicates, as explained above, that being mid- 20th century it would be considered contributory to the history of the Macarthur town and is not anomalous as claimed in the HIS. The Planning Principle (para. 44) states: *A contributory item in a conservation area is a building that is not individually listed as a heritage item, but by virtue of age, scale, materials, details, design style or intactness is consistent with the conservation area, and therefore reinforces its heritage significance.* The author, without analysis, claims that the extant cottage is non-contributory, but takes no account of the HCA listing and does not appreciate the microcosm of history that the town represents.

In this case, from which the Planning Principle is derived, demolition was refused and the Commissioner made the final comment: *... had I reached a different conclusion on demolition further consideration would have been required of the merits or otherwise of the proposed replacement ...*

If the cottage were to be demolished the important question becomes, will the replacement enhance the conservation area? The Built Form Place Principle in the UDF is: *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.*

As the Planning Principle indicates, any replacement development on the site should be of such quality as to fit in to the conservation area (question 6) and even so the replacement does not address heritage impacts of removing the original (para 45). The HIS and Response do not address the impact of the proposal on the rural character and country town sense of place of a main gateway of the HCA.

Most telling is that what is proposed to take its place is most definitely NOT contributory, is inconsistent with the UDF, is anomalous and would detract from the heritage narrative and rural character of the HCA including the Town Farm.

Whilst we agree that demolition of the cottage could be justified as it is in a floodway, the Camden community would be rightly outraged by this closing statement in the response denigrating Council's planning instruments and its highly valued 1840 Macarthur town:

It is my opinion that there is no heritage significance in this immediate context that has been conserved nor that requires protection.

We support all of the reasons for refusing this proposed development as previously set out by the Camden LPP. The responses to the reasons for refusal do not make any material difference to them.

Given that it is within a floodway, we again respectfully request that Council consider voluntary purchase of the property and that the site, in the public interest, be returned to nature and enhance the rural character of the town.

Yours sincerely,



Glenda Davis

President

Appendices:

Items for sale at Camden 19 October 2024 *Interstate Motor Marketing Services P/L - New & Used Farm Machinery for sale or hire*

Previous submissions: 16 May 2024; 28 August 2023

Search for an item...

Refine Search...

Home » Search » Interstate Motor Marketing Services P/L

Interstate Motor Marketing Services P/L - New & Used Farm Machinery for sale or hire

Showing 1 - 16 of 16 result(s)

Sort By: Premium Ads

PREMIUM



11

IMMS Budget GreenSips \$105,000

2015 KENWORTH T409

» Listing Type: Used » Class: Prime Mover
» Stock Number: S1700

📍 Camden, NSW

📞 02 8999 7256 MESSAGE

MORE DETAILS

PREMIUM



13

IMMS Budget GreenSips \$159,000

TOYOTA LANDCRUISER GXL

» Listing Type: Used » Transmission: Automatic

📍 Camden, NSW

📞 02 8999 7256 MESSAGE

MORE DETAILS

PREMIUM



16



ATS 185,000

SCANIA R650

» Listing Type: Used » Class: Prime Mover

» Stock Number: S1676

» Camden, NSW

02 8999 7256

MESSAGE

MORE DETAILS

PREMIUM



19



\$79,200

DOOSAN DX55-9CN

» Listing Type: New » Class: 0-7 tonnes

» Category: Mini Excavator

» Camden, NSW

02 8999 7256

MESSAGE

MORE DETAILS

PREMIUM



15



\$110,000

KENWORTH T409

» Listing Type: Used » Class: Prime Mover

» Power - hp: 550 » Stock Number: SN1701

» Camden, NSW

02 8999 7256

MESSAGE

MORE DETAILS



9



\$99,000

BULLET ST3 FLOAT

» Listing Type: Used » Class: Dropside Trailer

Camden, NSW

02 8999 7256

MESSAGE

MORE DETAILS



15



\$78,990

MAXITRANS ST3

» Listing Type: Used » Class: B Trailer

Camden, NSW

02 8999 7256

MESSAGE

MORE DETAILS



5



\$18,790

PANTECH 1996 MAXICUBE PANTECH TRAILER

» Listing Type: Used » Class: Pantech

Camden, NSW

02 8999 7256

MESSAGE

MORE DETAILS



9



\$49,990

INTERNATIONAL T2650

» Listing Type: Used » Class: Prime Mover

» Stock Number: S98

» Camden, NSW

02 8999 7256

MESSAGE

MORE DETAILS



14



\$179,990

MERCEDES-BENZ UNIMOG

» Listing Type: Used » Class: Prime Mover

» Stock Number: S104

» Camden, NSW

02 8999 7256

MESSAGE

MORE DETAILS



24



\$69,990

DAF XF105

» Listing Type: Used » Class: Prime Mover

» Stock Number: S111

» Camden, NSW

02 8999 7256

MESSAGE

MORE DETAILS



14



\$69,850

MACK RM6866RS

» Listing Type: Used » Class: Hooklift

» Kms: 12,469

» Camden, NSW

02 8999 7256

MESSAGE

MORE DETAILS



24



\$86,900

SCANIA P320

» Listing Type: Used » Class: Refrigerated
» Kms: 937,640 » Stock Number: S110

Camden, NSW

02 8999 7256

MESSAGE

MORE DETAILS



11



\$105,000

SCANIA G480

» Listing Type: Used » Class: Prime Mover
» Stock Number: S102

Camden, NSW

02 8999 7256

MESSAGE

MORE DETAILS



14



\$229,000

KOMATSU D375A-5

» Listing Type: Used » Class: Crawler

Camden, NSW

02 8999 7256

MESSAGE

MORE DETAILS



19



POA

INTERNATIONAL F180

» Listing Type: Used » Class: Prime Mover
» Stock Number: S103

Camden, NSW

02 8999 7256

MESSAGE

MORE DETAILS

Read More

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General Manager

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16 May 2024

Re DA 2024/142/1

3 Exeter Street Camden

Demolition of existing dwelling, construction of a shed (for storing of machinery & vehicles for hire & sale), small office within shed, regularisation of completed land forming and use of property as a vehicle sale and hire premises. Four at-grade car parking spaces. Hardstand area

We refer to the objections raised in our submission on a similar 2023 proposal for the site (DA 2023/430/1), lodged on 28 August 2023 which is appended. Whilst we are supportive of appropriate small business and entrepreneurship in historic Camden, these objections stand in relation to this current DA. We find nothing in the 2024 DA documentation that obviates our concerns on flooding and heritage matters and the site contamination assessment raises further issues. We also refer to the many and detailed reasons for refusal of the 2023 DA listed by the Local Planning Panel on 14 December 2023.

We summarise our main objections as follows:

- **This development is prohibited on the site because it is within a floodway (Camden Flood Risk Management Policy 7.3.6).** Building in a flood way is dangerous for people and property and diverts the natural water flow to other properties. It is socially and economically nonsensical. **On this ground alone the proposal cannot go ahead.**
- The site is likely contaminated to the extent that the development cannot proceed under this DA. The contamination assessment concluded: ... *there are preliminary indicators that the on-site contamination may represent an unacceptable risk to human health or the environment in the context of the future proposed industrial/commercial land use... Further data is required to assess the extent of contamination and potential for groundwater contamination*¹.

¹ Ramboll April 2024 *Site Contamination Assessment* pp. 13, 14

- The site is too small to constitute a vehicle sale and hire premises, especially as the applicant advertises as specialising in any size commercial vehicles ranging through car fleets, tractors, utilities, buses, coaches and prime movers.² The site has already been over-crowded with a small number of heavy commercial vehicles and does not appear to be what is generally understood as a hire and sale premises. We therefore question the intended land use and whether it is permitted under the zone.
- We insist that heavy vehicle commercial activity is unsightly and inconsistent with expectations of the town's Heritage Conservation Area (HCA), its prime location at the entrance to the town along Macquarie Grove Road and being in such close proximity to listed heritage items including Camden Town Farm.
- Demolition of the extant cottage cannot be permitted. According to the HCA listing it contributes to the heritage significance of the town.
- The proposed development does not articulate with the public domain and would be detrimental to the streetscape.
- The proposed building:
 - exceeds the LEP height standard;
 - is of excessive bulk, scale and form;
 - is inconsistent with the existing and desired future character of the area;
 - is inconsistent with the fabric and development pattern of the colonial country town, its heritage status supported through Camden DCP (2.16; 5.3) objectives and controls and the Camden Town Centre Urban Design Framework. It would not enhance Camden's heritage nor contribute to it as a rural town³.

We certainly do not believe for the reasons explained above and most of those set out previously by the Local Planning Panel on 14 December 2023 that this proposal is acceptable. Development on this site is absolutely contra-indicated. Given that it is within a floodway, we again respectfully request that Council consider voluntary purchase of the property and that the site, in the public interest, be returned to nature.

Yours sincerely,



Glenda Davis

President

² Interstate Motor Marketing Services (IMMS) Available at <https://www.immspl.com.au/truck-sales>

³ Camden Town Centre Urban Design Framework *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*

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General Manager

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28 August 2023

Dear General Manager,

RE: DA 2023/430/1

3 Exeter Street Camden

Proposes the demolition of the existing dwelling and the construction of a shed and use of property for a vehicle sales or hire premises

This site, 3 Exeter Street, is largely within a floodway and within Camden's Heritage Conservation Area (HCA). Camden's *Flood Risk Management Policy*¹ indicates that this proposal would be prohibited. It is also contra-indicated under the HCA listing and heritage policies including Camden's DCP which incorporates the Burra Charter and Camden Town Centre Urban Design Framework (UDF).

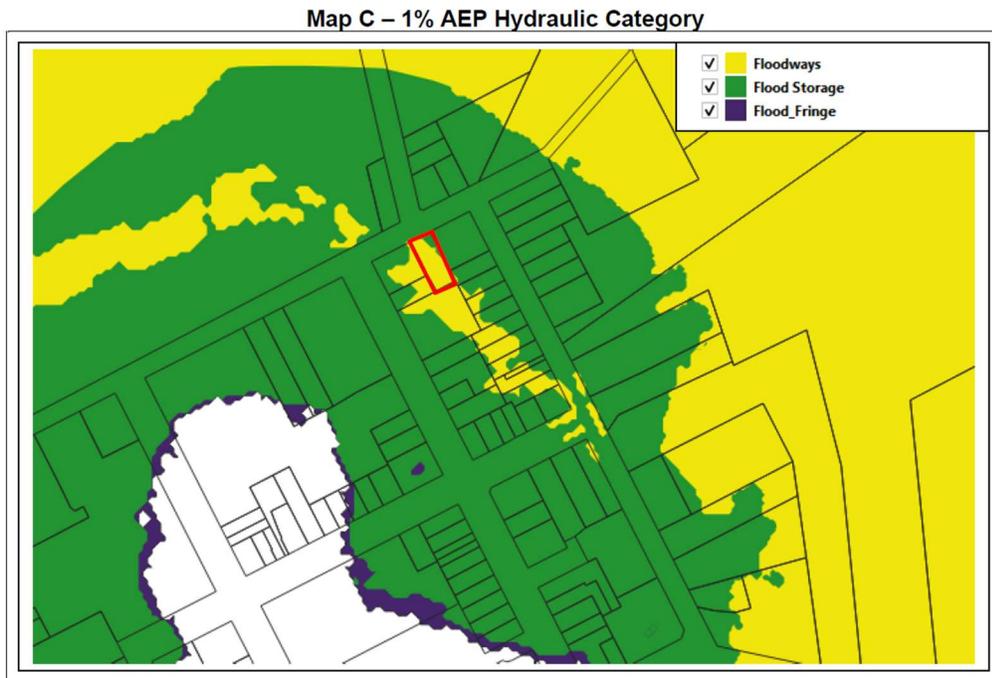
FLOODING

Neither the Statement of Environmental Effects (SEE) nor the Flood Impact Assessment (FIA) address the matter of the site being almost fully within a floodway, although the FIA includes the diagram below. We hope that the applicant was apprised of this fact before purchasing the property in August 2019 and before incurring the expense of an application in August 2023.

¹ Camden Council *Flood Risk Management Policy PI.0046.2 Adopted 14 February 2023*

The NSW Government² comprehensively covers the problems of any development in a floodway and how it can impact on natural flood behaviour with consequent devastating effects on communities.

The recent exceptional flooding in NSW including Camden and the property in question highlight the risks of climate change, the need to adapt and treat flood prone land with great caution.



Source: A.E Consulting Engineers Pty Ltd *Flood Impact Assessment 21 June 2023*

The NSW Government and Camden’s Flood Risk Management Policy³ define a floodway as *an area of significant volume of water flows during floods, often aligned with naturally defined channels...that even if only partially blocked, would cause a significant redistribution of flood flow, which may in turn adversely affect other areas...often, but not necessarily, areas of deeper flow or areas where higher velocities occur.*

In accordance with this definition Camden’s Policy prohibits any development in a floodway. The prohibition includes all commercial and industrial development:

Commercial and industrial development is only permitted in areas located outside the floodways mapped as shown at Council’s website (7.3.6). Concessional development is only permitted in areas located outside the floodways mapped as shown at Council’s website (7.3.7).

² NSW Department of Planning and Environment *Flood Risk Management Toolkit* Available at <https://www.environment.nsw.gov.au/topics/water/floodplains/floodplain-guidelines>

³ Camden Council *Flood Risk Management Policy P1.0046.2 Adopted 14 February 2023*

Surprisingly the SEE, although referring to LEP 5.21 Flood Planning (2), does not refer to 5.21 (1) which includes overriding objectives for development being compatible with the flood function and behaviour on the land, avoiding adverse or cumulative impacts on flood behaviour and enabling efficient evacuation in the event of a flood.

The issue of displacement and redirection of the floodway flows and consequent compounding of the damaging effects of a flood event is not addressed in the FIA.

The FIA provides an evacuation route which would seem unworkable according to local knowledge and it is not made clear why St John's Anglican Church Precinct is chosen or suitable to accommodate so many large and heavy vehicles. Evacuation orders for properties are given early and often in heavy rain events because roads to services become cut, not necessarily because a property will imminently flood. The proposal to house even more vehicles on site would certainly exacerbate road congestion during a flood evacuation, as experienced during four floods in 2022.

Development is prohibited in a floodway for good reason. Development such as this proposed large shed in a floodway diverts water from its natural course with detrimental consequences to other properties and the environment. Given that the last flood (July 2022) resulted in much damage and vehicles being swept away⁴ there is also the danger that vehicles would not be able to be removed in time and cause danger to people and property, and compromise the safety of others

Although the SEE and HIA would seem to presume that the proposal is able to be approved, common sense tells us this is a very bad idea.

Our reading of Camden's Flood Risk Management Policy confirms that what is proposed is prohibited development.

HERITAGE

We also take the opportunity to make clear our understanding that there are other reasons why this proposal is unacceptable.

The proposal involves demolition of HCA fabric. Demolition in a heritage conservation area is a last resort and requires much analysis to show that it is appropriate.

The documentation provides no analysis under the accepted LEC Planning Principle⁵ to determine the contributory status of the extant dwelling.

Under this Principle demolition of a building which contributes to a conservation area will impact on the area's heritage significance even if its replacement building can be argued to be satisfactory.

⁴ ABC News 4 July 2022 VIDEO: *Helicopter footage shows extent of flood damage in Camden* Available at <https://www.abc.net.au/news/2022-07-04/helicopter-footage-shows-extent-of-flood-damage-in-camden/13957594>

⁵ *Helou v Strathfield Municipal Council* [2006] NSWLEC 66 paras 44-46

The starting point under the LEC Principle is the Statement of Significance in the heritage listing. The conservation area listing of the Camden Town Centre deems built forms within the Township c. 1841 to mid-20th Century generally significant and contributory.

Although the Heritage Impact Statement (HIS) acknowledges that the subject site, originally part of the Macarthur land grant, is representative of the development of Camden Village in the twentieth century it provides no analysis, only an opinion that the extant cottage makes a neutral contribution to the HCA and therefore can be demolished. This is not consistent with the HCA listing.

Demolition is also not consistent with:

- the objectives of LEP 5.10 *Heritage conservation* including to conserve the heritage significance of heritage conservation areas, including associated fabric, settings and views;
- control under DCP 2.16.3 *General Heritage Provisions*, that demolition is last resort and only if incapable of repair;
- Burra Charter articles (8, 15.3, 22).

The HIS argues that the large over-height shed would make a neutral contribution to the HCA. Camden DCP requires new work to be compatible and make a positive contribution to the heritage place and conservation area as a whole (2.16.3).

In this case the proposed new building also cannot be argued to be a satisfactory replacement because it is over-height (LEP 4.3) and unsympathetic with the development pattern and fine grain of the conservation area as articulated in the DCP and UDF. The proposed shed is not fine grain being over-height with a large footprint and roof pitch uncharacteristic of the HCA built form and roofscape. It also deletes the rear setback of the domestic lot which is another significant characteristic of the development pattern of the 1840 town.

We point out that the site is at the Macquarie Grove Road gateway into Camden and in the vicinity of the town farm. The fact that there are other “sheds” in Camden is irrelevant – more a reason not to increase the number unconnected to the history of the town so as to retain its unique sense of place.

But the real issue is the number of large and heavy vehicles, that have nothing to do with Camden as a rural town, that are being housed on the site, and which have already begun to spill into 3 Exeter Street. This development would greatly increase the visibility of the vehicle yard. The crowded site and its electric signage as viewed from Exeter Street and Macquarie Grove Road are already unsightly and can no longer be seen to conform to the built form place principle of the Camden Town Centre UDF as adopted into Camden DCP:

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.

We support small business and enterprise, and it is pleasing to see how this business has adaptively reused the adjoining cottage on the corner of Edward Street. However, it has expanded significantly into bus, truck and other large vehicle sales⁶ and we feel it has grown too large for the sensitive HCA.

It is indeed unfortunate that the site, unlike other most other properties in the HCA, is almost fully within a floodway. We suggest that the site would be best returned to the environment, even if that meant sacrificing the extant mid-century cottage.

The NSW Government⁷ has instituted measures and guidelines in its Floodplain Management Program for voluntary purchase schemes. These include removing urban development from floodways which would also improve flood flows and reduce upstream flood levels. The NSW Government may also contribute funding for approved projects⁸.

We do not believe for the reasons explained above that this proposal can be approved. We respectfully ask that it be refused and the option of voluntary purchase be considered.

Yours sincerely,



Glenda Davis

President

⁶ Interstate Motor Marketing Services, see <https://www.immspl.com.au/truck-sales>

⁷ NSW Department of Planning and Environment *Flood risk management measures. Flood risk management guideline* MM01 Available at <https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Water/Floodplains/flood-risk-management-measures-230232.pdf>

⁸ NSW Department of Planning and Environment *Floodplain Management Program* Available at <https://www.environment.nsw.gov.au/topics/water/floodplains/floodplain-management-program>