

# *Camden Residents' Action Group*

*Incorporated*

## *Camden – Still a Country Town*

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

**Face Book:**

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

PO Box 188

Camden NSW 2570

Email: [admin@crag.org.au](mailto:admin@crag.org.au)

Ph: 0415 617 368

General Manager  
Camden Council  
70 Central Avenue  
Oran Park 2570  
**Email:** [mail@camden.nsw.gov.au](mailto:mail@camden.nsw.gov.au)

2 December 2020

Dear General Manager,

Re: DA 2020/232/1

GLEDSWOOD

900A Camden Valley Way Gledswood Hills

*Alterations and additions to an existing heritage building and change of use to a centre based childcare centre for 84 children and associated site works*

The property in question is State heritage listed<sup>1</sup> and its conservation and the use to which it is put is of wide interest to the community.

We wish to put on the record at the outset of our submission that we are very concerned about the lack of community awareness of this proposal. Although we are a long-standing community organisation that frequently makes submissions on heritage and environmental matters we were not notified. We also understand that Camden Historical Society was not notified.

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<sup>1</sup> NSW Department of Planning, Industry and Environment *Gledswood* Available at  
<https://www.environment.nsw.gov.au/heritageapp/ViewHeritageItemDetails.aspx?ID=5051540>

This lack of engagement with the community may be because Camden Council has yet to publish and implement its Community Participation Plan<sup>2</sup> embracing mandated community participation principles (EP&A Act s2.23)<sup>3</sup>. However, we understand that Councillors and the Council Heritage Advisory Committee were also not advised of this DA. From the community's perspective this omission is inexplicable as Gledswood is one of the municipality's most iconic and precious properties.

We must also state at the outset that the documentation publicly available to members of the community to inform their judgement is insufficient.

For instance, the property is subject to a Heritage Agreement with the owner signed by the then Minister for Heritage, Robyn Parker, on 9 May 2012. This Agreement relates to undertakings for appropriate conservation and future heritage management in exchange for a reduction and subsequent sale of historic curtilage. It includes the 2008 Conservation Management Plan (CMP) and is entirely relevant to the property's conservation and consideration of appropriate uses. Although the Heritage Agreement and CMP are technically public documents, we only were able to access them by undertaking considerable research.

This research included advice from the Office of Environment and Heritage that, whilst a review of the CMP is overdue, it is the 2008 CMP and 2012 Heritage Agreement that are relevant to this DA.

NSW Heritage Office comments on CMP 2008 resulted in a revised management plan (MP) being developed in February 2011 to address matters raised. This 2011 MP (like the 2008 CMP) recommended that the owner enter into the Heritage Agreement with the Minister.

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<sup>2</sup> Required by 1 December 2019

<sup>3</sup> EP&A Act 2.23(2)

- (a) *The community has a right to be informed about planning matters that affect it.*
- (b) *Planning authorities should encourage effective and on-going partnerships with the community to provide meaningful opportunities for community participation in planning.*
- (c) *Planning information should be in plain language, easily accessible and in a form that facilitates community participation in planning.*
- (d) *The community should be given opportunities to participate in strategic planning as early as possible to enable community views to be genuinely considered.*
- (e) *Community participation should be inclusive and planning authorities should actively seek views that are representative of the community.*
- (f) *Members of the community who are affected by proposed major development should be consulted by the proponent before an application for planning approval is made.*
- (g) *Planning decisions should be made in an open and transparent way and the community should be provided with reasons for those decisions (including how community views have been taken into account).*
- (h) *Community participation methods (and the reasons given for planning decisions) should be appropriate having regard to the significance and likely impact of the proposed development.*

The 2012 Heritage Agreement:

- facilitates appropriate conservation and future heritage management of the Property in exchange for the development of the less significant areas of Property and reduction of the State Heritage Register curtilage. (Background p 7 of 142).
- identifies conservation works and landscape restoration and their maintenance, informed by the management plan of 2011, but based on CMP 2008.
- includes annexures setting out the required conservation works in exchange for curtilage reduction. These works include restoration and ongoing monitoring and repair.
- required a \$2m bank guarantee to be placed with the Minister which could be drawn upon if the conservation works were not completed as required (10.1, p. 18 of 142).

The HIS (p. 38) simply claims:

*The homestead and surrounding outbuilding have been undergoing restoration since the introduction of the Heritage Agreement ..... These restoration works included the replacement of the roof, rectification of significant damp issue and general stabilisation works. Now that a new use for the building is proposed, the next phase of the restoration, those being the interior spaces and remainder of the exterior, can commence.*

Our understanding is that the sale of historic curtilage and the assurance of the \$2m bank guarantee were intended to fund all of the works described in the Heritage Agreement, which included restoration works and ongoing maintenance, without depending on a new non-tourism use.

A 2015 Historical Heritage Assessment and Heritage Impact Statement (HHA) written by Virtus Heritage for Astragal Heritage Pty Ltd was supplied as additional information with the DA. Astragal, from 2018, has operated under the trading name of Weir Phillips Heritage and Planning, which is the author of both the 2020 HIS and 2020 Statement of Environmental Effects (SEE) written in support of the proposal.

The 2015 HHA references the 2011 MP and cites the 2008 CMP that the Heritage Agreement with the Minister is to

*...facilitate the appropriate conservation and future heritage management of the Gledswood site in exchange for the development of less significant areas of Gledswood together with a corresponding SHR curtilage reduction (p. 119).*

This reason for the curtilage reduction was confirmed by the Proponent in 2013:

*....the \$2.2 million raised would go towards the restoration of the building as per a heritage agreement with the Planning and Infrastructure Department.....It will be a total restoration of virtually everything, bringing it back to its original state....The garden is going to be cleaned up.....Most of the money will be spent on the homestead as well as the servants' quarters and the convict lock-up.<sup>4</sup>*

It is not demonstrated in the documents submitted with the DA how it is judicious to now claim that a new use is required to fund conservation, especially one that requires alteration to historic fabric and gardens.

Importantly, this proposal is not necessarily permissible under its zoning of SP 3 Tourist as specified in the standard LEP<sup>5</sup> or in Camden's LEP as follows:

**1 Objectives of zone**

- To provide for a variety of tourist-oriented development and related uses.
- To enable low density housing that does not unreasonably impact on tourist-oriented development.
- To enable low scale, low intensity development that does not unreasonably increase the demand for public infrastructure, services or facilities.

**2 Permitted without consent**

*Nil*

**3 Permitted with consent**

*Aquaculture; Building identification signs; Car parks; Dwelling houses; Educational establishments; Food and drink premises; Function centres; Information and education facilities; Passenger transport facilities; Recreation facilities (outdoor); Registered clubs; Roads; Retail premises; Tourist and visitor accommodation; Viticulture*

**4 Prohibited**

*Any development not specified in item 2 or 3*

As explained by NSW Government<sup>6</sup> LEP Practice Notes, Gledswood's zoning means that it attracts visitors and that its intended future use is focused on developing tourist-related uses. Development in this zone may include 'tourist and visitor accommodation,' 'function centres,' 'information and education facilities,' 'recreation facilities,' 'food and drink premises' and other ancillary and compatible land uses.

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<sup>4</sup> Armstrong K 16 July 2013 *Sale of home's land to fund restoration* Camden Advertiser Available at <https://www.camdenadvertiser.com.au/story/1641052/sale-of-homes-land-to-fund-restoration/>

<sup>5</sup> NSW Legislation Standard Instrument—Principal Local Environmental Plan Available at [https://www.legislation.nsw.gov.au/view/html/inforce/current/epi-2006-155a#pt-cg1.Zone\\_SP3](https://www.legislation.nsw.gov.au/view/html/inforce/current/epi-2006-155a#pt-cg1.Zone_SP3)

<sup>6</sup> NSW Department of Planning Practice Note PN 11-002 <https://www.planning.nsw.gov.au/-/media/Files/DPE/Practice-notes/preparing-LEPs-using-the-standard-instrument-standard-zones-2011-03-10.pdf>  
LEP PN 09-006 <https://www.planning.nsw.gov.au/-/media/Files/DPE/Practice-notes/providing-for-tourism-in-standard-instrument-local-environmental-plans-20091202.pdf?la=en>

In relation to the permitted use of *information and education facilities*, the standard LEP Dictionary<sup>7</sup> states

***educational establishment*** means a building or place used for education (including teaching), being—

- (a) a school, or
- (b) a tertiary institution, including a university or a TAFE establishment, that provides formal education and is constituted by or under an Act.

It does not include child care, which is defined separately as follows

***centre-based child care facility*** means—

- (a) a building or place used for the education and care of children that provides any one or more of the following—
  - (i) long day care,
  - (ii) occasional child care,
  - (iii) out-of-school-hours care (including vacation care)
  - (iv) preschool care .....

The standard LEP seems to prohibit child care as a suitable use for a tourism asset. In any case, according to the Practice Note (PN 11-002), proposed uses such as a child care centre, are not to undermine tourism, or be incompatible with the primary tourist-oriented use of the SP3 Tourist zone. Whilst some types of educational establishment may be appropriate in some circumstances, child care does not apply. The extent of interference that this proposal requires is unacceptable. The description (HIS, p. 39) of some of what needs to be done to minimise the impacts of alteration to the homestead and fencing off of play areas is proof enough.

This proposal accepts that it relies on convincing the consent authorities to put aside its zoning and consider whether it meets the following requirements under LEP 5.10 (10) Conservation incentives:

- (a) conservation is facilitated by the consent, and
- (b) what is proposed is in accordance with an approved heritage management document, and
- (c) all necessary conservation work identified in the heritage management document is carried out, and
- (d) heritage significance, including its setting, is not adversely affected, and
- (e) there would be no significant adverse effect on the amenity of the surrounding area.

This DA does not comply with these requirements of LEP 5.10 (10) as follows.

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<sup>7</sup>NSW Legislation Standard Instrument—Principal Local Environmental Plan  
Available at <https://www.legislation.nsw.gov.au/view/html/inforce/current/epi-2006-155a#dict>

## **Conservation is not facilitated by consent for the proposal (LEP 5.10 (10) (a))**

Economic necessity is inherent in claiming assessment under LEP 5.10 (10) and obviating other LEP provisions such as zoning. We understand this means that the consent authorities will need to assess both the financial viability of the plan and a detailed, costed maintenance plan into the future.

No economic report is publicly available including of projected income streams and maintenance costs. No economic analysis and comparisons of financial viability with uses permitted under the zoning are provided. Given Gledswood's proximity to Sydney and eventually Badgerys Creek Airport its economic potential for tourism and as a specialist venue would appear obvious.

A substantiated economic argument would seem not to exist. The HIS (p. 39) supports this assumption as it makes the claim that sympathetic uses have been considered and discounted, but only mentions use as a private residence. A perusal of the market and CMP 2008 quickly belies the assertion that it is too large for a private home or unsuitable for other types of accommodation.

The HIS (1.3, p. 2) states that a full archaeological report has been carried out but then under Method of Assessment (6, p. 37) states that the Effect of Work (7, pp. 37-42) does not consider archaeological impacts. Neither the HIS or SEE refer to the archaeological assessment of 2015 HHA<sup>8</sup>, although it was commissioned by the author of both documents. Some relevant extracts on conclusions drawn from Gledswood's archaeological assessment from 2015 HHA<sup>9</sup> are cited below.

It is extraordinary that such far reaching changes to Gledswood can be proposed without consideration of this or any other archaeological assessment especially as consideration is specifically required under LEP 5.10 (1) (c) and DCP 2.16.3(g).

There is no strong supported argument and certainly no guarantee that conservation is facilitated by this proposal.

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<sup>8</sup> Virtus Heritage 2015 *Historical Heritage Assessment and Heritage Impact Statement (HHA) Summary of Features and Elements and Significance within the project area*

<sup>9</sup> Ibid *Table 10 Summary of Features and Elements and Significance within the project area*

<i>Extract: Table 10 Summary of Features and Elements and Significance within the project area</i>	
<b>Element/Archaeological Feature (Relics)/Area of Potential</b>	<b>Grading of Significance as a cultural landscape</b>
<i>Area of archaeological potential: The original building of c1812 construction within the Gledswood Homestead (particularly underneath the timber posted veranda and stone flagging and potentially the cellar) and the remaining sections of the Homestead relating to the mid nineteenth century and the Chisholm family.</i>	<i>Potential Exceptional</i>
<i>The Brick Feature outside the Former Convict Lockup</i>	<i>Potential Exceptional</i>
<i>Area of archaeological potential: The Former Convict Lock Up (c1810)</i>	<i>Potential Exceptional – if identified any material culture within this feature.</i>
<i>Carriage Drive</i>	<i>High</i>
<i>Carriage Loop</i>	<i>High</i>
<i>Remains of bridges and potential entry gates/access ways (except for the modern bridge)</i>	<i>Potential Exceptional to High</i>
<i>Trellised and ornamental gardens</i>	<i>Exceptional to High – if information can be obtained through further archaeological investigation on landscaping and garden use since the early nineteenth century.</i>
<i>Post and Rail Fence Lines</i>	<i>Potential moderate depending on the extent of interpretation of these fence lines and their relationships to existing and potentially unknown structures.</i>

**Source:** Virtus Heritage August 2015. *Historical Heritage Assessment and Heritage Impact Statement: Prepared for Astragal Heritage Pty Ltd (Weir Phillips Heritage and Planning)* (pp. 60-61)

**The Proposal is not in accordance with the approved heritage management document, CMP 2008 (LEP 5.10 (10) (b))**

Unfortunately, the HIS seems to cherry pick CMP 2008 which actually states:

*Accommodation use in the homestead should be encouraged in line with its historic use and the long role of this site with cultural tourism. No change in the external envelope of the homestead should be contemplated and adaptive reuse works to the interior to provide bathrooms and kitchens should be limited as far as possible to those spaces already altered.* (p. 124)

*There is an opportunity to provide a future residential/accommodation use for the currently unused homestead buildings and for associated sympathetic and sensitive infill development of related uses. .... There are opportunities not only to conserve but also to enhance the designed gardens surrounding the homestead. There may also be additional development opportunities in areas that do not form part of the key areas of significance within the estate. There may also be opportunities to link these development opportunities to the ongoing conservation and maintenance of the site through the Heritage Agreement provisions of the Heritage Act.* (p. 112-113)

The SEE (p. 18) claims without evidence that the internal modifications and change of use would be in accordance with the principles of the Burra Charter which underpin CMP 2008. As stated in Australia ICOMOS Practice Notes the proposed work should comply with the Charter as a whole, and particularly

- Not adversely affect the setting of the place (Article 8).
- Have minimal impact on the cultural significance of the place (Article 21.1).
- Not distort or obscure the cultural significance of the place, or detract from its interpretation and appreciation (Article 22.1).
- Respect and have minimal impact on the cultural significance of the place (Article 22.2).

There is no cultural relationship between the original and proposed use of the homestead.

The HIS asserts but does not explain compliance with each of the conservation policies in CMP 2008. This dismissive approach serves the Proponent and is simply unacceptable. Adaptive reuse of historic buildings needs to be sympathetic, and continue to allow the heritage item to be faithfully interpreted, culturally and historically. Use as a child care centre is inconsistent with the original purpose of the homestead. It also means that child safety and supervision is of overriding concern, not conservation or tourism attraction, and that the fabric is under unnecessary threat.

As one example, CMP 2008 7.4.7 on *Conservation of Significant Buildings, Spaces and Fabric* states that both internal and external fabric should be retained and conserved and refers to Figure 5.5 as shown below. This diagram shows that the homestead is mainly classified as of exceptional significance, the highest level.

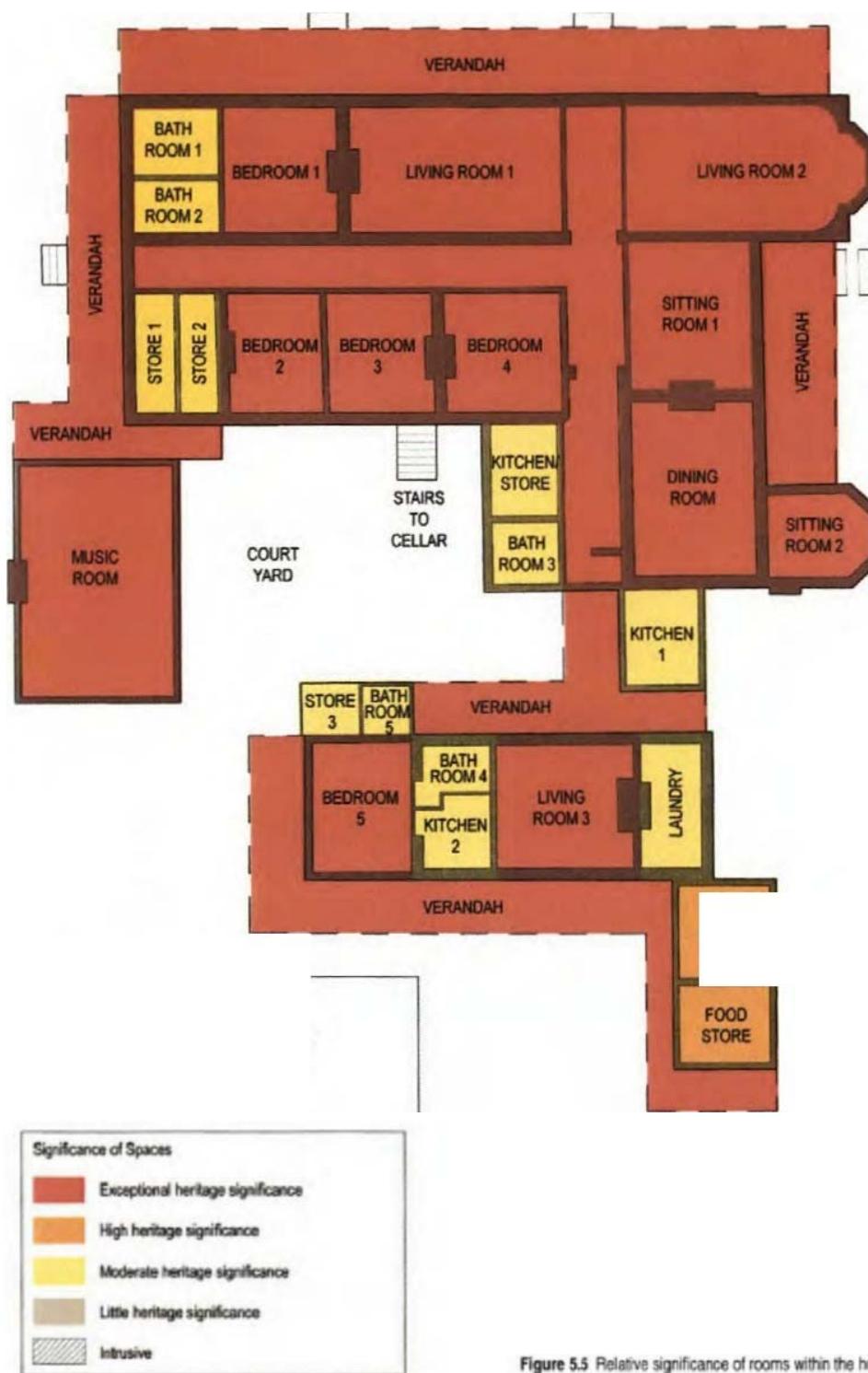


Figure 5.5 Relative significance of rooms within the homestead building.

Source: CMP 2008 Figure 5.5 p. 101

Conservation of fabric that is removed or altered, may be argued to be possible in particular cases with careful storage and photographing of details for eventual restoration. However, removal and alteration of fabric do not allow the public to appreciate the original and the best of conservation intentions can be lost in time. A clause in the Heritage Agreement (9.1 Public Access Day, p. 17 of 142)) requires that the public be given access for the purposes of inspection one day each year. The public expects to see a conserved colonial homestead, not a child care centre.

An unacceptable level of building alteration, additions and re-modelling of the homestead is required to re-use it as a child care centre. For instance, to provide the proposed four playrooms, cot room, communal children's bathrooms and outdoor play areas:

- The entirety of living areas on the east side are being converted into one long playroom and the veranda fenced.
- Many new wall openings (at least 10) and additions are to be made in the main building, including the total removal of two walls, one being between the dining room and external bayed sitting room.
- Two sections of walls in the small building (believed c1810) are to be removed and additions made.
- Security measures are to be made to the French doors including the possibility of replacing their glass with safety glass and possibly the need to make their sills higher
- The cot room and specialised wash and toilet facilities adjacent and connected to play areas require specific purpose-related alterations to be made to fabric which is inconsistent with Gledswood's use as a homestead as well as tourism and heritage conservation
- The landscaping and 1.5m high steel palisade fencing and gates proposed to enclose the outdoor play areas including the original veranda are additional and inappropriate to interpretation of the historic homestead and its setting.

Clearly making holes in original walls, removal of skirting boards and very possibly other fittings, damage caused by extra and specific plumbing works including plumbing for several new craft sinks in non-wet rooms, internal additions and external enclosed play areas and so on are not consistent with heritage conservation. The outdoor play areas also require considerable alteration to the heritage setting to be compliant with child care guidelines.

No substantial analysis is provided to demonstrate how conservation of historic fabric and gardens is to be achieved.

Indeed, no plan or assurance is possible. The findings contained in the Contamination and Salinity Report indicate that much greater intrusion into the fabric of the historic homestead and gardens is likely. This report (p. 4) finds lead levels in all 3 near surface samples to be over the limit and some very high readings. The potential play areas would need to be more thoroughly tested which suggests removal of top soil at least and possible greater excavation. This

probability is perfectly predictable given years of use and wear of lead-based paint and possibly lead pipes. The contamination report concludes and recommends:

*The assessment of the site for contamination indicated that there are Lead exceedances above the HILA thresholds near to the building where the 3 near surface samples were taken. Additional sampling will be required to delineate and characterize this lead contamination as to its lateral and vertical extent. Once this is undertaken a Waste Classification and Remedial Action Plan will be required for its removal. Once it is removed the base and sides of the removal trench would be tested so the site can be certified as having this contamination removed. (p. 4)*

Additional information provided by Architex (p. 5) states in relation to Environmental Health:

#### *21. Remedial Action Plan*

- *Additional testing is not possible until works are commenced and the walls and ceilings can be stripped of the original paint and Remedial Action Plan can be prepared based on the works completed in the preparation of the renovations;*
- *Additional testing cannot occur without disturbing the building materials and finishes and should be undertaken during construction phase;*
- *We request this to be a condition of a development consent.*

This indicates that use of such an old heritage item for young children is *prima facie* contraindicated and a major issue in approval as a child care facility. The wear and tear on original fabric due to day to day activity is also unnecessary and unacceptable.

Establishment of a child care facility with its many health and safety requirements cannot but change the character of any property, as is perfectly reasonable.

In Gledswood's case the requirements must be met at the expense of an irreplaceable artifact, and some of the damage cannot even be determined except during the construction phase when it is too late. This of course is not in accordance with CMP 2008.

One example of the damage that would be caused by the conversion into a child care facility is to its notable entrance way. From the access road an historic tear-shaped carriage loop and carriage drive leads to the northern (front) elevation (shown below). As referenced above in the above extract from 2015 HHA (*Table 10 Summary of Features and Elements and Significance*) both are graded as being of high significance in the cultural landscape.



*Source:  
Google maps*



*Source: SHR*



*2011 Photo*

The photomontage of the front elevation sharply contrasts with Gledswood's iconic image.



*2020 Photomontage*



*2011 Photo*

The two photomontages provided with the DA of the front and rear elevations depict idealised artist's impressions, that are incoherent and anachronistic with modern driveways, paths and fences which will be further exaggerated by children's play areas with equipment, shade sails and so on. As shown below the sense of place they project is not that of the Gledswood that is highly valued and captured in photos, including from its state listing.



*Source: SHR*



*Source: SHR*



*Source: 1997 Camden Images<sup>10</sup>*



*2011 Photo*

The photomontages of artistic depiction must be regarded as the absolute idealised outcome but, being based on this DA, they do not and cannot reflect or interpret the sense of place of Gledswood.

As well as not being in accordance with CMP 2008, this DA, if approved, may go down in history as responsible for destroying a unique legacy from Australia's colonial beginnings.

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<sup>10</sup> Camden History Notes *Gledswood Homestead Complex* Available at <http://camdenhistorynotes.blogspot.com/2017/12/gledswood-homestead-complex.html>



*Above: north-west corner of Homestead gardens leading downslope to the carriageway  
Above right: Pre-1888 cistern in Gledswood courtyard.  
Below right: Convict Lockup to right.*

*Source: 2015 HHA*



*2020 photos*

### **Necessary conservation work identified and agreed in the existing heritage management document is not fully carried out (LEP 5.10 (10) (c))**

The quality and extent of completion of the range of works as identified in the existing heritage management document of the 2012 Heritage Agreement which includes CMP 2008 are not clear. 2015 HHA indicates that drainage works, reflagging of verandas and trenching are probably completed.

Annexure D of the Heritage Agreement, the basis upon which the sale of historic curtilage was approved, outlines the conservation works to be undertaken and Annexure F the timeframes. Annexure D outlines many internal and external works of restoration, repairs and maintenance for the homestead. The 2012 Heritage Agreement sets out a timeframe for building conservation works, unless otherwise specified, of two years and a timeframe for landscape conservation works, as set out in the Landscape Management Plan, of five years.

However as already noted above, the HIS (p. 38), seemingly contrary to the Agreement which specified required restoration works and ongoing maintenance including allowing for complete internal and external repainting, states: *...now that a new use for the building is proposed, the next phase of the restoration, those being the interior spaces and remainder of the exterior, can commence.*

Work on interior spaces was covered in the 2012 Heritage Agreement.

The HIS (5.1, p. 31) claims: *All exterior conservation works have been carried out as per the Heritage Agreement dated May 9th 2012.*



It is not clear when the above photo of front elevation at the introduction to the 2020 HIS and SEE was taken. It is disturbing.

Other exterior conservation works include the gardens which are of an acknowledged state heritage significance and archaeological potential.

The photo below from the HIS (p. 17) of the eastern and northern elevations suggest they have, at least at some stage, been allowed to deteriorate despite the Heritage Agreement and are unrecognisable when compared to the 1997 Camden Image.



*Source: 1997 Camden Images*

The DA documentation does not address in any detail the extent of observance to date with CMP 2008 and the extent of completion of the restoration works and adherence to ongoing maintenance work as set out and scheduled in the 2012 Heritage Agreement.

Conversely, this proposal creates the requirement for future restoration work if the heritage significance and sense of place of the homestead is to be re-instated.

## **Heritage significance, including its setting, is adversely affected (LEP 5.10 (10) (d))**

Heritage significance will clearly be adversely affected. As noted at the outset of this submission insufficient documentation has been provided to fully inform the public of exactly what is proposed and its effects, adverse or otherwise. However, some detail of the inarguable adverse effects on the homestead and setting have been discussed above.

Again, on first principles it is contra-indicated to consider child care as an appropriate adaptive re-use of heritage listed property, especially one of such high and exceptional archaeological significance and one that is zoned for tourism.

NSW Childcare Guidelines do require that heritage be respected but quite rightly focus on child health, safety and educational opportunities. For instance, the gardens can and should be restored but installation of the required play areas and fences instead mean that much will be lost forever. After the DA's lodgement in April, it appears that additional information was requested and provided in mid-September. It is unclear whether subsequent changes to the plans, such as more internal wall openings, have been made in order to comply with the child care requirements that are not reflected in the SEE and HIS. This is quite possible as the suitability of the facility needs to be assessed in detail and approved for operation by NSW Regulatory Authority for National Quality Framework for child care.

The extent of the detrimental effect of this proposal is brushed over in the SEE and HIS. Cumberland Plain Woodland and relics of Aboriginal culture on the site have no doubt been all but eliminated due early European settlement. However, it is concerning that a draft 2008<sup>11</sup> and a 2014 Aboriginal heritage assessment<sup>12</sup> have not been referenced.

It is very concerning that the 2015 HHA, an archaeological and historical assessment of Gledswood's post settlement heritage has not been considered in the SEE and HIS. This analysis accompanied a Section 60 application to the Heritage Office for drainage and restoration works.

The detrimental effect of the proposal on heritage significance, which is clearly considerable, needs to be researched and addressed. It is assumed that proper analysis will be required to be included in any application under Section 60 of the NSW Heritage Act 1977. We do not understand why rigorous documentation was not supplied with the DA.

We categorically state however that it is undoubtedly clear the result of this proposal would leave the homestead and its setting so altered as to be historically and culturally unreadable.

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<sup>11</sup> Australian Museum Business Services 2008 *El Caballo Blanco & Gledswood, NSW Rezoning Aboriginal Heritage Assessment Draft Report A07009 Prepared for Camden Council*

<sup>12</sup> Virtus Heritage May 2014 prepared for Weir Phillips as referenced p. 11 of 2015 HHA

## **Significant adverse effect on the amenity of the surrounding area (LEP 5.10 (10) (e))**

The Camden community, as reflected in many Council documents, is proud of its heritage and wishes it to be preserved and shared. Tourism is an important economic consideration that affects livelihoods.

For instance, Camden's Local Strategic Planning Statement (LSPS) adopted in March 2020 states:

*We heard our residents share their aspirations and ideas for the Camden area. Among other priorities, we heard you want our existing heritage, rural and natural assets protected (p. 3).*

*Camden's rural setting, rich heritage and proximity to Sydney present several opportunities to grow the visitor economy. .... The retention and preservation of urban and rural heritage items that tell nationally important stories offer the potential for heritage-based tourism across the LGA (p. 65).*

What would be lost by this proposal is an irreplaceable and intact heritage asset that would inform future generations and one that is highly valued by the community and the people of NSW.

Gledswood is an iconic landmark with a unique sense of place. The result of this proposal would be altered fabric, specialised landscaping and modern finishes more akin to a purpose-designed newbuild.

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We note that under LEP 5.10 (10) the proposal must be convincing on all five of the criteria for exemption from planning rules on the grounds of being an incentive to heritage conservation. We submit that it does not satisfy even one criterion.

We respectfully suggest that this DA should never have seen the light of day and request that it be quickly refused.

Yours sincerely,



Glenda Davis