

Camden Residents' Action Group

Incorporated

Camden – Still a Country Town

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11 December 2025

**Re DA 2024/142/3
LEC Case 2025/00028864
3 Exeter Street Camden**

Dear General Manager,

Thank you for the opportunity to again object about the above DA which was refused twice by the Camden Local Planning Panel and was subject to an LEC conciliation conference on 2 June 2025. We understand that this is the fifth similar proposal for the site¹ and the third iteration of DA 2023/142² which seeks to regularise operations on the site occurring without development consent since around 2019.

The community does not accept that this development is a reasonable or acceptable use of flood affected land in the Heritage Conservation Area (HCA) of the 1840 Macarthur town. The operation has continued for some time without any approval and other versions of this retrospective DA have been resoundingly refused. We note also that it is seeking to regularise unauthorised fill in a floodway, driveway widening and removal of T intersection safety signage.

¹ The first DA 2023/18, was withdrawn. The second DA 2023/430/1 was refused by the Local Planning Panel. The first two iterations of this third current DA 2024/142 were refused by the Panel (including on div 8.2 review).

² CRAG's previous objections are available on our website:

16 May 2024 <https://www.crag.org.au/wp-content/uploads/2025/12/16-May-3-Exeter-Camden.pdf>

18 August 2023 <https://www.crag.org.au/wp-content/uploads/2023/10/28-August-2023-DA-3-Exeter-Street-Camden-CRAG-submission.pdf>

The community is astounded that this DA is able to be considered as the development is mainly within a floodway, and therefore categorically prohibited. From the public perspective there is no question that the existing activity on the site is dangerous in times of flood and should be shut down immediately.

In relation to its heritage impact on the accepted significance of the town, this development detracts from its unique rural heritage character and does/would erode its significance and its historic connections with the agricultural floodplain of the Nepean River.

The Minister for Heritage, Penny Sharpe and Camden's local state member, Sally Quinnell and Wollondilly's state member, Judy Hannan, have acknowledged the town's high significance and need for protection beyond its local listing. Minister Sharpe has promised that the town will be further protected by the state, a process which is in train.

We note in this latest iteration of the DA that the proposed large shed has been replaced by a smaller and more domestic scale building but that the prohibition of development in a floodway has not been addressed, that much hard stand is to remain over unauthorised fill and that the extant cottage which according to the HCA listing is arguably contributory, is to be demolished.

We largely reaffirm our strong grounds for objection to the proposed development (similar to those of the Local Planning Panel and Council), as covered in our previous DA submissions.

We comment on four main contentions (seemingly from Council's Statement of Facts and Contentions in court) addressed in the Addendum to the Statement of Environmental Effects (SEE) (November 2025): permissibility, development standard contravention, flooding and heritage.

PERMISSABILITY (Addendum SEE 5.1)

Retrospective and ongoing permission is required and sought for the sale and resale of vehicle fleets and any size commercial/industrial vehicles ranging from utilities through to prime movers and coaches, and continuation of water carting throughout NSW.

The land is located within Camden's HCA and zoned MU1. In considering development within the HCA, it is not sufficient to refer only to the objectives of the MU1 zone.

Camden DCP³ states: *Development within the MU1 Mixed Use zone at Camden must be consistent with the Camden Town Centre Urban Design Framework.* The Urban Design Framework (UDF)⁴ provides the following 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 (p. 33) and presents a philosophy throughout in accordance with this introduction:

Camden Town Centre offers a charm and character that is derived from a rich history, quality of original town layout and the evolution of Australian architecture ...it is essential built form preserves and enhances the character of Camden Town Centre through fine grain responses (p. 4).

This section of the Addendum omits any reference to the UDF or the HCA. It also presents little argument that the land use meets the objectives of the MU1 zone, which we find to be largely inconsistent with them as follows.

- *To encourage a diversity of business, retail, office and light industry land uses that generate employment opportunities.* This objective indicates that the activity should be light as generally understood in a town centre with heavier uses on land that is larger than a residential lot with road infrastructure to support it. Employment, which is minimal in this business, would still be generated in an appropriate location.
- *To ensure that new development provides diverse and active street frontages to attract pedestrian traffic and to contribute to vibrant, diverse and functional streets and public spaces.* This activity does not attract pedestrians. It appears that much of the marketing activity occurs online, with the vehicles stored for possible inspection and pickup or delivery. This activity does not contribute to the vibrancy and functionality of the street with its senior residential apartments, the agricultural pursuits at the Town Farm or to public spaces in close proximity such as Miss Llewella Davies Pioneer Walkway and town farm markets. The development sits as an anomaly within its location.

³ Camden Council 2019 *Development Control Plan 5.3.3 Camden – MU1 Mixed Use Control 6* Available at <https://dcp.camden.nsw.gov.au/employment-zones-development/camden-el-local-centre/camden-mu1-mixed-use/>

⁴ Camden Council August 2018 Available at Camden Town Centre Urban Design Framework Available at <https://www.camden.nsw.gov.au/assets/pdfs/Major-Developments/Camden-Town-Centre-Urban-Design-Framework/Final-Camden-Town-Centre-Urban-Design-Framework.PDF>

- *To minimise conflict between land uses within this zone and land uses within adjoining zones.* Within the zone the land use is an anomaly and thereby conflicts with the senior living apartments, the residential and light business and charity uses of the Edward Street cottages and, the use of the adjoining Girl Guide Hall, the community passive recreation use of Llewella Davies Pioneer Walkway and the agricultural and farmers market uses of the Town Farm. Uses in adjoining agricultural and residential zones bear no relationship to the development.
- *To encourage business, retail, community and other-non retail land uses on the ground floor of buildings.* This objective is not applicable.
- *To encourage development that supports or complements the primary office and retail functions of the local centre zone. This development does not support or complement office and retail functions of the E1 Local Centre zone as it bears no relationship to the grocery stores, food outlets, medical offices and other personal service premises that characterise it.* Indeed, it is not clear whether some of the heavy vehicles and trailers being stored on site⁵ can necessarily navigate the local road system without a permit. In any case their presence in the HCA road infrastructure would be counterproductive to the operation of the local centre and the mixed-use zone. Moving them during a flood would also be disastrous to the evacuation efforts of the community and emergency services.

The small site is argued to be commercial premises accommodating retail vehicle sales and hire, but it is largely used for storage of large heavy vehicles and not a retail business as commonly understood and expected within a small town. Such storage could be argued to be similar to the prohibited uses of *Heavy Industrial Storage Establishment*, *Storage Premises* or *Industrial Retail Outlet*. We also point out that the water transport use, being similar to a prohibited *Transport depot* and *Distribution centre* may not be permissible under the MU1 zone.

We consider that the MU1 zone is not intended to permit the type of business and development described in this DA.

⁵ See appendix for list on one website of vehicles and trailers for sale at Camden as at 7 December 2025 Available at <https://www.tradefarmmachinery.com.au/search/keywords-camden>

DEVELOPMENT STANDARD CONTRAVENTION (Addendum SEE 5.2)

This section of the Addendum only refers to the height standard and deletion of the large shed and its replacement with a small building that is not over-height (LEP 4.3).

Other LEP development standards are contravened although not mentioned under the relevant Addendum headings (“5.3 Flooding” and “5.4 Heritage”):

LEP 5.21 Flood planning. In summary and as further explained below, the land use is not compatible with documented flood function and floodway behaviour and does not enable efficient evacuation in a flood event.

LEP 5.10 Heritage conservation. The proposal does not conserve the environmental heritage of Camden, its HCA setting and fabric. The presence of a yard of heavy large industrial vehicles on an original residential block and the demolition of the cottage do not conserve the town’s heritage.

FLOODING (Addendum SEE 5.3)

Flood Risk: claim DA iteration 2024/142/3

As an aside we note that the development, including unauthorised fill and hardstand areas, has already quite possibly increased flood affectation to neighbouring properties.

The current iteration of the DA focusses on stormwater and the fact that displacement of floodwater, because of the small replacement building, is negligible. This is not the issue.

The Addendum SEE extracts the following on local flooding documentation⁶

The TUFLOW model was run for the 1% AEP and 20% AEP design events. The model results are presented in Appendix A1 and Appendix A2 respectively. The model results show that the location of the proposed development is unaffected by flooding in the 20% AEP design flood. In the 1% AEP event, only part of the site is affected by inundation. For those parts that are affected, peak flood depths are less than 200 mm for the most part (approximately ankle height) with a small, isolated section of the site reaching 200 mm. Peak flood velocity is approximately 0.2 m/s which is benign.

This same document goes on the state:

In the 1% AEP design event, peak flood hazard in the pre-development scenario is H1 – being the lowest of the 6 categories of flood hazard contained in Australian Rainfall & Runoff (2019).

⁶ Rienco Consulting 27 June 2025 *Expert Report in Relation to Local Flood Affectation and Development Impacts At 3 Exeter Street, Camden NSW*

These statements relate to a proprietary local overland-flow model which only considers rainfall runoff across the site not the flows of the Nepean River. Hence the report classification of the site having only a H1 (lowest) flood hazard rating. We are not clear why this analysis has been provided because at best it is distracting and irrelevant. As covered below, according to Camden Council's adopted 2022 Nepean River Floodplain Risk Management Study, as well as lived experience, the site is largely within a floodway with a H6 (highest) flood hazard rating.

We also find the Flood Emergency Response Plan⁷ provided with the current iteration of the DA to be somewhat cryptic. For instance, it states

With regard to Nepean River flooding, the 5-year ARI (20% AEP) flood does not reach the carpark or building area levels, but all other floods exceed that level and evacuation is required. The site is considered unsuitable for the safety of people in all flood events from the 5-year ARI (20% AEP) and above (s.2.3; p.3).

We note the author of the report on local flooding and the response plan is from Wollongong. Camden people live the floods and it is well known that the site floods early and is definitely well within 20%AEP. As explained by Camden Council⁸, Camden Town Farm and Miss Llewella Davies Pioneer Walkway, opposite the site, took some time to reopen after four damaging floods in 2022. As reported by Council, the recreational walkway was five metres underwater for days on end, causing serious damage.

It is also well known that it is not uncommon for floods to occur overnight, which was not considered in the Response Plan. The fourth flood in July 2022 rose quickly at night, stranding livestock and with water reaching well above floor boards in a number of houses in Edward Street.

A flood level of 12.72 metres at the Camden Weir is considered a moderate flood, while a major flood is one that exceeds 13.8 metres. The recorded flood levels at the Camden Weir during the highest 2022 events were:

- March 2022: The Nepean River at Camden peaked at 12.3 metres, a minor flood.
- July 2022: The river level exceeded the March peak, reaching 12.72 metres, just at the moderate level.

None of the floods in 2022 were major, all were moderate level so it is incomprehensible that it can be inferred that the proposed carpark and building are not often affected. It is also incomprehensible that the Plan ignores the fact that the site is almost entirely in a floodway that should be kept clear of obstruction.

⁷ Rienco Consulting 14 July 2025 *Flood Emergency Response Plan*

⁸ Camden Council 2023 *Popular walkway comes back to life*. Available at <https://www.camden.nsw.gov.au/media-centre/latest-news/popular-walkway-comes-back-to-life>

As explained below, the elephant in the room is the flood risk posed by a structure on, and storage of heavy vehicles for sale and water carting, on a site with the highest flood hazard rating that is mainly floodway.

Flood Risk: Official and Documented

Extraordinarily neither the Addendum SEE, nor the reports of the flood consultant, address the fact that the site is in a floodway.

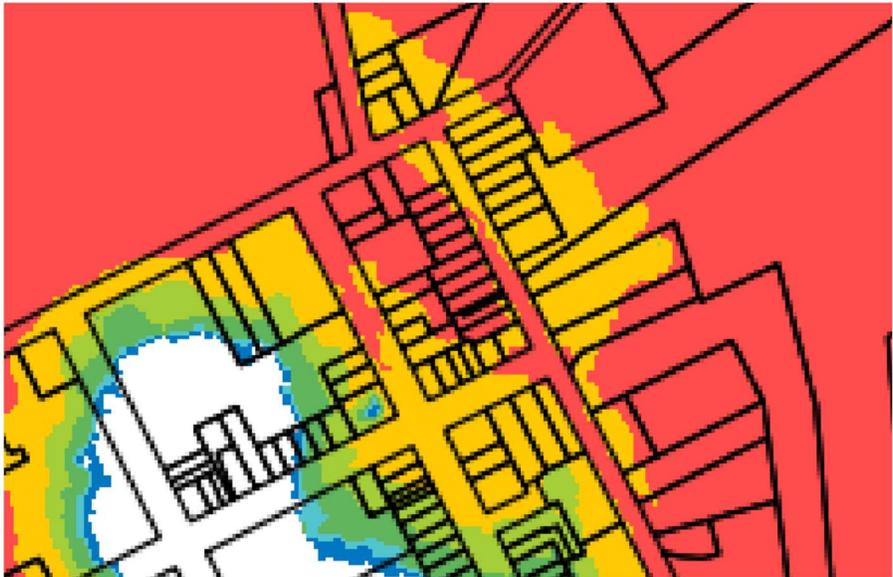
Camden Council, as cited in previous DA documentation⁹, provided detailed flood information for the site from the current Nepean River Flood Study (*Nepean River Floodplain Risk Management Study and Plan*, November 2022, Cardno / Stantec) as follows:

- 5%AEP Flood Level (approx. 20yr ARI): +69.4 mAHD
- 1%AEP Flood Level (100yr ARI): +71.1 mAHD
- PMF Flood Level: +74.9 mAHD
- 1%AEP velocities: 0.5-1.0 m/s
- 1%AEP Flood Hazard: High / H6
- 1%AEP Hydraulic Category: Floodway / flood storage

As shown in the maps below, as provided in the earlier DA application, all of the site is designated as the highest flood hazard (H6: unsafe for vehicles and people with all structures vulnerable to failure), and approximately 80% of the site is designated as floodway.

As is well understood, floodways are intended to convey large volumes of fast-moving water during flood events, and any obstruction can increase the flood hazard to surrounding areas and present significant risks to life, property, and infrastructure. Development in floodways is therefore generally prohibited.

⁹ Greenview Consulting 11/04/2024 *Flood Risk Management Plan and Evacuation Plan for proposed Commercial Development 3 Exeter, Camden NSW*



- ARR2016 Hazard
- H1 - Generally safe for vehicles, people and buildings.
 - H2 - Unsafe for small vehicles.
 - H3 - Unsafe for vehicles, children and the elderly.
 - H4 - Unsafe for vehicles and people.
 - H5 - Unsafe for vehicles and people. All buildings vulnerable to structural damage. Some less robust buildings subject to failure.
 - H6 - Unsafe for vehicles and people. All building types considered vulnerable to failure.

Map C – 1% AEP Hydraulic Category



Source: Greenview Consulting 11/04/2024 *Flood Risk Management Plan and Evacuation Plan for proposed Commercial Development 3 Exeter, Camden NSW*

Camden Flood Risk Management Policy¹⁰ (7.3.6) states *Commercial and industrial development is only permitted in areas located outside the floodways mapped as shown at Council’s website*. The Policy (Appendix 3) provides the development control matrix below:

Matrix 2 - Nepean River Catchment - Mainstream Flooding

Floodplain Development Controls Matrix		Mainstream Flooding							
		Floor Level	Building Components	Structural Soundness	Flood Affection	Emergency Management	Car Parking	Management & Design	
Flood Risk Predicts	High Flood Risk	Critical Infrastructure and Facilities							
		Sensitive Uses and Facilities							
		Precinct Planning & Land Subdivision							
		Low Density Residential							
		Medium and High Density Residential							
		Commercial and Industrial Uses							
		Concessional Development	1,4	1	1	1	1,2,3	1,4	1,3
	Rural & Recreation	1,5	1	1	1	1	1,4	1,3	
	Medium Flood Risk	Critical Infrastructure							
		Sensitive Uses and Facilities							
		Precinct Planning & Land Subdivision				1	1,3		2,5,6,7
		Low Density Residential	1,2	1	1	2	1	1,2,3	
		Medium and High Density Residential	1,2	1	1	1	1,2	1,2,3	1
		Commercial and Industrial Uses	1,2	1	1	1	1,2,3	1,2,3	1,3,8
		Concessional Development	1,4	1	1	2	1,2,3	1,4	1,3
	Rural & Recreation	1,5	1	1	2	1,2	1,4	1,3	
	Low Flood Risk	Critical Infrastructure							
		Sensitive Uses and Facilities	3	2	2	2	1	1	1,4
Precinct Planning & Land Subdivision					1	1		2,6,7	
Low Density Residential						1			
Medium and High Density Residential						1,2		1	
Commercial and Industrial						1,2,3	1	1,8	
Concessional Development						1,2,3		1	
Rural & Recreation					1,2	1	1		

Colour Legend

- Unsuitable land use
- No Controls
- 1,2 Flood related controls apply

Even on the small part of the site that is not in a floodway, development is generally prohibited due to the site’s high flood risk category (H6). As is clearly shown in the matrix, the site is unsuitable for any land use and there is no exception for a small building and certainly not for stored vehicles and trailers. The concessional development provision is not available because it can only be considered outside a floodway for an outbuilding (with a maximum floor area of 30 m²). Both the small proposed building and parked vehicles are unsafe according to the above extracts from Camden Flood Risk Management Policy which is based on the 2022 flood study referred to above.

The community wake-up call of the 2022 devastating floods led to a NSW inquiry and the government accepted all of its recommendations. The outcome was that building on the floodplain must be strictly controlled. This DA flies in the face of this public process and outcome.

¹⁰ Camden Council 14/02/2023 *Flood Risk Management Policy P1.0046.2* Available at <https://www.camden.nsw.gov.au/assets/pdfs/Council/Policies/Flood-Risk-Management.pdf>

We respectfully draw attention to the flood marker street art located at the nearby Camden Town Farm Walkway. This public artwork vividly illustrates historic flood levels in the area and serves as a powerful, visual reminder of the Camden township's vulnerability to repeated and severe flood events.



The proximity of this interpretive artwork to the subject site and Nepean River reinforces the importance of making planning decisions based on policy that is informed by local flood history and lived experience.

Given the site's location within a floodway, and its adjacency to these public flood markers, we suggest that observing the area in its physical context—including the topography, proximity to the Nepean River, and the informative street art—will provide valuable insight into the flood risks and community concerns associated with the proposed development.

Flood risk: stored vehicles

Given the site's classification as a high-velocity floodway and the nature of the vehicles already being stored without DA approval and proposed to be stored, the development presents an unacceptable flood risk.

The storage of vehicles or any items in floodways contradicts best-practice floodplain management. These areas should remain clear and unobstructed to ensure the safe and effective conveyance of floodwaters, as per most local and state planning policies.

The DA presumes that all vehicles can necessarily be removed to an appropriate place in good time without impeding the evacuation efforts of the SES, residents and other businesses. This confidence indicates a lack of experience of flood events, and wishful thinking.

Research into the impact of flood waters on heavier vehicles especially trucks, buses and combinations is ongoing with more data needed to determine and define their stability thresholds. However current research^{11,12,13,14} into hydrodynamic forces, stability thresholds, and risks associated with vehicles being submerged or swept away during flood events consistently shows that any vehicle

¹¹ Smith G P, B D Modra, T A Tucker and R J Cox May 2017 *Vehicle stability testing for flood flows* Water Research Laboratory University of New South Wales
Available at <https://www.unsw.edu.au/content/dam/pdfs/engineering/civil-environmental/water-research-laboratory/publications/WRL-TR2017-07-Vehicle-Stability-Testing-for-Flood-Flows.pdf>

¹² Bocanegra R A and F J Vallés-Morán 23 May 2019 *Review and analysis of vehicle stability models during floods and proposal for future improvements* Journal of Flood Risk Management Volume 13, Issue S1
Available at <https://onlinelibrary.wiley.com/doi/10.1111/jfr3.12551>

¹³ Al-Qadami E H H et al September 2021 *Static and Moving Vehicles Stability Criteria Inside Floodwaters-A Review* Engineering Letters Volume 29, Issue 3
Available at https://www.engineeringletters.com/issues_v29/issue_3/EL_29_3_54.pdf

¹⁴ Al-Qadami E H H et al September 2024 *Floodwaters and vehicle hydrodynamics: A deep dive into risk mitigation unravelling vehicle stability in floods* Results in Engineering Volume 23
Available at <https://www.sciencedirect.com/science/article/pii/S2590123024007953>

is surprisingly buoyant. It is observed from test results that there is a marked change in stability when water level reaches a vehicle's floor pan as the air trapped in the cabin acts like a bubble and the force required to move the vehicle rapidly decreases. Trailers in particular are typically large and flat-sided, making them highly susceptible to buoyant forces during flooding. It is obvious they would soon be swept away if not moved in good time.

We note these problems with the vehicles and trailers remaining on site:

- Their presence could impede flood flows, increase upstream flood levels, or alter the natural behaviour of floodwaters.
- They require a high level of restraint to resist hydraulic pressure and buoyancy forces which is impractical under typical commercial operations.
- They could become projectiles if not adequately secured, endangering lives, structures, and infrastructure.

The vehicles and other equipment on site could pose a serious hazard to downstream property and people if they become mobile during a flood event. As shown in the photos below avoidance of this is imperative as was demonstrated in the 2022 Camden flood event.



Photos taken in 2022 Camden floods

The Traffic Impact Assessment Report (22 October 2025) provides an analysis relating to vehicles of length not exceeding 8.8m. This length is not consistent with the size of the vehicles being stored on-site, as observed by the community, evidenced in the Appendix and as described in the Addendum (s 5.1) which states that the business specialises in any size commercial vehicles ranging from utilities through to prime movers and coaches. Such vehicles, and trailers are much longer than 8.8m. An obvious question is whether such large vehicles are permitted to use the local road system to enter and leave the site without a permit. And if they do need a permit what happens in a flood event?

Whilst the site may or may not be temporarily partially or fully cleared due to the assessment of the retrospective development application, what is clear is that this report does not accurately represent the usual and proposed activity on the site. It makes no assessment based on long and heavy vehicles or trailers or the number that are usually stored on site and treats the development as being much more minor than it is known to be.

But the big question is how can such large vehicles and trailers be efficiently evacuated in a flood event?

Despite the claims in the DA documentation the water level and its velocity at the site in a flood event are significant. We do not believe this danger can be fully avoided, even if the manager and any employees were at the site at the time of a flood event because moving the vehicles and trailers from on the site would:

- require many drivers with special licences;
- likely require shuttle trips to evacuate trailers;
- choke evacuation routes out of the town;
- impede evacuation efforts of other properties and emergency services;
- not necessarily be to an accessible and appropriate place to store the vehicles.

It is disingenuous to expect that the SES, with all it has to do to keep people safe, should have to be concerned with the possibility that vehicles will become projectiles, or to have to accommodate their evacuation on local roads.

Many vehicles and trailers either need to be moved which is problematic in terms of timing, where they are moved to, who is on hand with special licences to move them? Will the vehicle batteries be flat? Is there an appropriate vehicle to connect the trailers to? Can the longest vehicles turn corners without mounting kerbs and encroaching into the opposite lane? Will the vehicles and trailers block evacuation routes? Or do some stay put with the danger of being lifted precariously and swept downstream endangering people and property?

It is unlikely that all vehicles could be moved soon enough or all to St John's hill as suggested or other appropriate places. The potential for significant harm to persons and property cannot be adequately mitigated.

Those who are familiar with the church grounds indicate that the size of the vehicles on site could not easily enter through the gates to St John's Church. Roads are closed, the Macarthur Bridge is at a standstill, the Cowpasture and Macquarie Road Bridges are flooded and closed very early. The few local roads out are highly congested.

Clearly the author of the *Flood Emergency Response Plan* has no first-hand experience of a flood evacuation in Camden.

Flood risk: pollutants

The storage of vehicles, particular such large vehicles, presents the potential for spills or leaks of fuel and other hazardous materials on the site, which was already found to be potentially contaminated.

There can be no guarantee that a flood event and on-site activity in evacuation, especially as the site is in a floodway, would not spread pollutants, including to the Nepean riverine system contrary to Section 6.8 Flooding of the Biodiversity and Conservation SEPP 2021.

Flood risk: insurance

There are also broader implications for holders of insurance policies across Camden if this DA was to be approved. Known to be prohibited, intensified development in designated floodways especially for purposes involving heavy vehicles, long trailers and machinery may increase flood-related insurance premiums for residents and businesses.

Underwriters typically assess risk on a postcode or locality basis and may not have the capacity to distinguish between compliant and high-risk individual sites. As a result, a single inappropriate approval in a high-hazard area such as this may trigger a generalised premium increase or restricted coverage for all properties in Camden. This would unfairly penalise responsible owners and degrade confidence in the local planning system.

Heritage (Addendum SEE 5.4)

Camden Council has adopted the Burra Charter which emphasizes the cultural significance of a place — this includes historical, aesthetic, scientific, and social value. The assessment of heritage impact in this application is inconsistent with the Charter as it is narrowly focused on architectural merit, with little to no consideration of the broader historical and cultural significance of the site.

The site lies within the Camden Heritage Conservation Area and is in close proximity to significant heritage items including the Camden Town Farm which is of high cultural significance. As previously noted, the Minister for Heritage acknowledges that the town is of state significance and it is currently subject to investigation into how best to protect it at the state level.

The past and proposed activity on this domestic site is not consistent with the town's unique colonial, rural, dairying and country town history linked to earliest European settlement in Australia. The development with its yard of large heavy vehicles would detract from the historic integrity of the town and the visual amenity of the township's northern gateway.

The consultants engaged by the applicant no doubt possess all necessary heritage qualifications. However, they have provided no comfort in this case that they have employed qualifications and expertise in cultural heritage assessment, which is central to the site's significance within Camden's HCA.

The Heritage Consultant presents the opinion, without supporting evidence, that the extant dwelling is "non-contributory". However, it is arguably contributory according to the HCA heritage listing. The listing refers to the town's significance as including its being unusually privately planned by the Macarthur family with its layout signifying the social composition of the area, with relatively intact remnant building stock from c.1841 to the mid-20th Century contributing along with important communal open spaces in a major way to its valued character. It refers to some built forms within the Township being less than contributory outside the generally important c. 1841 to mid-20th Century period.

As well as its construction falling within the contributory period, the cottage in question sits within a cluster of comparable mid-century cottages which emphasise its significance and contribution in Camden's social history and to its low scale, fine-grained built form as emphasised in Camden's UDF. Camden's DCP¹⁵ specifically states that existing cottage dominated streetscapes should be retained.

The historical and social value of the cottage have not been considered in the DA. The demolition of this structure and its replacement with a small building surrounded by a crowd of large heavy vehicles and trailers would erase layers of meaning that contribute to the identity and long continuity of Macarthur's 1840 township.

Notably, Council officers have stated in assessments of iterations of this DA, which the Local Planning Panel have endorsed, that while the dwelling may only have a neutral architectural contribution, they do not support its removal, acknowledging that the proposed development would be a detracting element in the HCA. This reinforces the need for a more comprehensive and multidisciplinary heritage assessment than provided in the DA documentation.

Although the conservation area's listing indicates that the cottage is significant, we are unaware of any analysis to determine whether it makes a negative, neutral or positive contribution. As the stated in the Land and Environment Court's Planning Principle in *Helou v Strathfield Municipal Council* [2006] NSWLEC 66, the demolition of a building which contributes to a conservation area will impact on the area's heritage significance even if its replacement building "fits" into the conservation area (Para 45).

It follows that what replaces the item in a conservation area is critical to conserving heritage significance. The LEC outlined six key considerations for demolition in a Heritage Conservation Area. The proposed demolition at 3 Exeter Street fails to meet any of them:

1. *What is the heritage significance of the item?*

The dwelling may hold historical and social value that has not been properly assessed. Its contribution to the streetscape and local memory is part of Camden's layered heritage.

2. *What impact would demolition have on the heritage significance of the item and the HCA?*

Demolition would result in the irreversible loss of a structure that contributes to the continuity and character of the HCA, setting a precedent for further erosion.

3. *What conservation options are available?*

No alternatives to demolition have been explored. Adaptive reuse or sympathetic renovation could preserve the building's contribution while accommodating new uses.

4. *Would the replacement building respect the character and significance of the HCA?*

The proposed shed is not compatible with the original use of the site. It does not necessarily integrate respectfully with either the residential cottage character of Edward Street or the rural character of the Town Farm. The main issue though is that the preponderance of large heavy vehicles and trailers is the dominant feature on the site and they present as a completely unsympathetic detraction from what is special about the town.

¹⁵ Camden Council 2019 *Development Control Plan 2.16.4 Camden Heritage Conservation Area Control 9*

5. *Are there any other relevant matters?*

The development contravenes planning controls on flood risk and heritage conservation and has attracted significant community opposition. The storage of vehicles in a floodway is dangerous to property and people. Development in a floodway is prohibited.

6. *Is the replacement of such quality that it will fit into the conservation area?*

No. The proposed development comprised of a yard of large heavy vehicles is of an anomalous quality that is inconsistent with the renowned features of the HCA.

Regardless of argument that the cottage may well be contributory to the HCA, it is established in floodplain management policy that development within designated floodways poses unacceptable risks to life and property. The cottage has stood fast for more than 70 years, but if the cottage was not to be retained, the site could be reimagined as part of Camden's northern approach in the form of open green space complementing the Town Farm. This would improve floodwater conveyance, and act as a welcoming, visually pleasing entry to Camden, reinforcing both safety and heritage values in a balanced manner.

There is no case for redevelopment within a floodway, and certainly not for this development that detracts from the town's significance and visual amenity.

Conclusion

In conclusion, we submit that the proposed development at 3 Exeter Street is prohibited and unacceptable because it is located almost entirely within a designated floodway of the highest hazard category. It is contrary to Camden's Flood Risk Management Policy and the post-2022 state floodplain management framework. Additionally, storing and trading large heavy vehicles in this location presents an unmanageable risk to life, property and the environment during flood events.

We further submit that the demolition of the existing cottage and its replacement with a shed and continued heavy vehicle yard would erode the heritage significance, visual amenity and fine-grain rural character of Camden's Heritage Conservation Area, conflict with the MU1 zoning objectives, the DCP and the Camden Town Centre Urban Design Framework, and that unresolved contamination, traffic and insurance concerns reinforce the case against approval.

Thank you for taking into account these serious community concerns.

Yours sincerely,



Glenda Davis
President
On behalf of
Camden Residents' Action Group Inc

Appendix: Large heavy vehicles and trailers for sale as at 7 December 2025.



REDBACK
The one with the 'BITE'

WEEDWIPER

2.4m, 4.8m & 6.2m Models

Refine Search... 

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New & Used Farm Machinery for sale with keywords: camden

Showing 1 - 12 of 12 result(s)

Sort By:

Premium Ads



PREMIUM



 6

 **\$87,989**

2005 MACK METRO-LINER

» Listing Type: Used » Class: Prime Mover
» Power - hp: 435 » Kms: 180,803

 Camden, NSW

 02 8999 7256  ENQUIRE

MORE DETAILS

PREMIUM



 21

 **\$273,900**

VOLVO FH16

» Listing Type: Used » Class: Prime Mover
» Power - hp: 600 » Drive: 6x4

 Camden, NSW

 02 8999 7256  ENQUIRE

MORE DETAILS

PREMIUM



19



\$187,000

2022 JOHN DEERE 6120M

» Listing Type: Used
» Rated Engine Power - hp: 120

📍 Camden, NSW

📞 02 8999 7256 ✉ ENQUIRE

MORE DETAILS

PREMIUM



26



\$126,500

2019 SCANIA R650

» Listing Type: Used » Class: Prime Mover
» Power - hp: 650 » Kms: 921,458

📍 Camden, NSW

📞 02 8999 7256 ✉ ENQUIRE

MORE DETAILS

PREMIUM



19



\$97,900

2008 KENWORTH T408 SAR, CUMMINS ISX, 18SP MANUAL

» Listing Type: Used » Class: Prime Mover
» Stock Number: SN1706

Camden, NSW

02 8999 7256

ENQUIRE

MORE DETAILS



5



\$18,790

PANTECH 1996 MAXICUBE PANTECH TRAILER

» Listing Type: Used » Class: Pantech

Camden, NSW

02 8999 7256

ENQUIRE

MORE DETAILS



6



\$108,900

MACK FLEET-LINER

» Listing Type: Used » Class: Prime Mover
» Stock Number: S101

Camden, NSW

02 8999 7256

ENQUIRE

MORE DETAILS



19



\$35,200

INTERNATIONAL F180

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

Camden, NSW

02 8999 7256

ENQUIRE

MORE DETAILS



11



\$29,700

FREIGHTMASTER ST3 FLAT TOP SEMI TRAILER

» Listing Type: Used » Class: Flat Deck Trailer

Camden, NSW

02 8999 7256

ENQUIRE

MORE DETAILS



28



\$108,900

2024 LIEBHERR L509

» Listing Type: Demo » Year: 2024

Camden, NSW

02 8999 7256

ENQUIRE

MORE DETAILS



14



\$174,900

MERCEDES-BENZ UNIMOG

» Listing Type: Used » Class: Prime Mover

» Stock Number: S104

Camden, NSW

02 8999 7256

ENQUIRE

MORE DETAILS



6



\$18,790

MAXI-CUBE PANTECH-TRAILER

» Listing Type: Used » Class: Pantech

Camden, NSW

02 8999 7256

ENQUIRE

MORE DETAILS