

# Camden Residents' Action Group

*Incorporated*

*Camden – Still a Country Town*

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9 February 2026

Dear General Manager,

**Re: DA 2025/709**

Carrington 90 Werombi Road Grasmere

*Concept development application for a seniors housing development comprising demolition of the existing twenty (20) single-storey buildings (58 units) and construction of: a four (4) storey memory care building containing fifty-five (55) bedrooms; a four (4) storey assisted living apartment building comprising forty-two (42) apartments; a five (5) storey independent living units building comprising eighteen (18) units (with communal facilities); three (3) single-storey villas; and a single-storey community building, with associated basement and at-grade parking, landscaping, tree removal and ancillary civil works including widening of part of Carrington Circuit to approximately 8m for bushfire compliance.*

This is a concept proposal representing further major urbanisation within the Carrington campus, as shown in the diagram below. We assume that a Planning Proposal is not required because Camden LEP<sup>1</sup> permits residential flat buildings on the site with development consent (although the height and density of what is proposed would be prohibited under the site's R5 zoning).

We trust Carrington residents are fully informed in good time so that they may make submissions on the DA if they so choose. We understand that the new CEO of Carrington is ensuring that residents are notified of the application, and we trust they will have ample opportunity to consider potential impacts on their amenity.

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<sup>1</sup> Camden LEP: Schedule 1 (8) Use of certain land at 90 Werombi Road, Grasmere



Source: Michael Brown Planning December 2025 *Statement of Environmental Effects Fig. 2*

If this concept DA is approved, we understand that subsequent detailed development applications will be required to proceed further<sup>2</sup>. The intention stated in the Statement of Environmental Effects (SEE) is, upon approval of the concept, to first lodge a DA for the memory care building, which is badly needed.

**Comment:**

*We ask that if and when the concept is approved that a condition be that a DA for the memory care facility be required before any others.*

The SEE (p.10) states that it evaluates the DA’s compliance and consistency with the aims and objectives of statutory planning instruments, including Camden Local Housing Strategy 2020 (LHS). The final Housing Strategy is dated October 2021<sup>3</sup> and our comments relate to this adopted version.

The LHS acknowledges that affordability issues are a significant strategic challenge for Camden and addresses increasing the housing supply for lower- and moderate-income households.

<sup>2</sup> EP &A Act: s4.22 *Concept development applications*

<sup>3</sup> Camden Council October 2021 *Local Housing Strategy* Available at <https://www.camden.nsw.gov.au/assets/Uploads/FINAL-LHS-Website-Version.PDF>

Evidence<sup>4</sup> indicates that older people on fixed or declining incomes are one of the fastest-growing cohorts in housing stress. It is well known that market-rate senior's housing often remains unaffordable to pension-dependent residents.

It is not currently clear to us where Camden Council stands on mandating affordable housing to be provided or contributions<sup>5</sup> made in a proposed development such as this. The intention of the NSW government to increase affordable housing is clear through its focus on the issue in its planning instruments. The LHS provides demographic data and projections showing that Camden's population is aging and that demand for affordable senior housing infrastructure is increasing.

Carrington<sup>6</sup> is a large institution serving the area for more than 130 years. It states that it is shaped by its charitable past and values, progressing towards a future that continues the story encompassing all peoples of the area. Its history and mission are about community service, not just for-profit.

**Comment:**

***We request that Council include a condition in any approval of this concept DA that a reasonable percentage of housing – we suggest at least 5%- be set aside as affordable housing accessible to those on low incomes, including the age pension. This would be a socially responsible outcome and go some way to relieving housing stress that many older Australians face through circumstances beyond their control.***

As the accompanying Heritage Impact Statement observes, the wider landscape of Carrington is best described as rural or rural residential (p.21). Objectives of the R5 zone include the provision of residential housing in a rural setting while preserving, and minimising, impacts on environmentally sensitive locations and scenic quality and also minimising conflict between land uses within the zone. One of the planning controls over the site listed by the NSW spatial viewer is that of scenic protection land.

The Carrington campus is progressively becoming more urban and less compatible within the Grasmere rural residential area.

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<sup>4</sup> For instance:

Housing for the Aged Action Group (HAAG) *Older Women Ageing on the Edge* Research Library (various articles) Available at <https://www.older tenants.org.au/resource-themes/older-women>

Power, E et al 10 August 2023 *Opinion: Ageing in a housing crisis: growing numbers of older Australians are facing a bleak future*

The Conversation Available at

<https://theconversation.com/ageing-in-a-housing-crisis-growing-numbers-of-older-australians-are-facing-a-bleak-future-209237>

<sup>5</sup> Camden Council 9 December 2025 *Meeting Minutes ORD02 - Post-Public Exhibition - Draft Western Sydney Regional Affordable Rental Housing Contribution Scheme* Available at [https://www.camden.nsw.gov.au/assets/Ordinary-Council-Business-Papers/ORD\\_09122025\\_MIN.PDF](https://www.camden.nsw.gov.au/assets/Ordinary-Council-Business-Papers/ORD_09122025_MIN.PDF)

<sup>6</sup> Carrington Care *About Us Who Are We* Available at <https://carringtoncare.com.au/about-us/>

The Arboricultural Impact Assessment recommends the removal of 73 trees to accommodate the development and states that they will be replaced in the landscape upon completion. Camden DCP requires that up to 4 replacement trees be planted for every tree removed. Given the zoning and scenic rural quality of the site and surrounding area, we trust that 4 trees will be required as an offset.

**Comment:**

*To mitigate the urbanisation of the Carrington campus and the anomaly of the development within the R5 zone, we request that as many replacement trees as possible be required to offset those removed.*

Another objective of the R5 zone is ensuring that development in the area does not unreasonably increase the demand for public services or public facilities. This is a concept DA and as such we assume that the issue of sufficient infrastructure is one that needs to be addressed.

Carrington is not in close proximity to services and access to the site is difficult or impossible during flood events. We understand there is no on-site medical and staff accommodation. Camden Council's Flood Risk Management Policy requires consideration of cumulative increases in the number of persons at risk and that a Flood Emergency Response Plan be developed.

The concepts of aging and sheltering in place are ones that need close examination if staff, ambulances and other services cannot access the site, and patients cannot be efficiently evacuated to receive necessary care.

Traffic congestion on the Macarthur and Cowpasture Bridges and Camden bypass in normal times is a regular issue and congestion at the Smalls Road/ Carrington Circuit roundabout will be exacerbated if the Smalls Road Carrington development proceeds. In flood events Cawdor Road and the usual route to Carrington is closed early, and Burragorang Road intersection with Camden Bypass becomes highly congested and un navigable.

There are two questions that we believe need to be addressed:

- whether the existing infrastructure will be able to stretch to facilitate the intensity and immediacy of needs of so many vulnerable people housed at Carrington;
- how the needs of Carrington residents can be met in a flood event when traffic is almost at a standstill and Carrington is effectively isolated.

The answers to these questions likely pose another question: is the community expected to bear the additional infrastructure costs?

We do not see any answers to or acknowledgment of these questions about demand for public services or public facilities in the DA documentation. From future resident and community perspectives, as well

as in planning terms, we believe the sufficiency and efficiency of infrastructure supporting this concept development needs to be fully considered.

**Comment:**

***We ask that this concept DA be refused as it stands. Please require the developer to address the proposal's impact on existing infrastructure, what additional infrastructure is needed and how the needs of vulnerable people during flood events are to be met.***

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This proposal represents a cumulative urbanisation of the Carrington campus and further anomalous intensity of development within the landscape character of the R5 rural residential zone. There are unaddressed issues relating to affordable housing, infrastructure capacity and flood event access.

We request that the concept DA be refused until it is substantially amended to address requirements for affordable housing, landscape offsets, potential infrastructure provision and flood emergency planning. We submit that until these matters are adequately resolved, the proposal cannot be supported to be in the public interest.

Yours sincerely,



Glenda Davis  
President