

Camden Residents' Action Group

Incorporated

Camden – Still a Country Town

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15 May, 2026

Dear Homes NSW,

Re: Camden Housing Project
70-78 and 82-86 Menangle Road Camden NSW

Camden Residents Action Group (CRAG) writes to formally object to the scale of the proposed Camden Housing Project at 70–78 and 82–86 Menangle Road, Camden.

CRAG is on the record as advocating for and supporting the delivery of social and affordable housing (SAH) in Camden. We attended Council's forum on the housing crisis; we have argued for requiring developers to provide SAH within their developments and for more crisis housing. We understand the very real housing affordability crisis and strongly believe that having a safe and comfortable place to call home within a welcoming community is everyone's right, particularly in a rich country like Australia.

The research literature¹ demonstrates that SAH works best when it is integrated with market housing and not distinguishably enclaved. Providing 10 homes spread across the three sites as the NSW Government foreshadowed² and as confirmed to us by MP Sally Quinnell in August 2024 had a good chance of blending into the adjacent low-rise area of mainly single-storey homes and the Camden community.

We attended the drop-in session at Camden Civic Centre on 6 May 2026, and were shocked by the artist's impressions and the scale, height and bulk of what is now proposed.

¹ For instance, see Darcy, M. (2010). De-concentration of disadvantage and mixed income housing: a critical discourse approach. *Housing, Theory and Society*, 27(1), 1-22.

² <https://www.nsw.gov.au/media-releases/building-homes-for-new-south-wales-first-sites-identified>,

The artist's impressions show monolithic buildings that signal social difference and "otherness" within what is a cohesive Camden community.

We have long been active in the heritage space and are currently in discussions with Heritage NSW and the NSW Heritage Council about progressing our nomination³ of the Camden township for state listing and better protecting the uniquely historic town. A further meeting is scheduled this month in Camden.

Needless to say, the township, established as a private town by the Macarthur family, is recognised as being of high heritage value in not only the European story of NSW, but very arguably of Australia. As such it has exceptional tourism potential, particularly being close to Sydney and the new international airport.

We know that the vast majority of residents⁴ opposed to this particular development feel the same way about the imperative to protect Camden's unique heritage and have no issue with SAH wherever located as long as it blends into the existing sense of place and community. Please do not assume that this is just a case of nimbyism. Those needing SAH would likewise want their safe place to be part of the whole, not overtly different.

As we covered in our submission on the NSW Heritage Strategy⁵ it is not in the best interests of the people of NSW that we lose what is precious to all and that application of the Low and Medium Rise Housing Policy (LMR) was a path to conflict between heritage conservation and housing, with both losing out. As predicted the community is very unhappy with the height and scale of the proposed buildings which is already making news⁶. We argue that there are many pathways to additional housing and each need to be explored in terms of sustainability factors important to community, including heritage conservation and social cohesion.

The general community response is that the development is too differently big to be socially inclusive and to be architecturally appropriate for Camden, particularly as it is adjacent to the Heritage Conservation Area (HCA) and in close proximity to individually listed items (including state listed St John's Church Precinct).

The current proposal is fundamentally anomalous in Camden, and feedback to us is that the community will oppose it at every step. We maintain that the proposed buildings are out of scale with their setting and inconsistent with Camden's heritage character, local planning controls, existing and pending heritage controls and the capacity of existing infrastructure.

³ Camden Residents' Action Group November 2023 *Camden Township Heritage Study*. Available at <https://www.crag.org.au/camden-township-heritage-study/> and <https://camdenhistorynotes.com/2026/02/>

⁴ **Camden residents opposed to Menangle road development (opp. hospital)**
<https://www.facebook.com/groups/840824491779761>

⁵ CRAG 13 July 2025 *Draft NSW Heritage Strategy* Available at <https://www.crag.org.au/wp-content/uploads/2025/10/13-July-2025-NSW-Heritage-Act-Review-CRAG-submission.pdf>

⁶ 29 April 2026 <https://southwestvoice.com.au/community-alarm-high-rise-housing/>

8 May 2026 <https://www.tdr.com.au/editions>

Heritage conservation issues

The development sites are adjacent to the boundary of Camden’s HCA which is subject to a 7m height limit under the LEP and a two-storey limit under the DCP heritage provisions (s. 2.16.4). The sites are immediately opposite locally-listed Camden District Hospital and close to locally listed Macarthur Park and already state-listed St John’s Church Precinct.

The proposal is for three apartment buildings with of four to six storeys with heights ranging from 18.5m to 22.5m. The height limit of the that part of Menangle Road is 9.5m. The current proposal, being four to six storeys, is well beyond that height character and would dominate a precinct defined by low-rise heritage buildings, cottage dominated streetscapes and houses described in the HCA Listing as contributory to its heritage value.

The Design concept leaflet, provided at the drop-in session at the Camden Civic Centre, is headed “A design that reflects Camden”.



How it reflects Camden which is renowned as a surviving colonial country town is not explained. The 1840 town is a legacy of the pioneering Macarthur Family, almost certainly the only extant privately designed town in Australia.

The proposed buildings do not reflect the town’s history and human scale. The area is a unique and precious tangible reflection of Australia’s early European history and the community is highly protective of it.

We have undertaken a study⁷ demonstrating Camden’s state significance that is endorsed by eminent historians. NSW Heritage agree that the town is of state significance and is currently engaged with us on ways to better protect its locally listed conservation area for future generations.

There is an inconsistency with one branch of the NSW Government seeking ways to protect the town and another advocating policy that would see historic residential areas within and adjacent to the HCA replaced with new builds of different and inappropriate scale and character.

Such urban development would destroy what is well known as a surviving rural town with features including the town farm, equestrian centre, sale yards and milk factory as well as a yearly agricultural show⁸.

⁷ Camden Residents’ Action Group November 2023 *Camden Township Heritage Study*. Available at <https://www.crag.org.au/camden-township-heritage-study/> and <https://camdenhistorynotes.com/2026/02/>

⁸ <https://www.camdenshow.com/about-us>

Camden DCP identifies the health precinct surrounding Camden Hospital as one of the distinguishing character elements of the HCA.

In our view, the demolition of the former Nurses' Quarters and their replacement with apartment buildings of such height and bulk would directly damage a character element that the planning controls were intended to protect.

The Nurses Quarters form part of Camden's history and lives and memories of its families. The building is representative of institutional accommodation, now a largely disappearing class of buildings across NSW. It is important evidence of women's working history and the social organisation of hospitals before modern education and transport patterns changed healthcare systems.

There is no reference to a photographic and archival record in the Project documentation. Any demolition should not occur until this is produced and placed as a public record in Camden Library and with the Camden Historical Society.

The DCP also contains an unconditional control that views associated with the St John's Church spire must not be compromised. The sight lines are analysed in the Conservation Management Plan of St John's Precinct, and considered in every relevant DA.

The positioning of St John's to be dominant in the town and the surrounding landscapes with widespread sight lines was integral to the intentional design of the town by the Macarthur family and Sir Thomas Mitchell in 1836. The church was also positioned to be visible from state listed Camden Park and that sight-line is intact today.

We are concerned that buildings of this proposed height and mass on Menangle Road may intrude upon key views to the spire from the township approaches, the rural floodplain and Camden Park. No public sight-line analysis has been exhibited to demonstrate compliance with the DCP control or protections under St John's Precinct's state listing.

It is also important to note that Menangle Road is historically important because it formed a principal access route to and from Camden Park, physically and visually connecting the township with the Macarthur family estate lands, dairies, agricultural facilities and the village of Menangle. Today Menangle Road is one of the most sensitive heritage corridors in Camden. It forms a principal approach to the historic township and contributes to the visual setting of St John's Precinct.

We believe, given that Camden is so historically significant, that even at this initial stage of the development approval process, proper consideration of the heritage impacts should be in the public domain. We note that such an approach is usual for developers under the legislation (LEP 5.10).

A comprehensive Heritage Impact Statement addressing the Camden HCA and its potential state listing, St John's Anglican Church Precinct and associated sight-lines and locally listed items (particularly Camden District Hospital and Macarthur Park) needs to be publicly exhibited so that the community understands what could be lost by a development of this anomalous scale.

Clarification is needed as to whether involvement of Heritage NSW is one of advice or concurrence of the Heritage Council under section 57(3) of the Heritage Act 1977. We trust that in Camden's particular case of being considered for state listing that concurrence is sought even if not legislatively required.

We do consider that the height and bulk of this proposed development would be highly detrimental to Camden's human scale and country town sense of place which are fundamental to its irreplaceable heritage value and tourism potential.

Planning and process concerns

There is a 950% increase in proposed development density decided on after the Project was first foreshadowed entirely without community input. In July 2024, a low-rise development of 10 homes, consistent with the location, was proposed. By mid-2025 that had escalated to 95 dwellings in buildings of four, five and six storeys.

The community sees this as a single integrated project, one that should not prejudge or pre-ordain the outcome.

As argued above a comprehensive and public Heritage Impact Analysis should be an input in deciding whether on balance it is worth moving forward with imposing such an uncharacteristic element into a town with known high heritage value. Instead, such analysis is not provided up front and, as set out in the Scoping Report, the path to approval is fragmented and delays dealing with the big environmental and social issues.

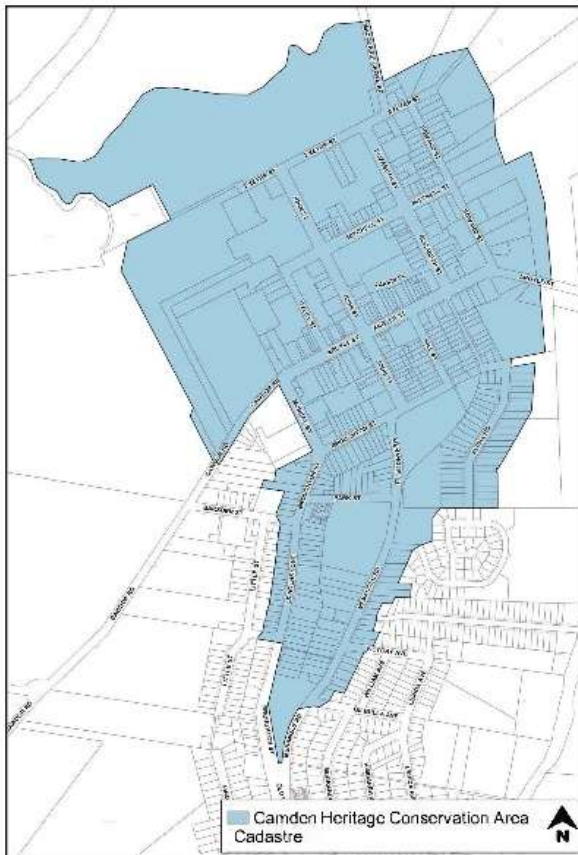
Section 5.5 of the EP&A Act requires examination of all matters affecting or likely to affect the environment by reason of the proposed development. Our understanding is that this includes heritage considerations and the impacts of demolition, spot rezoning and construction activities as a whole. For instance, progressing demolition ahead of the SSDA means that demolition is undertaken before rezoning and assessment of replacement buildings.

The application of the Low and Mid-Rise Housing Policy (LMR) is controversial. We believe that the ad hoc approach being taken as a result of the housing crisis is not conducive to careful consideration of potential outcomes. We note that the sites need to be rezoned from SP2 Infrastructure to R3 Residential to enable the LMR to apply. Spot rezoning is itself contentious in over-riding local planning that has been put in place through local research and consultation with the community.

For very good reasons, the NSW Government has previously opposed spot rezoning and favoured strategic precinct-wide planning. Good solutions do not destroy what is valuable or create other problems.

The approach being taken in furthering this development prevents the community from engaging with cumulative impacts and drives the development without holistic scrutiny and balancing of likely negative and positive outcomes.

Importantly, we must here question the independence of the approval pathway. The community would like to be disavowed of its feeling that as the NSW Government is both the proponent and consent authority of the proposed development that it has no real say in what happens on the sites. In upcoming documentation please let the community know that its concerns and associated issues raised will be fully taken into account and specifically addressed.



Yellow shaded area affected by LMR Housing Policy

Camden's HCA (left)

We note the following in relation to the above maps and applied LMR:

- The state-listed St John's Precinct, included in the LMR designated town centre⁹, is largely situated within its extremity, along Menangle Road to Forest Crescent.
- The walk to shops and services includes a significant length of border of the St John's Precinct along Menangle Road which reduces the walking distance to the edge of the town centre).

The walkability of the development sites in relation to the LMR concessions needs to be explained. Residents generally consider that the distances are not short and greater than the distances given in the LMR.

The application of both the LMR and In-fill Affordable Housing Policies results in extraordinary exceedances (95% and 137%) of the LEP height limits in the area. The planning of the Project would seem to be taking any and every opportunity to scale up the buildings.

As shown in the above LMR map, and as first announced, the yellow shaded areas take in residential areas of the HCA. This was of immediate concern and the issue was taken to MP Sally Quinnell who came back with the answer that the HCA would not be affected.

We were also relieved that Camden Council objected to the LMR applying to Camden¹⁰.

We find it misleading that the Scoping Report (p. 19) states that *Council are generally comfortable with the height and scale of the development*. To the contrary, Councillors and their constituents are extremely uncomfortable with the application of the LMR and proposed height and scale of the Project. Both the community and Council speak as one about the major issues of heritage status of the town and lack of supporting infrastructure.

We also assumed that the LMR mapping needed correction because of this statement in the explanation of the policy:

The Low and Mid-Rise Housing Policy does not apply to land that comprises or contains a heritage item listed in a Local Environmental Plan or the State Heritage Register. This will help to preserve important heritage items¹¹.

⁹ DCP s.5.3: E1 Local Centre zone

¹⁰ Camden Council February 2024 *Objection - DPFI Explanation of Intended Effects - Changes to Create Low and Mid Rise Housing* Attachment 2 ORD01 for the Ordinary Council Meeting held on 12 March 2024

¹¹ <https://www.planning.nsw.gov.au/policy-and-legislation/housing/low-and-mid-rise-housing-policy/low-and-mid-rise-housing-policy-exclusions>

Now we find that the Scoping Report (p. 8) states:

The proposal will not be out of context with the planning controls for the surrounding sites, noting the LMRH Policy provisions permit developments of 17.5m height and 4 storeys on adjacent sites.

The proposal provides a transition to existing lower scale residential uses, while recognising the future context and potential for 4-storey buildings on neighbouring sites in the future.

These statements are not consistent with what we were told and what we read nor with conserving Camden as a potentially state-listed town or respecting the heritage curtilage of state-listed St John's Church Precinct.

The Scoping Report unfortunately seems to cherry pick Camden's policies. The Report¹² claims that the project is consistent with the Camden Council's Local Strategic Planning Statement (LSPS). The LSPS does identify the need for more SAH and the site would be the right location for a more modest development.

However, the Scoping Report fails to acknowledge a key component of the Western City District Plan with which the LSPS aligns. This component is restated in the LSPS as: *Recognising the importance of heritage for an area's identity* (p. 12). The LSPS states, in the context of Camden being a renowned heritage town: *Camden Town Centre was established as part of the agricultural expansion of the early settlement of Sydney, being one of Sydney's oldest towns. The local community holds the Camden Town Centre in high regard for its attractive streets, beautiful heritage buildings, and rural village feel* (p.14).

In referring to Camden's LSPS, the Scoping report also does not acknowledge the following Principle for Housing Growth (p. 40):

12. Heritage values are preserved and reinforced (Delivery: Local Housing Strategy; Camden Urban Design Framework; Camden LEP & DCP).

Also, *Local Priority L2: Celebrating and respecting Camden's proud heritage* (p. 44) refers to the significance of the Camden region to the history of Sydney and the need to ensure that Camden's valued heritage is protected from the impacts of development and can continue to be celebrated by the community. Associated Action 39 (p. 45) states *Council will ensure that future precinct planning considers and protects State and Local Heritage items (Ongoing advocacy).*

¹² NSW Government April 2026 No.72 & No's 82-86 Menangle Road, Camden (Former Camden Hospital Old Nurses Quarters) Scoping Report for proposed concurrent Planning Proposal & SSDA
<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=PDA-116659989%2120260421T073437.755%20GMT>

The Scoping Report does not mention Camden's *Local Housing Strategy* (LHS)¹³ which plans for almost all housing growth to occur in the new suburbs of the SWGA. We point out here its vision:

Housing growth in the established areas is incremental, supported by infrastructure and preserves character. Camden LGA's visual, scenic and heritage values are celebrated, and the rural lands are protected from the impacts of urban development (p. 22).

This proposed development seeks to spot rezone and over-ride Camden's policies which the community was consulted on and believed could rely upon to make their own life and housing decisions.

Its precedent could destroy and at the very least would degrade what is a major economic asset given the town's unique history and tourism potential; essentially throwing a baby out with the bath water scenario.

Amenity and infrastructure issues

The proposal is likely to affect the amenity of the hospital for workers, visitors and patients especially in relation to ease of access and parking. The impact would be very severe during construction.

The proposal is likely to significantly impact the amenity of nearby residents in terms of loss of privacy, overshadowing, bulk and visual dominance. We consider these impacts to be particularly serious because of the building heights proposed and the fine-grained and low-scaled heritage context of Menangle Road.

¹³ Camden Council October 2021 Local Housing Strategy <https://www.camden.nsw.gov.au/assets/Uploads/FINAL-LHS-Website-Version.PDF>

Requested changes

CRAG maintains that the Project should be redesigned so that it delivers SAH in a form that is socially inclusive and sympathetic to Camden's history, heritage and town character and leaves existing residents with the same level of amenity. Please go back to the original concept.

CRAG respectfully requests that Homes NSW not progress the Project at this point and further engage with the community after public exhibition of the following:

- a photographic and archival record of the Nurses Quarters building;
- a more fine-grained design of buildings with reduced height, bulk and overall scale to better and properly reflect Camden's existing heritage character and the low-rise form of Menangle Road;
- a comprehensive independent Heritage Impact Statement of the revised proposal addressing the Camden Heritage Conservation Area, St John's Anglican Church Precinct, Camden District Hospital, Macarthur Park and Menangle Road;
- a detailed sight-line analysis demonstrating that views of the St John's Church spire will not be compromised;
- a full integrated assessment of the impacts of the development on hospital traffic, parking, pedestrian safety and other infrastructure taking into account well-known issues with road closures and evacuation routes in flood events;
- a full assessment of the impacts on the rights of surrounding home owners to quiet enjoyment of their properties including analyses of short-term construction impacts and longer-term impacts on privacy and overshadowing.

Conclusion

For all of the reasons set out above, CRAG respectfully submits that the proposed development at 70–78 and 82–86 Menangle Road is not appropriate in its current form and should not proceed without fundamental redesign and further public scrutiny. We insist that the housing objective should not be pursued at the expense of the town’s irreplaceable heritage, or the integrity of the planning system that aims to protect it. To achieve community support, the Project needs to be substantially redesigned and assessed through a transparent process that properly addresses heritage, design, and community concerns.

While we unequivocally support the delivery of SAH in Camden, that objective must be achieved in a way that is socially inclusive, contextually sensitive and respectful of Camden’s exceptional heritage significance, low-rise character and existing community amenity. The current proposal fails those tests.

The current proposal is fundamentally at odds with the low-rise, heritage character of the precinct, would adversely affect key views, amenity, traffic, and infrastructure, and risks causing irreparable damage to Camden’s historic identity and tourism potential. It is excessive in height, bulk and intensity, is fundamentally inconsistent with the Camden Heritage Conservation Area and adjoining heritage context, and would set a damaging precedent if it were permitted in one of the most historically significant townships in NSW and Australia.

We strongly argue that Homes NSW should not progress this project further until a comprehensive and publicly exhibited Heritage Impact Statement, sight-line analysis, archival record of the Nurses Quarters, and full assessment of traffic, parking, pedestrian safety, flood evacuation, construction impacts and residential amenity have been completed and properly considered.

We request that Homes NSW pause the project, publicly exhibit the outstanding heritage and technical assessments, and work with the community to develop a more modest and better integrated outcome that genuinely reflects Camden’s history, character and planning context.

Yours sincerely,



Glenda Davis

President