

# Camden Residents' Action Group

Incorporated

Camden – Still a Country Town

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## Local Planning Panel 19 May 2026

Re: 2-4 John Street and 11 Elizabeth Street Camden

### DA s4.56 Modification: 2008/644/12<sup>1</sup>

*Section 4.56 modification application, which seeks a number of changes to the approved configuration of Buildings 8 to 11, which are now proposed to be reclassified as Buildings A, B and C. Changes to the approved buildings include an increase of four units, reconfiguration of all levels which will result in minor changes to the maximum RLs, gross floor area, landscaped area and communal open space area and changes to external colours and finishes.*

I speak on behalf of Camden Residents Action Group. We have lodged two submissions on this modification. The first one<sup>2</sup> objected to the cumulative negative impact on the heritage conservation area and loss of adjacent residents' amenity.

In relation to the very long Agenda Report we stress the following:

We again find it extraordinary that assessment of this modification can claim that the development is substantially the same as originally approved, without presenting clear analysis of accumulated environmental impacts of all modifications since the 2009 council and 2010 Court consents<sup>3</sup>.

Despite requests and GIPAs, we have not been able to fully piece together all of the changes over 17 years. This we do know:

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<sup>1</sup> Parent DA approved in 2009: *Redevelopment of the Former Camden High School Site comprising: Demolition of disused School Buildings, Remediation of Contaminated Land, Earth Works, Refurbishment of 1 Existing Building, the Erection of 57 Multiple-Unit Dwellings, 108 Self-Contained Seniors Living Dwellings, 76 Bed Residential Care Facility, 51 Bed Motel, Restaurant, Cultural & Community Centre, Medical Centre, Ancillary Shops, Under Croft Car Parking and Landscaping Works.* We understand this was changed in 2012 to *Staged redevelopment of the former Camden High School site comprising demolition of disused school buildings, remediation of contaminated land, earthworks, construction of 193 self-contained seniors living dwellings, a 76-bed residential care facility, a 51-bed motel, a restaurant, cultural and community centre, medical centre, 1 shop, undercroft and basement car parking and landscaping works*

<sup>2</sup> Dated 20<sup>th</sup> January 2026

<sup>3</sup> <https://www.planning.nsw.gov.au/sites/default/files/2026-03/modifications-under-section-4-55-of-the-epaa-act.pdf>

The 2008 Heritage Impact Study and the 2009 Council Report emphasised that buildings would present as two-storey with loft on street frontages and that building footprints and rooflines would echo the fine-grained, human scale and set backs of the heritage conservation area. The built form is observably monolithic and inconsistent with the rural town's heritage-listing and development pattern.

Already buildings 3 and 5 plus 4 and 6 have been consolidated, and now buildings 8 to 11. This is in contradiction to the original heritage response and justification for approval.

This modification includes balconies overlooking private homes, four of which are heritage listed, and it will take many years for screening to grow if ever. This is a substantial change and a breach of faith with ordinary members of the community.

It is difficult to work out, but it seems the number of living units has increased over the originally approved number of 165 by at least 33<sup>4</sup> and this modification would add another 4. This is a significant increase in density on the site of 22.4%. Shops have been lost and there is no mention of the approved medical centre.

The original approval stressed that the complex would become integrated into the town, with flow through and community access. It is now a gated, ever more intense urban-scale enclave not the original concept of a compatible addition to town life.

Although the essential nature of the development remains seniors housing the cumulative environmental impacts, intensity of use and visual character are fundamentally different.

Councillors involved in the original approval almost certainly would NOT have approved what is appearing on the site, and the community is appalled and ask how did that happen?

We strongly argue that these piecemeal modifications obscure the overall cumulative impact. They are also destructive to the sense of place of this very historic area of the 1840 Macarthur town that NSW Heritage is currently considering for state protection.

The community does not believe that the development is substantially the same. A new DA is required.

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<sup>4</sup> 2009/2010: 57+108 = 165

2012: 193

2021: 195 (mod. 5, consol buildings 3 & 5)

2023: 198 (mod. 9, consol buildings 4 & 6)

2026: 202 (mod.12, consol buildings 8-11)

Increase 37 units, 22.4%

Contrary to the proforma determination in the Agenda Report:

The development is demonstrably inconsistent with Camden LEP's heritage and height of buildings provisions<sup>5</sup> (LEP 5.10, 4.3), the heritage listings, the heritage provisions of Camden DCP and Urban Design Framework<sup>6</sup>.

It is certainly not of an appropriate scale given the LEP height limit and DCP provisions and it observably has adverse impacts on the built environment of the heritage town and heritage items.

Our second submission<sup>7</sup> was a polite request to use this twelfth modification to re-instate the condition requiring an archival record of the High School which, when preparing our submission, was discovered to be deleted without notification or community input on 27 November 2024 under Modification 10<sup>8</sup>. We objected to withdrawn Modification 6 which proposed deleting the condition. We claim that our request is valid because if the deletion had been notified there would have been many objections and the Panel would have made the determination. This is our first opportunity to request that the anomaly in process be corrected. We sincerely request that the Panel reinstate the condition in your determination.

Word count: 698

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<sup>5</sup> LEP 5.10 Heritage conservation; LEP 4.3 Height of buildings

<sup>6</sup> DCP 2.16 Environmental heritage

<sup>7</sup> Dated 27 February 2026

<sup>8</sup> Modification 10