Camden Residents' Action Group

Incorporated

Camden – Still a Country Town

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Department of Planning, Housing and Infrastructure

17 October 2026

Dear Mr Dales and Mr Dobbs,

Re: State Significant Development SSD-116982991
72 and 82–86 Menangle Road, Camden NSW 2570
Response to Submissions and Amendment Report[1]

Our group has lodged two submissions[2,3] against this particular proposal. The first in May 2026 and the second, as referenced under 7.1.3 of the Amendment Report and attached, in August 2026. CRAG is on the record as supportive of social and affordable housing (SAH) but it needs to accommodate the well-being of its future residents and preserve what is already of value.

Our first submission referenced the research literature demonstrating that SAH works best when it is integrated with market housing and not distinguishably enclaved. We draw your attention to the similar philosophy stated this month by Premier Minns[4] that *public housing should be built alongside other homes, in communities where people from all walks of life live side by side….*

[1] FPD Planning 1 October 2026 *Amendment Report*
[2] CRAG 15 May 2026 Available at https://www.crag.org.au/wp-content/uploads/2026/05/15-May-2026-72-82-86-Menangle-Rd-Camden-CRAG-submission.pdf
[3] SE 140275989. Also available at https://www.crag.org.au/wp-content/uploads/2026/08/24-Aug-26-CRAG-Project-72-82-86-Menangle-Rd-Camden.pdf
[4] Graham B 15 October 2026 News.com Available at https://www.news.com.au/finance/real-estate/its-bullst-premier-erupts-on-housing-saying-public-housing-should-be-built-alongside-other-types-of-homes/news-story/2145b189cf8cfa2ee9fba44d7e4e6ad9 and https://www.facebook.com/reel/1738790127408792

we're making sure it's part of the wider community, not separated from it… Good communities bring everyone together from all walks of life… have it mixed in, have it close to the city, have it close to public transport…what we are trying to do is have integrated development… you wouldn't even know which one's social housing and which isn't... the old system doesn't work…

This proposed development is of the old system, the concentrated and distinguishable type, not close to public transport and with no pretence of being integrated into the established community of single-family homes in a highly valued rural and heritage town.

We acknowledge the changes made to the proposal in response to community submissions, but they do not make the proposal fulfill Premier Minns' vision, the needs of its future residents or the expectations of communal integration into the long-established town, conservation of heritage and amenity for everyone.

The Amendment Report (p. 5) states that it provides a consolidated response to the key issues raised in submissions and agency advice. We note that the SSD Guidelines[5] (7.1; 7.3) require that the community gets feedback on issues raised, that the issues are accurately summarised, carefully considered and a thorough response to them made.

With no cross-referencing of the publicly available submissions to the issues raised and responses to them in the Report, it difficult to ascertain whether every specific issue raised has been considered or perhaps been considered and dismissed for whatever reason. Having now had the time needed to consider the post-exhibition responses we are concerned that a number of key issues we raised have seemingly been dismissed or not addressed thoroughly. Consequently, many of our carefully considered and set out questions in relation to these issues have not been answered either.

May we insist that our concerns be thoroughly considered and acted upon in the upcoming assessment process. Detail and explanation are included in the attached submission and we also reiterate here the most pressing issues that we consider need serious attention in the assessment.

Use of Inappropriate LMR Housing Policy

The Amendment Report maintains that the site is suitable because it is identified as surplus government land located within an established urban area, near Camden Hospital, within walking distance of services and public transport. It maps the site as 468 metres walking distance from Site A and 618 metres from Site B to the edge of St John's Church Precinct.

We questioned the inclusion of the St John's Church Precinct within the mapped town-centre boundary, arguing that the precinct does not provide everyday retail and other services, the point of the walking proximity calculation.

[5] NSW Government March 2026 *State Significant Development Guidelines*

CRAG argued that the site was inappropriate for SAH because of its location on a steep hill, its distance from principal shops and services and limited public transport. The distance to the mapped town-centre boundary is not the same as a distance to the shops, essential services and facilities that future residents would need to access. They are much further away. The difficulty of walking back, perhaps carrying shopping, using a mobility aid or shepherding small children from those services up Windmill Hill has been ignored.

The response in the Amendment Report to this issue which was raised in many submissions, does not resolve the fact that the calculated walking distances are impractically underestimated, that the actual distances of routes to services are not calculated and that gradients are steep.

We also referred to Camden Council's identification of potentially more suitable government-owned land, including land associated with Leppington Town Centre. The Amendment Report (4.3) responds that alternative sites are outside the scope of the SSD assessment. This approach is unhelpful in answering the planning question of whether the proposed site is suitable or the most suitable by undertaking a comparative assessment of alternative locations.

Simple application of a one-size-fits-all LMR policy framework has not been distinguished from a separate assessment of the site's suitability for future residents, particularly those who are less physically able or do not have a car. We request a reasoned assessment of how the site's transport limitations, steep terrain and distance to everyday facilities have been weighed against the proposed development's benefits and the benefits of an alternate location such as Leppington with easily accessible services and public transport.

Separation of Demolition and SSD Approval Processes

We clearly raised concerns about the demolition being seemingly improperly separated from the SSD development and that the cumulative environmental impacts of the whole project not been fully considered as required under the EP&A Act and Regulations as well as NSW Guidelines.

We argued that the demolition of the former Nurses' Quarters, cottages and ancillary structures, together with the removal of 58 trees, was functionally connected to the proposed redevelopment. The Demolition Decision Statement states as a reason for the decision: *The proposed development will allow for the cost-effective re-development of the land and is anticipated to ultimately facilitate future construction of much needed social and affordable housing and assist in addressing the existing and growing demand for housing in the Camden local government area.*

The SSDA may not have even been lodged at the time of this decision but it cannot be argued that the demolition and SSD are not intended as a single project with cumulative impacts.

The Amendment Report records this concern and responds (p. 85): *The approved works in the Part 5 Approval do not form part of the SSDA… The impacts associated with the works under the Part 5 Approval were considered and addressed through the Review of Environmental Factors*.

This response does not address the issue that the separate assessment processes could result in the combined effects of demolition, site clearing, excavation and redevelopment not being assessed against the actual pre-demolition environment.

The existence of a separate demolition approval does not answer our concern about whether the combined impacts of the overall project have been adequately assessed as expected by the community and required under the EP&A Act (ss 4.38(4); 4.38 (4A); 5.1; 5.5;5.7), Regulation (s171(o)) and Guidelines[6].

We believe the community is entitled to answers and that no demolition should take place until this issue is satisfactorily resolved.

Heritage

As the development site is adjacent to and in the vicinity of heritage items, we did expect the Statement of Heritage Impact (SOHI) (Appendix N) it to more closely follow Heritage NSW guidelines[7] for SOHI preparation. We find the exhibited SOHI to be particularly deficient in that it contains assertions that are not supported by analyses, lacks references to relevant planning documents such as the objectives and controls in Camden DCP 2.16.4 *Camden Heritage Conservation Area* and St John's Church Precinct's *Conservation Management Plan*[8]. The SOHI (2.5.3) surprisingly states incorrectly that there are no CMPs relevant to the study area.

The Amendment Report's reliance on the SOHI is problematic as it does not contain sufficiently specific assessment of the existing buildings, their historical significance and the amended development's effects on the wider heritage setting including views to and from St John's Church.

It is worrying that the Amendment Report (Table 7) states that no comments are required from DCA Heritage Advisory. This means that our heritage concerns, including the heritage impact on St John's Precinct, have not been answered at all. References in the Amendment Report to the exhibited SOHI provide no comfort.

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[6] **Division 5.1 Guideline (May 2026)** relating to the demolition and Review of Environmental Factors (REF) emphasises that cumulative effects must include "likely future activities", not just nearby other existing projects. SSD projects are expressly identified as relevant future activities whose impacts must be considered in Part 5 assessments. **Cumulative Impact Assessment Guidelines for State Significant Projects (March 2026)** emphasises that effective assessment and management of cumulative impacts is critical to protecting the things that matter to the community in NSW.

[7] NSW Government Department of Planning and Environment 2023 *Guidelines for preparing a statement of heritage impact* Available at https://www.environment.nsw.gov.au/sites/default/files/guidelines-for-preparing-a-statement-of-heritage-impact-230201.pdf

[8] Source: Clive Lucas, Stapleton & Partners 2004; NBRS + Partners 2010 *St. John's Anglican Church Precinct Menangle Road, Camden Conservation Management Plan and Addendum* Available at https://www.crag.org.au/wp-content/uploads/2016/12/CMP-and-Addendum.pdf and https://www.stjohnscamden.info/Resources

A major issue for the community is the impact of the development on the sightlines to and from the iconic landmark of St John's. The SOHI provided an opinion that there would be no impact, not any analysis. Even local DAs require much more.
The Amendment Report response (p. 74): *Visual impacts on views to St John's Anglican Church have been addressed in the SoHI, which concluded that, due to the distance between the Church and the Site, the intervening topography and built form, the Proposal would not be visible from St John's Church and would not impact views or vistas associated with the item* only repeats the opinion. It does not address the issue raised.

Even if the proposed redevelopment does not physically alter the state-listed heritage item, the scale and visibility of the new buildings may affect the item's setting and its relationship with the surrounding historic townscape. We again point out that these sightlines are an important component of the state heritage status of the St John's Church Precinct and are set out in its CMP. We especially included them in our submission. They are important to the state's heritage, the community and Camden's identity and sense of place, and deserve to be specifically and carefully analysed.

Camden is renowned as a heritage town, arguably one of the most historic in Australia[9]. Whilst the reduction in height and additional setbacks are a slight improvement, the proposal is inconsistent with local heritage controls and the 1840 Macarthur town's rural history. The community's concern is not only that the buildings remain too tall and over-bulked but that they will introduce and set a precedent for a built form inconsistent with the historic character and established scale of Camden. The project's documentation provides no evidence that it genuinely responds to Camden's heritage and rural character, the town's historical development pattern or its desired future character as set out in local planning instruments (including Camden Town Centre Urban Design Framework which also emphasises the need to retain the fine-grain of the building stock and not exceed two storeys[10]).

The community is highly protective of the town and expects no less than analyses and answers to

- how the amended buildings respond to the historic townscape supported by photo montages, sightline analyses and its viewsheds;
- how their scale, massing and roof forms affect the setting of the Heritage Conservation Area and nearby heritage items in terms of comparative height, scale and bulk;
- why the remaining height and density are considered appropriate despite the concerns raised by Council and the community.

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[9] See Camden Township Heritage Study Available at https://camdenhistorynotes.com/2026/02/19/heritage-study-camden-new-south-wales-documentary-evidence-addressing-criteria-for-statutory-heritage-listing/ and https://www.crag.org.au/camden-township-heritage-study/

[10] Camden Council 2018 *Camden Town Centre Urban Design Framework* Available at https://hdp-au-prod-app-cam-matters-files.s3.ap-southeast-2.amazonaws.com/7317/5638/6060/Final-Camden-Town-Centre-Urban-Design-Framework.PDF

The Amendment Report did not answer our concerns about the impact of this proposed development on local and State heritage. We request evidence supporting heritage impact conclusions. We trust that the upcoming assessment will include input from heritage specialists and Heritage NSW and that it will be made public.

These are only three, albeit very significant, examples of outstanding issues that we see as needing to be resolved in the overall assessment and decision making. We appreciate and trust that every issue that we raised in our submission will be fully addressed in the upcoming assessment and that answers will be publicly provided with appropriate legislative and policy references to satisfy the community questions.

We specifically request:

- this community response to the Amendment Report and outcome of the public exhibition be filed and acknowledged in the upcoming assessment of the amended SSD Application;
- that this response plus our whole submission including the questions, as attached, be reconsidered in the Department's assessment of the amended application;
- that a revised Amendment Report be made publicly available which cross references uniquely numbered submissions to the responses to all the specific concerns raised in them. Where issues raised have not been resolved we trust that they will be acknowledged with a full explanation as to why they were not resolved to the community's satisfaction.
- that the final assessment report be made publicly available;
- that demolition works be delayed until the assessment is complete and until any amended SSDA is approved.

We ask for confirmation that this response to the Amendment Report will be included and addressed in the assessment and that the issues raised will be substantively answered.

Thank you, we look forward to your early reply.

Yours sincerely

President

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Director, Social and Diverse Housing Assessments
Department of Planning, Housing and Infrastructure
NSW Government
Locked Bag 5022,
Parramatta NSW 2124
24 August 2026

Dear Director,

Re: State Significant Development SSD-116982991
72 and 82–86 Menangle Road, Camden NSW 2570

As background, Camden Residents' Action Group Inc, established in 1973, has a long history of representing the community on heritage and environmental matters.

We are active in the heritage space having often raised issues associated with protecting Camden's heritage with our local member, Sally Quinnell and Minister Sharpe, who have both publicly recognised Camden's heritage as highly significant and made promises to protect it. Our Camden Heritage Study, which includes testimonials from eminent historians, is referenced in the Statement of Heritage Impact. We have interacted with the NSW heritage system on a number of occasions and most recently met with NSW Heritage and NSW Heritage Council about protecting Camden's heritage on 28 May 2026. The community is highly protective of Camden's heritage. In recent times we have seen groundswell opposition in the form of rallies, public meetings and mainstream media attention to inappropriate changes to the retail area of the town and the sale for proposed development of two-thirds of St John's Church Precinct (which was the catalyst for its belated state listing).

Our Group is also on the record as advocating for and supporting the delivery of social and affordable housing (SAH) in Camden LGA. 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 birthright. We acknowledge that the proposed development meets every BASIX design target, that every apartment meets the minimum size standard, and that the communal open space exceeds the minimum. We fully understand the urgency and that 579 households within the Camden LGA were on the waiting list at the end of April 2026.

However, it is also very relevant to point out that the area of the old town itself, even though it lacks transport and other infrastructure, does already provide a high level of SAH. The town is the cultural and recreational hub of the LGA. There are far better solutions to the housing and SAH crises and meeting departmental targets than compromising what is a major community asset, one with an irreplaceable sense of place, that lifts the quality of life for everyone.

We find it difficult to understand the rationale for this proposed SSD located on a steep hill, in a heritage town, on health services land opposite a working hospital amongst single and two storey established homes. The SSD application is asking for a planning context to be created so that the proponent's preferred development can proceed. There are many aspects to it that do not make sense to the community.

This submission relating to the current SSD exhibition and no doubt many others, again object to the proposed three residential flat buildings of up to six storeys. Although we are strongly supportive of the provision of social and affordable housing and recognise the genuine need for additional housing in the Camden Local Government Area (LGA), the achievement of housing targets does not remove the requirement for development to be appropriately located, sensitively designed and properly assessed against its environmental, heritage, social and infrastructure impacts.

The proposed development is unsuitable for this site because of its excessive height, bulk and scale, inappropriate location, impacts on Camden's heritage character, inadequate parking, traffic and emergency access implications, flooding and evacuation constraints, and impacts on adjoining residents and the wider community. Camden Council has itself objected to the proposal on these and other technical grounds. Council's position is that there is government land in more suitable and well serviced areas in the LGA, such as the Leppington Town Centre, which it is urgently investigating to propose as an alternative to deliver at least the same SAH outcomes.

Issues to do with height and scale of this proposed development are particularly problematic. The decision to include the historic Macarthur town of Camden within the Low and Mid-Rise Housing Policy (LMR) is, in our opinion, the opinion of the greater community and Camden Council, fundamentally flawed for many reasons. These reasons have already been covered in Camden Council's objection[1] (February 2024) and subsequent correspondence as well as the many community submissions to date.

[1] Camden Council February 2024 *Objection – Explanation of Intended Effect: Changes to Create Low and Mid-Rise Housing*

Of particular concern also is the relationship between the separately approved demolition and tree removal under Part 5 and the subsequent SSD. Homes NSW assessed and approved demolition of the existing buildings and removal of 58 trees on 25 June 2026, before the SSD was exhibited. The demolition assessment relied, at least in part, on the proposed future development and landscaping.

This creates a fundamental environmental and legal concern. The demolition and redevelopment appear to be sequential and interdependent components of the transformation of the same site. Yet the environmental assessments appear to treat them as separate activities, creating potential gaps in the assessment of their combined and cumulative effects. These gaps relate to the correct environmental and heritage baseline against which the SSD should be assessed and include, but are not limited to, the combined heritage consequences of demolition and redevelopment, the combined visual and cultural landscape impacts, the full contamination remediation and the prolonged environmental disturbance demolition and construction in the sensitive location.

This submission therefore questions whether the environmental consequences of the whole project—from the existing site, through demolition and tree removal, to the proposed 95-apartment development—have been assessed to the extent required by the Environmental Planning and Assessment Act 1979 and the applicable environmental assessment guidelines.

The proposal should not be assessed simply on the basis of a cleared site where that cleared condition has itself resulted from an approval undertaken in contemplation of the proposed redevelopment.

There are also significant questions about whether this is an appropriate location for concentrated SAH housing. The site is more than 800 metres from the principal shops and services of Camden, has limited public transport, is in a flood-affected town with significant evacuation constraints, and is surrounded by a predominantly low-density historic townscape. Council has identified alternative government-owned land that may be better suited to achieving the same housing objectives.

Our submission therefore concludes that the SSD should not be approved in its current form. As an immediate step, the demolition should not go ahead as planned. An integrated assessment of the entire development sequence should be undertaken and re-exhibited before any irreversible demolition, tree removal or determination of the SSD proceeds.

Our objections follow under the following headings with questions which we would like addressed before the proposal is progressed.

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USE OF INAPPROPRIATE LOW MID RISE HOUSING POLICY (LMR)

The Secretary's Environmental Assessment Requirements (SEAR) Response Table summarises the requirements and identifies the sections of technical reports that address each of them. As covered under *6. Built Form and Urban Design*, it is a requirement that the SSD application demonstrates how the proposed built form (layout, height, bulk, scale, separation, setbacks, interface and articulation) addresses and responds to its context, site characteristics, streetscape and existing and future character of the locality.

The response is that consideration is given to this requirement in the Design Report at Appendix E and Section 6.1 of the Environmental Impact Statement. In these documents the future character of the locality is being inferred from the inclusion of Camden Town Centre in the LMR. It is not a future character that is consistent with the unique character and private design of the town by the Macarthur brothers and Sir Thomas Mitchell. It is not a future character that the community has had input into, nor the desired character that the community has been consulted on and not as articulated in the local planning instruments.

Camden Councillors objected unanimously to the Low and Mid-Rise reforms applying to Camden. Although Camden Council formally objected to the LMR applying to the old town on many grounds, the reasons for denying those grounds are not in the public domain because apparently the LMR selection process is Cabinet-in-confidence. We do know that the LMR Policy Refinement Paper states the policy *will not apply on land below the Probable Maximum Flood (PMF) level in the Hawkesbury-Nepean Valley*. Camden Council's selection form recorded PMF depths of 10–11 metres in the Camden Town Centre and CBD inundation in a 20% AEP event.

NSW Heritage and NSW Heritage Council are on the record as acknowledging Camden's unique heritage. Heritage Minister Penny Sharpe and Camden MP Sally Quinnell made promises in 2019 and 2023 that they would support the state listing of the town.

Feedback from CRAG members who attended the community Drop-in Session on 6 May 2026 was astonishment that the design was promoted as reflecting Camden. No evidence was provided to support that claim and clearly the buildings' scale and design cannot be referenced anywhere else in the town. A question about the excessive height within its low-rise surrounds was met with the response that we were lucky the buildings were not nine storeys. Such consultation is about helicoptered policy, not listening to community.

It is well-known that Camden has limited transport infrastructure, limited job opportunities, is flood affected and needs more local hospital and healthcare services to provide for the LGA's fast growing population.

The community has a history of being strongly protective of Camden's heritage and unique character. Already there is a strong groundswell reaction to what is understandably seen as an autocratic and un-Australian imposition of a policy that would forever change the heritage and rural character of the 1840 historic Macarthur town that the community treasures.

Effectively, the community is not permitted to know why the LMR was applied to the 1840 town. It is being asked to make a submission on a proposed development that is very far outside the parameters of local planning rules, which is only made possible by the completely opaque reasoning of a high-level planning decision.

All things being equal, economic forces automatically create demand pressure on land close to town centres that provide convenient facilities. This SSD application takes that fact a step further by employing the LMR and Affordable Housing policies to assume that the town's facilities are so conveniently located to the Windmill Hill sites that there is no problem for anyone in walking between them without the need for any other form of transport, including a personal car.

The low and mid-rise housing outer area is defined as land between 400m and 800m walking distance of a designated town centre. A distance of approximately 600 metres, and an *8-minute walk*, is repeated across many of the SSD exhibited documents, but none show the calculation or where the measurement starts and ends. The two sites sit some distance apart along Menangle Road.

Many in the Camden community, particularly those living near the sites find the measurement difficult to believe and also reference the physical fitness needed to walk back up Windmill Hill particularly if carrying shopping.

If the LMR is determined by proximity to a railway, metro or light rail station, the distance is calculated to the public entrance of the station. In Camden's case the distance would seem to be calculated to the boundary of state-listed St John's Church Precinct which extends some distance along Menangle Road.

Camden Council wrote to the Department on 20 April 2026 asking for the Precinct to be removed from the walking calculation because it *artificially increases the size of the Camden Town Centre creating a potential for increased housing in areas that are not well-located in terms of access to goods and services*. This request was summarily refused on the basis that the boundary *aligns with the E1 Local Centre zone* and that the Anglican Church *is considered a functional part of the Camden town centre, contributing to its civic and community role*.

The Community and Social Infrastructure Needs Analysis (Appendix R) states at

- section1.2 that the site is *approximately 600 metres from the Camden Town Centre, which provides a range of essential services, retail, and civic facilities*;
- section 3.2.4 that the Camden Library, the Camden Civic Centre and the Camden Senior Citizens Centre are *approximately a 15-minute walk or five-minute drive or bus trip from the site*.

Table 5 provides the following distances:

Table 5: Overview of community facilities near the site

ID	Name	Type	Notes	Dist.
1	Camden Library	Library	• Branch library offering a range of services and programs. Includes small multipurpose spaces for study.	1.0km
2	Camden Civic Centre	Community facility	• Recently refurbished centre intended to serve both the LGA and wider Macarthur region in terms of arts, culture and community connection. • The centre includes facilities for touring exhibitions and performances, multipurpose spaces, creative studios and more.	1.1km
-	Camden Senior Citizens Centre	Community facility	• Community facility offering events and activities for older people, including indoor sports, social games, themed dinners, dancing, and exercise programs.	0.8km

Source: Camden Council (2026).

- Section 3.2.5 that *the site is located less than one kilometre south of Camden's town centre*.

The Report's *Figure 6: Community facilities near the site* shows that all of Argyle Street, Oxley Street (the main retail streets), the library, civic centre, swimming pool, Onslow Oval and town farm fall outside the 800m radius (not walking distances) from the sites.

The final mix of future residents is yet to be determined. However, Camden's MP has stated at public meetings about the SSD that many of the future residents of the proposed housing will be unlikely to need a car and usually be older single women, domestic violence (DV) victims (presumably often with children) and very low-income earners such as single parents, disability pensioners and trainees.

The low-income workers will almost certainly need a car to efficiently get to a railway station (a bus commonly takes 40 plus minutes) or directly to work. DV victims will probably have a car and need one if they have children to take to doctors, friend's places etc and to keep safe distance from a perpetrator. A perpetrator would guess the victim lives in in the dedicated apartment buildings and where they would otherwise be walking to and from the town. As for older people, who will continue to age, the length of the walk and the terrain will determine whether they can manage independently or not, particularly if they do not have a car. Any resident with a physical disability is likely to find the length and steepness of the walk to and from any of the town's facilities impossible to undertake.

Questions:

What reasons are there for ignoring the Camden Council's objections, on behalf of the community, to Camden's inclusion in the LMR?

Being a significantly flood prone town within the Hawkesbury-Nepean catchment, with Menangle Road being the only available evacuation route in times of flooding, on what basis was Camden designated as a nominated centre under the LMR, when other flood prone towns were not?

Given that the Minister, Camden's MP and Heritage NSW are aware of Camden's irreplaceable heritage, what input did they have to the inclusion of Camden in the LMR and using it to justify the dense development of the proposed 72 and 82–86 Menangle Rd project?

Upon what assessment criteria and measures were the Menangle Road sites selected above other sites in the Camden LGA that the community would consider much more suitable?

What is/are at the end points of the walk to Camden Town Centre?

How is the 600m measurement calculated from each site stating the start and end points of the walking routes?

What 600m end points provide essential shopping and services to the future residents of the proposed apartments?

What retail and services lie within 600 metres of the two sites? Can they be listed?

Why did the Department so quickly dismiss Camden Council's request to exclude St John's Precinct from the town's footprint?

How does land comprising an Anglican church, a cemetery and a glebe paddock, which unlike all other town facilities could be walked to on a more level path from the proposed apartments, provide for everyday shopping and services?

What is the logical calculation of the length of the walk to and from town under the reasoning of the LMR: 600 metres to the edge of the town centre, or (at least as the crow flies) 1.0 to 1.1 kilometres to its facilities?

How long does it take those with different levels of ability and fitness to walk back from 600m end points in the town to each of the proposed apartment buildings?

If the distance exceeds 600 metres, what happens to the height and parking justifications that depend on it?

COMMUNITY CONSULTATION

The 10 homes planned for the sites, as per the Ministerial media release of 1 July 2024 and as we discussed with Camden MP Sally Quinnell, became 95 without any community consultation and without Camden Council support. This approach disrespects the community and ignores the very good reasons why the Camden LEP and DCP do not permit such residential density in this sensitive area.

Nobody was informed of any change until November 2025. Answers to questions about the change were that the number of 10 homes was the result of a desktop assessment in July 2024 and the number of 95 apartments was the result of due diligence undertaken in mid-2025. Although there were strong opinions within the community that the sites should be retained for hospital and ancillary health care uses, there was no apparent community opposition to the size of the development if it was to be 10 homes. Silence on ten homes cannot be considered to be acceptance of such a change in scale to ninety-five apartments in five and six storey buildings.

We appreciate that consultation was subsequently undertaken and that some design changes were made in response to feedback along the eastern boundary to reduce impacts on immediate neighbouring properties. However, we do find that, not all issues raised and identified during consultation have been considered in the design of the project as we would expect.[2]

What the community is most concerned about, the height, number of apartments and location were raised many times at the drop-in session on 6 May 2026, in submissions and through its elected representatives. When concerns are so consistent and raised so many times the expectation is that the documentation will acknowledge and address them explicitly. Otherwise, the community feels unheard and understandably considers the consultation a window dressing exercise.

Questions:

When and why was the number of dwellings changed from about 10 to 95?

Can the July 2024 desktop assessment and the mid-2025 due diligence be produced and placed on the public record?

Why was the community not consulted at the point the scale of the proposal changed?

How many items of feedback raised major issues of height, number of apartments and location? Can a schedule be provided to show how each of these major issues was considered and responded to in the project design?

If no change resulted, on what basis was any change to address these major issues rejected?

[2] SEARs Response Table *4. Engagement*

AGENCY CONSULTATION

The agencies recorded as consulted include the Member for Camden and Camden Council.

The Consultation Report (Appendix Q) records that both Camden's MP and Camden Council, which opposes the LMR being applied to Camden and the location of this proposed development, raised concerns over the scale of the housing project.

The Report records from a briefing to Camden councillors on 16 June 2026: *Councillors raised concerns over scale of project and questioned why the project was not being used for Health services.*

The Report records from a project meeting on 19 May 2026 attended by the Member for Camden, representatives of the Minister for Housing and three Homes NSW directors: *MP raised concerns over scale of project.*

The Report does not respond to this main issue about the project. Its scale was raised not only by the community generally, but by its democratically elected representatives.

Camden Councillors also asked, why in an area with high population growth and acknowledged pressure on health services, the sites are not earmarked for health services.

Disturbingly the agencies NOT listed as consulted include those with relevant expertise in heritage, health and emergency services and knowledge of Camden:

• Heritage NSW and the Heritage Council of New South Wales
• NSW Health although it was the owner transferring the land and the operator of Camden Hospital
• NSW Ambulance, Fire and Rescue NSW

We believe the people involved in these agencies would know best about potential consequences of the proposal and know what questions to ask.

In relation to heritage conservation, the development site is within the setting of state-listed St John's Church Precinct, adjacent to Camden's Heritage Conservation Area (HCA), the state significance of which is being investigated, and opposite locally listed Camden Hospital. There is no assessment of the heritage significance of the nurses' quarters and its history in relation to the hospital and nurse education.

In relation to health and the operation of the hospital including its emergency department, patient and healthcare worker welfare and loss of parking, there is no assessment of how the construction is to be managed. This proposed Project involves both a demolition period of 15 weeks and subsequent a multi-year period of construction.

Questions about construction impacts include, but are not limited to, how heavy vehicle movements and site access affect hospital staff and visitor access, how ambulance access and emergency department access are to remain uncompromised and how noise, vibration and dust would affect patients. The Agency that manages the hospital and hospital staff were not asked about the expected consequences of the major construction.

In relation to emergency fire and rescue, the Fire and Rescue NSW station in Elderslie does not have the equipment to necessarily reach and rescue all people in the upper storeys and a multi-station response would be required. It is also understood that the water pressure in Menangle Road is poor. These matters have not been assessed in the public documentation and need to be.

Questions:

Where is the response to the scale issue raised by both Camden councillors on 16 June 2026 and by the Member for Camden on 19 May 2026, as well as in much feedback from residents?

Who decided and why that the land was never to be needed for health services?

Why weren't Heritage NSW and the Heritage Council of New South Wales consulted on a proposal within the setting of a State Heritage Register item and affecting the renowned heritage of Camden?

Why wasn't NSW Health consulted about the impacts of the proposed construction and change of use to 95 apartments immediately opposite the hospital, on their operations, their healthcare workers and patients?

How will dust, noise and vibration be managed and kept to acceptable levels and who will monitor that they are kept within the limits?

How will ambulance access to Camden Hospital remain unchanged during demolition and construction?

Will a construction management plan be prepared in consultation with NSW Health and NSW Ambulance, and exhibited before determination?

Will Fire and Rescue Services NSW be consulted, the available emergency fire and rescue services for the multi-storey apartment buildings be evaluated, and the assessment exhibited before determination?

CONFLICT OF INTEREST

The NSW government has set in place policies and procedures that sit above the local level of development control, and is using them to effectively exclude the voice of community and Camden Council as its elected representative.

We understand how the State Significant Development system is designed. But this case is different. It is not an outside third party that is seeking assessment and approval of a large development. In a case involving the NSW government as the proponent there is a need to be extra careful about the potential conflict and transparent in how it is being managed.

Not only is this project outside local planning legislation and required policy (endorsed by the NSW government), but because it is a NSW government rather than a private development, it seemingly cannot be effectively challenged by anyone including the community's democratically elected representatives.

The circularity of reasoning and lack of checks and balances is extreme in this case where the NSW government is the policy maker, land owner, rezoning applicant, the demolition applicant, the development proponent and the approval authority.

This is not a good look. It creates an apprehension of bias and violates the Australian principle of a "fair go." No-one believes or should be expected to believe that the community can realistically expect a neutral evaluation when the applicant, landlord, jury and judge are all the same entity.

This issue was raised by the community but apparently remains unanswered. The Consultation Report[3] under the heading *Consultation and Trust* records: *Concern regarding the NSW Government acting as proponent, policy maker, and consent authority*.

Questions:

Where in the exhibited material is this recorded concern about conflict of interest answered?

Will there be a written response to this concern before the SSD application is determined?

[3] Homes NSW July 2026 *Consultation Report Appendix Q 4.6 Submissions Received* p.24

SEPARATION OF DEMOLITION AND SSD APPROVAL PROCESSES

Demolition and tree removal, approved as a Part 5 activity outside the SSD framework, have been artificially separated from the SSD assessment with resultant gaps in environmental impact assessments. We strongly argue that the demolition and this SSD application should be paused for further assessment. In particular we submit that the irreversible demolition should not proceed before the rezoning and SSD application have been finally determined.

From the documentation available, the issue is that the demolition may have been improperly treated as separate from the single proposed SSD[4]. The separate Part 5 environmental assessment did not properly consider the cumulative effect of demolition and tree removal with the already planned redevelopment. For instance, the EIS states that a separate Part 5 approval covers demolition of the former Nurses' Quarters, cottages and ancillary structures, associated site works and tree removal. It then states that these works do not form part of the SSD application. The Arboricultural Impact Assessment is more specific. It says demolition of the structures and removal of 58 trees were approved before the SSD application was lodged, and because the trees are already approved for removal, the report says they are not within its scope.

Homes NSW's project timetable places design, the SSD application, demolition and construction within one continuous project program. It proposes demolition over 15 weeks from October 2026 even though the rezoning and SSD application may not be determined until late 2026, early 2027 or even later, with construction not considered to start before 2028. For instance, questions about retaining or adapting the Nurses' Quarters, changing the building footprint to save trees, reducing the scale of the proposal, retaining more of the existing landscape, or refusing the rezoning altogether would be considered after much of the existing site had already disappeared. It is worth noting that Homes NSW's Consultation Report records that stakeholders expressly objected to the possibility of the Nurses' Quarters being demolished before final planning decisions.

The Review of Environmental Factors (REF) for the demolition and its separate approval, processed independently from the SSD application, states the activity being assessed as demolition and tree removal *to facilitate future residential development* and explicitly defers key issues such as infrastructure demand, contamination suitability, landscape replacement, heritage impacts, visual character, excavation, social impacts and combined or staged impacts—to *future development applications*.

The REF's cumulative assessment is framed around impacts on nearby existing or proposed activities on other sites, not future activity on the cleared SSD sites. The demolition is presented as a temporary 15-week activity involving noise, dust, traffic, erosion, waste, and removal of 58 trees. It does not assess the cumulative or synergistic consequences of the reason for demolition and as a first stage of the specific 95-apartment project.

[4] Under the current version of s 4.38 EP&A Act

The SSD application treats the demolition as a separate event that has already occurred and outside its responsibility. The EIS (1.6.2) specifically states that the demolition of the former nurse's quarters, cottages, and ancillary structures, associated site works, and removal of trees does not form part of SSD redevelopment application. For instance, the Cost Report (Appendix AA) omits the cost of demolition from the development cost. Because the redevelopment is state significant, the early-stage demolition works must be contextualised alongside the broader social impact of introducing 95 new social housing units to the immediate locality.

The SSD application provides new assessments (heritage, arboriculture, contamination, traffic, noise, water, geotechnical) that start from a cleared-site baseline, not from the pre-demolition condition of buildings and 102 trees.

If the benefits of redevelopment of the sites are so closely associated with the demolition that they apparently justify clearing the site, then they need to be considered in the same decision.

As covered and emphasised in NSW guidelines[5], under the Environmental Planning and Assessment Act 1979 (EP&A Act)[6] and the EP&A Regulation 2021[7], this project must assess cumulative environmental impacts.

The determining authority (the Minister administering the Housing Act 2001) concluded that the demolition did not trigger s 5.7, meaning that the demolition was not considered *likely to significantly affect the environment* so no EIS was required and a REF was considered sufficient. The s 5.7 determination does not remove the SSD proponent's obligation to assess demolition impacts cumulatively with construction impacts in the EIS of the proposed SSD.

Even if the Planning Secretary had validly determined under s 4.38 that the demolition was outside the single proposed SSD, and there is no evidence to hand that he did, the Part 5 approval still had to be made under the statutory rules applicable to that Part 5 activity. Even when, as in this case, demolition is treated as a standalone approval the combined, sequential, and interactive impacts of demolition, construction and operation must be assessed.

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[5] **Division 5.1 Guideline (May 2026)** relating to the demolition and Review of Environmental Factors (REF) emphasises that cumulative effects must include "likely future activities", not just nearby other existing projects. SSD projects are expressly identified as relevant future activities whose impacts must be considered in Part 5 assessments. **Cumulative Impact Assessment Guidelines for State Significant Projects (March 2026)** emphasises that effective assessment and management of cumulative impacts is critical to protecting the things that matter to the community in NSW.

[6] Part 5, Division 5.1, Section 5.5 *Duty to consider environmental impact* imposes a duty on a determining authority that it must *examine and take into account to the fullest extent possible all matters affecting or likely to affect the environment by reason of that activity*.

[7] Under Part 8, Section 171, *the cumulative environmental effect with other existing or likely future activities* is a mandatory factor that a determining authority must examine and assess.

From the material available, there are at least these clear assessment gaps:

Heritage: loss plus new built form not assessed together

- The REF authorises demolition of the Nurses' Quarters, cottages and trees, requiring only protection of the boundary wall, while stating that *potential heritage impacts from future works will be assessed in the future development application*.
- The SSD heritage assessment (Statement of Heritage Impact) focuses on the new apartment buildings on a cleared site. If only assesses the new buildings against a cleared-site baseline, not the complete heritage consequence of demolition of extant buildings followed by redevelopment in a sensitive heritage location.

The site impacts the Camden Town Centre Conservation Area and setting of St John's Church Precinct. The assessment must verify that removing the existing buildings does not cause a cumulative adverse heritage impact when paired with the number of storeys and height profiles of the proposed replacement buildings. The key unanswered assessment questions concern the combined effect of demolition and new apartment buildings on the old town, its historic setting including the Nurses' Quarters, heritage items and the adjacent conservation area.

The issue is that the SSD heritage assessment treats the Nurses' Quarters and cottages as already absent, without assessing for instance:

- What heritage value existed before REF demolition; what was lost through demolition.
- How that loss affects the heritage setting, conservation area and heritage curtilage of state-listed St John's Church Precinct.
- How that loss affects the historic landscape and its mature vegetation.
- How the new buildings compound that loss; and whether the combined result is acceptable.
- Whether any archival recording is an adequate substitute for retaining and/or assessing the physical heritage resource.

Without that integrated analysis, the community cannot see the true heritage consequence of demolition plus redevelopment. The Consultation Report (Appendix Q under Heritage Impacts) records as feedback: *Concern that Camden Nurses' Quarters will be demolished prior to final planning determinations.* This prescient concern proved correct and is not answered.

Trees, landscape and visual character

- The REF removes 58 trees, retaining 44, and defers replacement planting to future landscape plans.
- The SSD Arboricultural Impact Assessment begins with only the 44 trees retained under the REF, and so is assessing only the residual tree impacts, not the total impact of the linked project. (The Report does go as far as to provide a table of all pre-demolition trees and note which ones will be lost.)

Tree removal is not just a temporary construction effect. It permanently changes the setting in which the SSD is judged.

The issue is that the SSD Arboricultural Impact Assessment does not evaluate canopy, habitat and visual effects against the correct pre-demolition baseline and properly assess:

- the combined tree loss from demolition and redevelopment;
- total canopy loss and habitat change;
- the streetscape and microclimate impacts;
- the visual relationship between taller apartment buildings and adjoining homes and heritage places.

Contamination and human health

- The REF acknowledges potential asbestos-containing material and possible fill contamination, but states that a detailed site investigation must occur following the demolition process, with remediation addressed as part of future redevelopment.
- The SSD responds with Preliminary and Detailed Site Investigations and a Remediation Action Plan.

This creates a temporal division: the demolition approval authorises disturbance and removal, while the SSD material is expected to address the post-demolition site. The demolition that would allow the testing is not part of this SSD application. Around 39 per cent of the site, approximately 2,831 m^2, cannot be tested for contamination until the buildings are demolished. The SSD application's Remediation Action Plan (Appendix W) confirms that further intrusive soil investigation, including an asbestos assessment, will be required beneath existing buildings and the car park at 72 Menangle Road following removal of the structures and that validation is required to render the site suitable for the proposed development. Although the SSD application has been treated separately to the REF for the demolition, the land will not be in a habitable state to go ahead with the construction. If the post-demolition testing finds something serious, the development options narrow.

What appears missing is a single risk pathway that:

- assesses disturbance and mobilisation of asbestos-containing material during demolition;
- links demolition controls to later remediation;
- evaluates exposure pathways for workers, neighbours and hospital users across the whole sequence.

If demolition is treated as "temporary" and SSD contamination work begins only after clearance, the period of greatest disturbance may be prolonged and under-assessed.

Construction traffic, noise and duration

- The REF states that future traffic impacts will be addressed in a future development application and that the current proposal has no new land use, dwellings or population increase. The REF assesses demolition traffic and noise for a 15-week period and explicitly excludes the ultimate development's operational and construction effects on future-development traffic.
- The SSD has its own Transport Impact Assessment, Construction Traffic Management Plan and construction noise/vibration assessment.

There is no clear evidence that either document assesses:

- cumulative effects on Menangle Road, Gilbulla Avenue and the hospital;
- combined disturbance of construction noise and vibration at sensitive receivers;
- total disturbance duration from demolition through to completion.

Cumulative construction traffic impacts must be mapped out, combining the demolition heavy-vehicle movements with the projected construction timelines of the new structures. In particular impacts on the hospital's operation should be evaluated.

For a hospital-adjacent site on a narrow through road with an adjacent heritage town centre and many nearby residents, this combined demolition and construction footprint is critical.

Hydrology and disturbed-site phase

- The REF notes that removing impervious surfaces may improve permeability and focuses on temporary erosion and sediment controls.
- The SSD assesses permanent drainage and water management for the completed apartments.

The transition from existing built site to demolition-disturbed site to construction site to completed development may not be fully assessed for temporary or cumulative water and soil impacts, especially if the site remains cleared for an extended period.

For Camden these assessment gaps mean:

- The community cannot see a single, transparent assessment of what is lost and what is built.
- Heritage, landscape, contamination and construction impacts are fragmented, making it harder for residents, Council and the consent authority to judge whether the project is acceptable in such a sensitive location and within a significant cultural landscape.
- The hospital, nearby residents and the town centre may face unexamined cumulative disturbance from demolition plus construction.

The Nurses' Quarters and mature vegetation form part of the historic character and cultural landscape of the Menangle Road/Camden area and their removal and replacement would be an irreversible environmental change.

The permanent loss of potential for adaptive reuse of the 1962 building and three cottages for health care purposes escapes any evaluation. This is not simply a case of demolishing an ordinary modern building and its setting, and then developing the cleared site.

Residents and businesses of and visitors to Camden highly value its heritage and character, and the community is entitled to a full, cumulative assessment before demolition and any further approvals proceed.

Given the regulatory requirements to consider environmental impacts *to the fullest extent possible* and the explicit emphasis on cumulative impacts, it is reasonable and proportionate to seek a pause on determination of the Menangle Road demolition and SSD until:

1. A single, integrated cumulative impact assessment is prepared that explicitly covers the full sequence: demolition/tree removal to cleared site to 95-apartment redevelopment.
2. Heritage, tree/landscape, contamination, traffic, noise and hydrology are all assessed against the pre-demolition baseline, not a cleared site.
3. The consent authority can be satisfied that the combined environmental consequences of the project have been examined in accordance with s 5.5 EP&A Act, s 171(o) of the Environmental Planning and Assessment Regulation 2021, the Division 5.1 Guidelines and the SSD Cumulative Impact Assessment Guideline.

Questions:

Why didn't the determining authority, when exercising the Part 5 power, properly identify and assess all matters affecting or likely to affect the environment by reason of the demolition activity, including reasonably foreseeable interactions with and combined with the proposed redevelopment?

Why didn't the SSD assess the redevelopment against the correct environmental and heritage baselines, rather than treating the consequences of the already-approved demolition as an established fact?

Demolition and tree removal is not temporary. It changes the character of the town and existing heritage setting. Where is the assessment of the full environmental and heritage impact of the combined demolition and construction?

The SSD Statement of Heritage Impact does not assess the heritage environment as it existed before the demolition and tree removal takes place but assesses under the assumption that the buildings and trees authorised for removal have already been removed. Where has the heritage impact of that loss been assessed as part of the SSD?

What is the combined traffic and parking consequences of the overall project through the stages of demolition and construction including temporary and permanent loss of parking on Menangle Road and the realistic use and parking of cars by future residents, services and support workers and visitors of the proposed 95 apartments?

Where is the assessment covering the total duration and intensity of demolition and construction disturbance arising from the entire Menangle Road project, including demolition noise, demolition dust, demolition truck movements, site clearing, excavation, construction noise, construction traffic and building works?

Why should a significant component of the site's existing environment be permanently removed before the decision-maker determines whether the redevelopment that supposedly necessitates its removal is acceptable?

The SSD is taken from a cleared development site, cleared only because Homes NSW obtained a separate Part 5 approval to demolish the existing buildings and remove trees. Why isn't the correct environmental baseline one that considers the environmental effects of transforming the existing site into the proposed development, including the demolition necessary to achieve that transformation?

The justification for demolition, approved separately on 25 June 2026 before the proposed housing project was first exhibited on 28 July 2026, relies on the housing project being approved. Homes NSW has confirmed demolition is set to proceed regardless of the SSD application outcome. Nothing in the exhibited material explains what happens to the land if the application is refused, amended or withdrawn. With demolition intended to proceed and conclude in 2026, what happens if the SSD is subsequently refused or substantially changed?

Will the demolition be deferred until the cumulative effects of the demolition and redevelopment are assessed and publicly exhibited?

Will Homes NSW give a written undertaking that no demolition will occur before the SSD application, including a full cumulative impact assessment, is determined?

Will the reviewed SSD assessment be publicly exhibited?

Why is demolition being scheduled to be carried out roughly two years before construction is scheduled to start?

If demolition occurs and the SSD is not approved, who is responsible for the site, its security, its landscaping and its remediation in the interim, and for how long?

As the redevelopment relies on demolition of buildings and clearing of the sites, will the redevelopment's assessment be reviewed to include the environmental and economic costs of the demolition?

Even if the statutory approval processes are independent, does that independence permit the environmental consequences of activities that are functionally and temporally interconnected to be assessed independently when doing so prevents the determining authority from examining and taking into account the combined environmental consequences to the fullest extent possible?

REZONING

The LMR does not apply to land zoned for infrastructure, such as much needed hospital and ancillary health services (SP2 Infrastructure). It is very arguable, and the exhibited documents do not address this, that the public benefit of land earmarked for health in the immediate area of the hospital, of potential value to everyone in the wider area, outweighs the public benefit of SAH in this location.

The future expansion of Camden Hospital is the logical use of the sites given that Camden is the fastest growing LGA in NSW. The current health infrastructure gap is evidenced in that Camden is one of only two NSW LGAs with a population above 140,000 (and rapidly growing) that does not currently have either an A1 Principal Referral Hospital or a B1/B2 Major Hospital.

The rezoning sought, R3 Medium density housing, sets residential controls for the sites permanently, and regardless of whether the SSD application is approved, they are available to any future purchaser of the land for housing. The public benefit of infrastructure zoned land is lost and so are the future opportunities to bring much needed health services into the area.

The R3 zone usually has a building height limit of 9.5m in the LEP, and the result of this in Camden can be seen in denser two storey housing in nearby R3 zoned land in Broughton Street and Old Hume Highway. However, the LMR and Affordable Housing Policies applied to R3 zoned land produce a building height of 22.75m. The height is justified by policies that would only apply if the rezoning to R3 is granted.

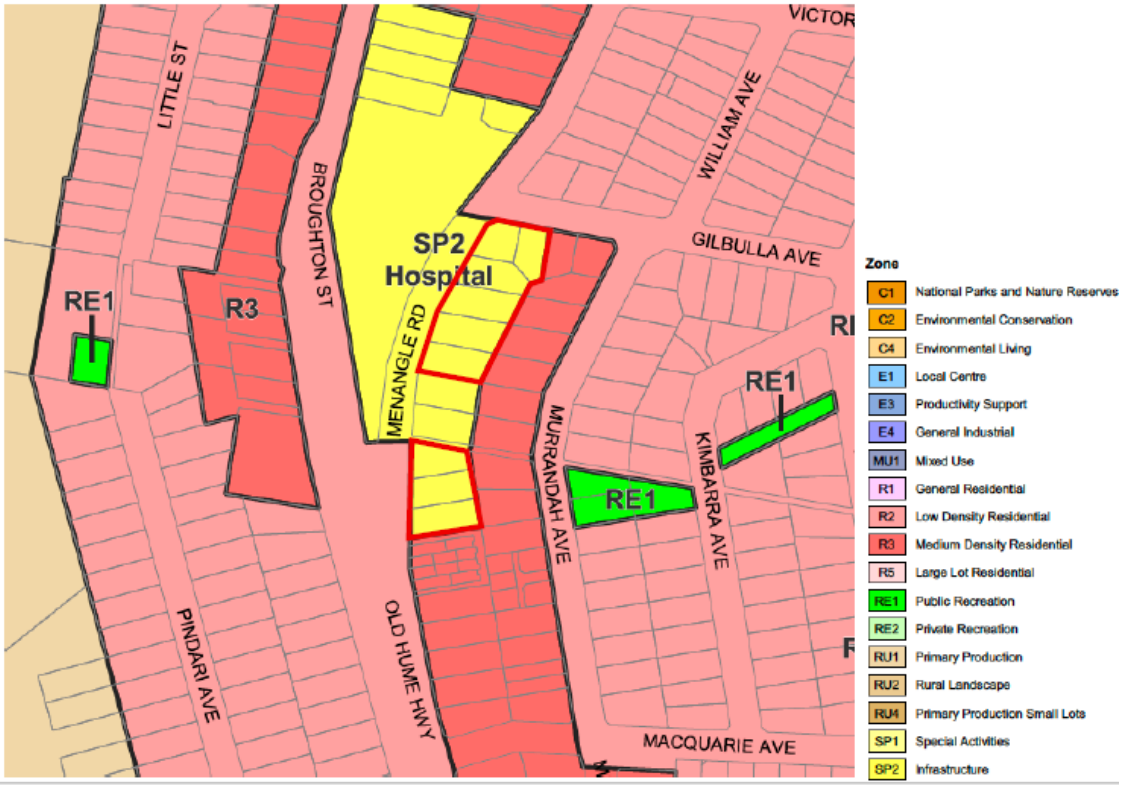
The reasoning behind the SSD rezoning application is circular, providing its own justification. An attempt by a private developer, even if providing affordable housing, to spot rezone SP2 Infrastructure to R3 Medium density would be unlikely to be pursued as it involves a rigorous and lengthy process involving extended and repeated public consultation, one that would normally have little chance of success. The developer would need to show that the R3 zone was acceptable on planning grounds and of public benefit compared to its infrastructure potential, particularly as the surrounding R2 and R3 zones are either within Camden's HCA or close to it and the community is crying out for more health services. Any claim that a private developer could pursue a building height of 22.75m on the land as it stands is simply not true unless the land is already rezoned to R3 and the developer includes affordable housing.

The LMR policy, one that does not currently apply to sites zoned as SP2, has been formally opposed by Camden Council. The exhibited documents describe a desired future character for the LMR R3 area of Camden as four (17.5m) to six storeys (22.75m). Of course, 22.75m is not general under the LMR, and only applies if claimed as dispensation under the Affordable Housing policy. Neither four nor six storeys are desired by the Camden community.

Two storeys is the maximum under the Camden LEP and DCP, and particularly in the HCA.

As shown in the map below, much of the surrounding residential land is zoned R2 Low density as well as R3. The R3 zoned properties on the north side of Menangle Road between the hospital and Macarthur Park are substantial, long established, one and two storey and located in the conservation area. They would be more appropriately zoned as R2. Under the HCA heritage listing they would be deemed as contributory to it. There would be much opposition if they were proposed to be demolished to make way for 17.5m or 22.75 tall buildings.

4.1.1 Existing and Proposed Zoning



Source: FPD Planning 15 July 2026 *Rezoning Report*

The EIS states that the proposed built form at its greatest extent is approximately 6 metres or two storeys higher than the former Nurses' Quarters, which apart from the hospital itself and landmark St John's Church, is the tallest structure in the surrounding area comprised almost entirely of one and two storey dwellings.

What matters in this residential and heritage context is how buildings of such proposed scale can ever not be anomalous and not detract from Camden's renowned sense of place. They would sit as permanent prompters of the questions- whose idea was that? how did that happen?

The Rezoning Report (Appendix A) correctly states that the Camden LGA is doing the most heavy-lifting on providing housing around Sydney. Premier Chris Minns and Camden MP Sally Quinnell led a Community Cabinet held in Camden's Civic Centre on 4 November 2025. They opened with stating that Camden had already done its fair share of providing housing and that other areas would be targeted more.

Further the Premier made it clear from the beginning of the public forum that Camden should not expect any new rail infrastructure as the cost and need to repurpose land were simply too great.

The Rezoning Report also refers to SAH being underrepresented in the LGA. It is not underrepresented in the old town area including Elderslie and South Camden with SAH housing already at 8%, well above the Greater Sydney average of 5%. It also understood that more dwellings are in the pipeline in this area of the LGA. In the Kelloway Street SAH, located a similar distance from the Camden town centre as the proposed Menangle Road SAH, it is locally known that ten out of twelve residents own and use cars, although the spaces allocated in the development were for three cars, one motorbike, and four bicycles. It is a well-known fact, and clearly observable that people living in Camden need cars to manage their lives.

Although admitting that housing growth within established centres, such as Camden, is limited, the Rezoning Report makes some extraordinary claims about the 2020 Camden Local Strategic Planning Statement (LSPS) and companion Local Housing Strategy (LHS) for guiding housing delivery across the LGA. Yes, they can be cherrypicked for statements about the need for additional SAH, greater housing diversity and improved housing affordability but a more nuanced reading of them clearly reveals that the established area of the old Camden town, which already contains a significant level of SAH, is not expected to accommodate any additional housing of consequence.

For instance, the Report wrongly claims that the SAH proposal for Menangle Road demonstrates strong alignment with these LSPS Principles:

Principle 4: Housing growth aligns with the delivery of infrastructure. This is not true. The old town demonstrably lacks infrastructure and no extra transport or other infrastructure is planned for its residents.

Principle 6: Housing growth is balanced with employment, environmental, cultural and recreational outcomes. This is largely untrue. There are very limited employment opportunities, particularly without efficient transport or a private car (and the proposal is based on many SAH residents not owning a car). The environmental outcomes for heritage and character of the 1840 town are catastrophic and vehemently opposed by the community.

Principle 7: Additional housing in established areas is incremental and supported by infrastructure. This is an unsupported claim. The scale of the additional housing is not incremental on any measure in the old town. It is not appropriate as evidenced by there being nothing of similar density anywhere even within a significant distance from the development sites. The proposed development is demonstrably not supported by transport infrastructure and is isolated from most facilities of the town in flood events.

Principle 9: Housing design supports sustainability and contributes to a sense of place. The claim is made that the proposal contributes positively to the built environment and the broader local character. No evidence is provided to support this obviously untrue and highly disputed claim.

Principle 10: Housing diversity supports healthy, walkable communities. The sites are on a hill and, as covered elsewhere in this submission, the walkability for everyday needs for many people is highly debatable, especially for the elderly or physically challenged.

Principle 12: Heritage values are protected and reinforced. The claim that the Proposal has been carefully designed to minimise visual impacts on nearby heritage items, including Camden District Hospital is demonstrably and in any reasonable person's opinion nonsense. No evidence is provided to demonstrate how the proposed buildings, much bulkier, twice as high or more than allowed in the local planning instruments, can possibly be compatible with the heritage town and its heritage items. The visual analyses in the Design Report clearly show devastating impacts on the character of the town, the streetscape and individual homes.

The Report also wrongly claims that the Proposal demonstrates strong alignment with these key housing priorities of the LHS:

Priority 1 – Providing housing capacity and coordinating growth with infrastructure. The existing infrastructure of the old town is known to be insufficient. There is no train station, buses are slow and limited in the areas they service to Campbelltown, Narellan and Picton. The town is largely car-dependent. Providing additional housing capacity of 95 apartments containing 144 bedrooms does not align with existing or planned infrastructure.

Priority 2 – Delivering Resilient, Healthy and Connected Communities. The Report claims that the Proposal as located would reduce reliance on private vehicles. As explained elsewhere, this reasoning is fanciful because of the terrain, lack of transport options and distance from many facilities in the town.

Priority 3 – Delivering the right housing in the right location. The claim that SAH as proposed in Menangle Road is well located and serviced is not evidenced and can easily be refuted because of distance from rail and lack of efficient public transport. It is also well evidenced that concentrating those who need help by the state in one easily identifiable place creates a stigma and hinders integration into the community. Such an obvious location can also be dangerous for women and children escaping domestic violence, especially if there is no dedicated safe place to park a car. Such places around the world are being torn down, not built.

As shown in the above map, most of the surrounding area, including in the HCA, is zoned R2 not R3. The maximum building height under the LEP and LMR Housing Policy[8] for R2 is 9.5m which effectively limits the number of storeys to two. The rezoning of the SP2 Infrastructure sites sought would have been more appropriate for the heritage town as R2, not R3.

Being on a ridge the proposed apartment buildings will be highly visible and interrupt the iconic village profile with St John's spire visible from all directions, as designed by the Macarthur brothers and Sir Thomas Mitchell in 1836.

[8] https://legislation.nsw.gov.au/view/html/inforce/current/epi-2021-0714#sec.179

The proposed five and six storey apartment building with many windows and balconies will dwarf the surrounding one and two-storey residences. In Murrandah Avenue particularly, homeowners who have saved and sacrificed towards the Australian dream, will lose privacy, sunlight and the right to quiet enjoyment of their properties. In particular, Building A1's setback from 1 and 3 Murrandah Avenue is only 6m rather than the required 9m under the *Apartment Design Guide.*

Source: DKO 26 June 2026 *Architectural Plans (Appendix F)*

Source: *Appendix E Design Report 3 View from Murrandah Avenue (East to West)*

The rezoning to R3 seems not to be based on what would work best in the location on heritage and community welfare grounds, but rather what the proponent wants.

Questions:

On what grounds was the potential of land zoned SP2 infrastructure for health considered of less public benefit than SAH?

Why were statements from the Camden Local Strategic Planning Statement and Local Housing Strategy cherry picked in the Rezoning Report to infer something that those documents did not mean?

What do Camden's planning instruments indicate as the desired future character of the historic Camden township and Menangle Road?

Can the reference of the adopted planning instrument or policy stating that the desired future character for this part of Camden is four to six storeys be provided and made public?

How was the proposed height assessed against the existing built form of Menangle Road, rather than against a control that does not yet exist?

What is the height and scale of the proposed buildings relative to each adjoining property?

What is the height and scale of the proposed buildings relative to the state-listed buildings of St John's Church Precinct?

Was any lower-scale option tested for this site, and what were the results?

On what environmental planning grounds, given the existing character and heritage significance of the town, was rezoning to R3 to access much greater scale and height than the existing and local desired future character, considered appropriate?

HERITAGE

The artist's impression of included in the Design concept leaflet, provided at the drop-in session at the Camden Civic Centre, is headed *A design that reflects Camden*.

The Architectural Plans show a similar impression of the building design and provide the elevations of proposed Buildings A1, A2 and B.

Source: DKO 26 June 2026 *Architectural Plans (Appendix F)*

None of the exhibited documentation, including surprisingly the Statement of Heritage Impact (Appendix N) (SOHI), provides any analysis of how the height, scale, bulk and overall design of the buildings reflects or is compatible with the character of the surviving colonial country town of Camden. Extraordinarily the Executive Summary of the SOHI leaves the St John's Precinct off its list of nearby heritage items. A legacy of the pioneering Macarthur Family, the town was privately designed by the Macarthur brothers and Sir Thomas Mitchell to sit aesthetically in the landscape in the village form of their homeland. St John's Church was deliberately designed as its social focus and to be visible from all directions, including from Camden Park, the Macarthur homestead.

The lack of analyses is extremely concerning to the community, especially as the renowned conservation area, promised to be supported for state-listing by the current Minister for Heritage, is opposite and adjacent to the proposed redevelopment area. The setting of the town is a precious tangible reflection of Australia's early European history and the community is highly protective of it. The proposed buildings interrupt and impose themselves into the human scale setting with stark abruptness. Their height, scale and bulk cannot be referenced anywhere else within a large radius of the town. The SOHI (Table 11) states, without any analyses or evidence, that:

The introduction of new buildings and materials won't be out of place given the varied nature of the buildings in the conservation area.

The study area is located outside the conservation area. The proposal has been designed to sit comfortably in its setting, respecting local heritage items and the character of the area. The proposal will make a positive contribution to the streetscape.

We have undertaken a study[9] demonstrating Camden's state significance that is endorsed by eminent historians. This Study is referenced in the SOHI. NSW Heritage agree that the town is highly significant and is currently engaged with us on ways to better protect it 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 its setting and historic residential areas within and adjacent to the HCA replaced with new builds of different and inappropriate scale and character. This scale of urban development would set a precedent and set the scene for destruction of 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 show[10].

Camden DCP identifies the health precinct surrounding Camden Hospital as one of the distinguishing character elements of the HCA. This is acknowledged in the SOHI, but how this development would impact that character is not taken any further.

[9] 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/
[10] https://www.camdenshow.com/about-us

The Camden DCP (2.16.4) also contains an unconditional control that views associated with the landmark St John's Church spire must not be compromised. The sight lines are analysed in the Conservation Management Plan of St John's Precinct (CMP)[11], and considered in every relevant DA, including in locations as distant as Cawdor and Grasmere. The focus landmark of St John's Church, as planned in 1836, has remained until this day. None of the documentation, including the SOHI, test this landmark's sight lines in relation to this proposed development.

The SOHI (8.1.2) states: *The topography, distance and built-up nature of the area mean the proposed works at the study area would not be visible from St John's.*

This conclusion is not supported by any comparison of ground levels, sightline analyses, schedule of viewpoints or photomontage.

In any case, the control in the DCP (2.16.4) is

1. *Views associated with the St John's Church spire must not be compromised.*

This is much broader and reflects the importance placed on the views to and from St John's as a landmark in the wider landscape as intended in the original 1836 village design and as comprehensively addressed in the CMP. The CMP (*3.7 Views and Rural Context*) lists sixteen views for conservation as reproduced below.

The SOHI makes no reference to the DCP control or the CMP, and only references Camden DCP 2.16.3 *General Heritage Provisions* and the character elements in 2.16.4 *Camden Heritage Conservation Area*. The SOHI is 82 pages long, but only a few pages are devoted to any impact of the proposal on Camden's heritage and as covered below there is no assessment supported by explanation or analysis.

The scale and bulk of the proposed buildings rival the sizes of St John's Church and Rectory. This development would mean that they are no longer the dominant feature in the landscape setting of the 1840 town. All relevant views associated with the church landmark need to be tested and the results made public. This is standard procedure for even an ordinary DA, if there is any possibility of the development affecting the heritage value of state-listed item of landmark status, and certainly for a project of this scale.

[11] Clive Lucas, Stapleton & Partners 2004; NBRS + Partners 2010 *St. John's Anglican Church Precinct Menangle Road, Camden Conservation Management Plan and Addendum* Available at https://www.crag.org.au/wp-content/uploads/2016/12/CMP-and-Addendum.pdf

3.7 Views and Rural Context

St. John's is situated to be seen from the countryside surrounding Camden township. There are many vantage points from which the church can be seen. Present-day views of St John's are shown in Figure 3.5 and described below:

View 1	First view of the spire approaching Camden from Sydney on the Camden Valley Way (Cowpasture Road).
View 2	Glimpse view of spire and tower from river flat east of the Cowpasture Bridge. This view approximates the view shown in many historic illustrations of the church such as Woore's sketch of 1842 (see Figure A2.1) and Lock's photograph of c1860s (see Figure A2.3).
View 3	First urban view from east on Argyle Street of the spire above the town buildings.
View 4	View of spire from new subdivision off Richardson Road adjacent to Camden By Pass between Elderslie and Narellan.
View 5	View of tower and spire from Springs Road south-east of the Nepean River. View is framed by poplars in foreground.
View 6	Glimpse view of tower from Narellan looking from the Camden By Pass.
View 7	View of tower, spire, old church hall, horse paddock, rectory and Bunya pines from countryside west of Narellan.
View 8	View of church, rectory, Bunya pines, old church hall and Masonic Lodge from Elderslie looking over Nepean River. This view approximates the view shown in Lloyd's sketch of 1857 (see Figure A2.2)
View 9	View of church spire with rectory and Bunya pines from the Camden By Pass Macarthur Bridge. View is framed in foreground by farmland and river flats.
View 10	View of spire and town from Ferguson Road west of the town. Studley Park is also visible.
View 11	View of tower, spire and Bunya pines from Druitt Lane south-west of Camden.
View 12	View of tower and spire from Cawdor Cemetery (dedicated 1898) south-west of Camden.
View 13	View of tower, spire and town from Macquarie Grove north of Camden. This view approximates the view shown in Reeve's photograph of 1870 (see Figure A2.4).
View 14	View of spire from Kirkham, north of Camden, framed by farm lands.
View 15	View of spire from Camden Park south-west of Camden.
View 16	View of Church Spire from Church Hall of St. Paul's Cobbity. This view was noted at the consecration of St. Paul's Cobbity in 1842.

Source: Clive Lucas, Stapleton & Partners 2004; NBRS + Partners 2010 *St. John's Anglican Church Precinct Menangle Road, Camden Conservation Management Plan and Addendum*

Locally-listed Camden District Hospital is described as historically and socially significant (p. 45) and its history is extensively covered.

Camden DCP (2.16.4) lists the health precinct surrounding Camden Hospital as a character element of the HCA.

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. Although within the health precinct surrounding Camden Hospital, a character element of the heritage impact of its demolition is not assessed.

Assessment of the heritage impact of the proposal is mainly limited to how the proposed development will change views to and from the hospital. Any heritage value of the health precinct, including the Nurses' Quarters, is not addressed in the SOHI of the SSD application as the timeline of the split Project means everything is already demolished.

Although the SOHI sets out the seven official NSW criteria for assessing heritage significance and the Burra Charter method it is not clear why. The SOHI does not apply these established heritage assessment practices to the health precinct and the Nurses' Quarters. None of the documentation publicly available assesses the significance of the any of the buildings to be demolished. The Nurses' Quarters is of significance to the community and may have historical and architectural value that is worth conserving. A 1962 nurses' home reflects a point in history and being built by a named architectural practice, purpose-built for the district hospital, with its foundation stone and opening plaque intact, should be assessed for heritage significance.

The Consultation Report (Appendix Q) (p.38) states *that a photographic archival recording will be completed prior to demolition in accordance with Heritage Council guidelines to document the existing buildings and their historical significance.*

However, there is no reference to a requirement for a full photographic and archival record (including measured drawings and systematic photography to Heritage NSW standards) in the SOHI or as far as could be ascertained in the EIS or other exhibited Project documentation.

No demolition should occur until this is produced and made a public record.

What is offered is retention of two plaques, and restoration of the low brick wall along Gilbulla Avenue and Menangle Road. The SOHI (9.3) only states: *Consideration should be given to the provision of heritage interpretation as part of the project which would outline the history of the Former Nurses' Quarters and its role in the development of the Camden Hospital Precinct. Interpretive measures could include reinstatement of the plaques, signage, panels or displays within the new development.*

This is not a commitment to produce anything, even though the production of archival records is standard practice for demolition of buildings of less significance than this one.

Whether this housing project requires these particular buildings in the health precinct to be destroyed, is not addressed in the SOHI or in any exhibited material for the demolition (REF) or the SSD application.

For instance, in relation to potential adaptive reuse of the Nurses' Quarters, the Consultation Report (Appendix Q) records, under heritage impacts, a *Request to consider re-use of Camden Nurses' Quarters to house women experiencing domestic and family violence*. There is no answer in the response table. Likewise, the SOHI did not establish what was being lost, did not test whether it needed to be lost, even though the alternate and much more immediately available reuse of the building is obvious to the community.

The SOHI concentrates on justifying the SSD project; it does not address what is proposed to be demolished. No alternatives are considered. There is no investigation into SAH of a smaller scale. Adaptive reuse of the building to be demolished is not addressed.

Standard heritage practice requires justification of the heritage impact and an analysis of why any loss is justified by the proposed redevelopment.

The impact on the streetscape of Menangle Road is not addressed at all in the SOHI.

The only reference to streetscape is: *The study area is located outside the conservation area. The proposal has been designed to sit comfortably in its setting, respecting local heritage items and the character of the area. The proposal will make a positive contribution to the streetscape* (Table 1.1).

This is an assertion as there is no analyses provided to support this claim. 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. Most of the road is within the HCA. It forms a principal approach to the historic township and contributes to the visual setting of St John's Precinct.

A much more comprehensive SOHI that addresses the Camden HCA and its potential state listing, St John's Anglican Church Precinct and associated sight-lines, and the overall impact on the streetscape of Menangle Road needs to be publicly exhibited so that the community understands what could be lost by demolition and redevelopment of this anomalous scale.

Questions:

Where is the analysis of the impact of this proposal on the renowned significance of the Macarthur town and its setting?

Why was Camden Development Control Plan 2.16.4 and St John's Precinct CMP not identified or addressed in the heritage assessment?

Will a measured sightline analysis be prepared, from identified viewpoints established in the St John's CMP, to test views to and from the site as well as views out from the St John's precinct?

On what evidence is the conclusion based that the development will not be visible from St John's?

Where is the assessment of alternatives to demolition, including retention and adaptive reuse?

Will an adaptive reuse feasibility study be prepared and exhibited before the buildings are lost?

What options were tested for delivering SAH while retaining the Nurses' Quarters?

Where in the exhibited material is the heritage significance of the Nurses' Quarters assessed against the seven NSW criteria?

Will a significance assessment be prepared for Nurses' Quarters and publicly exhibited before any demolition occurs?

On what date, by whom, and by what method was the condition of the Nurses' Quarters assessed?

Were the Nurses' Quarters entered to assess them? If not, why not?

Will an internal inspection and condition report for Nurses' Quarters be prepared by the heritage consultant before determination?

Will a full archival recording to Heritage NSW standards of the Nurses' Quarters be required as a condition, completed and made public including its lodgement with the State, Camden Library, Camden Historical Society and Camden Museum before any demolition begins?

Why was archival recording not included, as is standard practice, in the mitigation measures?

Will Homes NSW provide a written response to the proposal to reuse the building as housing for women experiencing domestic and family violence?

Was the adaptive reuse proposal to reuse the building as housing for women experiencing domestic and family violence assessed for feasibility at any point? If so, by whom and with what result?

What would it cost to adapt the building for housing women experiencing domestic and family violence, compared with the cost of demolition and replacement?

Where is the analysis of the impact of this proposal on the sensitive and historic streetscape of Menangle Road?

Will a comprehensive SOHI that analyses the impacts of the whole project, that is the impact on the heritage value of the town and on Menangle Road compared to the baseline of what exists before any demolition, be produced and exhibited?

PARKING AND TRAFFIC

The proposal is for 95 apartments containing 144 bedrooms with 46 parking spaces for residents and 2 for visitors which is far from sufficient for the site or local context. No provision has been made for disability support workers, carers and health professionals or community transport pick-up and drop-off areas.

Camden residents are heavily reliant on motor vehicles due to the lack of any rail or other convenient public transport services. The SAH parking rate is based on the claim that residents typically have lower car ownership rates and depend more on other forms of transport. There would seem to be no substantiation provided, no source, citation or Homes NSW tenant data, provided to support this claim. In Camden's case, it is well-known and clearly observable that almost all residents, except in exceptional circumstances, are car dependent.

In relation to the town being flood-affected, although Menangle Road being on a ridge is not normally inundated, the town quickly becomes isolated. Emergency services can declare that evacuation from homes is necessary because of that isolation from facilities and services. Evacuation is expected to take place in a private vehicle and begins particularly early in a rain event for residents who are considered more vulnerable. However, it is also expected that many residents of the proposed SAH will not own a car. The Transport Impact Assessment (Appendix I) does not address this issue.

It also does not address the issue that Menangle Road is a major evacuation route in a flood event. This main way out of the town would be hindered by potential evacuation of additional SAH residents and the likely congestion caused by additional street parking that the proposal necessitates in relation to the operation of the hospital and spill-over parking from the SAH development.

The Assessment claims that there is already enough dedicated off-street parking for Camden Hospital and other surrounding land uses. However, with no parking occupancy survey, kerbside inventory or parking duration survey in the Report, this claim is not substantiated. For instance, Camden Hospital staff and health vehicles regularly parked on the development site until they were displaced to surrounding residential streets, creating immediate congestion in the area.

With the site sitting opposite Camden Hospital, the shortage of parking for the proposed apartments will spill into Menangle Road and surrounding streets which would heavily restrict street parking essential for emergency drop-offs, elderly outpatients, and healthcare workers. Four additional car spaces will be lost on Menangle Road between 6:00 am and 3:00 pm to loading bays, justified as being *when residential parking demand is at its lowest*. It is actually a period of highest hospital staff, outpatient and visitor demand.

The Transport Impact Assessment asserts that there is enough parking for the hospital without any supporting survey or other research. Everyone who uses Menangle Road knows about the congestion at visiting hours and times of worker shift changes.

The parking assessment is not based on realistic assumptions and observable data.

In relation to traffic, the Transport Impact Assessment provides no supporting traffic count, intersection delays or other surveys to support its conclusion that the traffic increase attributable to the proposed development is negligible *relative to existing traffic volumes*.

The same Report (Section 2.2) states that in this area, because public transport networks *are generally less developed and less frequent compared to urban centres …private vehicles were the most preferred travel mode, accounting for up to 87 per cent of all travel…and public transport … accounting for up to six per cent….*

Nevertheless, the forecast of 12 vehicle trips in the busiest hour of the day is calculated by using the 48 parking spaces planned for the development not the likely number of its residents. This is circular reasoning. The insufficient parking produces a low traffic forecast. The forecast of 12 trips is used to conclude that no modelling of the Menangle Road, Broughton Street and the Old Hume Highway intersection is required and that no referral to Transport for New South Wales is needed.

Questions:

How many parking spaces are needed in this proposed development if it is based on the likely number of residents and the finding that 87% of all travel in the Camden area is undertaken by private vehicle?

Given that the SAH residents may need extra support, how many visitor car spaces are likely to be sufficient?

Being a flood prone town that becomes isolated, how will the residents of the proposed SAH evacuate, if required to by emergency services, without a vehicle to do so?

How will the SAH proposal affect the use of Menangle Road as an evacuation route in a flood event?

Will a parking survey of Menangle Road be undertaken, particularly during peak hospital times, before the application is determined?

What evidence is there to support the claim that Camden Hospital is served by adequate dedicated off-street parking?

How is the loss of parking due to the loading bay hours justified in relation to parking demand generated by a hospital that is directly opposite?

Why was traffic generation calculated from the number of parking spaces rather than the number of dwellings and likely number of residents?

What is the traffic generation forecast when calculated from 95 dwellings and expected number of residents using standard trip generation rates?

How were visitor, delivery, carer, community transport and support service trips accounted for?

Where are the existing traffic volumes on Menangle Road recorded?

Will there be a traffic assessment for the Menangle Road, Broughton Street and Old Hume Highway intersection, and will there be Transport NSW review?

Will a comprehensive Transport Impact Assessment be produced and exhibited that takes into account the car dependency of Camden residents and the impacts on parking and traffic of this SAH proposal?

SUMMARY CONCLUSION

The proposed Menangle Road development presents a fundamental conflict between the legitimate objective of providing much-needed social and affordable housing and the equally important obligation to ensure that development occurs in an appropriate location and is environmentally, socially and culturally sustainable.

The concerns raised in this submission are not objections to social or affordable housing. They are objections to the scale, location, design and process proposed for this particular development.

The six-storey buildings would represent a major and irreversible change to a predominantly one- and two-storey part of historic Camden. The site lies within the setting of the Camden's HCA and close to the State Heritage-listed St John's Church Precinct. The proposed development would therefore have consequences extending beyond the site itself and would materially affect Camden's established character and sense of place. Council similarly considers the proposal excessive in height, bulk and scale and out of character with the surrounding area.

The proposal also places substantial additional pressure on an already constrained area. The development provides 95 dwellings but only 46 parking spaces, despite Camden's limited public transport and reliance on private vehicles. At the same time, land previously used for Camden Hospital parking has been lost, increasing pressure on Menangle Road and surrounding streets.

Flooding and evacuation are further critical considerations. Camden Town Centre is significantly flood affected and Menangle Road is identified as the available evacuation route. Increasing the residential population at this location requires particularly careful consideration of emergency access and evacuation capacity.

Most importantly, the demolition and redevelopment should not be viewed as unrelated environmental events. The demolition removes existing buildings and 58 trees and fundamentally changes the environmental and heritage condition of the site. The subsequent SSD then assesses a substantially altered site. The submission identifies significant potential gaps between these two assessments, particularly in relation to heritage, landscape, trees, traffic, noise and the overall environmental consequences of transforming the existing site into the proposed development.

This sequencing is especially concerning because the demolition approval was made before the SSD was exhibited and was justified in part by reference to the proposed future development. It should not be possible for an irreversible component of a proposed development to alter the environmental baseline before the principal development has itself been assessed and determined, without a clear and comprehensive assessment of the combined consequences.

There are far more appropriate options within the LGA for SAH. We understand that Council is investigating these as potential alternative proposals. If accepted a different, more appropriate location would be very welcome. For instance, Leppington has a train station and government land that would produce a superior SAH outcome for its future residents and leave Camden's renowned heritage intact. The heritage setting of the Macarthur town which is of fully documented significance and recognised as such by the NSW Minister for Heritage needs to be conserved.

Accordingly, we submit that the appropriate course at this point is to stop the demolition and to refuse SSD-116982991 in its current form.

The proposal should not be progressed and any determination should be deferred until:

- the relationship between the Part 5 demolition and the SSD has been properly examined;
- the combined environmental and cumulative impacts of demolition, tree removal, site preparation and redevelopment have been assessed;
- heritage impacts are assessed against the pre-demolition heritage environment;
- traffic, parking, flooding, emergency access, noise and landscape impacts are assessed across the entire development sequence;
- the suitability of the site for a development of this scale is reconsidered; and
- alternative government-owned sites capable of delivering the same social and affordable housing outcomes are properly investigated.

Any subsequent proposal for Menangle Road should be re-exhibited with comprehensive assessments of the whole project without assessment gaps between any demolition and construction phases.

The need for social and affordable housing is compelling. It does not, however, justify compromising Camden's heritage, character, environmental values, flood safety, infrastructure capacity or the integrity of local planning and environmental assessment.

A better outcome is one that delivers the required housing while protecting the qualities of Camden that make it a leafy and human scale country town with unique colonial heritage and a visitor destination to be enjoyed by all.

Yours sincerely,

Glenda Davis

President