

## Objection to State Significant Development Application SSD 116982991

**Application:** 72 and 82, 86 Menangle Road, Camden, proposed rezoning (SP2 Infrastructure to R3 Medium Density Residential) and State Significant Development Application comprising three distinct above ground building forms (Buildings A1, A2 and B) across two development sites, delivering 95 social and affordable dwellings. (The EIS and Transport Impact Assessment aggregate A1 and A2 as “Building A” and describe the proposal administratively as two residential flat buildings; the architectural plans show three separate building forms.)

**Consent authority:** Minister for Planning and Public Spaces

**Exhibition period:** 28 July 2026, 24 August 2026

Submitted by: Simon Dimascio, 23 Old Hume Highway, Camden NSW 2570

**Position:** OBJECT

### Executive summary

I object to SSD 116982991 in its current form. I support the objective of delivering more social and affordable housing in Camden, the applicant’s own Community and Social Infrastructure Needs Analysis confirms a genuine, significant unmet need. My objection is not to social or affordable housing on this site. It is to the scale, height and traffic/infrastructure impacts of this specific 95 dwelling, five and six storey proposal, and to gaps in how the application has been assessed and how community and parliamentary questions have been answered.

In summary, I ask the Department to address the following before determination:

1. Whether a six storey, 22.4m building is appropriate immediately adjoining Camden’s established one and two storey residential character and the Camden Town Centre Heritage Conservation Area, given the Camden DCP 2019 applies an explicit two storey height limit and an explicit St John’s Church view protection control within that Conservation Area, 200m from this site.
2. Why the Department declined, when asked directly in Parliament, to amend the SEARs to require a sightline analysis against that St John’s Church control, and whether that position should be revisited given this is a six storey proposal on the Conservation Area’s doorstep.
3. Whether the traffic assessment’s headline trip generation figures can be relied upon at all, given they are calculated directly from the number of parking spaces the applicant chose to provide (reduced from 58 to 48 during design) rather than from independent demand, and separately rely on a substituted (not directly measured) rate for the AM peak.

4. Whether the applicant has modelled realistic sensitivity scenarios for parking and traffic demand, tested against Camden's own measured vehicle ownership data, given that providing 46 resident spaces does not itself limit how many vehicles the residents of 95 households may actually own, and what remediation would be available if the current forecast proves wrong after the buildings are occupied and cannot practically be expanded.
5. Whether essential electricity, sewer and water servicing is confirmed as technically feasible and deliverable, rather than deferred to post consent detailed design.
6. Whether the application complies with the SEARs requirement to name the registered Community Housing Provider and confirm its agreement to manage the development, which, on the Minister's own answer to Parliament dated 15 July 2026, it does not appear to, given a CHP had still not been procured as at that date.
7. Whether reasonable lower scale alternatives were genuinely tested before this scheme was selected.

I ask that the Department either refuse the application in its currently exhibited form, or require Homes NSW to submit a materially reduced scale alternative, before any consent or rezoning is granted.

### **1. The proposal relies on site specific planning controls that closely correspond with the development already designed**

The application form identifies the proposal as "Wholly Prohibited" under the current planning framework. The land is zoned SP2 Infrastructure (Hospital); Homes NSW is seeking, concurrently with approval of the development itself, to rezone the land to R3 Medium Density Residential and introduce new site specific height controls of 22.5m (Site A) and 18m (Site B), together with new floor space ratio controls. The exhibited buildings then reach 22.4m and 17.84m respectively, that is, the proposed planning controls and the proposed buildings match almost exactly.

Concurrent assessment of a prohibited development alongside a proposed rezoning is available under ss.3.39 and 4.38(5) of the Environmental Planning and Assessment Act 1979, and I am not asking the Department to disregard that pathway. But the fact that a building complies with a height control proposed concurrently with that building does not, by itself, establish that the height is appropriate. The Department's own Concurrent Rezoning Requirements guideline requires the applicant to demonstrate genuine site specific merit, and that merit assessment needs to be independent of the development envelope the applicant has already designed.

Homes NSW's own April 2026 Scoping Report shows the applicant's "Preferred Concept Option," tested before SEARs were even issued, at heights of 22.5m (Site A) and 18.5m (Site B), essentially the same figures now proposed as the exhibited height controls. In a written answer to Parliament dated 15 July 2026 (Question No. 5556, the Hon. Chris Rath MLC), the Minister for Planning and Public Spaces confirmed that, as at that date, no development application had been lodged and the Department "has not undertaken any merit assessment of the proposal, nor asked for feedback on the proposal from Camden Council."

The application was formally lodged shortly after (the EIS itself is dated 15 July 2026). I raise this timeline because it is a fair question for the Department to put to the applicant directly: were the site specific height controls now exhibited derived from an independent assessment of appropriate height for this location, or from the height the applicant had already settled on well before any such assessment occurred?

The same parliamentary answer also confirms that the Department's evaluation of applications operates "separate from the role of any proponent or landowner," supported by "established governance arrangements and internal processes." I take that assurance at face value, and note the same question (Q5556) also asked how independent assessment is ensured "where the Evaluation Panel that found the proposal eligible was composed of four DPHI officers", a specific composition claim which the Minister's answer does not directly confirm or deny. I ask the Department to clarify the composition of that Evaluation Panel and confirm what independence exists between it and the officers who will assess this SSDA.

## **2. Camden's own planning controls confirm a real, specific low rise standard for this part of town, not merely a general preference**

Camden Council's Development Control Plan 2019, Chapter 2.16.4 (Camden Heritage Conservation Area), sets out numbered controls for the Camden Town Centre Heritage Conservation Area, which lies approximately 200m from this site. Two of those controls are directly relevant:

- **Control 1:** "Views associated with the St John's Church spire must not be compromised."
- **Control 9:** "A two storey height limit must prevail except for significant architectural features incorporated into the design of buildings in significant locations."

I want to be precise about what this does and doesn't establish. This site is not within the Heritage Conservation Area boundary, so Control 9 does not directly bind this application as a numeric development standard. What it does establish is that Camden's own current planning framework treats two storeys as the height appropriate to protecting the character of the town centre immediately adjoining this site, and that protecting the St John's Church spire view specifically is a named, existing planning control, not an informal community preference. Clause 5.10 of the Camden LEP 2010 expressly identifies conservation of the heritage significance of heritage items and heritage conservation areas, including associated settings and views, as an objective of the LEP. The proximity, height and visual relationship of this proposal therefore require careful consideration even though the development site itself lies outside the mapped conservation area. A six storey, 22.4m building approximately 200m from a Conservation Area whose own controls limit height to two storeys and expressly protect a named view warrants rigorous assessment of that setting and view impact.

I asked the Department to require a rigorous, independent heritage view assessment. I now note that this has already been asked, directly, in Parliament. NSW Parliament Question

No. 5556 (Chris Rath MLC, asked 24 June 2026) asked specifically whether the SEARs for SSD 116982991 would “be amended to require a mandatory sightline analysis demonstrating compliance with the unconditional Camden DCP 2019 control that views of the St John’s Church spire must not be compromised.” The Department’s written answer, dated 15 July 2026, was direct: matters such as view impacts “would be considered as part of the assessment of the development application and rezoning,” but **“the SEARs will not be amended.”**

I ask the Department to reconsider that position in light of the exhibited application now before it. The applicant’s Statement of Heritage Impact characterises visual impact as “minor”, while the exhibited material does not appear to provide a dedicated surveyed sightline analysis demonstrating the effect on the protected St John’s Church view. Given that a named DCP control protects this exact view and the proposal reaches six storeys approximately 200m from the Conservation Area, I ask that a surveyed, public domain sightline analysis against Camden DCP 2019 Control 1 be obtained, whether through a formal SEARs amendment or otherwise, before this application is determined.

### **3. The proposal represents a major change in scale at a sensitive point in Camden’s built environment**

The site is bordered by established one and two storey residential development to the south and east (the EIS’s own site description confirms this), and sits opposite Camden District Hospital. The applicant’s own early design material identifies “transition to surrounding lower density residential areas,” visual impact, solar access/overshadowing, the heritage interface with Camden Hospital and the conservation area, and tree retention as key design considerations for the site.

Despite this, the exhibited scheme reaches six storeys/22.4m on Site A and five storeys/17.84m on Site B, around 6 metres taller than the former Nurses’ Quarters building on the site, by the EIS’s own acknowledgment. Camden LEP 2010 expressly seeks to retain Camden’s “valued traditional qualities, character and scenic landscapes” while accommodating growth (cl.1.2, Aims of Plan). The relevant question is not whether Camden should accommodate more housing, the Local Strategic Planning Statement and Local Housing Strategy both confirm it should, but whether this height and massing is appropriate on this particular site. I submit it is not, at least not without material reduction.

### **4. The applicant’s own outer area LMR justification does not, in fact, apply to this site, and is exceeded regardless**

Homes NSW relies in part on the argument that surrounding residential land may, in future, redevelop under the NSW Low and Mid Rise Housing (LMR) reforms, which set an outer area default of 17.5m and four storeys for eligible R3/R4 land (Housing SEPP 2021, s.176(2)), with a further 30% uplift available for affordable housing (Chapter 2).

The Minister for Planning and Public Spaces confirmed directly, in the same 15 July 2026 answer, that “the Low and Mid Rise housing policy only applies in residential zones R1, R2, R3 and R4... It does not apply to Special Purpose zones, like the site in question.” The

applicant is therefore relying, for justification, on a policy framework that the Department itself has confirmed does not currently govern this land. Separately, Homes NSW's own scoping material calculates  $17.5\text{m} + 30\% = 22.75\text{m}$  and then proposes a 22.5m height control on Site A, within 0.25m of that figure, despite the underlying policy not applying. I ask the Department to require the applicant to demonstrate the site specific planning merit of the proposed 22.5m and 18m controls by reference to the existing built context, heritage setting, applicable strategic framework and a reasonable transition to adjoining land, not to rely principally on a hypothetical LMR framework which does not presently apply to the site.

Question 5556 records Camden Council's submission as raising concerns including Camden's lack of heavy rail, its car dependent context and whether the reforms were required to meet local housing targets. The Minister's answer confirms that Council's submission and workshop feedback were considered during policy development, but that Council feedback was used to inform the centre selection process rather than determine final outcomes. The answer also records that land ownership "was not a selection consideration" when Low and Mid Rise centres were designated. This is relevant context when considering how much weight should be placed on the LMR framework as justification for this particular site specific proposal.

## 5. Traffic assessment: the trip generation figure is calculated from the parking supply, not from independent demand, and needs validation against observed local conditions

The Transport Impact Assessment (SCT Consulting) forecasts 12 vehicle trips and 25 person trips in the busiest peak hour, and concludes this is "minor" and that no further traffic analysis or intersection modelling is required. I do not suggest this modelling is invalid on its face, but it rests on a methodological assumption that warrants direct scrutiny before it is relied upon in this particular location.

Table 4 to 2 of the TIA applies the TfNSW *Guide to Transport Impact Assessments* (2024) sub metropolitan formula " $0.19P + 1.79$ " to derive peak hour vehicle trips, where the TIA's own footnote states in terms: "**P represents the number of proposed parking spaces.**" In other words, the input variable driving the traffic impact conclusion is not the number of dwellings (95), the resident population (132, per the applicant's own Social Infrastructure Needs Analysis), or an independent car ownership estimate for the future occupants, it is the number of parking spaces the applicant itself has chosen to provide. As set out at item 7 below, that figure was reduced from 58 spaces (the "Preferred Concept Option" tested in the April 2026 Scoping Report) to the 48 spaces now exhibited, a reduction of roughly 17% during design development.

I accept that using proposed parking supply as an input to a trip generation formula may be an appropriate modelling approach where parking supply genuinely constrains vehicle use, that may well be the basis on which TfNSW developed this formula for this development category. My concern is with how that methodology has been applied here, rather than with the formula itself. Its use in this instance requires evidence that constrained on site parking will actually translate into correspondingly constrained resident vehicle

ownership and use, rather than simply displacing vehicles the applicant has not provided for onto surrounding streets. No such evidence is provided. Because the same reduction from 58 to 48 spaces that lowered the parking supply also mechanically lowered the computed traffic impact figure, without any independent test of whether resident vehicle ownership was reduced by a corresponding amount, the resulting “minor impact” conclusion has not, in my view, actually been demonstrated, only assumed.

This is not a hypothetical concern for Camden. 2021 Census data for the Camden suburb/locality itself (ABS QuickStats, SAL10769, the specific locality in which the site sits rather than the wider local government area) records an average of 1.8 registered motor vehicles per occupied private dwelling, with 55.2% of Camden households owning two or more vehicles and only 7.8% owning none. The broader Camden local government area (LGA11450, which also includes the newer, larger household growth area suburbs) records a higher average of 2.2. I rely primarily on the suburb level figure as the more locally precise benchmark for this site. I accept that social and affordable housing tenants, as a cohort, may on average own fewer vehicles than Camden’s general population. A sensitivity assumption of 1.0 vehicle per dwelling would nevertheless produce about 95 resident vehicles among 95 households, compared with only 46 resident parking spaces. Applying Camden’s general population average mechanically would produce about 171 vehicles, but I do not suggest that is a forecast for this tenure restricted development. Its significance is that the proposed resident parking provision of about 0.48 spaces per dwelling is only around 27% of the measured Camden township average. The application should therefore provide tenure specific evidence explaining why such a large departure from the local transport profile is appropriate.

I ask the Department to require the applicant to demonstrate trip generation and parking demand figures derived from an independent estimate of likely vehicle ownership among future residents of this specific development, informed by Camden’s own car ownership profile and the realities of social/affordable tenancy in a car dependent LGA, rather than a formula whose input variable is the applicant’s own parking provision decision. Where actual demand materially exceeds the supply provided, the effects (on street parking pressure, informal parking, and the resulting traffic movements the TIA has not modelled) should be assessed on their own terms.

Separately, the TIA’s own methodology note states that TfNSW’s *Guide to Transport Impact Assessments* (2024) does not provide a complete set of AM/PM peak rates for the sub metropolitan category used, and that “no rate provided for the AM peak, therefore, the rate for the PM peak has been applied to estimate the AM peak person trip generation.” The headline trip figures are therefore, in part, a modelled substitution rather than a directly measured, period specific rate.

That does not by itself invalidate the forecast. It does mean the modelling should be validated against Camden’s actual local conditions before it is relied upon as a basis for concluding impacts are negligible, particularly given Homes NSW’s own Consultation Report records residents describing the area as car dependent and identifying existing congestion at school times and around Camden Hospital shift changes. I ask the Department to require the applicant to demonstrate that the trip generation assumptions

have been tested against observed conditions on Menangle Road, Broughton Street and the Old Hume Highway intersection, including hospital peak periods.

Separately, the Consultation Report's engagement record shows that when TfNSW was emailed on 9 April 2026 to summarise the traffic and transport aspects of the proposal, "TfNSW confirmed that the site is located some distance from the nearest classified roads. TfNSW is of the view that a consultation meeting is not required and did not provide comments at this stage." I note that this consultation response was made in April 2026, based on a summary of the proposal, and before the scheme now exhibited, including its final scale, parking reduction and detailed traffic modelling, was finalised. Because the site does not meet the SEPP (Transport and Infrastructure) 2021 threshold definition of "traffic generating development," referral to TfNSW is at DPHI's discretion rather than mandatory. Given the methodological limitation identified above, and that TfNSW's April 2026 consultation response preceded the completed exhibited scheme and its final TIA, I ask that DPHI seek updated, substantive TfNSW input on the proposal as now exhibited before determination.

## **6. The role of Menangle Road/Old Hume Highway in regional flood access has not been addressed**

The EIS confirms the site itself is not flood affected, including up to the Probable Maximum Flood, I am not suggesting otherwise. However, submissions received during consultation specifically raised that Menangle Road and the Old Hume Highway are understood locally to serve an important access function for the wider Camden township during flood events. Neither the Transport Impact Assessment nor the Consultation Report's response table appears to address this. I ask the Department to require the applicant to confirm whether the strategic function of this road network during regional flood events has been considered, and whether additional permanent or construction phase traffic on Menangle Road could affect that function.

## **7. Parking provision has not been demonstrated as adequate, and was reduced materially during design development**

The proposal provides 48 on site parking spaces for 95 dwellings, 46 resident spaces (the Housing SEPP minimum) plus two visitor spaces. Homes NSW's own April 2026 Scoping Report shows the "Preferred Concept Option" tested at that stage provided 58 spaces (39 for Site A, 19 for Site B) for essentially the same dwelling yield. The exhibited scheme provides 48, a reduction of ten spaces, roughly 17%, during design development. I ask the Department to require the applicant to explain why this reduction occurred, whether it was supported by any parking demand evidence specific to Camden, and whether the effect on surrounding streets was reassessed following the change. As set out at item 5 above, this reduction is not simply a parking question in isolation, because the TIA's own trip generation formula takes the number of parking spaces provided as its input variable, this same reduction also mechanically lowered the assessed traffic impact of the whole development, independent of actual likely vehicle demand from 95 households.

I also note that, unlike a private strata development where a car space is typically title linked or otherwise dedicated to a specific dwelling, 46 resident spaces cannot be allocated one for one across 95 dwellings, fewer than half the households can have a space of their own, however the spaces are distributed. I have been unable to find anywhere in the EIS, the TIA, or the EIS's own "Management of Social and Affordable Housing" section (s.3.8) any statement of how the 46 resident spaces will actually be allocated among the 95 households, whether by a needs based priority system, a waiting list, rotation, or simply shared, unmanaged basement parking used on a first come, first served basis. Section 3.8 addresses only the future Community Housing Provider's broader tenancy management role (see item 11 below on that provider not yet being identified) and says nothing about parking allocation specifically. I ask the Department to require Homes NSW to disclose, before determination, exactly how access to the 46 resident spaces will be allocated, managed and enforced among 95 households, and what happens for the households who do not receive one.

Accessible parking for residents with disability, and for the significant number of older residents this development is itself projected to house (see item 13 below, over half the projected population aged 50 or over, including 21.9% aged 70 or over), raises the same disclosure gap. The TIA states that "accessible parking spaces are designed in accordance with AS2890.6," but at no point in the EIS or the TIA is the actual number of accessible bays provided among the 48 spaces disclosed. More significantly, the TIA itself records that, in lieu of Camden DCP's requirement for 10% adaptable apartments, the development instead provides 15% of apartments (around 14 of 95) designed under Schedule 4 of the Housing SEPP, and states expressly that "these apartments are not required to be linked to an accessible parking space." On the applicant's own account, then, a resident of one of those adaptable apartments has no guaranteed accessible car space at all. I ask the Department to require the applicant to disclose the actual number of accessible spaces provided, confirm whether each Schedule 4 adaptable apartment will in practice be linked to one, and explain what is meant to happen for a resident with a mobility impairment, or simply an older resident who no longer drives with ease, if the accessible and resident spaces are full. Given the site's own "significant slope" and "significant fall across the site" (as the EIS itself describes it in relation to the basement design), a resident in that position who cannot find an on site space would need to park on Menangle Road or a side street and make their way, and carry groceries or belongings, back to the building across that same sloping site, which is a real and foreseeable amenity impact that does not appear to have been assessed anywhere in the application.

Two visitor spaces for 95 households is a low ratio, and real parking demand includes carers, support workers, community service providers, tradespeople and visitors, matters Homes NSW's own consultation record shows residents specifically raised, alongside whether statewide minimum parking rates reflect Camden's genuinely car dependent context.

I want to be specific about how thin this provision actually is, and about which buildings it actually serves. The EIS confirms Building A1 and Building A2 are two separate above ground buildings roughly 12m apart, but they share a single basement level between them, and that shared basement contains only one visitor space for both buildings combined (66

apartments). Building B, the third building, has its own single visitor space (29 apartments). So of the three actual building forms on this site, two of them (A1 and A2) do not each have a visitor space of their own at all, their residents' visitors must compete for the one space allocated to "Building A" as a whole. Across the whole 95 dwelling, at least 132 person development (see item 13 below on why that population figure may itself be understated), there are two designated visitor spaces in total, and neither the EIS nor the TIA identifies any time limit, booking system, turnover management or visitor parking management plan for either of them. The two designated visitor spaces could therefore be fully occupied by only two simultaneous visitor, carer, support worker or trade vehicles, whether or not they turn over during the day, leaving any further simultaneous demand to be accommodated elsewhere, most likely on surrounding public streets. The application does not demonstrate how that foreseeable overflow demand would be managed, and I ask the Department to require it to do so.

The development will also remove approximately four on street parking spaces on Menangle Road between 6am and 3pm for loading and waste collection. The TIA considers this acceptable because surrounding uses, including Camden Hospital, have off street parking, so on street supply is "complementary rather than essential", an assumption rather than an observed finding. I ask the Department to require actual on street parking occupancy surveys, including during hospital shift change periods, before accepting this conclusion.

#### **8. Providing 46 resident spaces does not itself limit how many vehicles 95 households may own, realistic demand should be modelled as a range, not a single "compliant minimum" figure**

The 48 parking spaces provided satisfy the statutory minimum in s.22B of the Housing SEPP for affordable housing. That is a minimum supply obligation placed on the applicant, it does not, and cannot, limit how many vehicles the 95 households who will actually live here may lawfully own. The proposed provision of 46 resident spaces does not itself restrict the number of vehicles residents may lawfully own. Vehicles that cannot be accommodated on site may therefore generate demand for lawful parking on surrounding public streets, subject to the parking controls applying there. If actual household vehicle ownership exceeds the 48 spaces provided, which, as set out at item 5 above, the applicant's own methodology cannot rule out, because it derived the traffic forecast from the parking supply rather than testing it, that demand does not disappear on site; it is displaced onto Menangle Road and the surrounding streets, which residents have already told the applicant are congested.

Given that, I ask the Department to require the applicant to model parking and traffic demand using a supply constrained reference case and at least one evidence based sensitivity scenario, scaling up both resident vehicle ownership and visitor, carer, support worker and tradesperson demand together. The current assessment effectively aligns resident vehicle demand with the 46 resident spaces provided and offers only two designated visitor spaces across the development. To show why sensitivity testing matters, I have set out below an illustrative range using clearly stated assumptions. I am not

presenting these figures as a precise prediction, and I am not a transport consultant. They simply demonstrate that the result is highly sensitive to the assumptions used and that alternative plausible scenarios should be tested before the Department accepts the current single point forecast as evidence that traffic and parking impacts are minor.

| Scenario                          | Resident vehicle assumption                                                                                                                    | Indicative resident vehicles (95 dwellings) | Visitor / carer / support worker / tradesperson demand                                                                                         | Indicative total demand | Against 48 spaces provided                                        |
|-----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-------------------------------------------------------------------|
| Supply constrained reference case | 0.48 resident vehicles per dwelling, corresponding with the 46 resident spaces provided                                                        | 46                                          | 2 designated visitor spaces: one shared by Buildings A1 and A2, and one for Building B                                                         | 48                      | No on site shortfall if actual demand matches the physical supply |
| Reasonable sensitivity case       | 1.0 vehicle per dwelling, used as an illustrative sensitivity assumption. This is about 56% of Camden township's measured 1.8 vehicle average. | About 95                                    | Illustrative allowance of about 1 simultaneous visitor, carer, support worker, tradesperson or family vehicle for every 10 dwellings: about 10 | About 105               | Potential shortfall of about 57 vehicles                          |

Camden's own actual, ABS verified suburb level average, 1.8 vehicles per dwelling (2021 Census, SAL10769), is not put forward here as a prediction for this development; the tenure, income profile and design of this development differ materially from Camden's general population, and I do not suggest residents will own vehicles at that rate. I raise it for a narrower reason: it is the actual, measured local benchmark, and the applicant's implied rate of 0.48 vehicles per dwelling sits at barely a quarter of it. That gap is the applicant's to explain, not mine to assume away. I ask the Department to require Homes NSW to justify, with tenure specific evidence, why residents of this development would be expected to own vehicles at a rate so far below the measured local average, rather than the Department simply accepting the implied 0.48 rate because it happens to match the parking supply provided.

I ask the Department to require the applicant to replace this illustrative range with an actual modelled assessment covering resident vehicle ownership and visitor, carer, support worker and tradesperson demand, using genuine, checkable, tenure specific vehicle

ownership evidence relevant to Camden or a genuinely comparable car dependent locality. This could include Homes NSW or DCJ tenant vehicle ownership data if held, or observed occupancy at a comparable, already occupied social or affordable housing development. The Department should have this evidence before relying on the current single point forecast to conclude that traffic and parking impacts are minor.

I also note that Homes NSW has used tenure specific ABS vehicle ownership data when assessing parking for other social housing developments. For example, a Homes NSW planning assessment for 95 Albert Street, Goulburn relied on 2021 ABS figures for car ownership among social housing households in the Goulburn local government area when considering whether the proposed parking provision was adequate. I do not suggest that Goulburn is a direct comparator for Camden, nor do I seek to apply those ownership rates here. The relevance is methodological: Homes NSW has demonstrated that tenure specific evidence can be obtained and used. Equivalent, properly sourced evidence for Camden or a genuinely comparable car dependent locality should be provided for this application.

### **9. If the parking and traffic forecasts prove wrong after occupation, it is not clear what could actually be done about it**

Parking for this development is provided in basement and podium levels within the building envelope. Unlike an at grade car park, that kind of structure cannot readily be expanded once construction is complete. If the forecast turns out to understate real demand, which items 5 and 8 above suggest is a genuine possibility, not a remote one, there does not appear to be any practical way to add further on site spaces after the buildings are occupied.

I also ask the Department to be precise about what “the forecast” would actually bind, if anything. If consent is granted for 48 parking spaces and Homes NSW builds and provides those 48 spaces, a later finding that residents in fact own substantially more vehicles would not, on its own, amount to a breach of that consent, the excess vehicles would simply appear on surrounding public streets, lawfully. Likewise, a peak hour traffic figure proving higher than the 12 trips forecast is not necessarily an enforceable breach of anything, unless the consent itself contains a specific condition that has been contravened. Unless the Department imposes explicit, monitored conditions now, the current forecast risks operating as a one off assessment input with no ongoing legal consequence if it turns out to be wrong.

I ask the Department to clarify, before determination, rather than leaving these questions to be worked out informally after residents are already living with the consequences:

- Whether any conditions of consent will require post occupancy monitoring of on site and surrounding on street parking and traffic conditions, with defined trigger points and required actions if actual demand exceeds the forecast.
- Whether there is any practical mechanism to increase on site parking supply after construction if the forecast proves inadequate, and if not, whether the Department accepts that any shortfall will simply be absorbed by on street parking on Menangle Road and surrounding streets.

- Whether responsibility for any resulting traffic or parking management response, for example, introducing or extending a residential parking scheme, would fall to Camden Council and existing ratepayers, or to Homes NSW as the applicant and asset owner.
- What recourse, if any, existing Camden residents would have if the forecast is later shown to have materially understated actual demand.

Camden is a car dependent area by the applicant's own consultation record, and the site directly adjoins Camden Hospital, whose shift change parking pressures residents have already raised. These are practical, foreseeable questions, and I ask the Department to require clear answers and appropriate binding conditions of consent, not an assumption that the forecast will simply be correct, before this application is determined.

## **10. Essential servicing remains dependent on post lodgement detailed design and authority approvals**

I am not suggesting a major project of this kind must have every engineering detail finalised before consent, that is not realistic. But the applicant's own Infrastructure Report (ADP Consulting, June 2026) confirms several essential services are not yet secured: a new 1,000kVA electrical substation is required, with the final connection point to be determined by Endeavour Energy at "detailed design stage"; the sewer main requires extension, and Sydney Water's feasibility advice notes this "may take 6 to 12 months for design approval" and may require amplification or an on site holding tank pending confirmed flow calculations; and a water pressure booster pump is mandatory, because the Pressure & Flow Inquiry found sufficient flow but insufficient pressure to serve upper floors without one.

I ask the Department to satisfy itself, before determination, that there is a technically feasible, funded and deliverable servicing solution for electricity, sewer and water at this density, not simply that these matters will be worked through after consent is granted.

## **11. The application does not appear to identify the Community Housing Provider required by the SEARs**

The Secretary's Environmental Assessment Requirements for this project specifically require, where affordable housing is proposed, the name and ABN of the registered Community Housing Provider (CHP) responsible for managing the affordable housing component, together with documentation confirming that provider's agreement to undertake the role. The EIS's management section does not identify such a provider, it states only that Homes NSW "will be partnering with a registered CHP" to manage the development for at least 25 years.

This is confirmed directly by the Minister for Housing's own answer to Parliament. In response to Question No. 5554 (Chris Rath MLC, answered 15 July 2026, the same date the EIS itself is dated), the Minister confirmed: "Homes NSW is currently going through a procurement process to select a CHP partner," and that once appointed, the CHP "will provide the necessary support services for tenants relevant to their requirements and

needs.” On the Government’s own account, no CHP had been selected as at the date the EIS was finalised.

This matters because the EIS relies on the future CHP’s tenancy management, support coordination and referral functions when responding to community concerns about ongoing management and social impacts. Those functions cannot properly be relied upon as mitigation while the organisation responsible for delivering them remained unidentified at the time the EIS was signed off. I ask the Department to determine expressly whether the EIS complies with this specific SEARs requirement, to confirm whether a CHP has since been appointed, and if the requirement is not met, to require the deficiency to be corrected before determination.

## **12. The current assessment should independently test the full impacts of the 95 dwelling scheme**

Demolition of the former Nurses’ Quarters on this site was carried out under a separate Part 5 (Division 5.1) environmental assessment ahead of this SSDA, a process the Department has confirmed “operates independently of the State Significant Development application and rezoning processes” (answer to Question No. 5556, addressing why the demolition, referenced as P5 to 2026 to 75, was progressed ahead of the SSDA and rezoning). Parliamentary questions raised in July 2026 note that the demolition’s own “public interest” justification relied on the anticipated benefits of the future 95 dwelling redevelopment, without that redevelopment’s traffic, heritage and infrastructure impacts being assessed at the same time. I raise this only to ask the Department to ensure this SSDA assessment now independently and fully examines those impacts on their merits, rather than treating the benefits of the scheme as already effectively settled by the earlier, separate demolition approval.

## **13. Social infrastructure and social impact assessment should be proportionate to the actual scale of the proposal**

The applicant’s Community and Social Infrastructure Needs Analysis (HillPDA) projects an on site population of around 132 people, and every “negligible impact” conclusion in that report, on schools, open space, community facilities and health services, is built on that 132 figure. I ask the Department to test that figure closely, because the applicant’s own report gives good reason to doubt it is the right one to rely on.

The 132 figure comes from applying an average household size of only 1.11 people per 1 bedroom dwelling, 1.60 per 2 bedroom and 2.51 per 3 bedroom (Table 6), a weighted average of about 1.39 people per dwelling across the 95 apartments. HillPDA’s own report explains that this rate is not local: it is Greater Sydney wide 2021 ABS TableBuilder data for social and community housing in three or more storey buildings, used “due to a limited supply of comparable dwellings in the social locality or Camden LGA.” The same report’s own community profile (Table 1), drawn from the actual 2021 Census for the “social locality” immediately surrounding this site, records an average household size of 2.4 people per dwelling, nearly double the 1.39 figure used to project the site’s population. I am not suggesting that figure should be applied directly to this development, the general

population of the surrounding locality is not the same as the tenure restricted, income tested population of a 100% social and affordable housing development, and the two are not directly comparable. I raise it only to show the scale of the gap between the local general population average and the figure actually used, and to support the point below.

HillPDA's own report goes on to caveat its projection directly: "the eventual on site population and age breakdown is likely to differ from these preliminary results," and "should the eventual population more closely resemble Camden's existing social and community housing demographics, there may be a greater proportion of older residents and larger household sizes." In other words, the applicant's own consultant has flagged, in its own words, that the 132 figure could understate the real outcome, and every "negligible" conclusion elsewhere in the EIS that depends on it (school places, open space, community services, and by extension, the visitor and support worker parking demand discussed at items 7 and 8 above) inherits that same uncertainty. I ask the Department to require the applicant to test its social infrastructure, traffic and parking conclusions against a higher, better evidenced population range, rather than relying on a single Greater Sydney wide proxy figure its own report acknowledges may be too low, before accepting that impacts across the board are negligible.

The same report's projected age profile also matters for parking specifically: more than half of the projected population (aged 50 and over, including 21.9% aged 70 and over) falls into life stages where home care, health and support worker visits are typically more frequent, not less, particularly in a location like Camden with limited public transport. That cuts against any assumption that this population would generate materially lower visitor and support worker vehicle demand than assumed elsewhere in this submission.

On schools specifically, the HillPDA report records that Camden South Public School, the nearest primary school, 600m from the site, has 712 FTE enrolments and "very limited non local enrolment availability," while projecting the proposal will add only 6 primary aged children and concluding there is "some degree of additional headroom." I don't think this single data point proves the development will overwhelm the school, and the applicant's own consultant doesn't conclude that either, but it is a fair basis to ask the Department to test whether "negligible impact" conclusions across the board have been reached on a consistent, evidenced basis.

More broadly, the EIS's own Executive Summary concludes social impacts are limited to the construction phase, a conclusion produced by the applicant's own planning consultant. Given the SIA Guideline for State Significant Projects only requires a full Social Impact Assessment where the EIS identifies significant impacts, I ask the Department to independently test whether the level of social assessment undertaken is proportionate to a 95 dwelling, 100% social/affordable development of this scale, including tenancy and on site management arrangements, support service demand, and neighbourhood interface, not because social housing residents should be presumed to create any particular impact, but because these are ordinary, legitimate planning and management questions for any development of this size.

#### **14. The overlapping roles of government in this application make transparent, independent assessment especially important**

Homes NSW (the Land and Housing Corporation) is the applicant. The Minister for Planning and Public Spaces, through the Planning Secretary exercising both the rezoning proposal authority and SSD consent authority functions (EP&A Act ss.3.39, 4.38(5); Planning Systems SEPP Sch.1 s.26), is the decision maker. Camden Council's role, per DPHI's own Concurrent Rezoning Requirements guideline, is limited to consultation during exhibition. I make no allegation of improper conduct by any consultant or official, and I accept the Department's own assurance that it maintains governance arrangements to keep its assessment function separate from Homes NSW's role as proponent.

Given the overlapping roles, transparent and independently tested assessment of the technical reports underpinning this application is particularly important. All of the technical reports in this EIS were commissioned, directly or indirectly, by the applicant, standard practice, and not itself evidence of any problem, but several conclusions rest on assumptions rather than site specific, observed local evidence: the parking demand assumption, the substituted AM peak trip rate, the "minor" heritage impact characterisation reached without surveyed sightlines, and the "negligible" social infrastructure demand findings. I ask the Department to critically test these assumptions on their merits, and to seek independent agency advice or peer review where a technical conclusion is contested or rests on an assumption rather than direct local evidence.

#### **15. Community concern is extensive, and responding to a concern is not the same as resolving it**

Homes NSW's own Consultation Report records 498 submissions during pre lodgement consultation, raising, among other things, constrained on street parking, Camden's car dependence, hospital related congestion, ambulance and emergency access, Menangle Road's capacity, pedestrian safety, and the site's prominent position at what residents describe as a gateway to the town. These are ordinary land use planning concerns, not objections to the socioeconomic profile of future residents, and the applicant knew of them well before lodgement.

The Consultation Report's "project response to feedback" table characterises most of these as resolved on the basis that a response was provided, for example, treating the parking concern as resolved because the statutory Housing SEPP minimum is met. Responding to a concern is not the same as resolving the underlying planning question it raises. I ask the Department to independently assess whether each substantive concern has actually been answered with adequate evidence.

I would also note that Camden Council officers were reportedly only "generally comfortable with the height and scale of the development" at an informal February 2026 briefing stage (per Homes NSW's own April 2026 Scoping Report), and that this has already been directly put to the Department in Parliament (Question No. 5556) as inconsistent with Council's formal position on the underlying LMR policy. I ask the Department to give weight only to

Camden Council's actual formal submission on this specific application, not to earlier informal officer level comments.

## **16. Reasonable lower scale alternatives have not been demonstrated**

This site does not need to remain vacant, and I am not asking for that outcome. I ask the Department to require Homes NSW to demonstrate genuine consideration of a lower scale alternative that provides a materially reduced building height and storey count, a stronger transition to the surrounding one and two storey residential context and the neighbouring Heritage Conservation Area, protection of the St John's Church view corridor identified in Camden DCP 2019, increased resident and visitor parking supported by an actual demand assessment, reduced reliance on Menangle Road for servicing, and confirmed (not deferred) infrastructure capacity, while still delivering meaningful social and affordable housing on this site. The applicant's own material acknowledges that most future housing growth in the Camden LGA is expected to occur in the South West Growth Area; the choice is not between this exact 95 dwelling scheme and no social housing, but between a better calibrated development here and additional capacity delivered elsewhere in the LGA.

### **Requested outcome**

I ask that the Minister and Department refuse SSD 116982991 and the concurrent rezoning in their currently exhibited form. If residential redevelopment of the site is considered appropriate, I ask that Homes NSW instead be required to submit a substantially redesigned proposal, at materially reduced height and bulk, with a surveyed sightline assessment against Camden DCP 2019's St John's Church view control, parking and traffic impacts modelled across realistic sensitivity scenarios, tested against Camden's own measured vehicle ownership data and properly evidenced (not derived from the parking supply itself), essential servicing confirmed, the Community Housing Provider identified as required by the SEARs, and clear, binding conditions of consent addressing what will happen if parking and traffic demand prove higher than forecast after occupation, before any approval or rezoning is granted.

### **Declaration**

I confirm I have not made a reportable political donation in the two years preceding this submission. I understand this submission will be made public in full (name may be withheld from publication on request), consistent with the Department's exhibition notice for this application.

Simon Dimascio  
23 Old Hume Highway, Camden NSW 2570  
19 August 2026

### **Key source documents and parliamentary references**

- Environmental Impact Statement, 72 and 82 to 86 Menangle Road, Camden, 15 July 2026 (Homes NSW / FPD Planning), and Appendices A, AA, AB, B, C, D, E, I, N, Q, R, Y.
- Notice of Exhibition, Application Form, and Concurrent Rezoning Requirements guideline (DPHI).

- Scoping Report for Camden Affordable Housing, April 2026 (Homes NSW).
- Camden Development Control Plan 2019, s.2.16.4 (Camden Heritage Conservation Area), Controls 1 and 9. [Website](#)
- Camden Local Environmental Plan 2010, cl.5.10.
- NSW Parliament, Questions and Answers Tracking ([parliament.nsw.gov.au/parliamentary-business/questions-and-answers-tracking](http://parliament.nsw.gov.au/parliamentary-business/questions-and-answers-tracking)):
  - [Question No. 5554](#) (Chris Rath MLC → Minister for Housing), asked 24 June 2026, answered 15 July 2026.
  - [Question No. 5555](#) (Chris Rath MLC → Minister for Heritage), asked 24 June 2026, answered 15 July 2026 (Minister declined to answer substantively; redirected to Minister for Planning and Public Spaces).
  - [Question No. 5556](#) (Chris Rath MLC → Minister for Planning and Public Spaces), asked 24 June 2026, answered 15 July 2026.
  - Question No. 5677, 5678 (Rachel Merton MP), asked 28 July 2026, answered 18 August 2026.
- Environmental Planning and Assessment Act 1979 (NSW), ss.3.39, 4.38(5), 5.5, Division 5.1.
- State Environmental Planning Policy (Housing) 2021 (NSW).
- Transport for NSW, *Guide to Transport Impact Assessments* (2024), sub metropolitan trip generation formula and “P” (parking spaces) definition, as applied in Appendix I, Transport Impact Assessment (SCT Consulting), Table 4 to 2.
- Australian Bureau of Statistics, Census of Population and Housing 2021, QuickStats, Camden suburb/locality (SAL10769), number of registered motor vehicles per dwelling. [Website](#)
- Australian Bureau of Statistics, Census of Population and Housing 2021, QuickStats, Camden local government area (LGA11450), number of registered motor vehicles per dwelling (cited for LGA wide context only). [Website](#)
- [NSW Planning Portal](#), Homes NSW assessment for 95 Albert Street, Goulburn (example of tenure specific ABS vehicle ownership data used in a social housing parking assessment).