

Dear IPC

**Catholic Metropolitan Cemeteries Trust (CMCT)**  
**A085-18 Crown Cemetery 136,000 Grave Development, Scenic Hills, St Andrews Road, Varro Ville.**

The problems with this proposal as we see them.

The quotes below are from information available on the Internet:-

The cemetery proposal is totally incompatible with the current Scenic Hills E3 zoning objectives set out in the Campbelltown Local Environmental Plan 2015 – *“To preserve the rural heritage landscape character of the Scenic Hills.”*

#### **Direct Adverse Impacts on the Historic Homestead**

“A burial zone with headstones is proposed directly west south west of the Homestead along the entrance road to the Homestead and forming the main foreground view of the homestead when viewed from St. Andrews Road. This is especially unsympathetic and will totally destroy the rural character of the vista to the Homestead”.

Quote *“Development of different types of memorialisation”* - Will it be a repeat of Rookwood?



This photo is one example showing many types of Memorials as mentioned below.

*“This has informed every aspect of the proposal, from the treatment of the landscape, the location and **development of different types of memorialisation**, tree and shrub plantings (species and siting), siting of roads and infrastructure, siting and architectural design of new buildings, the conservation and adaptive reuse of the outbuildings precinct, WSUD and treatment of the dams, conservation and reinterpretation of significant landscape elements, provision for public art, and regeneration of CPW/ MSW”.*

However, the new Greater Sydney Region Plan also has Objective 13 – *Environmental heritage is identified, conserved and enhanced*. The Plan then states –

*“Conserving, interpreting and celebrating Greater Sydney’s heritage values leads to a better understanding of history and respect for the experiences of diverse communities. Heritage identification, management and interpretation are required so that heritage places and stories can be experienced by current and future generations.*

*Environmental heritage is protected for its social, aesthetic, economic, historic and environmental values. Environmental heritage is defined as the places, buildings, works, relics, moveable objects and precincts of State or local heritage significance. It includes natural and built heritage, Aboriginal places and objects, and cultural heritage such as stories, traditions and events inherited from the past.*

*While the strongest protection for heritage is its value to the community, it is also protected under the Heritage Act 1977, National Parks and Wildlife Act 1974 and local environmental plans. The statutory framework requires identification of the values of environmental heritage, and context specific design and development that conserves heritage significance. This includes the tangible and intangible values that make places special to past, present and future generations.*

*The NSW Office of Environment and Heritage is developing a new legal framework to improve the protection, management and celebration of Aboriginal cultural heritage that will include an Aboriginal Cultural Heritage Act.*

*Areas of natural heritage are found in wilderness areas and managed landscapes across Greater Sydney. These are often sites of important biodiversity and cultural value and many are significant to Aboriginal people”.*

Strategy 13.1 for Objective 13 states –

*“Identify, conserve and enhance environmental heritage by:*

- engaging with the community early in the planning process to understand heritage values and how they contribute to the significance of the place*
- applying adaptive re-use and interpreting heritage to foster distinctive local places*
- managing and monitoring the cumulative impact of development on the heritage values and character of places”.*

*“In terms of the proposed cemetery development on this State Heritage Significant place, the National Trust would contend that the community has clearly articulated the heritage values of this property and how they contribute to its significance and that the development proposed would destroy the distinctiveness of this local place and its rare heritage.*

The Western City District Plan has Planning Priority W16 – Protecting and enhancing scenic and cultural landscapes with its corresponding Objectives 18 – Scenic and cultural landscapes are protected. Specifically mentioned in the list of scenic landscapes requiring protection is the Scenic Hills between Campbelltown and Camden. This Planning Priority notes” –

*“Continued protection of the Western City District’s scenic and cultural landscapes is important for the sustainability, liveability and productivity of the District. It can complement the protection of biodiversity and habitat, help manage natural hazards and support tourism. Protecting scenic and cultural landscapes can also help preserve links to Aboriginal cultural heritage.”*

Action 76 states –

*“Identify and protect ridgelines, scenic and cultural landscapes, specifically the Scenic Hills, Mulgoa Valley and the escarpments of the Blue Mountains.” Responsibility – Councils, other planning authorities and State agencies.*

Action 77 states –

*“Enhance and protect views of scenic and cultural landscapes from the public realm.” Responsibility – Councils, other planning authorities and State agencies.*

In the Trust’s view, the protection of the Scenic Hills as specific Actions in the District Plan overrides the more general planning priority – *“A growing Greater Sydney requires additional land for burials and cremations.”*

The cemetery proposal is totally incompatible with the current Scenic Hills E3 zoning objectives set out in the Campbelltown Local Environmental Plan 2015 – *“To preserve the rural heritage landscape character of the Scenic Hills.”*

**“The Development Application’s Design Statement identifies seven major new buildings and various shelter buildings. An examination of the various building designs for the Chapel accommodating 500 people (pages 44 & 53), the Administration Office (page 63), the Function Room (page 67), the Gatehouse (page 59), the Café for 80 people (page 71), Ground Staff Facilities (page 75), more than 70 Crypts in length and five crypts in height (page 82) and sixteen Shelters (page 80) confirm that none of these buildings contribute to *“preserving the rural heritage landscape character of the Scenic Hills.”* On the contrary, these buildings and the newly created landscape around them is totally out of character with the Scenic Hills rural heritage landscape.**

## **Roads & Car Parking**

“The sheer scale of the road network and car parking provisions is, in the Trust’s view extraordinary and highly destructive of this early colonial period rural landscape of State Heritage Significance. There is car parking provision for 350 vehicles as well as kerbside parking on all roads. There will be 8.5 kilometres of concrete roadways up to 8 metres wide with provision in the majority of cases for car parking on both side of roadways. Expressed in other terms that equates to more than 50,000 sq metres of concrete roadways.

The new road design has no regard to, and the proposed landscape design obliterates, the historic driveway from the outbuildings to St. Andrews Road”.

The Heritage Impact Statement (Conclusion and Recommendations – Page 126) tries to put the argument –

*“The Macarthur Memorial Park proposal is underpinned by a strong understanding of the heritage values and significance of the place (including natural and scenic values, built form, the cultural landscape, views and vistas, European and Indigenous archaeology etc). This has informed every aspect of the proposal, from the treatment of the landscape.*

***The location and development of different types of memorialisation, tree and shrub plantings (species and siting), siting of roads and infrastructure, siting and architectural design of new buildings, the conservation and adaptive reuse of the outbuildings precinct, WSUD and treatment of the dams, conservation and reinterpretation of significant landscape elements, provision for public art, and regeneration of CPW/ MSW.***

*The result is a highly considered proposal that not only retains and conserves but also celebrates the heritage aspects of the place”.*

“It is difficult for the National Trust to believe that these statements and claims actually refer to the Varroville early colonial scenic landscape being dissected with 8.5 kilometres of concrete roadways”.

It is even more concerning to see the provisions of the Burra Charter being quoted as though they would be supportive of this project –

*“Best Practice Heritage Management”*

*“...the Burra Charter also recognizes that all places and their elements change over time at varying rates. It further states that the amount of change to a place and its use should be guided by the cultural significance of the place and its appropriate interpretation.”*

### **Proposed Destruction of the Early Colonial Period Remnant Viticultural Trenching**

The Conservation Management Plan for the Varroville Estate states that the remnant viticultural ‘terracing’ has high significance. The Statement of Significance notes –

*“Varroville is a ‘celebrated early farm estate dating from 1810 with early structures, the 1850s homestead, layout, agricultural (vineyard) terracing and evidence of early access road.’ (Morris and Britton, 2000, 98)*

*‘Varroville is rare as one of the few larger estate landscapes remaining in the Campbelltown area where the form of the original grant and the former agricultural use of the estate and its rural landscape character may be appreciated.’ (Morris and Britton, 2000, 98)*

*Varroville was significant to the horticultural development of New South Wales through the laying out of a productive kitchen garden in 1809 noted for its extensive fruit varieties by the early 1820s and the establishment of a vineyard, said to be second only to that of Gregory Blaxland of Brush Farm, Eastwood.*

*The vineyard terraces are extant and together with the early drive suggest that the present 1858 house occupies the site of the earlier 1810s house. Accounts relating to Charles Sturt's ownership (1837-39) indicate the property's continued role in the acclimatisation of plants sourced from as far afield as Calcutta."*

## **Roads & Car Parking**

"The sheer scale of the road network and car parking provisions is, in the Trust's view extraordinary and highly destructive of this early colonial period rural landscape of State Heritage Significance. There is car parking provision for 350 vehicles as well as kerbside parking on all roads. There will be 8.5 kilometres of concrete roadways up to 8 metres wide with provision in the majority of cases for car parking on both side of roadways. Expressed in other terms that equates to more than 50,000 sq metres of concrete roadways.

The new road design has no regard to, and the proposed landscape design obliterates, the historic driveway from the outbuildings to St. Andrews Road".

The Heritage Impact Statement (Conclusion and Recommendations – Page 126) tries to put the argument –

*"The Macarthur Memorial Park proposal is underpinned by a strong understanding of the heritage values and significance of the place (including natural and scenic values, built form, the cultural landscape, views and vistas, European and Indigenous archaeology etc). This has informed every aspect of the proposal, from the treatment of the landscape, **the location and development of different types of memorialisation**, tree and shrub plantings (species and siting), siting of roads and infrastructure, siting and architectural design of new buildings, the conservation and adaptive reuse of the outbuildings precinct, WSUD and treatment of the dams, conservation and reinterpretation of significant landscape elements, provision for public art, and regeneration of CPW/ MSW.*

*The result is a highly considered proposal that not only retains and conserves but also celebrates the heritage aspects of the place".*

"It is difficult for the National Trust to believe that these statements and claims actually refer to the Varroville early colonial scenic landscape being dissected with 8.5 kilometres of concrete roadways.

It is even more concerning to see the provisions of the Burra Charter being quoted as though they would be supportive of this project –

### *Best Practice Heritage Management*

*"...the Burra Charter also recognizes that all places and their elements change over time at varying rates. It further states that the amount of change to a place and its use should be guided by the cultural significance of the place and its appropriate interpretation."*

This early colonial landscape is of State Heritage Significance and it is recognised as a vital scenic protection area. Thus a development of the type proposed is totally unsuitable due to the massive change that it involves".

## Direct Adverse Impacts on the Historic Homestead

A burial zone with headstones is proposed directly west south west of the Homestead along the entrance road to the Homestead and forming the main foreground view of the homestead when viewed from St. Andrews Road. This is especially unsympathetic and will totally destroy the rural character of the vista to the Homestead.

Having regard to the three sections of the Local Environmental Plan set out above, the National Trust makes a number of points

- Clause 7.7 (3) declares Lot 1 DP 218016 and part of Lot 22 DP 564065 a “No Build Area”. The clause then requires that, in determining whether to grant development consent to development on this land, the consent authority must consider the fact that this land is not capable of accommodating development other than a lawn cemetery and associated fencing. On this land the developer proposes major roadworks (concrete roads up to 6 metres in width) totalling 2 kilometres in length. While these roads provide access to the lawn cemetery they also provide access to the other general cemetery areas and ‘intervene’ between Varroville Homestead and its historic outbuildings. The use of these roads for other than lawn cemetery purposes, their over scaled design and their impact on the historic link between Varroville Homestead and its outbuildings are all factors for not permitting the current proposed road system within the ‘No Build Area’.
- Clause 7.8A states that development of a cemetery will only be permitted if the consent authority is satisfied that the development will complement the landscape and scenic quality of the site and the development will not adversely affect the visual or physical qualities of the site. On the 28 November, 2013 the Heritage Division of the NSW Department of Environment and Heritage provided a detailed comment on the planning proposal for the cemetery,
- Advising Campbelltown City Council of the Division’s refusal to support the proposal. The letter mentioned that the Heritage Division did not believe the *‘proposed concept design for Macarthur Memorial Park will be compatible with the predominantly rural character of the Scenic Hills and the subject land. Formal lawn graves, memorial terraces, car parking, roads, signage, condolence rooms and formal lines of trees are all at odds with the informal character of the subject land’*. A subsequent Heritage Division submission stated –

*“The Heritage Division believes that additional cemetery usage of the subject land contradicts the aims and objectives of the existing Local Environmental Plan and the existing zoning of the land. The Planning Proposal also appears inconsistent with the findings of the Visual and Landscape Analysis of Campbelltown’s Scenic Hills and East Edge Scenic Protection Lands, Final Report prepared for Campbelltown City Council by Paul Davies P/L and Geoffrey Britton Environmental Design Consultant, dated October 2011.*

*The Heritage Division maintains that the landscape and the outbuildings surrounding Varroville Homestead is an exceptionally significant part of heritage of the Varroville Homestead – its remnant estate that explains its creation, siting and where funding originated to build it. Any change of use in this land may substantially change the landscape and identity of the former estate and the ability of site users, visitors and passers-by to comprehend and interpret that history.*

*On the basis of the above the Planning Proposal for Macarthur Park is not supported.”*

The National Trust argues, in support of the views put by the Heritage Division and, in the knowledge that most of these lands are proposed to be added to the State Heritage Register Listed Area, the development proposed will NOT complement the landscape and scenic quality of the site and will adversely affect the visual and physical qualities of the site.

- Clause 7.6 states that development consent must not be granted to any development in the Escarpment Preservation Area unless the consent authority is satisfied that the external surfaces of any building consist of prescribed materials, that is, materials that are dark-coloured and of low reflective quality and blend with the landscape of the site. In the Trust’s view, the majority of the buildings proposed incorporate light-coloured stone walls with considerable areas of glass. The number of buildings proposed and their scale (the building named the ‘chapel’ contains multiple chapels) make it impossible to fulfil the objective of Clause 7.6 – *“to recognise and protect the scenic, environmental, cultural and historic qualities of the Scenic Hills and the landscape setting of Campbelltown.*



## **Development Application based on outdated supporting reports**

“The Conservation Management Plan was prepared in October 2015 based on earlier reports, for its assessment Varro Ville House’s significance, including its significant views, such as –

- *Colonial Landscapes of the Cumberland Plain and Camden, NSW*, 2000, prepared for the National Trust of Australia (NSW),
- *Historical Context: “Varro Ville”*, 1992, Wendy Thorpe, prepared for Orwell and Peter Phillips Architects, revised and updated by Pearson-Smith & Associates Pty Ltd Architects and
- *Revised Conservation Policy ‘Plan’ for “Varro Ville”, St Andrews Road, ‘Varroville’*, Pearson-Smith & Associates Pty Ltd Architects May 1999, originally prepared by Orwell & Peter Phillips Architects in May 1992.

Geoffrey Britton and Peter Phillips have since updated these assessments in the study commissioned by the owners of Varro Ville House funded by a grant from the NSW Heritage Council (*Curtilage Study Varro Ville, May 2016* by Orwell and Peter Phillips).

This 2016 Curtilage Study was utilised by the NSW Heritage Council to inform and support its recommendation to the NSW Heritage Minister, in late 2017, to list on the State Heritage Register, the major part of the land proposed for the cemetery development”.

The Development Application does not comply with Policy 9 of the Conservation Management Plan (page 121)

- *“All future decisions and works to the place must be guided by the statement of significance and the identified significant spaces, views, fabric, and building elements identified in this Conservation Management Plan (section 5.4) together with any additional detailed research and assessment.”*

As required by Clause 7.8A (2) (e) of the Campbelltown Local Environmental Plan 2015 –

*“the development will be carried out in accordance with the conservation management plan titled ‘Conservation Management Plan, Varroville Estate: 166–176 St Andrews Road, Varroville’, dated October 2015, and the supplementary information relating to the plan provided by letter by Urbis on 22 August 2016, published on the website of the Department of Planning and Environment.”*

## **Inconsistencies and Contradictions in the Conservation Management Plan**

“Even within the Conservation Management Plan there are inconsistencies. Point 4.2.7 on page 78 of the Plan states that “[Varroville’s] archaeological remains have the potential to be of state significance”. However, in the Significance Assessment Criterion (e) ‘Research Potential’ (page 20 of the Heritage Data Form) Varroville is only rated at the local level”.

Policy 29 of the Conservation Management Plan (page 126) states –

*“Those dams identified and assessed by archaeological or other detailed physical investigation to have been formed in the Sturt period are regarded as being of heritage significance and should be retained and conserved where possible, and used for ongoing water management of the subject property.”*

The Sturt Dams are within Area 3, as shown in Figure 27 on page 23 of the Conservation Management Plan’s Appendix C – Artefact Heritage – Historical Archaeological Assessment.

However a recommendation (section 7.2, page 35) of the Historical Archaeological Assessment contradicts the policy quoted above –

*“An archaeological impact assessment should be prepared for future development applications within Areas 1 and 2. Area 3 does not require approvals and therefore an archaeological impact assessment is not necessary.”*

The National Trust understands that no archaeological impact assessment has been carried out”.

## **Conclusion**

“The National Trust is firmly of the view that major cemetery proposals must not be sited within State Heritage Register listed early colonial agricultural landscapes. The two land uses are totally incompatible and the various provisions in Campbelltown City Council’s Local Environmental Plan would appear to confirm this.

The Trust re-iterates its strong objection to this development proposal and puts the alternative proposal that cemeteries should be included on the list of land uses considered for Western Sydney Parklands Trust’s land bank of ‘operational lands’ (that is lands that can be subdivided and sold, to generate funds to run the Western Sydney Parklands).

Both the Greater Sydney Region Plan and the Western City District Plan do have an objective that a growing Greater Sydney and the Western City District require additional land for burials and cremations. However, the strategy for providing this will be through the Metropolitan Sydney Cemetery Capacity Report, which has confirmed that the South-West Sydney Region is well served, with the number of graves available.

However, the Greater Sydney Region Plan has a specific objective to identify, conserve and enhance environmental heritage. The Western City District Plan has a planning priority and objective for protecting and enhancing scenic and cultural landscapes and the Scenic Hills is specifically highlighted – “identify and protect ridgelines, scenic and cultural landscapes, specifically the Scenic Hills, Mulgoa Valley and the escarpments of the Blue Mountains” It is ironic that the other State Heritage Listed landscape threatened by a cemetery development was in the Mulgoa Valley”.

“Finally, the Varroville Homestead is State Heritage Register Listed, its original surrounding estate has now been recognised by the Heritage Council for its State Heritage Significance and recommended to the Minister for Heritage for Listing on the State Heritage Register and the Heritage Division has lodged an objection to this development proposal.

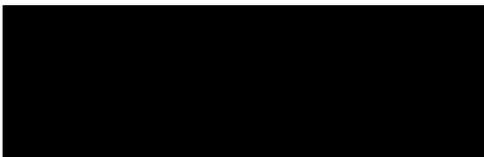
A cemetery development on the Varroville Estate is unthinkable and should be rejected outright.

It rightly or wrongly appears that progress of the cemetery proposal is intentionally unimpeded by a state heritage listing. In the eyes of the community there is a lack of transparency in assessment of the heritage significance of the land surrounding Varroville homestead. If the curtilage is worthy of protection, which the documentation and National Trust indicates is the case, then the community expects it to be protected”.

Varroville Homestead as it is now.



Yours Faithfully



Charles and Helen Cowell