

Ms Dianne Leeson, Chair
Independent Planning Commission
Level 3. 201 Elizabeth Street
SYDNEYNSW 2000



DEVELOPMENT APPLICATION, 166-176 ST ANDREWS ROAD VARROVILLE – File no. DA3293/2017/DA-C

Dear Ms Leeson,

The Australian Garden History Society is the leader in concern for, and conservation of, significant cultural landscapes and historic gardens through committed, relevant and sustainable action. It has three branches in NSW and this submission is made on behalf of the Sydney and Northern NSW (i.e., the local) branch (the Branch).

We are pleased to provide this second letter of objection to the proposed Crown Cemetery Development at Varroville in the Campbelltown Scenic Hills. Further information has been provided since lodging our objection in 2016 however the fundamental reasons for our strong objection remain.

The reasons for our objection are as follows,

1. Adverse impacts on the heritage significance of the Varro Ville, a property listed on the State Heritage Register.

A 2001 study specifically commissioned by the Heritage Council to report on the remaining pre-1860 colonial farms on the Cumberland Plain, described Varro Ville as, 'a *'celebrated early farm estate dating from 1810 with early structures, the 1850s homestead, layout, **agricultural (vineyard) terracing and evidence of early access road.**' It concluded that it was '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.**' (p98, *Colonial Landscapes of the Cumberland Plain & Camden Morris and Britton, 2000*). The proposed cemetery development will introduce a significantly more intensive use of the site over time resulting in its rural landscape character being eroded and eventually dominated by an excess of roads, emphasised by now informal roadside plantings, formal garden rooms, buildings and memorials. The final effect will dominate the simplicity of the expansive pastoral setting that now surrounds Varroville house and garden.*

2. Adverse impacts on the curtilage of Varro Ville house and garden

The subject cemetery development is within the curtilage of the historic Varro Ville estate. Varro Ville's historic and visual curtilages have survived substantially intact for 200 years and can still be readily understood and appreciated as a Colonial cultural landscape. It is critically important for Campbelltown, the Cumberland Plain (as the site

of the earliest Colonial settlement) and the State of NSW that this rare historic complex remains intact and able to be interpreted as a cultural landscape (p84, *Visual Analysis of Campbelltown's Scenic Hills and East Edge Scenic Protection Lands*, P Davies, G Britton, 2011).

The NSW Heritage Council (NSWHC), through the Minister for Heritage, has given a heritage grant to the owners of Varro Ville to conduct a curtilage study. This NSWHC study has recommended that almost all of the cemetery land should be state heritage listed. The proposed 10 metre 'no burial' buffer zone along the perimeter of the current property boundary to Varro Ville is unrealistic and will not be read within the significant view corridors to and from the item. The location of the proposed road between the Varro Ville house and its outbuildings (Figure 15, Civil Report, Warren Smith and Partners) will sever this important connection and further erode the significance of this State Heritage listed item. The AGHS urges the Independent Planning Commission to **defer any consideration of this application until the Minister provides a response. This NSWHC study should be considered alongside the development application documents.**

3. The Visual Assessment by RLA consideration of the car parking requirements of the site is inadequate

The visual assessment is fundamentally flawed as it has not assessed the true visual impact on both Varro Ville house and the Campbelltown urban area of the development proposed. The proposed cemetery development includes 350 car spaces on site (93 underground) plus kerbside parking on all roads (Transport Impact Assessment, TTPP, 9 August 2017)). This is a staggering 1750% difference between the 20 spaces provided in a single formal carpark (p36 Traffic Impact Assessment, GTA Consultants, 2015) proposed under the Planning Proposal that argued that the location of this development within E3 zoning would 'protect and maintain the environmental, ecological and visual amenity of the Scenic Hills' (Part 2, Campbelltown LEP 2015). The parking numbers are questionable as the Traffic Report still includes Liverpool Cemetery as a comparative example to assess car parking numbers. The report incorrectly describes Liverpool Cemetery and Rookwood Cemetery as being similar to the site, as being poorly serviced by public transport. Liverpool is well serviced by a regular Mon-Fri bus route with a stop immediately in the vicinity. Due to the steepness of the topography, the large cemetery carparks will require extensive cut and fill. As the principal building, the multi-purpose chapel, has been located on the steeper part of the site, the cut required for this building, the road and the carpark is also within the visually prominent part of the site. It is appalling to see crypts are proposed to line the high side of these primary entry roads and must be considered visually incompatible with this scenic landscape. The AGHS urge the Council to **refuse the development on the visual impact of the parking requirements for the proposed development**

4. The increase in roads and buildings across the site is out of character with the surrounding rural land.

The number and width of proposed roads (up to 8m width for primary road) and buildings associated with the development has considerably increased from the Planning Proposal. The proposed cemetery development includes a larger Chapel for up to 500 people, a Café, a Function Building and 16 shelters for up to 30 people. The true extent of works across the site is revealed most clearly in the General Arrangement Plan prepared by Warren Smith and Partners (Dwg C1.01 Issue 1 24/8/17). Further civil plans have not been prepared. This plan and the detailed plans accompanying it indicate the DEVELOPMENT APPLICATION, 166-176 ST ANDREWS ROAD VARROVILLE – File no. DA3293/2017/DA-C

full extent of bulk earthworks, retaining walls, roads, paths, drainage swales, headwalls and further additional structures that are to be scattered across the rural landscapes. With likely signage and lighting, it can be concluded that the proposal will be closer related to a large new residential subdivision. The combined impact of roads, car parking is not in character with the surrounding rural land and fails to achieve the objectives of the E3 zoning. The AGHS urge the Council to **refuse the development on the failure to achieve the objectives of the E3 zoning.**

5. The Tree Report prepared by Travers Bushfire and Ecology is inadequate

The Final Tree Report submitted on the 23 July 2018 fails to provide an arboricultural impact assessment (Section 4.3 Travers Bushfire and Ecology) as required under AS4970-2009 Protection of Trees on Development Sites, and for this reason alone this application should be refused. The report provides no indication of the plans to which it refers and is almost identical to the tree report submitted with the originally lodged plans. The number of trees to be retained and removed are identical despite design modifications to the landscape plans. The proposed road impacts alone include extensive excavation and filling for batters on either sides that will result in major encroachment and likely removal of a significantly greater number of existing trees than is indicated. The proposed circular design of graves such as to the east of the Chapel will result in excavation in contravention of arboricultural best practice, structurally compromising these significant remnant trees. Similarly concealed concrete beams proposed for burial plots within the TPZ of trees will require further excavation within the TPZ (Dwg 601, Sheet 20, JFLA). In addition to the civil and hydraulic designs, the proposed burial designs have not been included in the arborist assessment and conflict with the proposed requirement for retention of remnant critically endangered vegetation across the site. The inadequacy of this report also has a direct impact on the conclusions of the Flora and Fauna Report. The proposed excavation for graves and associated structures should not be permitted within the TPZ of existing critically endangered vegetation and instead these areas should be preserved as conservation zones. The AGHS urge the Council to **refuse the development due to the inadequate and unsubstantiated claims of the tree assessment and the clear and significant impacts on existing critically endangered vegetation that is proposed to be retained.**

I might finally add that the file size of the final landscape plans, the principle documents provided in the Supplementary Response to Submissions, at 91MB, is so large that they have been almost impossible to view by the interested public online. This would go against the applicants intention to provide a comprehensive understanding of the project.

We would be happy to discuss points made in this letter if that is of assistance. Please contact me at the address below.

Yours sincerely

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4 April 2019

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