

3rd April 2019

To The Independent Planning Commission (IPC)

DEVELOPMENT PROPOSAL: AO85-18 Crown Cemetery Development, Varroville NSW

I STRONGLY OPPOSE the Catholic Metropolitan Cemeteries Trust (CMCT) proposed development proposal for a cemetery at 166-176 St Andrews Road, Varroville NSW.

I do NOT give permission for my name NOR my address to be published.

I am writing to you as a concerned resident of the Macarthur Region. I grew up in Varroville, then known as Minto. We moved there in late 1971. My family still resides there and I live close by and visit daily. In fact, my family would be the longest residing resident in the area.

There are a number of issues I am concerned about that brings me to my OBJECTION of this development proposal for the CMCT cemetery within the Scenic Hills Varroville, the implication of this, and also for any surrounding areas, especially those currently protected for the future.

Before I get into the technical point side, I would like to mention that I attended the public meeting at Wests Leagues Club on the 25th March 2019, and I was mortified when watching presentations of just how impacted the true view from Varro Ville Homestead will be. No amount of screening will block out the view of the cemetery. Moreover, it will block many aspects of their current vista views. The views that will be seen will be ugly... There is no amount of landscaping or modern architecture that can make a cemetery blend into the Scenic Hills regardless of an artist's impression, and that is all it is, an artist's impression.

I was also very concerned by a gentlemen in the audience who appeared to be blatantly directing what speakers opposed the cemetery, could and could not say. This was in particular to two speakers – Peter Gibbs, and Elizabeth Pemberton. However, in regards to Ms Pemberton this gentleman appeared not to be able to get the panels attention. With Mr Gibbs, this gentleman appeared to sway what could be spoken about and what could not. This gentleman even moved seats to sit next to a panellist when Mr Gibbs was speaking.

This was a public meeting where people who registered were supposed to be able to speak freely on their opinions, and how it would affect them. Every time Mr Gibbs, who is the owner of Varro Ville Homestead, tried to state how this process and the project has affected his situation personally, he was being shut down and told to speak on facts of the proposal.

Nowhere did I see in any documentation that people had to stick purely to points on the DA. This was not what this public meeting was about. So I feel there was a carriage of injustice occurred in regards to Mr Gibbs speech. He should have been able to state what his views were within the timeframe allocated. Not instructed to what he could or could not say. The general public has a right to know how the owners of Varro Ville Homestead have been affected by this process, and will be further affected should this be approved.

I was also appalled to learn through presentations that concerns of acoustic noise were basically not taken seriously and the advice was to keep windows closed, and for more insulation to block it out. NO person should be instructed that to live quietly, in a rural area, or even suburban for that matter, that they will need to keep their windows closed and/or use more insulation. The people directly affected live here because of its serene and aesthetic surroundings. The Brothers and the Retreat serve as a place for peace and rejuvenation. The Nuns reside in the Scenic Hills for its peaceful

surroundings. Having a cemetery is going to destroy these aspects of the area. It is also going to enjoy my mother's peacefulness, not to mention my own. I suffer from a very rare medical condition where sound causing me serious issues with my hearing and balance, and being at my Mum's actually gives me peace and quiet which I cannot get even in my own home not too far away in a fairly quiet suburb. It is my retreat where I can relax.

Living with this very rare condition, plus my other medical conditions, multiple sclerosis being another, makes me think about my mortality a lot. I do not want to be confronted daily, when driving to my Mum's, of death. It is hard enough now to deal with losing loved one's. With losing my own abilities to lead a normal functioning life. I do not want to constantly see a brigade of funeral cars and people grieving. This is not a sight people should have to be faced with each day just from travelling from a to b, and that will be my reality and I do not like that prospect. It will have a negative impact on my health.

Now to the general points:

In general it is abhorrent, in my opinion, if the IPC even remotely considers such a proposal to allow a cemetery in this protected area in which cemeteries were NOT permitted under the previous 7 (d1) zone (Environmental Protection – Scenic), and continue to be prohibited under the new E3 zone (Environmental Management).

I wish to draw your attention to the new zone E3 (Environmental Management), which is listed below from (CLEP 2015), in which the proposal for a cemetery does NOT fulfil any of the listed objectives past or present. It also is classed as prohibited.

The spot rezoning goes against EVERYTHING under the Zone E3 Environmental Management section of the CLEP 2015. This is utterly disturbing, and actually outrageous and hypocritical! Again I have to ask HOW is it, that this proposal is even on the table for consideration!

Zone E3 Environmental Management

1 Objectives of zone

- To protect, manage and restore areas with special ecological, scientific, cultural or aesthetic values.
- To provide for a limited range of development that does not have an adverse effect on those values.
- To enable development for purposes other than rural-residential only if that development is compatible and complementary, in terms of design, size and scale, with the character of land in the zone.
- To allow cellar door premises, restaurants and cafes only where they are directly associated with the agricultural use of the land.
- To protect, and maintain the environmental, ecological and visual amenity of, the Scenic Hills, the Wedderburn Plateau and environmentally sensitive lands in the vicinity of the Georges River from inappropriate development.
- To preserve the rural heritage landscape character of the Scenic Hills.
- To protect and enhance areas of scenic value and the visual amenity of prominent ridgelines.
- To protect bushland, wildlife corridors and natural habitat, including waterways and riparian lands.
- To ensure the preservation and maintenance of environmentally significant and environmentally sensitive land.

2 Permitted without consent

Home occupations

3 Permitted with consent

Animal boarding or training establishments; Bed and breakfast accommodation; Building identification signs; Business identification signs; Cellar door premises; Dual occupancies (attached); Dwelling houses; Educational establishments; Emergency services facilities; Environmental facilities; Environmental protection works; Extensive agriculture; Farm buildings; Farm stay accommodation; Flood mitigation works; Home-based child care; Home businesses; Home industries; Horticulture; Places of public worship; Recreation areas; Restaurants or cafes; Roads; Roadside stalls; Rural workers' dwellings; Viticulture; Water supply systems

4 Prohibited

Industries; Multi dwelling housing; Residential flat buildings; **Retail premises**; Seniors housing; Service stations; Warehouse or distribution centres; Any other development not specified in item 2 or 3

In the Draft 2014 CLEP the only listed area in the Scenic Hills that was listed for any potential rezoning was as follows:

Lot averaging controls to potentially allow some limited subdivision in the East Edge Scenic Protection Lands.

There was absolutely **NO mention** of the Scenic Hills of Varroville even being considered for any changes. In fact the previous CLEP was amended to include the words cemetery being **prohibited**, and they **remain prohibited**.

I would like to draw your attention to a letter from the NSW Government Planning and Infrastructure Director General Mr Sam Haddad to Mr Paul Tosi of Campbelltown City Council dated 24th March 2014 – ref: 13/19771. Within this document Mr Haddad states:

‘I have also agreed to Council’s proposed prohibition of “cemeteries,” “crematoria” and “mortuaries” from the following proposed zones:

- RU@ Rural Landscape
- E3 Environmental Management
- E4 Environmental Living
-

‘I agree to this on the basis that these land uses are not mandated under the Standard Template and their exclusion from these zones reflects the existing zoning status.’

It truly troubles me to see that something the local community objected vehemently to, as did councillors (I had been present at some of these meetings), and that this was taken out of OUR Local Governments hands and into the NSW State Government. It troubles me that the State Government did this ‘spot’ rezoning without it appears much consideration to the cultural value of the land, or residents.

I am urging the IPC to act in the best interests of OUR community! It is OUR heritage landscape and views! WE are the ones who reside here! Please rezone the land back to its original zoning for protection with removing cemeteries as an allowed entity.

Our local community has been fighting now since 2007 against developments in this protected zone. This clearly demonstrated to the NSW State Government that the community of Campbelltown does NOT want a cemetery, or for that matter any other development that will impact on the rural heritage value, and aesthetic views within the Scenic Hills at Varroville, especially in an area which includes the historical homestead of Varro Ville which is steeped in history from early settlement days of our Nation! Nor did we want this land re-zoned. We want it to remain protected and used ONLY for those purposes permitted under the Zone E3 Environmental Management plan. It seems ludicrous that this proposal has even managed to get to DA proposal stage.

Personally I would like to see this land to stay as is, but if it was to be used, that it is as a vineyard again. Bringing back that historic value of its past. That would blend more into the natural surroundings, whereas a cemetery with all its headstones, plaques and crypts does not. It detracts from the natural beauty of the land, not blend nor enhances it.

The glossy beautiful brochures from the CMCT cemetery is just that, glossy photo-shopped brochures. They do not truly represent how the cemetery will look. They are merely artist's impression. Anyone can make a property look great with photo-shop. You only have to look at real estate images to know this. They look all fantastic in the brochure, and in real life the total opposite. In the brochure, they present headstones as all equal in size etc., and we know this is not going to actually be the case, as it will be up to individuals to decide what they want for their family's head stones.

This CMCT cemetery DA proposal should have had the word '**DENIED**' stamped immediately given it does not meet CLEP requirements! Not only that, the studies used by CMCT for the purpose of this DA were from outdated studies from 17-26 years ago to assess views to and from Varro Ville Homestead. I believe these views have been re-assessed as part of a new study, partly funded by the NSW Heritage Council (NSWHC). Why is it that over 12 months has passed and the proposed extension of curtilage is still 'under consideration', according to the IPC website. The Heritage Council supports this extension, yet the NSW State Government has not actioned on this. This is ludicrous.

I refer you to a thesis written by Dr Phillip Norrie in 2005 titled Wine and Health Through the Ages with Special Reference to Australia. Dr Norrie states:

'Dr Townson was the first Doctor to establish a vineyard, which was in Varroville after being granted 405 hectares in 1811 in Minto. Dr Townson was a Doctor of Law.'

The Australian National University (ANU) biography published in Australian Dictionary of Biography, Volume 2, (MUP), 1967 on Dr Townson. Here is an excerpt from *Australian National University* (ANU's) website:

'Varro Ville became a show place for its beauty, abundance and variety in orchard and garden; his vineyard was second only to that of Gregory Blaxland; his fine-woolled sheep and their clip were in great demand; his cattle were numerous and in the opinion of his contemporaries 'no single man had accomplished more in the rearing of stock'.

Dr Townson place in history deserves to be respected, honoured and protected in our region, as with other early famous settlers. Townson was part of the famous 'Rum Rebellion' in 1808 which saw Bligh lose power. Townson named Varro Ville after the ancient Roman agriculturalist and author, Marcus Terentius Varro. Townson was known for having the most extensive library in the early colony. I refer to Campbelltown Councils Website:

'It was only after Macquarie's departure in 1822 that he reentered Sydney life, became a foundation member of the NSW Royal Agricultural Society and was appointed a magistrate in 1826. Townson also helped to establish the Sydney Dispensary which gave free medical attention to the poor.

His library was the most extensive in the colony and dinner parties at his home were always intellectual debating forums. When he died in 1827, Townson left behind a thriving vineyard and sheep/cattle farm.

Varro Ville became the property of Thomas Wills, a brother of Sarah Redfern, and in 1837 in was purchased by one of the greatest Australian explorers, Charles Sturt. He had moved to the Campbelltown area from Mittagong because of the bushranger problems in that region. But he didn't stay at Varro Ville for long, accepting a top government job in the colony of South Australia in 1839.

The new owner was James Raymond, who was to become the NSW Postmaster-General. Supreme Court judge, Alfred Cheeke became another owner, and by the turn of the century the estate was one of the region's leading dairy farms.'

Also Campbelltown City Councils website also states:

'He was also the first was arguably the finest scholar and scientist ever to set foot in the early colony.'

From JRPP's site on the History of Varroville:

After Dr Townson's death Varro Ville Homestead became the property of Thomas Wills, the brother of the famous Sarah Redfern. Thomas Wills sold the property in 1836 to the famous explorer Charles Sturt. Sturt was known for his passion of horticulture. The also famous bird artist John Gould used to visit Sturt at Varroville. Sturt moved to Adelaide in 1839 and sold Varro Ville Homestead back to Thomas Wills, as well as two other partners – also famous – John Gilchrist and John Manning. Gilchrist and Manning sold out in 1929 to James Raymond the FIRST Post Masters General. This is just a brief account of some of the history behind Varro Ville Homestead, and this is why we MUST protect this Homestead and the areas surrounding. To ensure that we always have a snapshot back into the past of life in early Australia. As cemetery really detracts from this. It is not suitable for this location!

As you can see OUR region is **RICH** with history from the early days of settlement. OUR Local Government should be **COMMENDED** on ensuring the preservation of the Scenic Hills thus far, and needs to ensure we preserve these buildings, areas, and the surrounds into the future. There is so much at stake here (past, present and future), that it cannot be ignored! That once it is gone, it is gone forever! **YET** it appears that is exactly what is occurring, and appears this is all about \$\$\$ and not about conservation of scenic heritage land, or its aesthetic values for the residents and visitors of/to the City of Campbelltown.

This land should only be used for purposes that have been outlined as in the Zone E3 Environmental Management CLEP 2015. Deviating for this not only breaches those zones, it will also be the demise of the naturally beautiful aesthetic cultural landscapes of the Scenic Hills. RESIDENTS who have purchased to live, do so for a reason. They knew these areas were protected and this is why they choose to reside here. Since this sale to CMCT and re-zoning several residents in Varroville have sold and moved away.

The protection of the Scenic Hills was established in 1972, and here we are only 47 years on and CMCT are determined to destruct this land with prohibited usage. There is nothing aesthetic about a cemetery! I would like to see one cemetery that looks identical to its glossy brochure... There is much more suitable land tomography wise available elsewhere, but this notion this land is needed because we are running out of burial space is absolutely outrageous as it is simply not true!

There is NO shortage of burial land locally at all. Forest Lawn cemetery claims it still has enough burial space for the local area for another 70 years!! Refer to the Macarthur Chronical 19/02/16 where they state: 'Burial plots are not in short supply in the Macarthur region, says Forest Lawn...' So why should we be taking overflow from other suburbs.

The NSW State government even released a capacity report on November 2017 demonstrating this shortage is not true. That the South-West of Sydney is 'well served' (pg. 39) and will only run out of space in 2056 as it will be taking the dead from South Sydney (pg.34). The report demonstrates strongly the need for cemeteries in South and Northern districts of Sydney (pg. 39). Please refer to link listed directly below:

https://www.crownland.nsw.gov.au/__data/assets/pdf_file/0010/746947/CCNSW-Metropolitan-Sydney-Cemetery-Capacity-Report.pdf

In the CMCT's development proposal Varro Ville Homestead will be surrounded, within 10 metres, by all types of burial plots.

- Monumental Lawn Burial: with headstones 300mm in height
- Monumental graves: with monuments 1.2 metres in height.
- Family Estate Blocks: described as 'cubes with an expected capacity for none interment' (i.e.'Family Crypts').

Note an image of a Family Crypt. Is this an example of what the Scenic Hills will be dotted with? What about these Monumental Lawn Burial headstones up to 300mm in height, and Monumental Graves up to 1.2 metres in height. The latter is basically nearly as high as residential fencing!! How is that aesthetic? How is the preserving the heritage of the Scenic Hills in this area? One of the major points of the protection of the Scenic Hills is protecting its aesthetic value! The views will be changed forever from the ridge lines. This site is highly visible. It will be ugly! It is going to be an eyesore set amongst the hills, as aesthetic value will be destroyed forever...



I would like to draw your attention to Campbelltown Council's Visual Analysis of Campbelltown's Scenic Hills and East Edge Scenic Protection Lands Paul Davies Pty Ltd in association with Geoffrey Britton (Environmental Design Consultant) in October 2011.

Imagine this image below totally dotted with low and high headstones! How is that fitting with keeping to 'preserve the rural heritage landscape character of the Scenic Hills'?

<https://www.legislation.nsw.gov.au/#/view/EPI/2015/754/partlanduseta/include21>

Or for that matter the heritage conservation objectives.

<https://www.legislation.nsw.gov.au/#/view/EPI/2015/754/part5/cl5.10>



Figure 4.0.4. From St Andrews Road looking towards north-east towards Bunbury Curran Hill and over the significant Colonial cultural landscape of Varroville

Imagine this image being dotted with ugly Monumental Headstones or Graves in the above setting as there will be no control over this side... Again I ask, how is that aesthetic, and how does that 'blend' in with the current use of the land? Remember there are Monumental Headstones, Monumental Gravestones and also Family Crypts being proposed in this development application. Regardless that height restriction has been adjusted, it still does not dictate as to what type of Monumental Headstones people may choose, and they have a right to choose... So whilst a brochure may show all nice perfect even plaques, this in reality is not going to be the truth.



This cemetery proposal is not incompatible with retaining views to and from the Varro Ville Homestead. Therefore, it is again incompatible with Zone E3 Environmental Management. There is no way the rural landscape character of the Scenic Hills (as defined in the objectives zone E3

Environmental Management) can be maintained in conjunction with the development of this, or any other cemetery. The land is totally unsuitable and detracts from the objectives that the E3 Environmental Management is supposed to be protecting. You only had to look at the presentation by Mr Gibbs showing the views from Varro Ville Homestead windows. There is NO way a cemetery, no matter the landscaping, is going to not change this landscape in a massive way.

Please note: excerpt from the Visual Analysis of Campbelltown's Scenic Hills and East Edge Scenic Protection Section 4.0.1 page 62:

'The prevailing character of the landscape is one in which the aesthetic of the natural landscape dominates over the constructed even though it contains many historic farms and structures at a density which is now rare in such close proximity to a major conurbation such as the Sydney metropolitan region. Most evidence of human occupation 'sits lightly' in this landscape, being modest in scale, simple in design and built using traditional materials and finishes. The more sympathetic structures are visually connected to the landscape through densely planted gardens around the house which blend into the landscape when viewed from a distance. Outbuildings, sheds and fences are simple, vernacular structures and are unobtrusive in their siting and construction.'

'Many of the early farmhouses in the Scenic Hills have survived and most of these are now recognised as being of State heritage significance. The survival of whole Estates has however been a rarer phenomenon, with Varroville being a rare and highly significant example of an early Colonial property (from 1810) still in its original landscape setting, even though the ownership has been divided and the management of its significance as a visually intact historic landscape is now a challenging one.'

Even with the alterations to the original plans for the buildings and road networks, this will be an eyesore. You cannot have road winding through countryside, and carparks and say that it is not going to ruin the rural aspect. It will change it forever, for the worse. If I was a visitor to this area, and came across a cemetery in this location, my first reaction would be why would someone intentionally destroy a beautiful setting like this with a cemetery, and that is without knowing anything about its history or significant cultural value.

The Café and Function Building are planned to be constructed on the side of rural dams, with adjoining carparks, boardwalks, sculptures, then trees. The trees will hide the natural aspect of view of these dams from the road.

I refer to the same study as mentioned above, section 4.0.2 – Issues Affecting the Scenic Hills - pages 68,69:

'The landscape of the Scenic Hills is essentially a cleared, pastoral one. The areas of significant tree growth are limited to the highest prominences and in gully lines, and the remainder of the landscape is undeveloped. The juxtaposition of these in distant views creates a textural depth to the landscape that is lost when developed, even if screened by emergent trees.

Any increase in the density of development and/or introduction of non-agricultural uses into the landscape of the Scenic Hills will have a significant adverse impact on the setting of the City of Campbelltown and its integrity as a mature and truly unique urban landscape which has been so carefully protected over the last 50 years of development.'

'The integrity of the cultural landscape of the Scenic Hills depends not only on the aesthetic qualities of views over the landscape, but also the retention of rural land uses throughout the area. Although the desire of owners to pursue active farming activity varies, the Scenic Hills still contains a range of rural uses including dairy farming, large-animal grazing and the growing of plants such as grapes and olives and these should be encouraged to continue and thrive through land use zones. This includes ensuring that the uses allowed in adjoining zones will not be likely to give rise to complaints and conflict over the essential incompatibility of some agricultural uses and suburban living caused by pollutants such as noise and odours. One type of land use that has a strong precedent in the landscape of the Scenic Hills is that of education and religious centre St Gregory's College, the Mt Carmel High School, the Carmelite retreat and priory and the recently approved St Sava's College are all within the landscape. It should be noted however that none of these uses includes facilities for active worship such as churches or other religious gathering places.'

So this proposal by CMCT for a cemetery goes against everything outlined in our Local Governments Visual Impact Study used for the CLEP 2015. It goes against everything under the Zone E3 Environmental Management area. What is the point of having LEPs if the NSW State Government just thinks it can override things without proper community consultation. More importantly the question needs to be raised on HOW is it that the NSW State Government has even become involved and able to re-zone?! Instead of fair and transparent consultation process, we have seen the CMCT lead people to believe untruths, which, has also led people in the community to believe this is a done deal. Therefore, the proper due process did not occur!

I want to be able to drive along Spitfire Drive, Raby, or from St Andrews Road from the bridge and look onto the beautiful rolling hills. Every day when I drive this I always think how beautiful and truly lucky we are in Campbelltown to still have such lovely areas. I cannot begin to image how horrid that drive will be looking onto buildings, headstones, cars and the like. I cannot even begin to envisage how Varro Ville Homestead's state-heritage rated pastoral views will be decimated.

Campbelltown City Council publicly acknowledged that the development around Historic Blair Athol House was a HUGE mistake! YET here we go again with the proposed CMCT cemetery, and Varro Ville Homestead... Here is an excerpt from the Macarthur Advertiser dated March 11th, 2016:

In a 2002, former Campbelltown councillors admitted to Fairfax Media that the development at Blair Athol was not sensitive to the area's heritage.

"In the case of Blair Athol, we messed up badly," former councillor and three-time mayor Aaron Rule said at the time.

It is like our rich heritage of early settlement is something of the past that is not worthy of preservation.

This whole proposal from the beginning was wrong. CMCT misled our local community from the get go. I cannot for the life of me see how this ultra-modern invasive commercial development is consistent with the E3 zoning objectives of the Campbelltown LEP 2015.

I highlight inside the front cover of the Macarthur Memorial Park brochure in 2016, stated:

'Macarthur Memorial Park **will be situated** on land what was once in the sights of home builders and commercial developers, with 38 hectares to be used as public parkland for the fast growing Macarthur Community.'

The phrase – will be situated - implies this cemetery is already approved, and that was even before this development proposal. It also implies that this is better than having residential or commercial developments. YET, neither of those developments are permitted, NOR is a cemetery under the Zone E3 Management Plan, or the previous CLEP! In my opinion this appears unconscionable conduct misleading the local community! Retail is also prohibited yet there will be retail sales occurring for plots, headstones and the like. Not to mention café trading.

I have to laugh at the suggestion that the cemetery will be used by the Local Community for recreational purposes. Who is going to CHOOSE to go to a cemetery for recreational purposes? My young niece and nephew were mortified with this suggestion. Which raises another issue, that this proposed cemetery may encourage vandalism which I doubt the CMCT has not even considered. This may also pose an issue for theft with existing residents in Varroville, not to mention that the value of their land will more than likely decrease significantly, as to who wants to live next to, or opposite a cemetery by choice?!

The land in this proposed cemetery is actually unstable. This was another reason for its preservation. Please refer to the original 1973 State Planning Authority of NSW Structure Plan (*The New Cities of Campbelltown, Camden, Appin*). In this report it is also stated that the instability of substantial parts of the Razorback Range and the Central Hills land (which encompasses the Scenic Hills in Varroville) strengthens the case of conserving these areas. It is stated on page 48 under the heading Conservation and Landscape in the Central Hills Land, Razorback and Nepean River Flood Plain, section 8.21 states:

‘The land should remain in its present basically agricultural use and private ownership to ensure the skyline is free from urban development. The public will enjoy the area as a visual setting to the city but will not have access rights except at particular vantage points which will be publicly acquired (e.g. St James Road viewing platform).’

I also want to raise further points in regards to instability.

I noticed Dr Boyd Dent in Appendix P, in the exhibition documents initially in 2016, Contentious issue cleared the site for a cemetery in the documents supplied for consideration.

3.4. Investigation of the geological condition of the site confirming that ground water protection can be achieved - A geoscientific Investigation has been undertaken by a renowned expert, Dr Boyd Dent, and has regard to World Health Organisation documents. Dr Dent’s recommendation is that the site is broadly suitable for the proposed development. His report includes site digging and investigation and lists “General Best Practice Guideline” for siting of burials. Such guidelines can inform detailed development assessments in the future. It is considered that this condition is adequately fulfilled and the JRPP’s concerns are adequately addressed

YET here he is in 1999, in an interview with A.Salleh from ABC Science published on Wednesday, 17 November 1999, titled - Australian cemeteries given the all clear the following is stated:

‘...Nevertheless, Dent’s research has successfully identified a number of areas where, for environmental reasons, new cemeteries should not be built.’

‘These include: next to or within former swampland areas, next to ponds or natural lakes, locations where the water table rises (which sometimes occurs on floodplains or on coastal areas), locations which are subject to erosion or flooding, and some hillsides and cliff lines.’

It has been noted that the Scenic Hills land is unstable. It also is subject to becoming water logged in some areas. Even at the roundabout on St Andrews Road and Spitfire Drive becomes extremely dangerous in very wet weather because it floods through there, and badly at times. Also on this property that the CMCT propose for their cemetery, there are hillsides that are listed as unstable, and this land also contain natural dams, and YET the CMCT proposes to build many pathways along, up and through these unstable hills...

In the Visual Analysis of Campbelltown’s Scenic Hills and East Edge Scenic Protection. Refer to section 4.0.3, page 72, RECOMMENDATIONS RELEVANT TO ALL LANDSCAPE UNITS WITHIN THE SCENIC HILLS, subheading *Continued Protection from Inappropriate Development* states:

‘Given the ongoing erosion of the traditional active agricultural landscape in the area (which has led to increasing passive-rural development and more recently to the increasing suburbanisation of built forms found in the landscape), consideration should be given to re-emphasising the importance of active rural activity to prevent it being further eroded. This could be achieved by allowing the erection of a dwelling only when ancillary to agriculturally productive land uses.’

‘The nature of significant views makes them particularly vulnerable to unsympathetically designed and sited structures. Continue to limit the density, range of permissible land uses and the built form of any new development to ensure that it does not have any adverse impact on the scenic qualities of the landscape.’

The Scenic Hills is a protected area, and is so for a reason. It is basically the last truly beautiful natural part of the Campbelltown District. Lush rolling hills which are home to a few lucky people, including the Discalced Carmelite Nuns and The Friars. The Friars have been in Varroville since 1964. The Nuns since 1987. They are also against this proposed development as it will be disruptive. It will contradict the reasons this area was chosen for them to reside, as it will ruin the beautiful landscape that they find solace and peace within. Not to mention the impact also on other residents in Varroville, and across Campbelltown.

There also is much flora and fauna in the Scenic Hills at Varroville – which also raises concerns about their endangerment. There are black foot wallabies, echidnas, wombats, foxes and the like.

I struggle to comprehend how in the Traffic Impact Assessment, dated 09/08/2017, section 2.7 St Andrews Road Upgrade can state that it is envisaged that St Andrews Road will be connected the whole way from Camden Valley Way to Campbelltown Road given the following:

I also cannot understand how this cemetery is even being considered when access will also be limited, as St Andrews Road is a rural road, and in NSW Planning & Environment Leppington (Stage 1) Finalisation Report October 2015 , it clearly states in section 4.4 Traffic and Transport – St Andrews Road that the proposed extension and upgrade was amended. That St Andrews Road link is **NOT** included in the road network that is currently being evaluated, that alternate road connections have sufficient capacity for future traffic growth, therefore completion and upgrading of St Andrews Road from Camden Valley Way to Campbelltown Road will NOT be required!

This is due to the objectives about the road not meeting its environmental objectives as the road upgrade would mean the rural, peaceful and scenic nature of the area could not be maintained.

If this cemetery is allowed, we have the same issue where this portion of St Andrews Road will not be able to meet its environmental objectives!

There also is no public transport. There is no train station in walking distance. There is only access via Campbelltown Road or Spitfire Drive as main access roads. It has been suggest the walk to the cemetery from bus stops in Raby will take 13-15 walk (Traffic Impact Assessment 2.4 – Public Transport Services). This is ludicrous as it will take a lot longer than that to walk from the bus stop to the cemetery. This time frame is of someone walking at a relatively fast rate and only to the closest entry point. It is not a quick walk. It is not a sheltered walk. It is extremely hot in Summer, with over 40 degree heat not uncommon, and in bad weather the area floods at the roundabout and areas actually get washed away. It is also common for plenty of snakes to sun baking in Summer. It is an isolating walk which could prove dangerous for many reasons. This area is rural, it is not residential. Should someone fall, or be bitten by a snake, or suffer from heat stroke etc., there is NO immediate help close by such as a house or passing by traffic.

It really is implausible that this cemetery is even being considered even in the context of access. Any changes made to St Andrews Road to accommodate this cemetery will take away this rural, peaceful and scenic nature of this area!! Again breaching the Zone E3 Environmental Management CLEP 2015.

If this is proposal goes ahead, it sets precedence for further re-zoning applications for development. Then it will be 'Bye, Bye Scenic Hills, and aesthetic and historical heritage value to the Macarthur Region.' Once it is gone, there is NO turning back. The damage will be irreversible. This land was traditionally used for farming and viticulture. These activities blend into the Scenic Hills, whereas, a cemetery does not. It detracts from this.

It will be absolute abominable behaviour if the IPC allows this development application to go ahead. We are a young nation, and yet we are not protecting our important heritage for the future. Something other nations, like the UK, pride themselves on. Tourists often visit places overseas to see things of historical and/or heritage value. Often drive to locations to take in the beautiful sites and views. If this cemetery goes ahead the NSW State Government is literally putting nails in coffins for our colonial heritage. This development is not something that can be reversed. Once done, the cultural and heritage aspect is lost forever...

Please **reject** this absurd development proposal for a cemetery by the CMCT, and allow OUR community to stop feeling threatened. That our rural heritage, and cultural landscapes of the Scenic Hills, and Varro Ville Homestead are protected from cemeteries, and greedy developers now and into the future. Hands **OFF OUR** Scenic Hills!

Yours Sincerely

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