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By email: sally.munk@planning.nsw.gov.au

Dear Ms Munk

Proposed Macarthur Memorial Park, Varroville – Response to Submissions – Crown DA

I refer to your email dated 20 September 2018 requesting the Heritage Council to review the Response to Submissions (RTS) for the proposed Macarthur Memorial Park Crown DA, and to advise whether the response satisfies the issues raised by the Heritage Council and if there are any recommended conditions of consent for the proposed Macarthur Memorial Park at Varroville.

The Heritage Division of the Office of Environment and Heritage (OEH) has reviewed the RTS and advises that the response fails to adequately address the seven recommendations raised by the Heritage Council in its submission to Campbelltown City Council on 19 February 2018. The recommendations were made to mitigate the adverse impacts of the cemetery proposal upon the Colonial farm estate, its intact rural landscape setting and archaeological relics. An assessment of the RTS is outlined in the following table. No conditions of consent have been recommended as the proposal is not supported in its current form.

Heritage Council recommendations in letter dated 19 February 2018	Heritage Division comment on the Response to Submissions (RTS) by Urbis
<p>1. A Development Control Plan (DCP) be developed in consultation with the Heritage Division prior to the Development Application being finalised to further reduce the impacts on the existing Varroville House in terms of setbacks, built form, materials, noise, hours of operation and maintenance. To provide guidelines for the development of the subject site, the DCP should incorporate the following documentation:</p> <ul style="list-style-type: none"> • An endorsed Conservation Management Plan • Plan of Management • Landscape Masterplan • Interpretation Plan • Sustainability Strategy 	<p>The RTS has not addressed this issue.</p>
<p>2. The landscape master plan referred to in point 1 should include details of all landscape furniture, including but not limited to details on the proposed shelters, signage (both way finding and interpretation), seating, and all other</p>	<p>The Landscape Design Report provides only indicative examples of the proposed shelters, water stations, seating, gateway structures, living chapels, bird hides, play spaces and sculptures. The Public Art Plan proposes sculptures across the site with heights</p>

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<p>landscape ancillary uses. The Heritage Council is concerned that insufficient detail has been provided at this stage in the proposal to adequately assess the impacts of the changes and furniture on the overall significance of the wider Varroville landscape.</p>	<p>varying between 2m and 9m. Details of signage have not been provided.</p> <p>Whilst the location of each furniture item is marked on the landscape plans, there is still no precise detail of the element within that location. This is a concern because some elements substantially vary in size. For example, the Landscape Design Report outlines that 21 shelters are proposed, which are generally of 3 sizes accommodating 5 to 40 people. The indicative examples show that these shelters could be quite large and prominent, and where inappropriately located, could have an adverse impact upon significant views and the rural landscape setting.</p> <p>The landscape plans propose at least 43 water stations across the site in separate locations to the 21 shelters which also have drinking fountains. These water stations also vary in size and may have an adverse impact upon the rural landscape.</p> <p>Overall, the Heritage Council is concerned with the size and excessive amount of furniture which would diminish the heritage values of the site. Specific detail and/or maximum dimensions of each structure needs to be approved. A signage plan would also be required.</p>
<p>3. Rather than test excavation and exposure of the potential relics, redesign of Precincts 3 & 4 to remove the impacts in the first place is a better option. The Heritage Council considers in-situ conservation to be the best way of managing the archaeological resource into the future.</p>	<p>The RTS has not addressed this issue.</p>
<p>4. The proposed access road, toilet block and carpark area should all be relocated as currently these structures are located within the designated "No build" area. This area was designated as a "No build" area to reduce the impact to the State Heritage Register Listed Item - Varroville Homestead.</p> <p>Furthermore, this area where these structures are proposed is highly significant as part of the wider landscape of the homestead and any new structures, and specifically a car park in this area, will affect that relationship and significance.</p> <p>It is recommended that further investigation be undertaken in this</p>	<p>The RTS has not addressed this issue and has made no modifications to the proposal.</p> <p>It is the understanding of the Heritage Council that the no build area at the southern portion of the site is to restrict development to that of a lawn cemetery and associated fencing. The Campbelltown LEP 2015 provides a definition of lawn cemetery to be <i>"a cemetery in which monuments and grave markers do not extend above natural ground level."</i></p> <p>There are several structures proposed within the no build area, contrary to the LEP. It is also unclear if the LEP permits roads, paths and car parking which also have potential to affect the significant landscape.</p>

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<p>regard and an amended plan be referred to the Heritage Council or its delegate for approval prior to any development consent being issued.</p>	<p>Furthermore, the secondary access road within the no build areas bisects the Varroville homestead and its associated outbuildings. If a road is permissible in this area, it must be sensitively located because the current road layout distorts a reading of the historic relationship of the homestead with its outbuildings.</p> <p>The landscape plans also propose several furniture items in the no build area, including 3 sculptures, 5 shelters and 17 drinking fountains. Within the historic Outbuilding Precinct there includes a Living Chapel which will have 2m x 2m monolithic square concrete blocks. Insufficient detail has been provided about these blocks and their installation meaning that any impacts they have on this area cannot be assessed.</p>
<p>5. The Heritage Council considers that the proposed road width and verges are excessive and intrusive within the wider Varroville landscape and recommends that further investigation be given to reducing their width. This is to ensure that the proposed road network fits smoothly in the natural landscape features of the site and are not unnecessarily visually intrusive.</p>	<p>The RTS provides an insufficient response to Point 5 by simply stating that the road widths are proposed for emergency vehicle access and designed following significant discussion with the Rural Fire Service.</p> <p>To minimise modification to the landform and the visual impacts of bitumen upon the landscape, it is suggested that DPE confirms with the Rural Fire Service the minimum requirements for all the proposed roads within the cemetery, whether further narrowing of the roads are feasible, and whether all roads are required.</p>
<p>6. The Heritage Council considers that the proposed Access C is too close to the existing driveway for Varroville Homestead and should be relocated further away from the homestead to ensure that the residents of Varroville enjoy their current quality of life without excessive noise that cars would generate given the proposed hours of operation of the cemetery.</p>	<p>The RTS states that Access C cannot be relocated and that is accordance with the masterplan in the CMP. This response does not address the concern that the impact of an access point so close to the entry to the Varroville Homestead will have on the amenity and continued occupation of this residence.</p> <p>It is suggested that DPE investigate the necessity for four public access points into the site, all from St Andrew's Road. If four access points are not required, Access C, as a secondary access, should be deleted from the proposal and the internal road network amended in a manner that does not cause further impact.</p>
<p>7. The Heritage Council considers that the loop road (indicated on the plans as Road No.10) which is connected to Road No. 3 from proposed Access C should be redesigned as a pedestrian walkway to reduce the amount of hardstand close to Varroville Homestead for the reasons outlined in point 6, above.</p>	<p>The RTS states that the loop road is in accordance with the masterplan. This response does not address the Heritage Council's concerns.</p> <p>It is suggested that DPE investigates whether this loop road is necessary for access to the small burial area. The road network in this area should be modified to minimise impacts to the Varroville homestead.</p>

As outlined above, the Heritage Council has not recommended conditions of consent for the Macarthur Memorial Park as the proposal is not supported in its current form. If the Department of Planning is of the view that a recommendation for approval will be made, the Heritage Council would welcome the opportunity to provide input into the conditions of approval at that time.

If you have any questions, please contact Lily Chu, Senior Heritage Assessment Officer, at the Heritage Division on (02) 9873 8595 or lily.chu@environment.nsw.gov.au.

Yours sincerely



05/10/2018

Katrina Stankowski

A/Manager, Northern Region

Heritage Division

Office of Environment & Heritage

As Delegate of the Heritage Council of NSW