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Ms Sally Munk
Principal Planning Officer - Industry Assessments
Planning Services Division
Department of Planning & Environment
PO Box 39
SYDNEY NSW 2001

Via Email: Sally.Munk@planning.nsw.gov.au

Dear Ms Munk

RE: Heritage Council's comments on the Applicant's response to submissions on the proposed Macarthur Memorial Park Development at Varroville.

Thank you for your request for the Heritage Council to review the CMCT's response to the issues the Council raised in its submission on the proposed Macarthur Memorial Park Development at Varroville. It is noted that part of the land subject to the development application has been recommended for listing on the State Heritage Register by the Heritage Council.

The Heritage Council notes that the Macarthur Memorial Park DA has since been referred by the Minister for Planning to the Independent Planning Commission (IPC) to expedite its determination and that the assessment of the application is being carried out by the Department of Planning and Environment (DP&E). It is also noted that on 12 October 2014, the Minister for Heritage referred the Heritage Council's Recommendation to List the Varroville Curtilage Extension to the IPC under Section 34(1)(b) to review their recommendation.

The Heritage Council has considered the Catholic Cemeteries Memorial Trust's amendments of the proposed memorial cemetery development at their special meeting of 21 November 2018. Based on discussions at that meeting, the Heritage Council provides the following comments on the proposed CMCT amendments:

1	Issue	A Development Control Plan be prepared....
a)	Heritage Council of NSW comments	<p>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

		<ul style="list-style-type: none"> • Interpretation Plan • Sustainability Strategy
b)	Applicant's response.	Campbelltown Council has outlined in writing that they do not expect or require the preparation of a DCP. The Applicant notes that it is therefore not appropriate to prepare a DCP and that the remaining reports raised in point 1 are provided with the DA documentation
c)	Heritage Council of NSW's response to CMCT amendments	<p>The Heritage Council considers that this response is appropriate, and no condition is recommended to be included in any approval for this issue.</p> <p>The Heritage Council notes that the principles of a DCP can be incorporated into a CMP and if the site is listed on the state heritage register the heritage council is happy to consider the endorsement of a CMP for the site which incorporates all the significant values of the site.</p>
2	Issue	Details of all landscape furniture be provided;
a)	Heritage Council of NSW comments	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 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.
b)	Applicant's response	<p>The amended landscape plans identify the location of all landscape furniture including shelters, seating and water stations. An amended Landscape Design Response (has been prepared describing all the proposed furniture.</p> <p>No exact signage detail is available at this stage, although general 'Signage design principles for a cemetery' have been submitted. Signage would include identification of entry points and buildings, interpretative, directional wayfinding, and regulatory. The Applicant is aware of the potential for signage clutter particularly within the three significant view corridors and the open/pastoral landscape. Signs will be integrated within planting buffers to reduce their visibility and perception of clutter.</p>
c)	Heritage Council of NSW's response to CMCT amendments	<p>The Heritage Council considers that this appropriate and recommends that it should be conditioned into any approval.</p> <p>The Heritage Council also request a condition be included requiring that the detailed signage plans and public art strategy are sent back to the Heritage Council for comment prior to their implementation.</p> <p><i>Reason: to ensure that proposed signage and public art are appropriate for the wider Varroville landscape.</i></p>
3	Issue	Redesign of precincts to avoid exposure of potential relics
a)	Heritage Council of NSW comments	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.

b)	Applicant's response	There is no change to the location and design of the precincts. The Applicant has stated that they will only excavate in areas where impacts are proposed. There will be no additional impacts to areas of potential historical archaeology.
c)	Heritage Council of NSW's response to CMCT amendments	The Heritage Council considers that this appropriate and recommends that it should be conditioned into any approval, noting that other archaeological conditions will be required to ensure the appropriate management of historic and Aboriginal archaeology as part of any development approval, and that the requirements of the Heritage Act and National Parks & Wildlife Act will still require approvals for any archaeological disturbance.
4	Issue	Relocation toilet block and carpark in the Outbuilding Precinct and "No build" area; Relocation of the access road dividing homestead from outbuildings.
a)	Heritage Council of NSW comments	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. 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.
b)	Applicant's response	<p>The amended plans have deleted the new carpark and toilet block building from the significant outbuildings area. Toilet facilities for the Outbuilding Precinct will be housed within the adaptively reused Dairy Building provided it is safe to do so.</p> <p>The amended plans have not modified the access road that bisects the Varroville Homestead and its associated outbuildings. The Applicant states that a secondary access road is required for access to graves and many options have been considered to address NSW Rural Fire Service requirements, whilst having the least visual impact. The Applicant has reiterated that the access road is proposed in the alignment of the historic drive.</p> <p>The Applicant has suggested that the land could be re-shaped (low bund) to minimise the visual impact of the new bisecting road and to preserve the visual connection to the outbuildings.</p>
c)	Heritage Council of NSW's response to CMCT amendments	<p>The Heritage Council considers that the deletion of the new toilet block and car park from the significant outbuilding areas is appropriate. The adaptive reuse of the dairy building to facilitate a new amenities block is appropriate. These modifications should be conditioned into any approval.</p> <p>The Heritage Council considers that the access road cutting through the landscape between Varroville Homestead and its outbuildings will impact the highly significant setting of Varroville and should not be approved.</p> <p><i>Reason: to ensure that the state significant Varroville Homestead is not physically separated from its significant outbuildings.</i></p>
5	Issue	Reduction of road widths and verges;

a)	Heritage Council of NSW comments	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.
b)	Applicant's response	The Applicant has negotiated with the NSW Rural Fire Service to reduce road widths from the standard 8m for a two-way road. Main roads are two-way and are reduced to 6.5m wide with 2.1m wide grassed verges on both sides for parking. Secondary roads are one-way and are 3.5m wide with a 2.1m wide grass verge on one side for parking. This is the minimum requirement for the RFS. Roads cannot be made any narrower.
c)	Heritage Council of NSW's response to CMCT amendments	The Heritage Council considers that this appropriate and recommends that it should be conditioned into any approval. The Heritage Council also requests a condition which does not allow hard edging (especially no concrete kerbing) for any roads within the development. All roadside kerbing should be timber or steel edged, flush with ground level to ensure that the open landscape of the site is maintained. <i>Reason: to ensure that the pastoral nature of the Varroville landscape is maintained.</i>
6	Issue	Relocation of Access road C further away from the Varroville Homestead driveway
a)	Heritage Council of NSW comments	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.
b)	Applicant's response	The Applicant states that the entrance of Access C is 70m from the Varroville driveway, although appearing close on the drawing. The Applicant states that an access point is required in this vicinity for bushfire management, and that relocation of this access point further along St Andrews zone will impact on the riparian zone. To minimise impacts upon the residential amenity of Varroville Homestead, the Applicant has offered to use Access C as an exit only, with the condition that it can be used as an entry for special occasions e.g. Father's Day, Mother's Day, All Souls Day) to facilitate traffic management.
c)	Heritage Council of NSW's response to CMCT amendments	The Heritage Council considers that this appropriate and recommends that it should be conditioned into any approval.
7	Issue	Redesign of the loop road off Access road C into a pedestrian walkway

a)	Heritage Council of NSW comments	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.
b)	Applicant's response	<p>The applicant states that the loop road is necessary for access to the burial zone which is 140m deep and sloping significantly, making it unacceptable for mourners, especially the elderly and disabled to be walking uphill.</p> <p>To minimise the amount of sealed surface, the Applicant has negotiated with NSW Rural Fire Service to narrow the loop road to a 3.5m wide one-way road.</p> <p>The loop road will be bordered by screen planting so that it will be invisible from St Andrew's Road and the Varroville property boundary.</p>
c)	Heritage Council of NSW's response to CMCT amendments	<p>The Heritage Council considers this acceptable and the following condition is recommended to be included in any approval:</p> <p>The proposed loop road off Access C should not be constructed until the end of stage 1 works to preserve landscape views of Varroville and to allow any screen plantings sufficient time to mature prior to construction.</p> <p>The Heritage Council requests that a condition should also be included requiring that proposed road and boundary lines should not be reinforced with screen or avenue tree plantings, rather planting across the proposed development should respond to and reinforce the overall pattern of the original landscape - the pattern created by topography, drainage lines, remnant natural or cultural vegetation, and other elements such as fence lines.</p> <p><i>Reason: to ensure that the visual impacts from the Varroville Homestead associated with this loop road are minimised.</i></p>

If you have any questions on the above advice relating to the Heritage Council's response to the CMCTs Response to Submissions for Macarthur Memorial Park, please feel free to contact Lily Chu, Senior Heritage Officer, Regional Heritage Assessments North on 9873 8598 or via email at lily.chu@environment.nsw.gov.au; or Katrina Stankowski, Senior Team Leader, Regional Heritage Assessments North on 9873 8569 or via email on katrina.stankowski@environment.nsw.gov.au.

Yours sincerely



29/11/2018

Pauline McKenzie
Executive Director
Heritage Division

As Delegate for the NSW Heritage Council