

URBIS

MACARTHUR MEMORIAL PARK

STATEMENT OF ENVIRONMENTAL EFFECTS

Prepared for
**CATHOLIC METROPOLITAN
CEMETERIES TRUST**
October 2017

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EXECUTIVE SUMMARY

Overview

This report has been prepared on behalf of the Catholic Metropolitan Cemeteries Trust (CMCT) and accompanies a Crown Development Application to Campbelltown City Council seeking approval for the development and use of land at 166-176 St Andrews Road, Varroville which is legally described as Lot B in DP370979, Lot 22 in DP564065 and Lot 1 in DP21801, as a cemetery with associated facilities

This Statement of Environmental Effects describes the site, its context and the proposed development, and provides an assessment of the proposal in terms of the relevant matters for consideration under Section 79C (1) of the *Environmental Planning & Assessment Act 1979*.

The development has been based on the a design approach that the cemetery can function as a park, sanctuary, sculpture park and open space available to the public. It will allow a largely unused property to be sympathetically embellished reflective of its scenic landscape and historical values and made accessible to the public and managed/maintained effectively by the applicant the Catholic Metropolitan Cemeteries Trust in perpetuity.

Key Elements of the Proposal

The Crown DA seeks approval for the following specific uses and works for the site:

- Use and operation of the site for a “cemetery” and associated publicly accessible parklands / “recreation areas”;
- Landscaping of the entire site with associated the planting strategy;
- Burial areas and memorialisation guides;
- Construction of six (6) new buildings on the site and the ancillary use of the buildings in association with the cemetery and publicly accessible parklands;
- Restoration of the historic buildings and heritage interpretation of Aboriginal and European historical elements of the site and locality;
- Public art sculptures;
- Site access and parking including internal road and footpath network, onsite carparking and four vehicle crossovers onto St Andrews Road;
- Tree removal; and
- Stormwater infrastructure and other site services.

Project Need

The application is based the strong demand for additional cemetery space in Sydney with a particular focus on South Western Sydney and the Macarthur Region. This demand was documented in specialist reports considered as part of an earlier Planning Proposal for the site that resulted in an amendment to Campbelltown LEP to facilitate the development of the site as reflected in this development this DA

The Macarthur Memorial Park has been envisaged and proposed to provide both immediate and long term relief to this identified need for interment sites.

Planning Assessment

The proposed development has been assessed against the applicable State and local planning policies. This assessment concludes that the proposal represents a design, quality and form that is entirely consistent with the objectives of the planning controls and policies as they apply to the site and will have an acceptable and positive environmental impact. Therefore, the proposal warrants a recommendation for approval for the following key reasons:

- The proposal has been designed to comply with all state and local planning provisions which apply to the site with specific reference to the site-specific provisions detailed in the *Campbelltown Local Environmental Plan 2015* and the *Campbelltown Development Control Plan*. Additionally, the proposal

satisfies the desired quality outcomes sought from relevant State Environmental Planning Policies as they apply to the site.

- The proposal has considered and positively addresses the previous planning determinations issued for the site. The proposal has not only considered the amendments to the CLEP 2015 but also the reasons for decision detailed by the former Sydney West Joint Regional Planning Panel in its consideration of the planning proposal for the site.
- The design responds positively to the site conditions and the surrounding built environment. The design has been formulated having close regard to the known scenic and heritage qualities of the site. The proposed design of the facility represents a highly sympathetic design which will ultimately function as a parkland cemetery which is positively responds to the environmental attributes of the site.
- The proposal provides for the conservation of more than 35Ha of native habitat through the conservation and management and revegetation of the sites riparian corridors, Cumberland Plain Woodland and Moist Shale Woodland landscapes.
- The intensity of the proposed use is reflective of the capacity of existing public infrastructure of the site . Notably, the use can be undertaken without significant augmentation to the existing road network, particularly St Andrews Road;
- The proposal is in the public interest as it will long term relief to the identified shortfall in burial land within the South West Sydney Region; and facilitate public access to a previously privately owned parcel of land with approximately 36 hectares of the site being for the sole purpose of publicly accessible passive recreation.

Having considered all the relevant matters, we conclude that the proposal represents an entirely appropriate and considered development of the site which satisfies the relevant planning controls and policies. The proposal is in the public interest as will deliver internment space for South Western Sydney whilst ensure the historical, scenic and ecological opportunities of the site are fully realised. The proposal therefore is considered worthy of support from Campbelltown City Council and ultimately approval from the Western City Planning Panel.

1. INTRODUCTION

1.1. OVERVIEW

This report has been prepared on behalf of the Catholic Metropolitan Cemeteries Trust (CMCT) and accompanies a Crown DA to Campbelltown City Council seeking approval for the development and use of land at 166-176 St Andrews Road, Varroville which is legally described as Lot B in DP370979, Lot 22 in DP564065 and Lot 1 in DP21801, as a cemetery with associated facilities DA.

The DA seeks approval for the following specific uses and works for the site:

- Use and operation of the site for a “cemetery” and associated publicly accessible parklands / “recreation areas”;
- Landscaping of the entire site with associated the planting strategy;
- Burial areas and memorialisation guides;
- Construction of six (6) new buildings on the site and the ancillary use of the buildings in association with the cemetery and parklands;
- Restoration of the historic buildings and heritage interpretation of Aboriginal and European historical elements of the site and locality;
- Public art sculptures;
- Site access and parking including internal road and footpath network, onsite carparking and four vehicle crossovers onto St Andrews Road;
- Tree removal; and
- Stormwater infrastructure and other site services.

This Statement of Environmental Effects describes the site, its context and the proposed development, and provides an assessment of the proposal in terms of the relevant matters for consideration under Section 79C(1) of the *Environmental Planning & Assessment Act 1979*.

1.2. PROJECT TEAM

Table 1 below details the specialist consultant team and their contribution to the design of the proposed development:

Table 1 – Project Team

Input	Consultant
Catholic Metropolitan Cemeteries Trust (CMCT)	Proponent/Site Owner
Urbis	Town Planning, Heritage Planning and Community Consultation
Florence Jacquet Landscape Architects (FJLA)	Executive Landscape Architect
Botanica	Landscape Architect
Francis-Jones Morehen Thorp (FJMT)	Project Architect
Architectural Projects	Heritage Architect
Degotardi Smith & Partners	Surveyor
Warren Smith and Partners	Civil and Stormwater Engineer

Input	Consultant
Alluvium	Water Sensitive Urban Design
Travers	Watercourse, Flora & Fauna, Bushfire, Tree Assessment and Vegetation Management
Douglas Partners	Stability, Salinity and Contamination Assessment
Artefact	Aboriginal Archaeological & Cultural Assessments
Richard Land and Associates	Visual Impact Assessment
Virtual Ideas	Visual Impact Study
The Transport Planning Partnership	Traffic Impact Assessment
Acoustic Studios	Acoustic Assessment
Group DLA	Building Surveyor
Morris Goding Access Consulting	Accessibility Consultant
Steenon Varming	Sustainability Consultant
Waste Audit and Consultancy Services	Waste Management
Napier and Blakely	Quantity Surveyor

STRUCTURE OF THE REPORT

This Statement of Environmental Effects is structured as follows:

- A description of the site context, including identification of the site, existing development on the site, and surrounding development (Section 2);
- Summary of the planning history of the development site including previous DAs (Section 3);
- Detailed description of the proposed development (Section 4); and
- Assessment of the proposed development with the relevant planning controls and issues relevant to the proposed development in accordance with s79C of the Environmental Planning and Assessment Act (Section 5)
- Summary and Conclusion (Section 6)

The DA in its entirety has been submitted to Campbelltown City Council as five (5) Separate Documents as follows:

- Volume of Plans – Part One comprising Appendix A-D
- Volume of Plans – Part Two comprising Appendix E-G
- Volume of Plans – Part Three comprising Appendix H-K
- Statement of Environmental Effects Volume One comprising this report and Appendixes L-U
- Statement of Environmental Effects Volume Two comprising Appendixes W-DD
- Statement of Environmental Effects Volume Three comprising Appendixes EE-PP

In accordance with the understood lodgement requirements of Campbelltown City Council an electronic copy of all documentation has also been provided as a separate USB stick.

2. SITES AND SURROUNDS

2.1. SITE LOCATION

The site is located at 166-176 St Andrews Road, Varroville, and is situated along the north-eastern alignment of St Andrews Road and to the north of the Hume Highway. The site is located in the non-urban area of Varroville.

Varroville is a suburb located within the Local Government Area of Campbelltown, within the south western region of the Sydney Metropolitan Area. The property is located approximately 7.5 kilometres (by direct line) north east of Campbelltown City Centre and approximately 38 kilometres (by direct line) south west of the Sydney Central Business District (CBD). The location of the site is indicated in the aerial map at Figure 1 below.

2.2. TITLE DESCRIPTION

A Site Survey has been prepared to accompany the DA and is attached Appendix A of this report. The legal description of the subject property comprises three separate lots, including:

- Lot B Deposited Plan 370979
- Lot 22 Deposited Plan 564065
- Lot 1 Deposited Plan 218016

Note that the Survey Plan also includes adjoining Lot 4 DP 239557 located immediately to the south of Lot 1. Lot 4 DP 239557 does NOT form part of this DA.

2.3. DIMENSIONS AND SITE AREA

The is an irregular shape and has a total area of approximately 113 hectares as detailed below in Table 2.

Table 2 – Schedule of Areas

Lot & Deposited Plan	Area (sqm)	Area (ha)
Lot B DP 370979	597,600	59.76
Lot 22 DP 564065	433,900	43.49
Lot 1 DP 218016	101,200	10.12
Total	1,132,700	113.37

There are natural ridgelines and troughs that extend throughout the site. The natural topography of the land slopes from the northern escarpment boundary, downwards to the southern boundary, adjacent to the Hume Highway.

The site surrounds a 'battle-axe' shaped lot as identified in the aerial map at Figure 1 below. The lot was subdivided from the main site in 1973 (Lot 21 in Deposited Plan 564065). This lot has a separate access to St Andrews Road and is privately owned and does NOT form part of the site subject to this DA. This site accommodates the State listed heritage item, Varroville House. Lot 21 in DP 564065 has a total area of approximately 31,610 square metres (3.161 hectares).

2.4. EXISTING LAND USES AND BUILT FORM

The site is predominantly of an open and cleared landscape character and is mostly free of built structures. The site includes strands of remnant vegetation, water bodies including dams, and a small group of six (6) historic buildings/structures originally associated with Varroville Homestead (which is not located on the subject site as discussed above). Images of the site are included at Figure 2 below.

The site has a history of pastoral and agricultural uses. Since the early 1990s, agricultural uses have fallen into a state of disuse and decline. That said the site is currently used for the agistment of livestock. The site includes a number of informal and unsealed tracks but does not include any formal road network. A detailed account of the Aboriginal and European heritage of the site is discussed in the Heritage Impact Statement attached as Appendix X.

2.5. SURROUNDING LOCALITY

The site is located within a semi-rural setting and is surrounded by rural residential landholdings to the north, the Hume Highway and the suburb of St Andrews to the south, the Scenic Hills Riding Ranch and rural land to the east, and Our Lady of Mt Carmel Catholic Church the Mt Carmel Catholic Retreat Centre and the Mount Carmel Catholic College to the west. The Ingleburn industrial precinct extends along the southern side of the Hume Highway to the south east of the subject property.

Other land uses within the locality to the site include:

- St Gregory's College, a Catholic secondary and boarding school for boys (approximately 5.5 kilometres south west).
- Camden Valley Way, a major north-south sub-arterial road that connect Camden with Liverpool (approximately 3.1 kilometres north west).
- Eagle Vale Marketplace (neighbourhood shopping centre) (approximately 3.5 kilometres south east).
- Minto Mall (neighbourhood shopping centre) (approximately 3.9 kilometres south east).
- Mount Annan Christian College (approximately 5 kilometres south west).
- Campbelltown CBD (approximately 7.4 kilometres south west).

Figure 1 – Aerial map of the site



Source: PMSA Australia 2017

Figure 2 – Images of the site



Picture 1 – Looking north west within site towards escarpment



Picture 2 – Looking north east within site



Picture 3 – Looking east towards dam within site



Picture 4 – Looking north east from escarpment



Picture 5 – Heritage Coach House in southern portion of the site



Picture 6 – Heritage cottage in southern portion of the site

2.6. LANDSCAPE CHARACTER

The site is located within the Campbelltown Scenic Hills, which is a landscape ridgeline extending in a south west direction from Liverpool to Mt Annan. The landscape character of the site includes undulating grassed hills, forested areas and natural and human made waterbodies. Where present, native vegetation has a riparian structure due to small creeks and tributaries running through the site.

Whilst the site contains a mix of native and introduced vegetation, most areas have been heavily modified due to previous grazing and agistment uses. Pockets of native vegetation on the site largely follow the riparian corridors and dams.

2.7. ECOLOGY

Flora

There are six identified vegetation communities present on the site, including two endangered ecological communities (EEC), Cumberland Plain Woodland and Moist Shale Woodland. Cumberland Plain Woodland and Moist Shale Woodland are present in variable conditions and are largely located within riparian areas. Cumberland Plain Woodland occurs on the gentle topography in the lower slopes of the site. Moist Shale Woodland occurs on the steeper south facing slopes in the northern corner of the site.

The site includes a significant infestation of African Olive which accounts for 7.3ha of vegetation coverage within the north western portion of the site. Dense African Olive, together with the previous clearing and grazing on the site has attributed to an absence of any high-quality EEC remnants.

Fauna

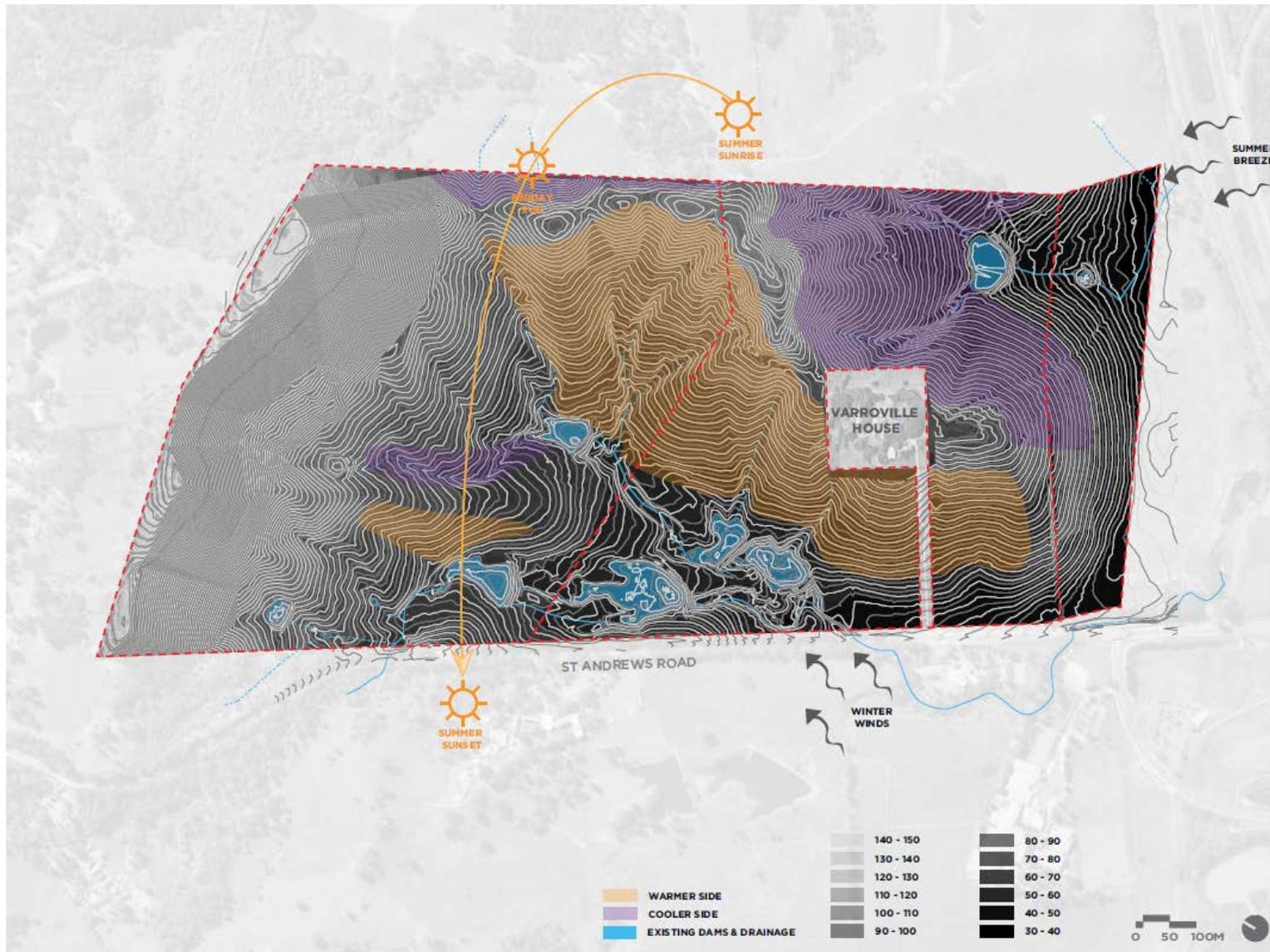
Fauna Surveys have been undertaken on the site by Travers Ecology in July 2013 September 2015 and April 2017. A variety of birds, mammals, reptiles, Amphibians and Molluscs were observed on site during this period. Regionally significant fauna species observed during the survey period include the Wedge-tailed Eagle, Peregrine Falcon, Bar-shouldered Dove, Swamp Wallaby and Smooth Toadlet.

A complete survey of all existing flora and fauna on the site is contained in the Flora and Fauna Assessment Report at Appendix AA.

2.8. TOPOGRAPHY

The site has a complex topography which includes a series of ridgelines, gullies and flatter pastures. The northern boundary of the site follows a distinctive ridgeline which includes the Bunbury Curran Hilltop. The ridgelines in this area of the site slope steeply (13 – 30%) towards the south east. The ground slope then decreases in grade and includes undulating terrain with gentle slopes (less than 10%). The site has an overall relief of approximately 85m from the highest point (Bunbury Curran Hill) to the lowest point (dams near south western site boundary). The undulating topography of the site is illustrated in the topographic map at Figure 3 below.

Figure 3 - Site topography



2.9. GEOLOGY AND HYDROLOGY

The site is underlain by Bringelly Shale, which typically comprises shale, carbonaceous claystone, laminate and lithic sandstone. The site includes several watercourses including second and third order streams which in some cases flow into existing dams. Streams on the site drain towards the existing dams on the site and to Bunbury Curran Creek.

2.10. ROAD NETWORK

St Andrews Road

- St Andrews Road is a local road and is a two-lane undivided road with a speed limit of 70km/h. A school zone is operational 8am-9.30am and 2.30pm-4pm in the sections north and south of Spitfire Drive.

Spitfire Drive

- Spitfire Drive adjoins with St Andrews Road at a single-lane T-junction roundabout. Spitfire Drive is a local road and is a two-lane undivided road with a speed limit of 60km/h. A school zone is operational 8am-9.30am and 2.30pm-4pm. Bike lanes are generally provided on both sides of Spitfire Drive.

Campbelltown Road

- Campbelltown Road is an RMS main road (MR 177) and is two-lanes and undivided in the vicinity of St Andrews Road. Campbelltown Road accesses St Andrews Road to the south of the Hume Highway. Campbelltown Road has a sign posted speed limit of 70km/h near to St Andrews Road.

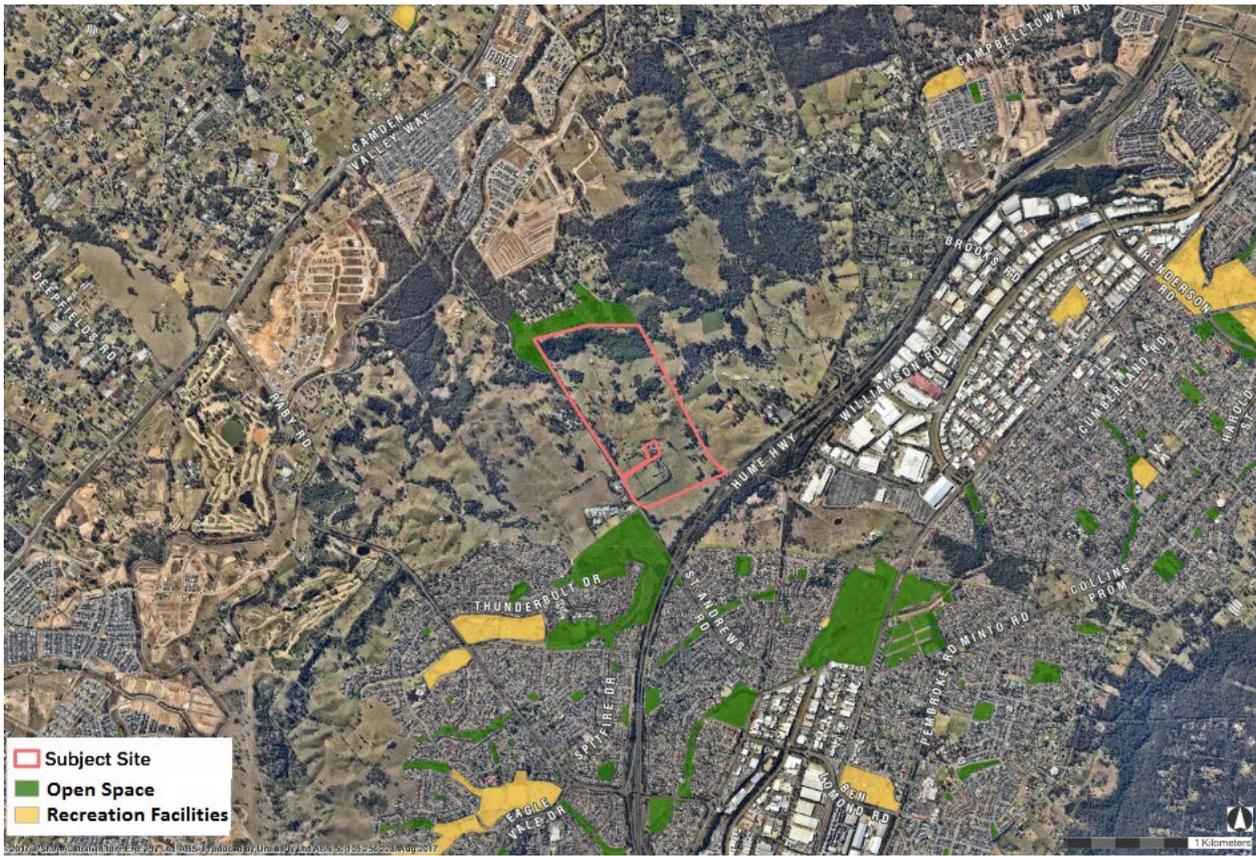
2.11. OPEN SPACE AND RECREATION FACILITIES

Open space and recreation facilities such as sports fields in the vicinity of the site include:

- Varroville Reserve adjacent to the site to the north;
- Kooringa Reserve on the south-western side of St Andrews Road;
- Victoria Park and Kays Park to the south east of the site; and
- Raby Sports Complex to the south west of the site.

Open space and recreation facilities are mapped below at Figure 4.

Figure 4 – Open space and recreation facilities



3. PROJECT HISTORY AND BACKGROUND

3.1. PLANNING PROPOSAL

A site-specific planning proposal to amend the Campbelltown Local Environmental Plan 2015 (CLEP 2015) was gazetted on 20 February 2017. The gazettal amended the CLEP 2015 to permit development for the purposes of a “cemetery” on the site subject to the satisfaction of certain requirements of the overall design.

The key amendments to the CLEP 2014 relevant to this DA are:

- **Addition of clause 7.8A Use of certain land at 166–176 St Andrews Road, Varroville:** permits development for the purposes of a “cemetery” on the site subject to a variety of site specific provisions.
- **Amendments to Schedule 5 Environmental Heritage and heritage maps:** identifies and includes “Varro Ville” estate (located on Lot 1, DP 218016 and Lot 22, DP 564065) as a local heritage item.
- **Endorsement of the Conservation Management Plan and supplementary Information:** requires development on the site to be carried out in accordance with the Conservation Management Plan titled “Conservation Management Plan, Varroville Estate: 166–176 St Andrews Road, Varroville” and supplementary information.
- **Addition of clause 7.7(3)(d):** establishes a “no build area” on site which may only be developed for a lawn cemetery and associated fencing.
- **Amendments to the CLEP 2015 maps and dictionary:** identifies the “no build area” and define “lawn cemetery”.

All provisions relevant to the site and proposed development are addressed in Section 6.1.5 of this SEE.

3.2. PRE-LODGEMENT CONSULTATION

3.2.1. Campbelltown City Council

CMCT and the project team met with Campbelltown City Council on 22 May 2017. Table 3 below details the key matters raised at the meeting and how these matters have been considered and incorporated during the design phase of the development.

Table 3 – Pre-DA matters and response

Matter	Design Response/Comment
Traffic DA to assess the impacts of traffic on the site and surrounding area.	The Traffic Impact Assessment undertaken for the proposal and attached as Appendix II has considered the Level of Service for both St Andrews Road and the surrounding road network.
Address occupancy rate of vehicles (2.6 persons per vehicle), and occupancy rate of staff vehicles (1.5 per vehicle).	Vehicle occupancies rates have been calculated based on case studies undertaken at both Rookwood and Kemps Creek Cemeteries as detailed within the Traffic Impact Assessment undertaken in support of the proposal and attached as Appendix II.
Archaeology DA must identify and address the impacts on any known aboriginal archaeological sites.	An Archaeological Investigation has been undertaken for the proposal and accompanies this report as Appendix Y. Physical works have avoided where possible areas of known archaeological or cultural sensitivity.

Matter	Design Response/Comment
<p>Staging of works</p> <p>Proposal is to detail the staging of physical works across the site.</p>	<p>The proposed cemetery is proposed to staged on a needs basis. The indicative staging of the proposal is detailed with Section 4.3 of this report.</p>
<p>Stormwater</p> <p>DA submission is to address site stormwater.</p>	<p>As detailed in the Civil Engineering Services Report attached as Appendix P the stormwater management of the site has been designed to store the majority of the site’s catchment to six (6) of the existing dams on site.</p> <p>The undeveloped northern portion of the site will reticulate south to several proposed swales which are to be installed along the boundary of Road 1, Road 7 and Road 8. These swales are sized to capture runoff from the 5% AEP storm event and will connect into the stormwater network in Road 1</p> <p>MUSIC Modelling has also been undertaken for the proposal and provided to Campbelltown City Council under separate cover if required by Campbelltown Council.</p>
<p>Roof height of Chapel</p> <p>All parties acknowledged that the variation to the building height limit for the Chapel will have minimal adverse visual impact.</p>	<p>As per the design tabled at the Pre-DA Meeting the Architectural Roof Features of the proposed chapel building exceed the 9m height limit of the site. Whilst the proposal is considered to comply with Clause 5.6 of the CLEP 2015 in regards to Architectural Roof Features a Clause 4.6 assessment has also been prepared in support of the proposal</p>
<p>Photomontages</p> <p>DA submission to include photomontages from key viewpoints</p>	<p>A Visual Impact Study has been undertaken for the proposal by Virtual Ideas in accordance with the requirements of the NSW Land and Environment Policies. This Visual Impact Study has been used to inform the Visual Impact Assessment undertaken by Richard Lamb and Associates.</p>
<p>Planting</p> <p>DA submission to detail the types of planting proposed.</p>	<p>Planting schedules have been prepared as landscape plans prepared for the application by Botanica and is attached as Appendix C of this report. The proposal has placed a specific emphasis on the selection of native and appropriate tree species for the site to ensure its long-term management. Further to this the Landscape Specification Planting Works documents prepared by Botanica and attached as Appendix N specifically detail the planting and maintenance procedures which will be undertaken as part of the future development of the site and can reasonably be enforced as Conditions of Consent.</p>
<p>Headstone typology</p> <p>DA submission to detail the types of memorialisation and headstones across the site.</p>	<p>The headstone typology varies based on the location of the site and its visual exposure. The typology is fully detailed within the Landscape Design Response attached as Appendix D</p>

3.2.2. Community Consultation

CMCT has undertaken extensive community engagement following the gazettal of the planning proposal and throughout the preparation of the DA. The engagement process has informed the Landscape Masterplan (Appendix B) and proposed built form across the site. The purpose of conducting community consultation prior to the finalisation of the scheme and lodgement of the DA included:

- Provide information about the draft master plan and the process to prepare the DADA.
- Invite feedback through a range of channels, to inform ongoing design and planning.
- Collate feedback and prepare a summary of consultation outcomes.
- Inform the finalisation of the draft master plan and the preparation of the DA for lodgement.

A Summary of Consultation Outcomes Report has been prepared by and is included at Appendix MM.

Consultation Process

Community consultation was undertaken over 6 weeks in June and July 2017. Consultation activities included:

- Distribution of a letter and project fact sheet to 1,600 households, stakeholders and previous submitters notifying them of the proposed DA, community information and feedback sessions and contact details for further information.
- Two Community Information and Feedback Sessions (three hours each) attended by approximately 41 people. These sessions were held on 22nd June 2017, 6:00pm-9:00pm and Saturday 24th June, 10:00am-1:00pm. Representatives from CMCT and the project team were present to answer questions and collate feedback.
- Formal feedback forms available at the Community Information and Feedback Sessions
- A project website including copies of all materials distributed and displayed at the Community Information and Feedback Sessions.
- Additional feedback channels including a dedicated project email, 1800 phone number and online feedback forms.
- A meeting as requested by three stakeholders who responded to the letter distributed to the local community.

Community Feedback

Feedback received during the consultation process were generally either supportive (14 feedback forms) or not supportive (12 feedback forms), with no middle ground. The feedback was often not in response to specific aspects of the masterplan, but expressed as simply being for or against the proposed land use as a cemetery. Other themes raised within the feedback are detailed in Table 4 below.

Table 4 – Community feedback summary

Public comment	Design Response
Traffic	
Concern about existing traffic congestion on St Andrews Road.	SIDRA Modelling has been undertaken for the project to determine the existing and future Level of Service for St Andrews Road. An A level of Service is maintained during both the AM and PM peak for both the existing and future development scenario. From a capacity standpoint St Andrews Road is therefore considered to have adequate capacity to accommodate the development.
Concern regarding the poor condition of St Andrews Road and its future ability to support additional traffic.	The proposed development seeks consent for a Channelised Right Turn Lane off St Andrews Road to access the site to ensure the safe operation of St Andrews Road.
The draft master plan needs to show site access off St Andrews Road and parking provision across the site more clearly.	Detailed development plans have identified the proposed entrance points for the proposal and the site car parking.
The draft master plan needs to show site access off St Andrews Road and parking provision across the site more clearly.	The proposal includes four vehicular access points from St Andrews Road. All access points, internal roadways and parking are indicated on the Landscape Masterplan.
There is support for St Andrews Road to be improved and upgraded as part of the draft master plan.	The proposed development seeks consent for a Channelised Right Turn Lane off St Andrews Road to access the site. As the proponent does not own St Andrews Road no further upgrade works are proposed.
Scenic Hills	
Strong desire to preserve the Scenic Hills for its heritage values, ecology and natural amenity. Based on this, many are opposed to any form of development occurring in this region.	The Landscape Masterplan and proposed buildings have been designed to complement the natural landscape and the scenic qualities of the site. The site will resemble landscape parklands and will retain its semi-rural aesthetic. The heritage significance of the site and surrounding sites is thoroughly considered in the Conservation Management Plan, which has guided the development proposal. The heritage impacts associated with the proposal are considered in the Heritage Impact Assessment.
There are concerns that approval of DA will pave the way for future development in the Scenic Hills region.	This DA relates to the development of the site for a cemetery and publicly accessible parklands only. The planning proposal for the site (gazetted on 21 February 2017) demonstrated that the use of the site for a cemetery is consistent with the E3 Environmental Zone Objectives. Any other planning proposal or DA would be required to address all relevant strategic planning policies and the provisions of the CLEP 2015.
Masterplan and Design	
There is support for the overall vision of the draft master plan including the landscape design, open space and recreational facilities.	A key element of the proposal is the creation of publicly accessible parklands focused principally along St Andrews Road. The proposed landscape masterplan is for a cemetery design, which is supported by subtle and low-lying memorialisation and landscape character resembling publicly accessible parklands.

4. PROPOSED DEVELOPMENT

4.1. MMP VISION AND OBJECTIVES

The vision and objectives of MMP are stated below and are established in the Landscape Design Response Report prepared by Florence Jaquet Landscape Architect at Appendix D.

Vision for the site

- *A distinctive landscaped cemetery, the best of its kind, the pride of the industry;*
- *A Sculpture Park, offering opportunities for local and Australian artists;*
- *A respectful space and scenic route, open to all;*
- *A cemetery which respects and safe keeps the important colonial and non-colonial landscape;*
- *An arboretum for future preservation and education of generations to come;*
- *A concept which respects the Land, its landform and ecology by carefully laying roads and any built environment and limiting their footprint;*
- *Concealed, private and low laying burial spaces to minimise visual impact;*
- *Much needed burial space for the area whilst offering choice, at affordable prices, in varied settings, for a multi-denominational community*

Objectives of MMP

- *Minimise the impact on existing environment, especially the topography and the Cumberland Plains Woodland, to protect them for future generations;*
- *Protect the Colonial landscape qualities;*
- *Provide an environmentally sensitive development;*
- *Achieve Best Management Practices in all aspects of cemetery provision, including Stormwater Management and Ecologically Sustainable Developments;*
- *Provide an exceptional open space for the community, for perpetuity; and*
- *Provide a quality burial ground for the whole community*

4.2. DEVELOPMENT FOR WHICH CONSENT IS SOUGHT

4.2.1. Summary

The Crown DA seeks consent for the following specific uses and works for the site:

- Use and operation of the site for a “cemetery” and associated publicly accessible parklands / “recreation areas”;
- Landscaping of the entire site with associated planting strategy;
- Burial areas and memorialisation guides;
- Construction of six (6) new buildings on the site and the ancillary use of the buildings in association with the cemetery and parklands;
- Restoration of the historic buildings and heritage interpretation of Aboriginal and European historical elements of the site and locality;
- Public art sculptures;
- Site access and parking including internal road and footpath network, onsite carparking and four vehicle crossovers onto St Andrews Road;

- Tree removal; and
- Stormwater infrastructure and other site services.

Specific elements of the above are described in further detail in the sub-sections below

4.2.2. Landscape Design and Planting

This DA seeks approval for the Landscape Masterplan at **Appendix B**. The Landscape Masterplan will guide development across the entire site. The Landscape Masterplan details the location of burial areas, publicly accessible parklands, significant landscape features, new built form, public art, site access, roads and other supporting infrastructure. The Landscape Masterplan has been informed by all technical reports which accompany this DA. The Landscape Masterplan is illustrated in Figure 5 below.

The Landscape Masterplan is directly supplemented by the following documents which accompany this DA:

- **Landscape Design Response** (Appendix D): The Landscape Design Response details the vision and objectives of MMP. The document provides a thorough account of the design process and details the how the Landscape Masterplan achieves consistency with the objectives of the project whilst also responding to all opportunities and constraints present on the site.
- **Species Plans** (Appendix C) The Species Plans detail the locations and species of new planting across the site. Key elements of the proposed Species Plans are detailed below.
 - Planting has been carefully considered to conceal new built form when viewed from significant vantage points within the site and from surrounding sites. A detailed analysis of the visual impact of the proposed development is included at Section 6.3.10.
 - Species selection has considered the existing landscape character of grassed hills, native vegetation and historical settings.
 - Planting has been selected to screen burial areas and memorials when viewed from roadways within the site, from St Andrews Road and from Varroville House.
- **Vegetation Management Plan** (Appendix EE) The Vegetation Management Plan (VMP) prepared for the site acts as a guide for the retention, consolidation, enhancement and management of retained bushland and riparian zones which are identified on the site.

Figure 5 – Landscape Masterplan



Source: Florence Jaquet Landscape Architect

4.2.3. Burial Areas and Memorialisation

The proposed landscape design reflects an ability to accommodate approximately 136,000 full body burial plots in addition space for ash interments. Unique to MMP, this DA includes a highly considered landscaped response to the planning and design of burial areas across the site. A key objective of MMP has been to design a memorial park where burial areas and memorialisation are visually subordinate to the rural character of the site and surrounding area.

The proposal includes areas for lawn burials, natural burials, burial rooms, ash interments and crypts. The different burial areas and typologies across the site are subject to memorialisation design guides which are a location specific response to ensure the protection of the visual qualities of the landscape.

The proposed design for each burial area and typology are described below and is detailed in full within the following documentation:

- Landscape Masterplan (Appendix B);
- Species Plans (Appendix C);
- Landscape Design Response (Appendix D); and
- Plan of Management (Appendix M).

4.2.3.1. Lawn Burials

Lawn burial areas are characterised by grassed areas and simple plaque style memorialisation which sit flush within the lawn. Lawn cemetery design is considered contemporary cemetery design across Australia. The south-eastern portion of the site will constitute a lawn cemetery and will accommodate lawn burials only.

Under the CLEP 2015, a “*Lawn Cemetery*” is defined as “*a cemetery in which monuments and grave markers memorialising the interment of deceased persons do not extend above natural ground level*”. The areas of the site to be developed for lawn burials are indicated in the Lawn Burials Plan at Figure 6 below.

Lawn burials areas are to abide by the following burial and memorialisation guides:

- Use of flush lawn plaques;
- Concealed concrete beams below ground level;
- Rows of graves to generally follow topography of land;
- Re-grading only where localised water ponding may occur; and
- Occasional specimen tree planting for shade and respite.

The above principles will ensure memorialisation has minimum visual impact on the landscape. These principles are further detailed within the Landscape Design Response (Appendix C); and Plan of Management (Appendix M).

Figure 6 – Lawn Burial Plan



Source: Florence Jaquet Landscape Architect

4.2.3.2. Burial Rooms

For burial areas of the site which will include memorialising extending above ground level, the proposal has adopted the concept of the “burial room”. A burial room is a district burial area separated and concealed from other areas of the site by landscaping and planting.

The screening for each burial room is provided in the form of native planting of varying height, ensuring the planting blends into the existing semi-rural and native landscape. Burial rooms are further divided into burial sub-rooms which create a human scale for each burial area. The areas of the site which will include burial rooms are indicated in the Burial Rooms Plan at Figure 7 below.

Burials within Burial Rooms are to abide by the following burial and memorialisation guides:

- Provide screening in the form of native planting of varying height, ensuring the planting blends into the existing rural and native landscape;
- Avoid using exotic tree species which may clash with heritage landscape;
- Set the burial rooms against the backdrop of the existing and future Cumberland Plain Woodland zones;
- Provide ash interment and memorialisation options within each burial room; and
- Provide 3 types of burial rooms as indicated in **Figure 7** below:
 1. Low headstones (700mm high) on concrete beams in a lawn setting
 2. High headstones (1.2m high) on concrete beam or full monumental
 3. Lawn graves on terraced stone retaining walls with headstones recessed into wall face

Figure 7 – Burial Rooms Plan



Source: Florence Jaquet Landscape Architect

4.2.3.3. Natural Burial Area

Natural burials, including full body burial and ash interments are to occur in the natural burial area indicated in Figure 8 below. The natural burial area is located within an existing pocket of Cumberland Plain Woodland, providing a contemporary and sustainable alternative to traditional burial.

Natural burials are to abide by the following burial and memorialisation guides:

- Chemical free and 100% biodegradable coffin or shroud;
- Biodegradable grave markers (wood) or none;
- Grave location to be recorded and marked with steel pegs in the ground (traceable with metal detector);
- Double depth of burial allowed;
- Grave plots to radiate out of the structure root zone to minimise root damage (running in same direction as structural roots);
- Only 5 burials allowed around each tree per 5 years period to allow for root regeneration;
- Ash interment to be limited in numbers and buried in the structural root zone;
- Restore grave surface with site topsoil and plant species; and
- Bushland setting with denser perimeter plantings for privacy.

Figure 8 – Natural Burials Plan



Source: Florence Jaquet Landscape Architect

4.2.3.4. Ash Interments

Dedicated spaces for ash interments are provided throughout MMP as indicated in Figure 9 below. MMP will continue to cater for the increasing proportion of cremations by provided substantial space for the interment of cremated remains.

Guidelines for ash interments are as follows:

- Provide new and sculptural designs in keeping with design rationale;
- Provide a variety of 'Ash interment option' varying in prices, aesthetics and cultural relevance; and
- Provide options for ash interments along all path networks which are within 50m of a road, with memorialisation to complement the 'park-like' setting as these paths will also be used for recreation.

Figure 9 – Ash Interments Plan



Source Florence Jaquet Landscape Architect

4.2.4. New Built Form

This DA seeks consent for the construction of six (6) new buildings on the site, the Chapel, Administration Building, Function Building, Café, Grounds Staff Buildings and Gatehouse. The proposal also seeks consent shelters throughout the site and crypts located in the north-western area, near to St Andrews Road. The proposed buildings and design philosophy are detailed in the Architectural Plans (Appendix H) and the Architectural Design Report (Appendix G) prepared by FJMT.

Through highly considered siting, design and materials selection, the buildings achieve a seamless integration with the rural qualities of the landscape. The design of the buildings has been driven several design principles as detailed in the Architectural Design Report at Appendix G. The key design principles include:

- **Memorial and recreational landscapes:** The cafe, function building, gatehouse and administrative facilities have a greater integration with the daily activities occurring in the recreational landscape and are therefore located in the southern portion of the site along St Andrews Road. The memorial landscape is located further north east and is to include the Chapel and Crypts.
- **Access, orientation and topography:** The axis and orientation of each building has been carefully considered to optimise views, solar access, amenity, accessibility and connection to the landscape. Each building position has generally been aligned with the topography of each specific location on the site and where possible has been located in close proximity to existing water bodies.
- **Materiality:** The buildings utilise a considered palette of natural materials and colours to compliment the landscape. The material palette embodies timber and stone to create a contemporary expression which will remain timeless.

- **Sustainability:** The Sustainability Strategy applicable to the site (Appendix KK) directly relates to the design, construction and use of the buildings on site. Areas to achieve excellence in sustainability include environmental management, community integration, sustainable and active transport promotion, energy, water, materials and waste efficiency and optimisation.

The proposed buildings directly support the use of the site as memorial park and publicly accessible parklands. The locations of each proposed building and the site access points from St Andrews Road are indicated in the Figure 10 below. The following sections provide a description of each building and a numeric overview of new built form, including the parking provisions for each building.

Figure 10 – Buildings and Site Access



Source: FJMT

4.2.5. Chapel

The Chapel will provide a multid denominational facility for services associated with MMP. The Chapel has been sited in the hillside to present as a single storey building and to achieve integration with the natural landscape. The building provides panoramic views of the site and its surrounding rural area.

The built form and roof features have been designed to emulate the rolling ridgeline which forms the dominant backdrop of the Chapel. Natural materials and tones have been chosen to ensure that the Chapel complements its landscaped setting as indicated in the photomontages at Figure 11 below.

The ground floor of the Chapel has been designed as a multifunctional space, which can be divided and used as three separate chapels to suit the requirements of individual services. The ground floor of the Chapel is framed by three separate courtyards to the north, west and south of the building. The basement level accommodates 93 car parking spaces, an ancillary mortuary and building plant. The mortuary facilities are dedicated for the use of chapel itself for storage both pre and post ceremonies.

The Chapel plans are provided at Figure 12, and in the at Architectural Plans at Appendix H and the Architectural Design Report at Appendix G prepared by FJMT.

Figure 11 – Chapel Design



Picture 7 – View from reflection pool and primary courtyard looking east

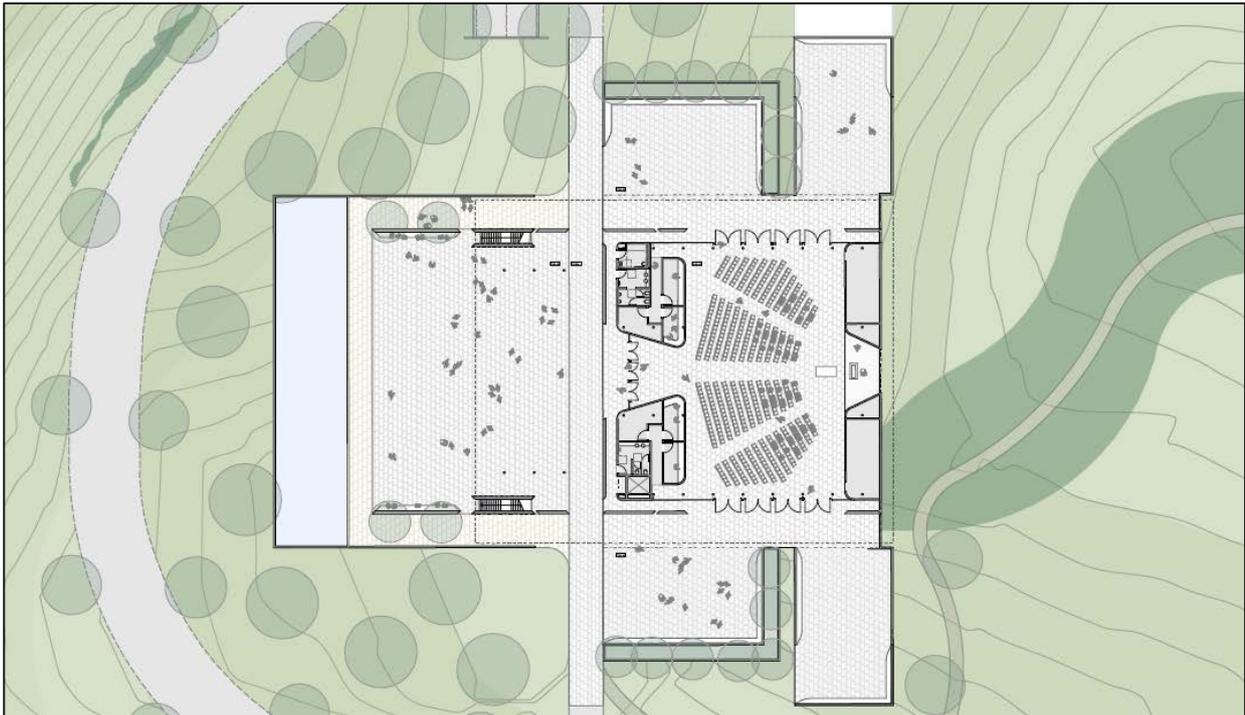
Source: FJMT



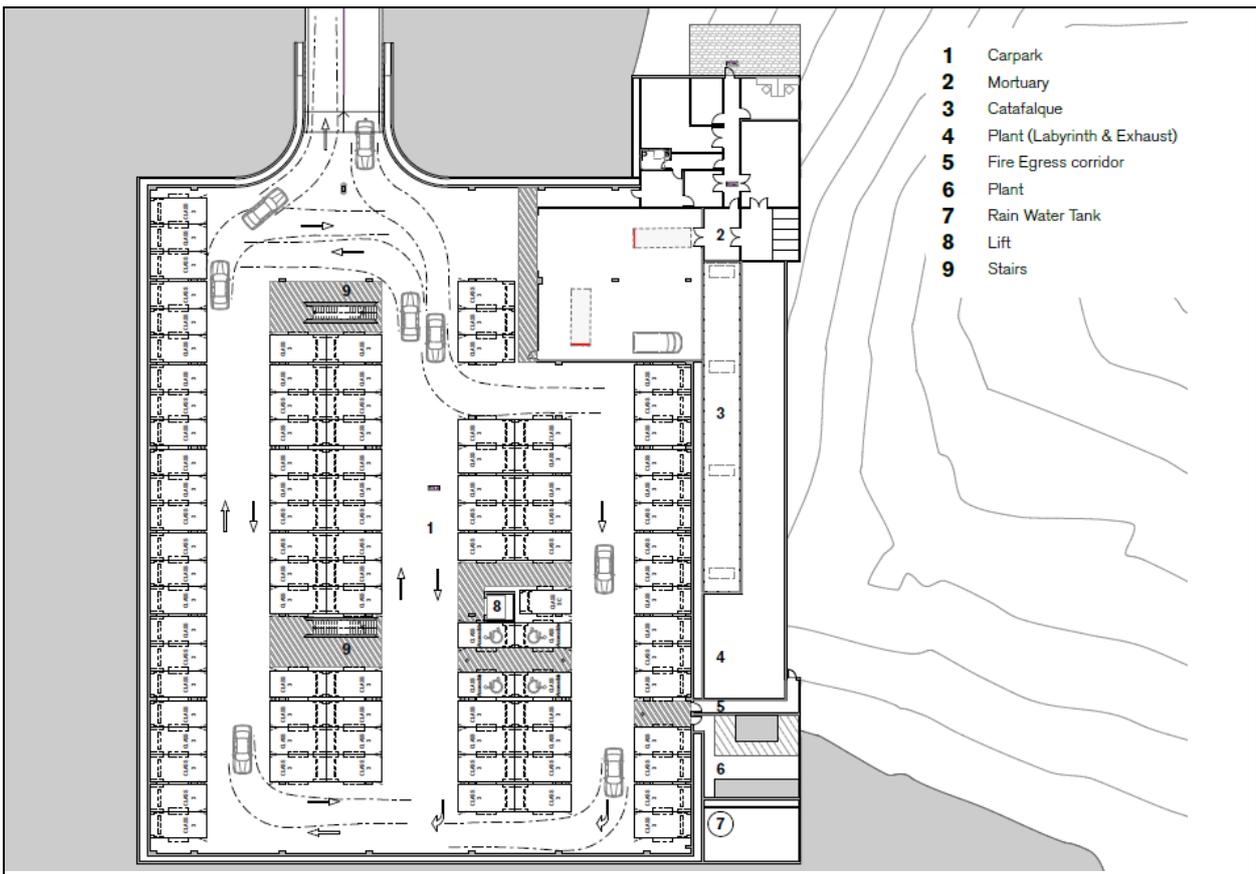
Picture 8 – Internal view of the Chapel

Source: FJMT

Figure 12 – Chapel Floor Plans



Picture 9 – Ground Floor Plan



Picture 10 – Basement Plan

4.2.6. Gatehouse

The proposed Gatehouse is located beyond entrance E1, which is to be used for funeral parties and visitors accessing the Chapel. The Gatehouse forms part of the processional journey from St Andrews Road to the Chapel. The buildings accommodate administrative areas where staff will provide relevant wayfinding information for visitors and hearse drivers. The proposed Gatehouse is detailed in the Architectural Plans at Appendix H and the Architectural Design Report at Appendix G prepared by FJMT.

4.2.7. Administration Building

The proposed Administration Building is located south of the Chapel. The building is single storey and accommodates ancillary office space and a boardroom for staff, a visitor's area with condolence rooms and a protected external courtyard. The proposed Administration Building is detailed in the Architectural Plans at Appendix H and the Architectural Design Report at Appendix G prepared by FJMT.

4.2.8. Function Building

The proposed Function Building is a single storey building located adjacent to an existing site. The Function Building includes a flexible function space which can be purposed as one or two rooms, a kitchen, amenities and an outdoor deck which extends over the dam. The Function Building has been designed to accommodate 168 people seated or 300 people standing.

The Function Building is indicated in the photomontage provided below at Figure 13. The design of the Function building is detailed in the Architectural Plans at Appendix H and the Architectural Design Report at Appendix G prepared by FJMT.

Figure 13 – Photomontage of proposed Function Building



Source: FJMT

4.2.9. Café

The proposed Café Building is of a similar design to the Function Building and is located within the publicly accessible parklands and adjacent the existing dam near to the primary entrance of the site. The Café Building includes seating, outdoor deck, kitchen, amenities and an ancillary flower shop. The café and flower shop will operate as ancillary facilities for the use of the public visiting the parklands and for those specifically visiting the Memorial Park and Chapel. The Café has been designed to accommodate 80 people. The design of the Cafe is detailed in the Architectural Plans at Appendix H and the Architectural Design Report at Appendix G prepared by FJMT.

4.2.10. Garden Staff Building

The Proposed Garden Staff Building is located adjacent to the St Andrews Road alignment and is accessed from site entrance E3. As detailed below, E3 is for staff access only. Similarly, the Garden Staff Building is not open to the public and is for staff use only. The building includes staff areas, storage areas, and machinery and workshop areas. The design of the Garden Staff Building is detailed in the Architectural Plans at Appendix H and the Architectural Design Report at Appendix G prepared by FJMT.

4.2.11. Shelters

Consent is sought for 16 shelters located throughout the site and adjacent to burial rooms. The shelters are open structures with a curved roof design. As indicated in the Architectural Plans at Appendix H and the Architectural Design Report at Appendix G, there are two shelter designs to be implemented across the site;

a small shelter which can accommodate 5-10 people, a large shelter which can accommodate 10-30 people. The shelters will provide a weather protected space for visitors to prepare flowers and memorials and to gather for small memorial services near to graves. The small and large shelter designs are indicated in the images below at Figure 14.

Figure 14 – Shelter design



Picture 11 – Small shelter design, memorial preparation area



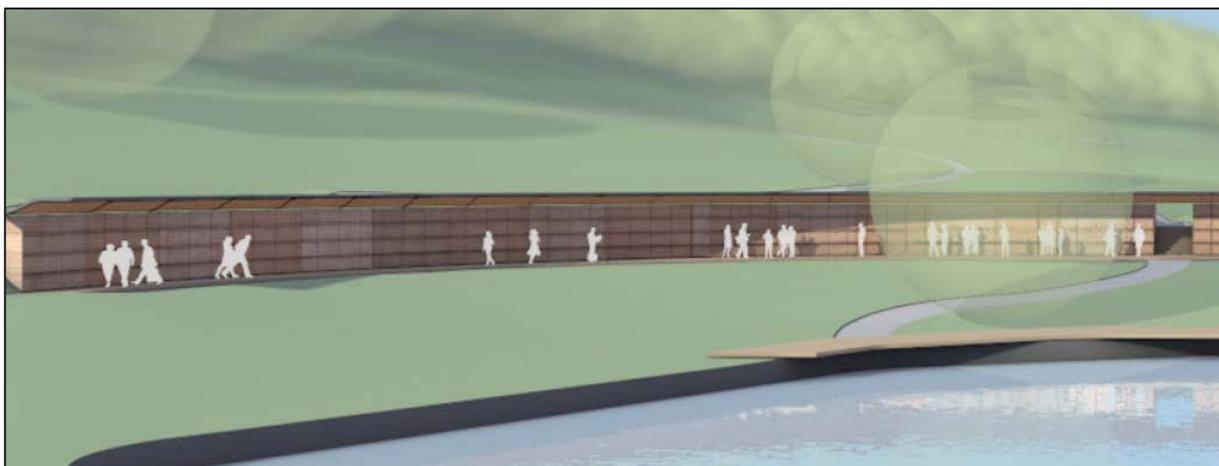
Picture 12 – Large shelter design, gathering space

Source: FJMT

4.2.12. Crypts

The proposed crypts are to be located adjacent to the existing dam in the north western area of the site. The crypts are an above ground burial chamber located within a singular curved shaped structure fronting the dam. The crypts have been designed and sited to sit within the hill adjacent to the dam. As such, they appear to be buried when viewed from the north west. The structure is one crypt deep and four crypts high, creating a structure which is approximately 3.5m in height. The design of the Crypt structure is detailed in the Architectural Plans at Appendix H and the Architectural Design Report at Appendix G prepared by FJMT.

Figure 15 – Crypt Structure



Source: FJMT

4.2.13. Numerical Overview

A numeric overview relating to each proposed building is provide below in Table 5 below.

Table 5 – Numeric overview

Building	Maximum Height (m)	Car parking spaces
Chapel	11.596	At-grade: 105 Basement: 93
Gatehouse	4.33	7
Function Building	6.34	90
Café	5.17	20
Administration building	4.23	18
Grounds Staff Facility	4.3	12
Shelters	3.44m	Kerb side parking only
Crypts	4.45m	Kerb side parking only

4.2.14. Heritage Interpretation and Restoration

4.2.14.1. Historic Building Restoration – Outbuildings Precinct

This DA seeks approval to restore and repurpose the heritage outbuildings on the site. The outbuildings are located south of the adjacent battle-axe block containing Varroville Homestead. The outbuildings originally formed part of Varroville Estate, including the State heritage listed Varroville Homestead. The land containing Varroville Homestead was subdivided from the remainder of the original estate in 1973.

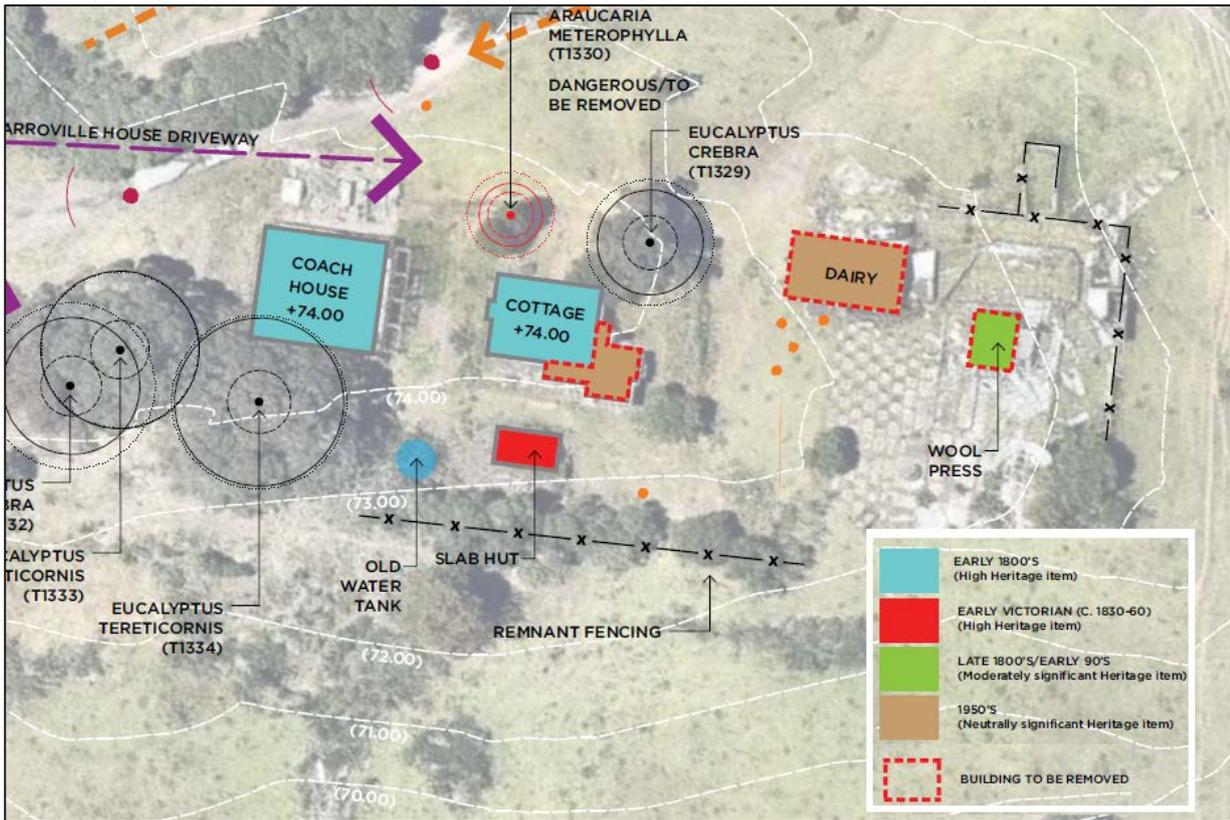
The outbuildings are collectively referred to as the Outbuildings Precinct within this DA and include the Coach House, Cottage, Old Water Tank, Slab Hut, Dairy and Wool Press. These buildings are identified in the Existing Outbuildings Plan at Figure 16 below.

The proposed works and future use of the outbuilding precinct are detailed in Table 6 and illustrated in the Proposed Outbuildings Precinct Plan at Figure 17 below. The works associated with the Outbuildings Precinct are detailed in full within the following documentation supporting this DA:

- Landscaping Plans prepared by Florence Jaquet Landscape Architecture at (Appendix B);
- Species Plans prepared by Narelle Sonter Botanica (Appendix C).
- Interpretation Strategy prepared by Florence Jaquet Landscape Architecture (Appendix D); and
- Heritage Building Architectural Plans prepared by Architectural Projects (Appendix I);

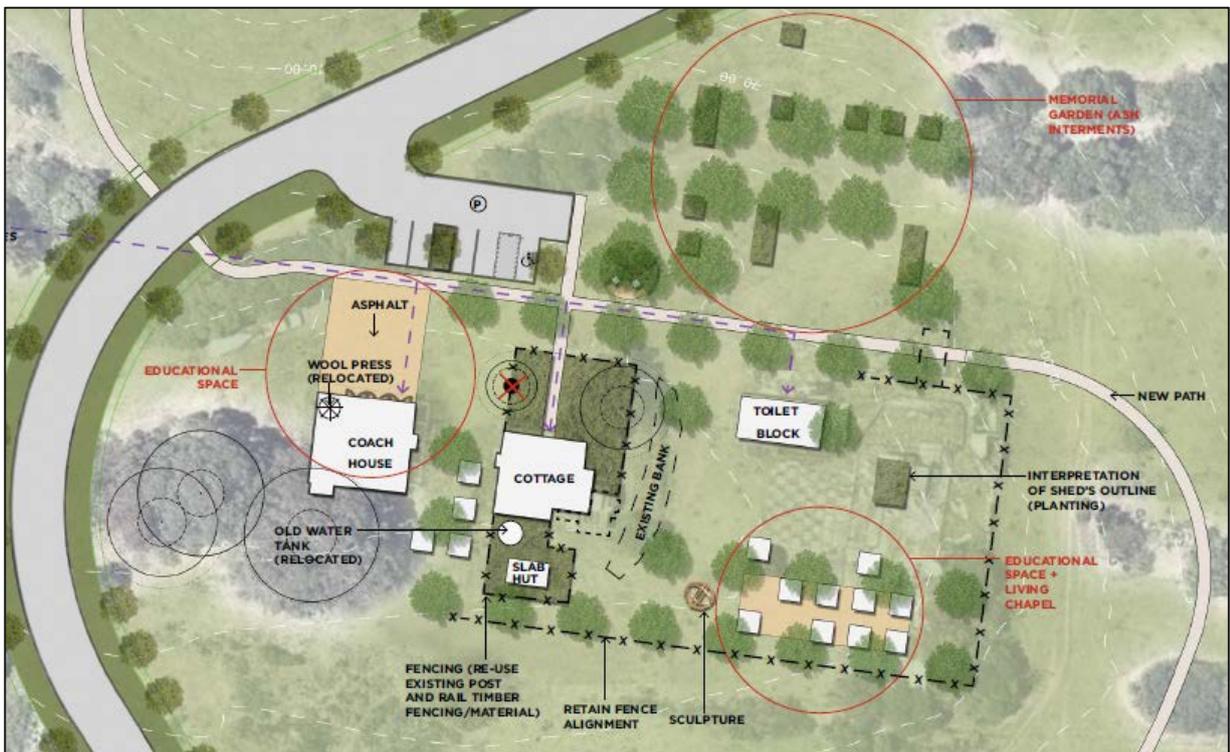
The heritage impacts associated with the proposed works are assessed in the Heritage Impact Statement prepared by Urbis Heritage attached as Appendix X.

Figure 16 – Existing Outbuildings Plan



Source: Florence Jaquet Landscape Architecture

Figure 17 – Proposed Outbuildings Precinct Plan



Source: Florence Jaquet Landscape Architecture

Table 6 – Proposed works to Outbuilding Precinct

Element	Proposal
Couch House	<ul style="list-style-type: none"> • Retain and restore building in accordance with the Heritage Buildings Architectural Plans (Appendix I) • Adapt building for educational purposes – site and local area history • The Wool Press is to be re-located to the Coach House for display and preservation.
Cottage	<ul style="list-style-type: none"> • Retain and restore building in accordance with the Heritage Buildings Architectural Plans (Appendix I) • Adapt building for educational purposes – site and local area history
Old Water Tank	<ul style="list-style-type: none"> • To be relocated in a visible area adjacent to the Slab Hut.
Slab Hut	<ul style="list-style-type: none"> • The slab hut that will be retained, fenced off and managed as a relic.
Dairy	<ul style="list-style-type: none"> • The Dairy Building and sheds will be removed. • A toilet block will be provided within the existing footing as part of an adaptive re-use of the building.
Wool Press Shed	<ul style="list-style-type: none"> • The Shed's location will be interpreted with low planting or paving patterns.
Fencing and landscaping	<ul style="list-style-type: none"> • The lay of land is to remain unchanged and predominantly grassed. • The spaces around the buildings will provide opportunities for teaching or gathering/ceremonial places to respond to the adaptive re-use of the area as a cemetery and also as an educational precinct. • Groves of small distinctive trees and platform seating will be provided, using a grid layout, reminiscent of the orchard and productive gardens which once existing on the property. • Existing rail and timber fencing material will be re-used for fencing where possible.
Access	<ul style="list-style-type: none"> • A path is provided from St Andrews Rd to facilitate access by the school/students. • The Outbuildings will be open to the public from 8.00am - 3.00pm, Monday to Friday. • The car park provides five spaces.

4.2.15. Interpretation Strategy

Along with the restoration and interpretation of the Outbuildings Precinct, the DA includes a consolidated heritage interpretation strategy for the site. As a memorial park and publicly accessible parklands, the site will be open for public enjoyment in perpetuity. As such, MMP presents a unique opportunity to convey and celebrate the history of the site and Campbelltown Area.

An Interpretation Strategy has been prepared by Florence Jaquet Landscape Architecture and is included at Appendix F. The Interpretation Strategy has been informed by the Conservation Management Plan at Appendix W, which accounts for both the Aboriginal and European heritage of the site. The Interpretation strategy details the methodologies and the rationale for conveying historical themes within MMP, including walking trails, lookout, reinstatement of historic vineyards, storyboards, sculptures, signage and internal road naming.

4.2.16. Public Art

Consent is sought for the siting of 34 individual public art pieces / sculptures. A comprehensive Public Art Strategy has been prepared by Florence Jaquet Landscape Architecture and is included at **Appendix D**. The Public Art Strategy details the locations and proposed height of each future artwork. The Public Art Strategy also contains parameters to guide the materiality of each artwork to ensure that it is in keep with the rural and natural aesthetic of the site.

This DA does not seek consent for the design of individual artworks, rather it sets the parameters for the siting and scale of future art within MMP. It is the intention that no further approval is required for the application of art within the designated zones.

The curation and commissioning of local artists is to be encouraged so that artworks create a relevant and rich experience for the local community and wider cemetery visitors. Examples of artwork in landscape spaces are included in Figure 18 below. The Public Art Strategy is closely linked with the Interpretation Strategy (Appendix F). Most artworks are proposed to be located in close proximity to the building and publicly accessible parklands for the enjoyment of visitors. The role and function of public art will be varied across the site and will include a mix of the following:

- Create a focal point
- Spiritually uplifting
- Contemplative
- Meditative
- Offer play opportunities
- Wayfinding – connective
- Historically interpretative
- Interactive

Figure 18 – Examples of public art in a landscaped setting



4.2.17. Site access and Parking

4.2.17.1. Site Access

Vehicular access is proposed from four new driveways on St Andrews Road, as indicated in the Buildings and Access Map. The details of entry and the available vehicle movements are provided in the Table 7 below. The Civil Engineering Plans and Road Masterplan prepared by Warren Smith and Partners attached as Appendix J provide the proposed site access and road layout arrangements.

Table 7 – Site Access Arrangements

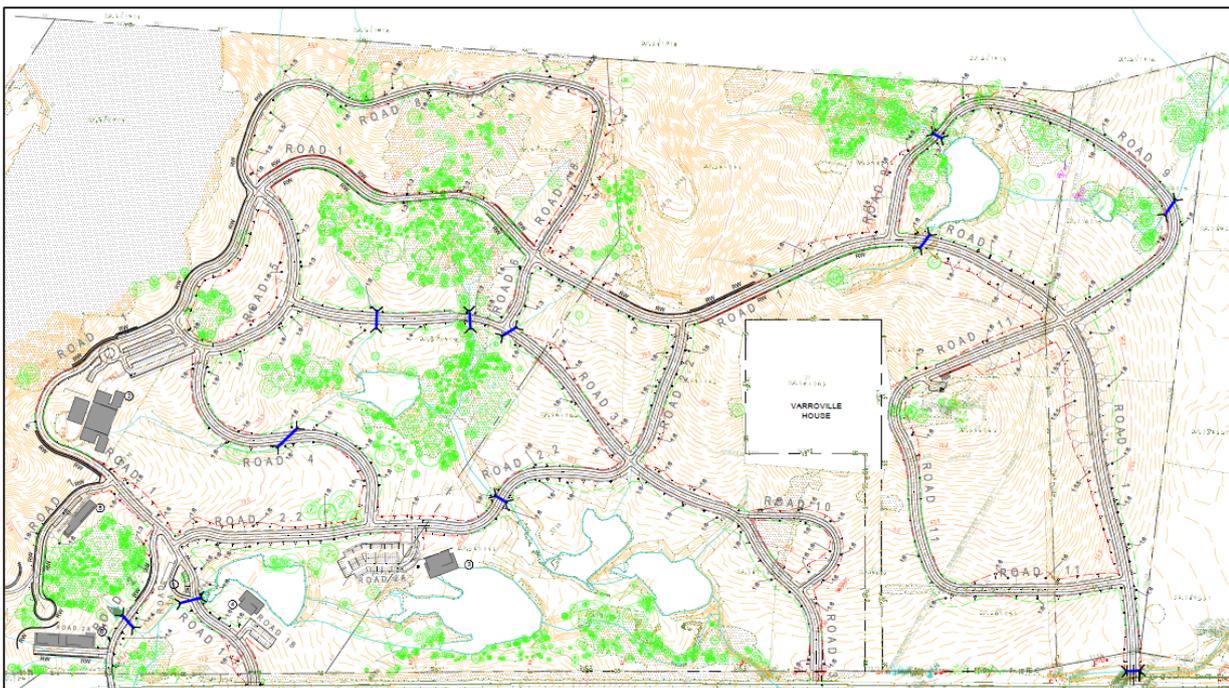
Entrance reference	Vehicle movements
Access A	Access A is proposed to be a service road primarily for staff access to the ground facility. This intersection would allow full movements into and out of St Andrews Road
Access B	Access B will connect with Road 1 and will be the main site access. As agreed with the RMS in the rezoning phase, this intersection will be provided in the form of a channelised right turn (CHR) treatment. The layout involves road widening to enable a northbound through vehicle to pass a vehicle slowing to turn right into the site from St Andrews Road
Access C	Access C will connect with Road 3 will be the secondary site access as it will relieve any pressure, when necessary, at Access B.
Access D	Access D will connecting with Road 1 and will emerge opposite the St Andrews Road/ Spitfire Drive roundabout

4.2.17.2. Internal access and Parking

Consent is sought for all internal roads, footpaths and on-site parking as indicated in the Road Masterplan prepared by Warren Smith and Partners at Appendix J. The road Masterplan is indicated in Figure 19 below. The road alignment has been developed to promote ease of access between buildings and through burial areas. The Road Masterplan has been developed to align with the existing topography and to minimise cut and fill where possible.

The proposal includes 350 formal on-site car parking spaces which are co-located with the buildings and the Outbuildings Precinct as detailed in Table 8 below. The Landscape Masterplan and Road Masterplan have been developed to accommodate road-side parking throughout burial areas. Road-side parking will facilitate access to burial and interment sites. Road-side parking will utilise a re-enforced grass surface to minimise impervious surfaces and the visual impact of the road layout. Formal parking areas and road-side parking are indicated in the Parking Strategy at Figure 20 below and within the Landscape Design Response Report at Appendix D.

Figure 19 – Road Masterplan



Source: Warren Smith and Partners

Figure 20 – Parking Strategy



Picture 13 – Parking Plan

Source: Florence Jaquet Landscape Architecture



Picture 14 – Examples of reinforced grass parking areas

Source: Florence Jaquet Landscape Architecture

Table 8 – Formal on-site parking spaces

Building	Parking spaces
Chapel	At-grade: 105 Basement: 93
Mortuary Facilities	2
Function Building	90
Café	20
Administration building	18
Grounds Staff Facility	12
Outbuildings Precinct	5
Total formal parking spaces	345

4.2.17.3. Fencing and Gates

Consent is sought for fencing around the perimeter of the site and gates at each entrance point. Fencing and gates are a means of identifying the site and formal entrance points. The proposed fencing and gates are rural in character, with most fencing typical of rural property fencing in the Varroville locality. Gates are proposed to be provided at each entrance point in order to restrict access into the site outside of opening hours. As indicated below in Figure 21, the Fencing and Gates Strategy incorporates different fencing depending on the depending on the site frontage. As indicated below, rural style farm fencing is proposed along much of the site perimeter. Landscape Design Response Report at Appendix D provides full details of the proposes site fencing and gates.

Figure 21 – Fencing and Gates Strategy



Source: Florence Jaquet Landscape Architecture

4.2.18. Tree Removal

The proposal includes the removal of 119 trees out of 1,418 trees currently present on the site. A Tree Assessment Report has been prepared by Travers Bushfire and Ecology to assess the condition and significance of each tree on site (Appendix DD). Tree removal is required and recommended for the following reasons:

- **Required to accommodate proposed development:** 28 trees (1.97% of total trees) are required to be removed to accommodate the proposed development.
- **Unsafe trees:** 91 trees (6.42% of total trees) have been deemed unsafe are recommended for removal.

The impacts of tree removal are assessed and considered in Section 6.3.2 of this report.

4.2.19. Stormwater Drainage System

As detailed in the Civil Engineering Services Report (Appendix P) and the Civil Engineering Plans at Appendix J, the proposed stormwater network has been designed to store the majority of the site's catchment to six of the existing dams on site.

The undeveloped northern portion of the site will reticulate south to several proposed swales which are to be installed along the boundary of the proposed roads adjacent to the escarpment area. Swales are sized to capture runoff from the 5% AEP storm event and will connect into the stormwater network in Road 1 (refer to Civil Engineering Plans at Appendix J).

The majority of the site will reticulate over land through the burial areas to be captured by the stormwater pit and pipe network in the roads. In areas where the stormwater cannot be piped directly to a dam, water will be discharged over land and captured by the existing stormwater system which ultimately reticulates to an existing dam. A certain portion of overland flow from the site which reticulates directly to the dams or natural watercourses will remain as per the existing conditions.

4.2.20. Operational details

The key operational details relating to MMP are contained within **Table 9** and are detailed in full within the Plan of Management at Appendix M.

Table 9 – Key operational details

Element	Proposed operating hours	Details
Publicly accessible parklands and Memorial Park	• Daylight to dusk	• The access gates at St Andrews Road will be opened and closed by the site's security company daily.
Chapel	• 8.00am to 6.00pm, seven days	• Staff may be present outside of normal office hours
Cafe	• 8.00am to 5.00pm, seven days	• These hours to operational hours
Function Building	• 8.00am to 5.00pm, seven days	• Extended hours of operation may occur during special functions. Consent will be sought for these functions if necessary
Administration Building	• Public hours: 6.00am to 6.00pm, seven days	• Staff may be present outside of normal office hours.
Heritage Outbuildings	• 8.00am until 3.00pm Monday to Friday	• The buildings will be opened and closed by the site's security company daily.

4.3. ANTICIPATED CONSTRUCTION STAGING

The MMP will be delivered in stages to respond to the ongoing demands for burial space. It is anticipated that based on current and project rates of interment that the cemetery will be progressively developed over a circa 150 year period and the footprint will slowly extend as burial space is required.

It is anticipated that MMP will be developed as per the Indicative Staging Plan at Figure 22 below. The works associated with each stage are described in Table 10.

Figure 22 – Indicative Staging Plan

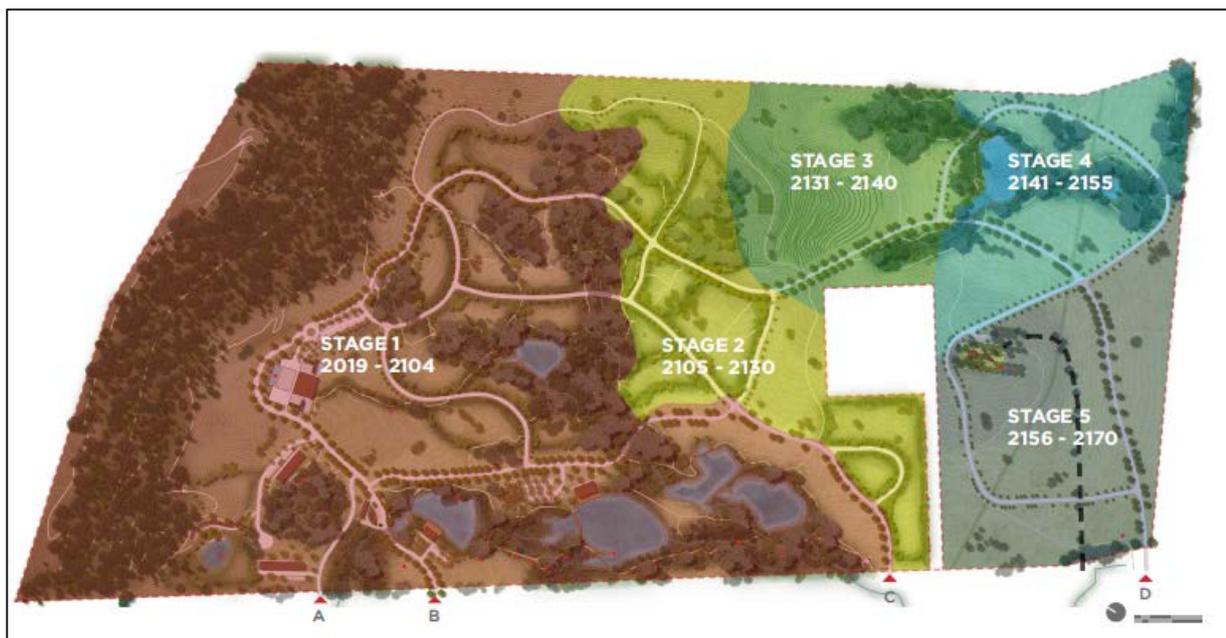


Table 10 – Indicative Staging Plan

Stage	Works
Stage 1	<ul style="list-style-type: none"> • Six new buildings and associated car parking • Entrances and roads within Stage 1 area • Landscaping and furniture within Stage 1 • Outbuildings Precinct (within Stage 5 area) restoration works, keeping existing road for access • Stage 1 will provide burial for approximately 85 years.
Stage 2	<ul style="list-style-type: none"> • Extension of road network to extent shown in Stage 2. • Landscaping and furniture within Stage 2. • Stage 2 will provide burial for approximately 25 years.
Stage 3	<ul style="list-style-type: none"> • Extension of road network to extent shown in Stage 3. • Landscaping and furniture within Stage 3 • Stage 3 will provide burial for approximately 10 years.
Stage 4	<ul style="list-style-type: none"> • Extension of road network to extent shown in Stage 4. • Landscaping and furniture within Stage 4. • Stage 4 will provide burial for approximately 15 years.

Stage 5	<ul style="list-style-type: none">• Extension of road network to extent shown in Stage 5.• Landscaping and furniture within Stage 5.• Additional entrance/exit in South-West corner.• Stage 5 will provide burial for approximately 25 years.
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5. KEY PLANNING APPROVAL CONSIDERATIONS

5.1. ENVIRONMENTAL PLANNING AND ASSESSMENT ACT (NSW) 1979

5.1.1. Crown Development

Part 4 Division 4 of the EP&A Act allows for DAs to be made by, or on behalf of the Crown. Among other persons, Clause 226 of the EP&A Regulations prescribes that a public authority (not being a Council) is the Crown for the purposes of Part 4 Division 4 of the EP&A Act.

The proponent is the CMCT, which is a Crown cemetery trust within the meaning of the Cemeteries and Crematoria Act 2013 and is therefore a Crown authority for the purposes of the DA and Clause 89 of the EP&A Act.

5.1.2. Integrated Development – Section 91

Roads Act 1993

The proposal seeks development consent for a channelised right turn (CHR) treatment to allow for access from St Andrews Road. Approval is therefore warranted and sought by this application under Section 138 of the *Roads Act 1993*.

Rural Fires Act 1997

The development site is identified in part as being bush fire prone land for the purpose of the Rural Fires Act 1997. Approval is therefore warranted and sought by this application under Section 100B of the Rural Fires Act 1997.

Water Management Act 2000

The proposed development seeks consent for works to and within 40m of a registered waterway . Approval is therefore warranted under Section 91 of the Water Management Act 2000.

Heritage Act 1977

It is acknowledged that the NSW Heritage Council is currently seeking to list a portion of the development site as a State Heritage Item. At the time of lodgement the site is a local heritage item only and as such no form of consent can be issued for the site under the Heritage Act 1977 and the proposal is therefore not integrated development for the purpose of the Heritage Act 1977.

National Parks and Wildlife Act 1974

Consent is not sought under this application for the issuance of Aboriginal Heritage Impact Permit (AHIP) under Section 90 of the *National Parks and Wildlife Act 1974*. Consent will be separately sought for an AHIP should it be required. It is noted that *Maule v Liporoni & Anor (2002) NSWLEC 25* established that there is “no compulsion on an applicant to make an application for an integrated development approval, if he or she chooses not to do so”.

5.2. BIODIVERSITY CONSERVATION ACT (NSW) 2017

In August 2017 the NSW State Government Gazetted the Biodiversity Conservation Act 2017. Transitional arrangements related to biodiversity assessment for the various categories of development consent or approval that are underway or have been made already has now been established under the Biodiversity Conservation (Savings and Transitional) Regulation 2017. In regards to local development such as that proposed the regulations state the following:

Local developments in the following western Sydney local government areas will have 12 months from 25 August 2017 to submit an application under the previous legislation: the local government areas of Camden, City of Campbelltown, City of Fairfield, City of Hawkesbury, City of Liverpool, City of Penrith and Wollondilly.

AS the proposal is located within the Campbelltown Local Government Area this application has been considered under the Threatened Species Conservation Act 1995 being the previous legislation.

5.3. ENVIRONMENT PROTECTION AND BIODIVERSITY CONSERVATION ACT (CTH) 1999

The Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) is the central piece of environmental legislation within Australia and applies to matters of national environmental significance.

Field investigations undertaken by Travers Ecology and Bushfire have confirmed that the matters of consideration under the EPBC Act are located on the site:

- One (1) threatened fauna species Grey-headed Flying-fox,
- One (1) protected migratory bird species, Cattle Egret,
- Two (2) Endangered Ecological Communities Cumberland Plain Shale Woodlands and Shale-Gravel Transition and Western Sydney Dry Rainforest and Moist Woodland on Shale listed under this Act were recorded within the study area.

A Flora and Fauna report has been prepared for the application which forms Appendix AA of this report. The assessment confirms that whilst matters for consideration under the EPBC Act are located on the site, the proposal is not considered to cause a significant impact on matters of national environmental significance. As such referral under the EPBC Act is not required for the application.

5.4. STRATEGIC PLANNING CONTEXT

The following strategic planning documents are relevant to the assessment of the subject application:

- A Plan for Growing Sydney;
- Draft South West District Plan;
- Campbelltown Local Planning Strategy 2014;
- Campbelltown Visual Landscape Study; and
- Campbelltown Heritage Study.

5.4.1. A Plan for Growing Sydney

Released in December 2014, *A Plan for Growing Sydney* (the Plan) includes a range of goals, directions and actions that aim to support the strategic growth of Sydney over the long term.

The Plan sets four goals which are supported by 22 directions and underpinned by 59 actions. The key directions relevant to this application include:

- **Direction 1.11: Deliver infrastructure**
- **Direction 4.1: Protect our natural environment and biodiversity**

The relevant actions under these directions are addressed in Table 11 below.

Table 11 – A Plans for Growing Sydney – Responses

Direction / Action	Response
<i>Action 1.11.5: Deliver long-term planning for cemeteries and crematoria Infrastructure</i>	<ul style="list-style-type: none"> • The proposal directly relates to a recognised shortage of burial space across Metropolitan Sydney, as identified within A Plan for Growing Sydney and publications released by Cemeteries and Crematoria NSW. • The planning proposal gazetted for the site in February 2017 established that there is a strong demand for additional burial space in Western Sydney. The planning proposal was supported by a Cemetery Demand Assessment, which confirmed that if no additional burial space was provided in the

Direction / Action	Response
	Western Sydney Catchment Area, existing plots would be fully absorbed by approximately 2042.
<i>Action 4.1.2: prepare a Strategic Framework for the metropolitan Rural area to enhance and protect its broad range of environmental, economic and social assets.</i>	<ul style="list-style-type: none"> Consistent with this action, the proposal will increase the amount of publicly accessible open space for residents and visitors of the broader locality. The publicly accessible parklands in addition to the memorial park, will provide open space for passive recreation activities.

5.4.2. Draft South West District Plan

The site is located within the Draft South West District Plan (the Draft District Plan) which identifies specific priorities and actions to guide growth for the next 40 years. The priorities and actions relevant to the proposal are addressed below in **Table 12**.

Table 12 – Draft South West District Plan - Responses

Priorities / Actions	Response
<i>Liveability action L19: Support planning for cemeteries and crematoria</i>	<ul style="list-style-type: none"> The development of the site for a cemetery will facilitate in meeting the known demand for additional burial space across land considered by the Draft District Plan. It is noted that no other land within the Campbelltown LGA is suitably zoned to accommodate a cemetery.
<i>Sustainability action S1: Protect the qualities of the Scenic Hills landscape</i>	<ul style="list-style-type: none"> The site is located in the Scenic Hills. The Scenic Hills are a pastoral landscape with Aboriginal and European significance. The publicly accessible parklands, memorial parks and all associated buildings and infrastructure have been designed to remain subordinate to the landscape character of the Scenic Hills. The development of the site has been designed to protect the historic, cultural and ecological significance of the site as detailed throughout this report.
<i>Sustainability priority 2: Maintain and improve water quality and waterway health</i>	<ul style="list-style-type: none"> The proposal seeks to revegetate the existing waterways of the site in a manner which will improve the overall waterway health of the site.

5.4.3. Draft Campbelltown Open Space Strategic Plan 2016

The Draft Open Space Strategic Plan 2016 is a strategic document aimed at identifying the demand for additional open space in the Campbelltown LGA. The Draft Plan identifies focus areas and guidelines relating to the protection of existing open space and the development of future open space.

Of relevance to the proposal, the Draft Plan highlights that, increasingly, open space can be multifunctional and can include the following uses and purposes:

- *Biodiversity conservation – Area set aside for the conservation of native vegetation and wildlife.*
- *Commemoration – Commemorative areas (eg, memorial gardens, cemeteries).*
- *Cultural events - Area designated for cultural events (eg, community events, festivals, district shows, entertainment or markets).*
- *Environmental amenity – Area set aside for tree protection, space for nature, bush fire asset protection zones.*
- *Health/fitness – Area with facilities for informal exercise and fitness activities, shared paths, etc.*

- *Heritage conservation – Area set aside for the protection and interpretation of cultural heritage items, or curtilage around these items (eg archaeological site, heritage building, heritage garden, significant trees).*
- *Relaxation – Area for quiet enjoyment, contemplation, tranquillity, urban escape.*
- *Visual amenity – Area set aside to enhance the visual quality of an area, soften the built environment, as a visual buffer between different land uses, landscaped entry treatments.*

MMP provide publicly accessible open space for the growing Campbelltown community, which will serve all of the abovementioned purposes.

6. PLANNING ASSESSMENT - SECTION 79C HEADS OF CONSIDERATION

6.1. RELEVANT ENVIRONMENTAL PLANNING INSTRUMENTS AND DEVELOPMENT CONTROL PLANS

In The following environmental planning instruments and development control plans are relevant to the assessment of the proposal:

- *Environmental Planning and Assessment Act 1979; (The Act)*
- *State Environmental Planning Policy No 44—Koala Habitat Protection (SEPP 44)*
- *State Environmental Planning Policy 55 – Remediation of Land (SEPP 55);*
- *State Environmental Planning Policy (Infrastructure) 2007 (ISEPP2007)*
- *Campbelltown Local Environmental Plan 2015 (CLEP)*
- *Campbelltown (Sustainable City) Development Control Plan 2015*

A summary assessment of the proposal’s compliance with the above is provided in the sections below.

6.1.1. Environmental Planning and Assessment Act 1979

Clause 5 of The Act details the key objects for planning throughout NSW. These objectives and the design response are detailed in Table 13 below:

Table 13 – Assessment of the Application Against the Objectives of the Environmental Planning and Assessment Act 1979

Objects	Design Response
<p>a) to encourage:</p> <p>i. the proper management, development and conservation of natural and artificial resources, including agricultural land, natural areas, forests, minerals, water, cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment</p>	<p>The proposed development represents a sustainable and unique landscape which is a contemporary alternative to traditional cemetery design. The proponent being CMCT will act as stewards for the site to ensure its proper management in perpetuity.</p> <p>The role of the facility itself as a cemetery will be a resource for the entirety of Sydney by responding to the established need to provide additional cemetery land within Metropolitan Sydney.</p>
<p>ii. the promotion and co-ordination of the orderly and economic use and development of land</p>	<p>The proposed development responds to the acknowledged need for additional cemetery space within Metropolitan Sydney in a manner consistent with the objectives of the planning controls which apply to the site. The proposed development for this reason contributes to the orderly and economic development of the land.</p>
<p>iii. the protection, provision and co-ordination of communication and utility services,</p>	<p>The project team has had significant discussions with the relevant service providers to ensure that all required communication and utility services are provided on site. Where adequate capacity does not currently exist within existing infrastructure for</p>

	the development to occur new facilities are proposed by this application.
iv. the provision of land for public purposes,	As a Crown entity, CMCT acquired the site to enable its development for the purposes of a general cemetery, accessible to all member of the public..
v. The provision and co-ordination of community services and facilities	The proposed development of the site as a cemetery is as a direct result of an established and acknowledged shortfall in burial space within metropolitan Sydney. The facility will provide long term relief to this shortage in addition to publicly accessible open space. In this regard the proposal is considered to make a significant contribution to the co-ordination of community services and facilities.
VI. the protection of the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats	Macarthur Memorial has been designed to preserve and respect its rural landscape and the visual qualities of the Scenic Hills. The development will contribute to the preservation of the site's significant ecology, heritage values and visual landscape, which are key values and are integral to the management of the site from now and into the future.
vii. ecologically sustainable development	A sustainability strategy has been prepared for the proposed development and is attached as Appendix KK of this report. The sustainability outlines additional strategy in addition to the minimum accepted BCA requirements for energy and water efficient for the site.
viii. the provision and maintenance of affordable housing,	The proposal will not impact on the provision and maintenance of affordable housing.
b) to promote the sharing of the responsibility for environmental planning between the different levels of government in the State,	In accordance with the relevant provisions of the <i>Environmental Planning and Assessment Act 1979</i> this application is made to Campbelltown City Council and will be determined by the Western City Planning Panel.
c) to provide increased opportunity for public involvement and participation in environmental planning and assessment.	Community Consultation for the project was undertaken over a 6 week period in June and July 2017 to facilitate public involvement with the project. The feedback received from the community and relevant stakeholders has directly impacted the overall design of the facility as detailed in Appendix MM. The DA will be further publicly notified by Council in accordance with the relevant policies.

6.1.2. State Environmental Planning Policy No 44—Koala Habitat Protection (SEPP 44)

SEPP 44 Koala Habitat Protection applies to land within Local Government Areas (LGAs) listed under Schedule 1 of the Policy. In addition, Part 2 of the Policy outlines a three (3) step process to assess the likelihood of the land in question being potential or core koala habitat. Part 2 applies to land which has an area of greater than 1 hectare or has, together with any adjoining land in the same ownership, an area of more than 1 hectare.

The study area is required to be considered under SEPP 44 as it falls within the Campbelltown LGA, which is listed on Schedule 1 of this Policy. In addition, the total area of the study area is greater than 1 hectare, hence Part 2 – Development Control of Koala Habitats, of the Policy applies.

The Flora and Fauna Assessment undertaken by Travers Ecology and Bushfire and attached as Appendix AA of this reports notes that no Koalas were directly observed at the time of fauna survey, which included diurnal searches of trees and spotlighting. In addition, there was no secondary evidence of Koala habitation in the area including characteristic scratches on trees and scats beneath trees.

6.1.3. State Environmental Planning Policy No 55 – Remediation of Land

State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55) was gazetted on 28 August 2005 and applies to NSW. Clause 7(1) requires the consent authority to consider whether land is contaminated prior to granting consent to a DA.

A Detailed Site Investigation has been undertaken by Douglas and Partners which is attached as Appendix S of this report. A site walkover and soil testings has identified the following localised areas of contamination:

- Fuel / oil spillage (TP14 – refer to Appendix S) near to dams;
- Metals, pesticides, asbestos containing materials and polycyclic aromatic hydrocarbons near the outbuilding precinct; and
- Polycyclic aromatic hydrocarbons next to timber power poles.

Douglas and Partners recommend that a Remediation Action Plan (RAP) is prepared to inform how the identified impact areas will be remediated and validated. A hazardous materials report should be carried out by a licensed asbestos removal contractor for demolitions works within the outbuildings precinct. The report concludes that the potential for contamination constraints outside of the impact areas identified above is considered to be low and the site is suitable for the proposed cemetery use. It is proposed that a RAP be prepared and a copy provided to Campbelltown City Council prior to the issuance of the relevant Construction Certificate

6.1.4. State Environmental Planning Policy (Infrastructure) 2007

This SEPP aims to facilitate the effective delivery of infrastructure across the State. In this regard, development that is proposed to generate a threshold amount of traffic must, in accordance with Clause 104 of this policy, be referred to the RTA (now the RMS) for concurrence.

For development not otherwise classified by the SEPP, the relevant threshold is 200 or more motor vehicles. The proposed development will under peak operating conditions will breach this threshold and as such referral to the RTA (now the RMS) under Clause 104 of the SEPP is therefore required.

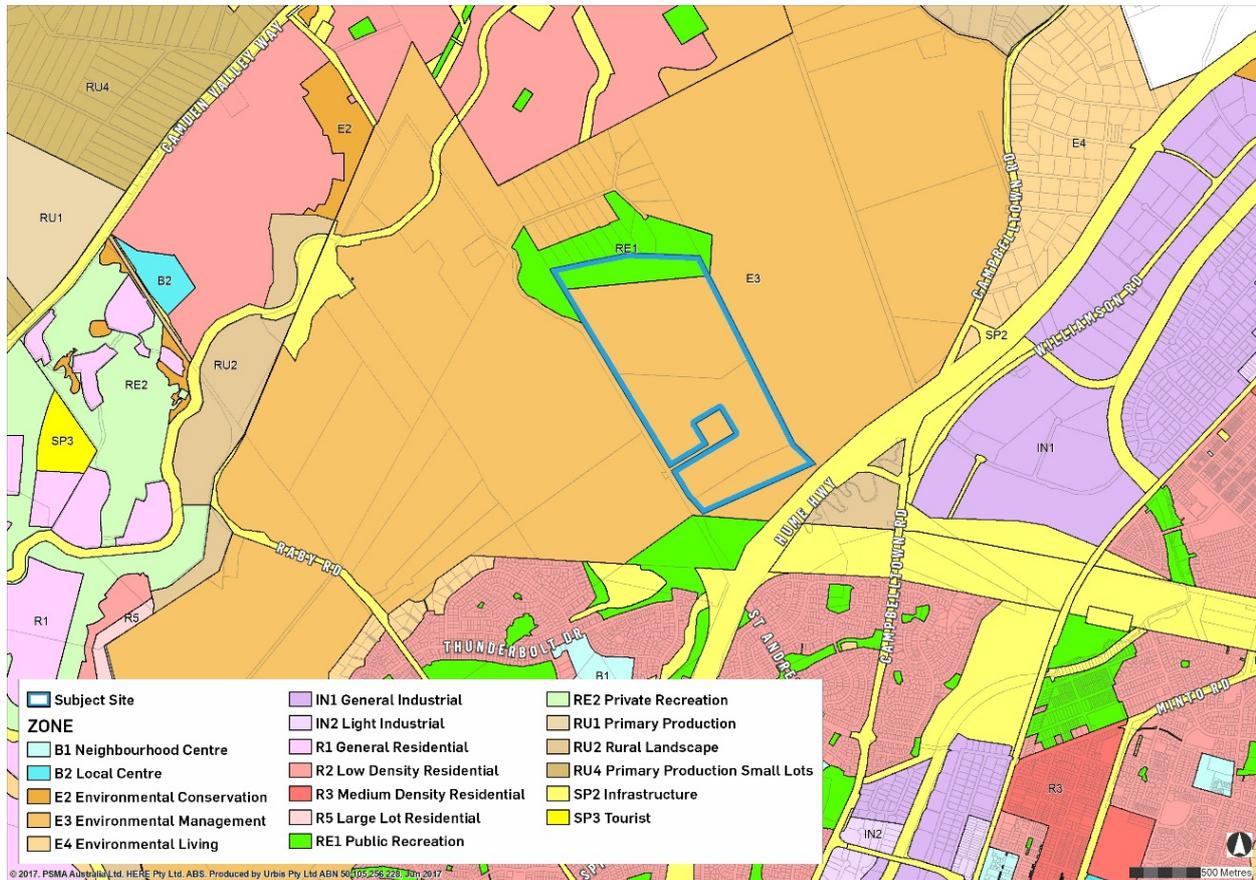
6.1.5. Campbelltown Local Environmental Plan 2015

The *Campbelltown Local Environmental Plan 2015* (CLEP 2015) is the principle environmental planning instrument applying to the site. An assessment of the proposal against the relevant provisions of the CLEP 2015 is provided in the subheadings below.

Zoning and Permissibility

Under the CLEP 2015, the site is zoned part RE1 Public Recreation and part E3 Environmental Management (refer Figure 23).

Figure 23 – Zoning Map



Cemeteries are prohibited within the RE1 Public Recreation and E3 Environmental Management zones of the CLEP2015. The site however benefits from additional local provisions that are contained in clause 7.8A of the LEP. Clause 7.8A permits the use of the site for the purposes of a cemetery, subject to the satisfying a number of considerations prior to consent being granted. An assessment of the proposal against these considerations is provided in **Table 13** below.

The use of the site as a Recreation Area in the form of parklands is permitted with development consent within both the RE1 Public Recreation and E3 Environmental Management.

Table 13 – Clause 7.8A Assessment

LEP Provision	Design Response
<i>C17.8A (2) Development for the purposes of a cemetery is permitted with development consent, but only if the consent authority is satisfied that:</i>	
(a) the development will complement the landscape and scenic quality of the site, particularly when viewed from surrounding areas including the Campbelltown urban area, “Varro Ville” (homestead group at 196 St Andrews Road, Varroville) and the Hume Highway,	<p>The proposal has been designed to complement the natural landscape and the scenic qualities of the site.</p> <p>The memorial park has been designed to integrate with the existing topography, watercourses and significant vegetation on the site. The cemetery will be developed as a contemporary memorial park, which will resemble landscaped parklands.</p> <p>Memorialisation will remain subordinate to the natural landscape. Memorialisation in the southern portion of the site will not extend beyond natural ground level. Memorialisation in other areas of the site will be concealed by a plant screening</p>

LEP Provision	Design Response
	<p>strategy in response to sightlines and the natural topography of the site.</p> <p>New buildings have been located in the northern portion of the site to provided further separation from Varro Ville Homestead, the Hume Highway and the Campbelltown urban area, to ensure that the natural landscape remains the visually dominant element of the site.</p>
(b) the development will not adversely affect the visual or physical qualities of the site	<p>The development provides for a combined opportunity for the conservation of the natural, cultural and scenic resources of the Site and public participation in the interpretation or those values, that would otherwise not be likely to occur. In this regard the proposal is considered to have a positive effect on the visual and physical qualities of the site.</p> <p>A detailed Visual Impact Assessment has been prepared for the project by Richard Lamb and Associates and is attached as Appendix HH of this report.</p>
(c) the development will cause minimal effect on the existing landform and landscape	<p>Development across the site has been planned and designed to have minimal effect on the existing landform and landscape. The road network, built form, landscaped gardens and parklands integrate with the existing topography to minimise cut and fill across the site and has been located on areas of the site which has minimised the need for extensive cut and fill which would impact on the existing landscape.</p> <p>The Landscape Plans and species (Appendix B and C) have been developed to minimise required vegetation clearing. Vegetation clearing primarily relates to the removal invasive species such as the African Olive which is present in the northern corner of the site.</p> <p>Having considered the above holistically the proposed development is considered to have a minimal effect on the existing landform and landscape.</p>
(d) the site will also include a publicly accessible passive recreation space	<p>As demonstrated on the site masterplan the proposal includes publicly accessible parklands adjacent to St Andrews Road. The parklands have been designed for passive recreation and includes walking trails, boardwalks, a playground, public art and a café.</p> <p>The land zoned RE1 in the northern portion of the site will be developed to include walking trails and a lookout connecting to the public open space at St David's Road increasing the overall quantum of space within the Macarthur Memorial Park dedicated as passive recreation space.</p>
(e) the development will be carried out in accordance with the conservation management plan titled "Conservation Management Plan,	<p>The development as proposed is consistent with the adopted policies of the endorsed Conservation Management Plan.</p> <p>A detailed assessment of the proposal against the individual policies has been undertaken by the Heritage Impact Statement</p>

LEP Provision	Design Response
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.	submitted in support of this application and attached as Appendix X of this report.

Accordingly the proposal is permissible and is capable of satisfying the provisions

Clause 4.3 Height of Buildings

The maximum building height across the site under the CLEP 2015 is 9 metres. The proposal seeks consent for the construction and operation of six (6) buildings across the site. The proposed building height and its relevant compliance is detailed in Table 15 below

Table 15 – Maximum Building Height

Building	Proposed Height	Compliance
Chapel	11.596m	No
Gatehouse	4.33m	Yes
Administration Building	4.23m	Yes
Function Building	6.34m	Yes
Cafe	5.17m	Yes
Garden Staff Facilities Building	4.30m	Yes
Shelters	3.44m	Yes
Crypts	4.45m	Yes

The noncompliance of the chapel against Clause 4.3 of the CLEP is a direct result architectural form of the roof itself as demonstrated in Figure 24 below

Figure 24 – Perspective's showing 9m above natural ground level



Source: FJMT



Source: FJMT

Clause 5.6 of the CLEP permits an Architectural Roof Feature of the site to exceed the height limits dictated by Clause 4.3 of the CLEP.

Table 16 - Architectural Roof Feature

Provision	Design Response
3. Development consent must not be granted to any such development unless the consent authority is satisfied that:	
a) the architectural roof feature: <ul style="list-style-type: none"> i. comprises a decorative element on the uppermost portion of a building 	Sections of the chapel roof protrude above the 9m height plane. These elements are part of the roof feature elements which form the skylights through the centre of the roof. These curved roof features have been designed to further emulate the topography of the landscape, in particularly the steeper slope behind the chapel.
<ul style="list-style-type: none"> ii. is not an advertising structure 	The noncompliance is not proposed to be used as an advertising structure.
<ul style="list-style-type: none"> iii. does not include floor space area and is not reasonably capable of modification to include floor space area 	Modifications could not reasonably be made to the development to include additional floor space area within the proposal.
<ul style="list-style-type: none"> iv. will cause minimal overshadowing 	No overshadowing to adjacent properties is proposed by the application owing to the location of the proposed chapel.
b) any building identification signage or equipment for servicing the building (such as plant, lift motor rooms, fire stairs and the like) contained in or supported by the roof feature is fully integrated into the design of the roof feature.	No building identification signage or building services are proposed within the identified area of non compliance.

Should the consent authority not be satisfied that the identified non compliance is not an Architectural Roof Feature Section 6.2.4.3 forms a written request to vary the height control under Clause 4.6(3) of the CLEP2015, which is attached as Appendix O of this report.

Clause 4.4 - Floor Space Ratio

The subject site is limited to Floor Space Ratio (FSR) of 0.5:1 under the provisions of the CLEP2015. Based on a site area of 1,132,700sqm the site is restricted to a total Gross Floor Area (GFA) of 566,350sqm.

The proposal seeks development consent for a GFA of 2,698.34sqm which is significantly lower than the permitted GFA of the site. Based on this the proposal is compliant with the requirements of the CLEP2015.

Clause 5.1A - Development on land intended to be acquired for public purposes

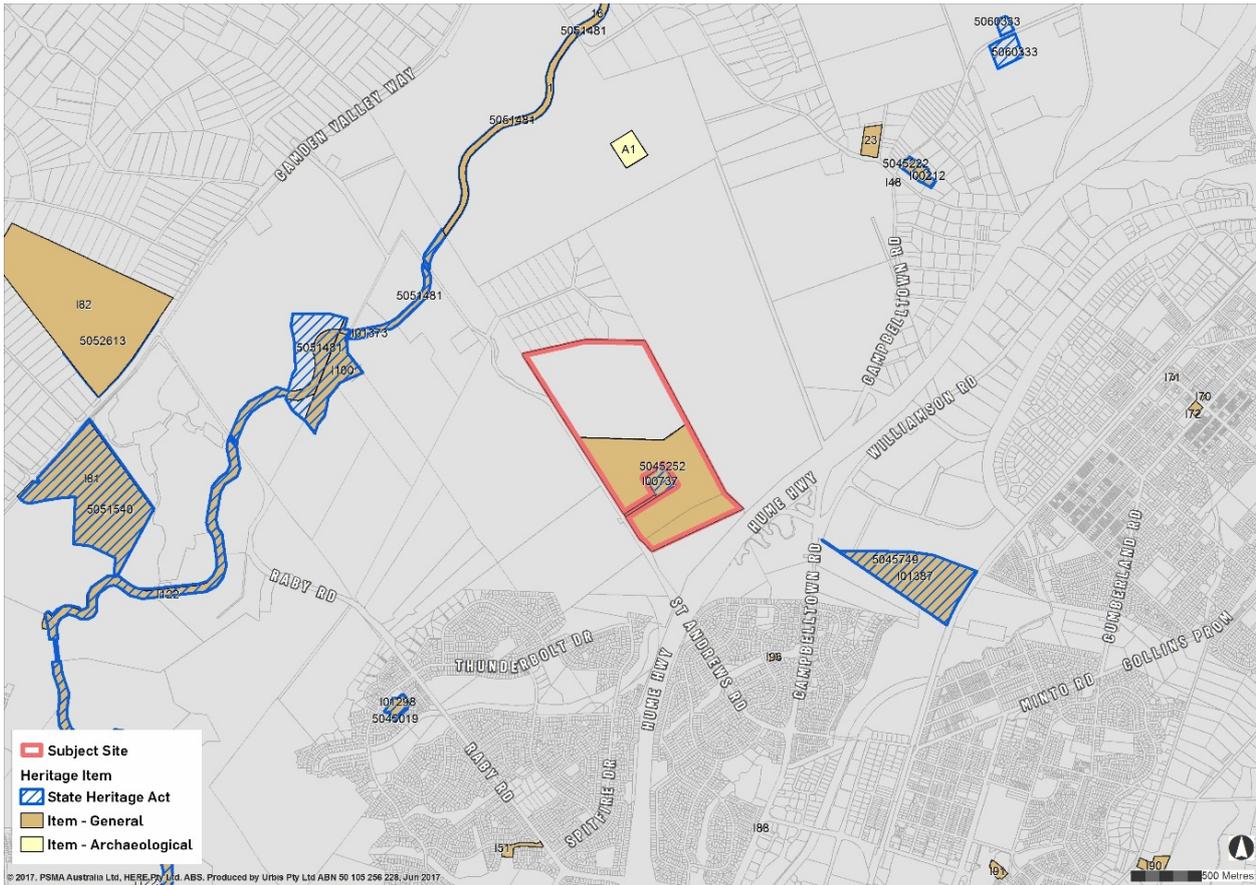
The northern escarpment area of the site is classified as land to be acquired for "Regional Open Space". Under clause 5.1A of the CLEP 2015, only development for the purposes of "recreation areas" is permitted on this portion of the site.

Development of this portion of the site is restricted to a series of walking trails and a publicly accessible scenic lookout. No cemetery infrastructure will occur on this area of the site and as such the proposal is fully compliant with the requirements of Clause 5.1A of the CLEP.

Clause 5.10 - Heritage Conservation

As shown in Figure 25 Lot 1, DP 218016 and Lot 22, DP 564065 which form the two southern most elements of the proposed development site are identified as a heritage item for the purpose of the CLEP2015

Figure 25 – CLEP2015 Heritage Map



The following heritage listings apply to Varroville House. The CMCT lands surround but do not include the former Varroville House.

Table 17 – Heritage Listings – Varroville House Lot

Type of Listing	Name of Item	Assessed Level of Significance
Statutory Listings		
State Heritage Register under the <i>Heritage Act 1977</i> (items of state significance)	Varroville, Lot 21 DP 564065/ 196 St Andrews Road (Item #00737)	State
Campbelltown Local Environmental Plan (CLEP) 2015 - Schedule 5- Environmental Heritage – is listed as a State heritage item – Part Lot 21 DP564065).	Varro Ville Homestead Group, 196 St Andrews Road/ Part Lot 21 DP 564065 (Item #00737)	State
Non-Statutory Listings		
Register of the National Estate under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (items of local, state or national significance)	Varro Ville, St Andrews Road, Varroville. Place ID 3268, Registered (21/03/1978), Place file no: 1/15/010/0010 (no boundary given)	N/A

Type of Listing	Name of Item	Assessed Level of Significance
National Trust of Australia (items of local, state or national significance)	Varroville (extent of the classification is unknown however is thought to include Lot 22).	N/A

In response to the heritage significance of the subject site and land immediately adjacent to the site a Heritage Impact Statement has been prepared by Urbis and is attached as **Appendix X** of this report and confirms the following:

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

Further the Heritage Impact Statement makes the following recommendations which can be enforced as Conditions of Consent should the application be approved:

- The former Varroville Estate should be subject to archival recording prior to any demolition or earthworks, in accordance with the CMP policy, Heritage Division guidelines and subject to DA conditions of consent. The archival should include (but is not limited to) significant landscape features (dams and remnant trenching) and built elements proposed for demolition (i.e. within the outbuildings precinct).
- Heritage interpretation is a critical aspect of the design and the subject proposal provides for extensive interpretation of the significant European and Aboriginal values as an integrated part of site design and planning. The Heritage Interpretation Strategy should be further expanded including development of detailed interpretation briefs, informed by archaeological test excavation, stakeholder consultation and any additional historical research. Delivery of heritage interpretation should be subject to DA conditions of consent.

Based on the summary findings above and the detailed analysis provided in the Heritage Impact Statement the proposed works are consistent with the heritage objectives of the CLEP2015.

Clause 7.2 Flood Planning

The multiple dams and waterways located on the site results in elements of the site being considered as Flood Prone Land by the CLEP2015.

Finished Floor Levels for the proposed buildings on the site which are located within the identified Flood Prone Land have been considered in the Flood Planning Investigation prepared by WMA Water and is attached as Appendix FF of this report and has been reflected in the proposed development plans for the site.

The proposed development is therefore considered compatible with the flood hazard of the site and will not result in unsustainable social and economic costs to the community. As such the proposal is considered to be compliant with Clause 7.2 of the CLEP2015.

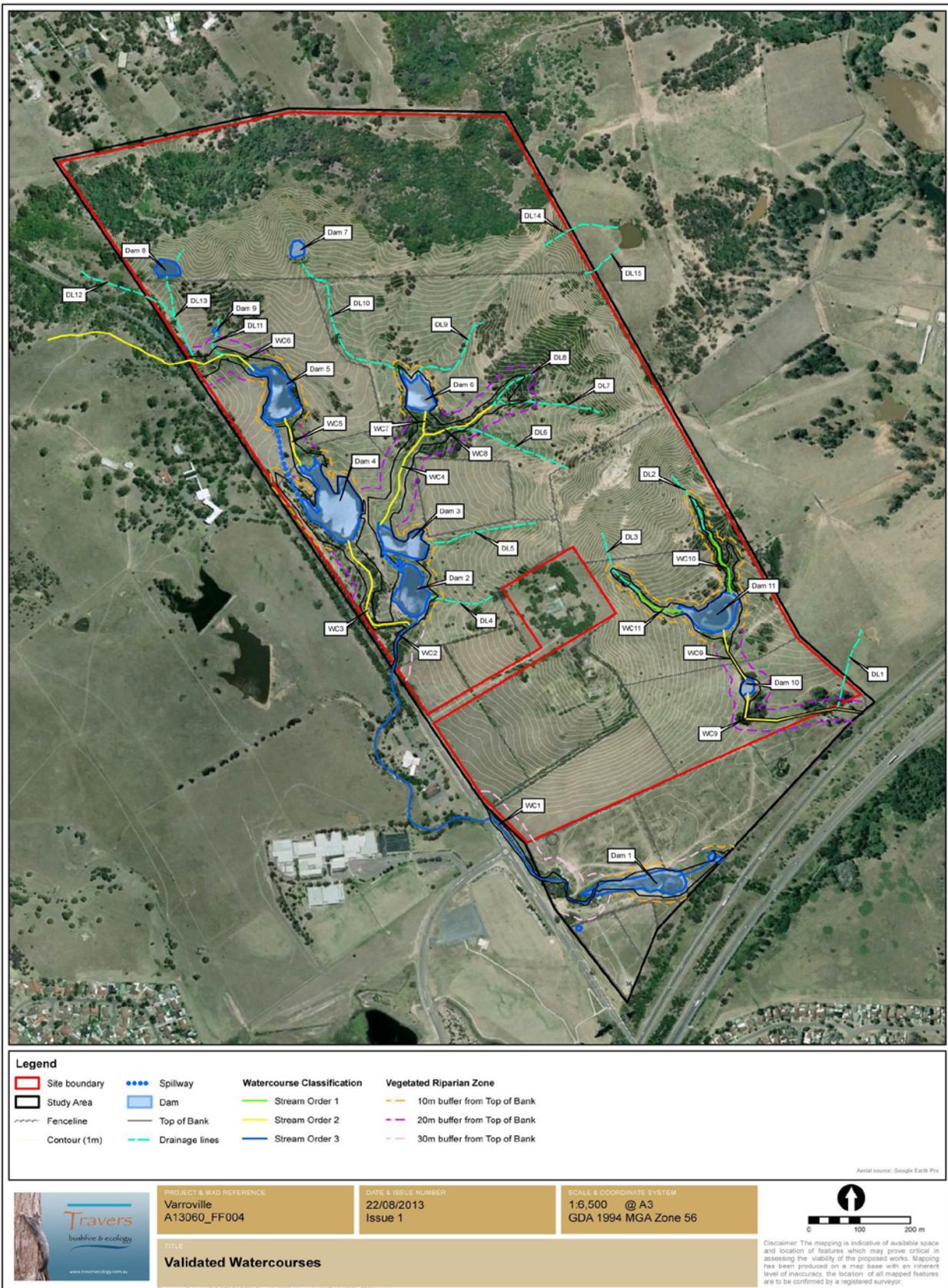
Clause 7.3 - Riparian Land and Watercourses

As detailed in the Watercourse Assessment prepared by Travers Bushfire and Ecology which is attached as Appendix BB of this report a total of 11 watercourses, 11 dams and 15 drainage lines are located on the site. These watercourses are classed as either first, second or third order and are shown in Figure 26.

As acknowledged by Travers the proposal provides a net gain in riparian protection and revegetation including native vegetation protection zones immediately adjoining the riparian corridors and as such is considered to have a positive impact on the watercourses located on site when considered holistically.

It is further acknowledged that a VMP has been prepared for the proposal (Appendix EE) for all riparian corridors to specify the outcomes of all riparian management works in terms of areas to be protected, revegetation inclusive of planting densities and plant species which will be used.

Figure 26 – Validated Watercourses



Source: Travers Ecology and Bushfire

Clause 7.4 - Salinity

A detailed Salinity Investigation and Management Plan has been carried out for the proposal by Douglas Partners and is attached as Appendix T of this report.

The Douglas Partners report confirms that the “Map of Salinity Potential in Western Sydney” published by the NSW Office of Environment and Heritage identifies a majority of the site as being of moderate salinity potential with small pockets of the western and southern portions of the site located within an area of “high salinity potential”. A minor region within the South-Western Portion of the site is within in an area of known salinity.

To confirm the extent of salinity on the site field Investigations have been undertaken for the proposal by Douglas Partners with 13 test pits being excavated on the site. Across the 13 excavations pits laboratory results indicate that soil conditions will at worse be mildly aggressive to concrete steel.

It is considered that the salinity present on the site will not impact on the development subject to the adoption of the Salinity Management Plan detailed in Section 8 of the Douglas Partners Salinity Investigation and Management Plan.

Further it is noted that significant works are not proposed within the areas identified to be mildly aggressive to concrete and steel and that the development will not have any adverse impact on salinity processes on the land.

Clause 7.5 - Preservation of the Natural Environment

The proposed development does not seek consent for the removal of bush rock or soil from the site.

Clause 7.6 - Scenic Protection and Escarpment Preservation

The site is classified as an escarpment preservation area under clause 7.6 of the CLEP 2015. The matters which must be considered and the response of the proposal is detailed in Table 18 below

Table 14 – Clause 7.6 Considerations

Provision	Design Response
a) measures will be taken, including in relation to the location and design of the proposed development, to minimise the visual impact of the development on the natural and visual environment of the land,	No buildings, significant memorialisation or sculptures are proposed for the southern portion of the site which is the most visually exposed area. The most significant elements of built form has been screened and will not be a prominent features of the site when viewed from the Campbelltown Urban Area. The development satisfies the requirements of Clause 7.8A of CLEP2015
b) the external surfaces of any building consist of prescribed materials, and	The external surfaces of the proposed buildings on the site consists in part of dark coloured timbers and materials.
c) the development will incorporate measures to preserve the scenic qualities of, and views to and from, the land,	The proposed development is considered to make a positive contribution to the scenic qualities of the site as the proposal provides an opportunity for the conservation of the natural, cultural and scenic resources of the site and public access to enable the interpretation and appreciation of those values, that would otherwise not be likely to occur
d) measures will be taken to reduce any potential land use conflict	Buildings and significant levels of memorialisation have been located internal to the site to avoid land use conflicts. Further to this significant planting has

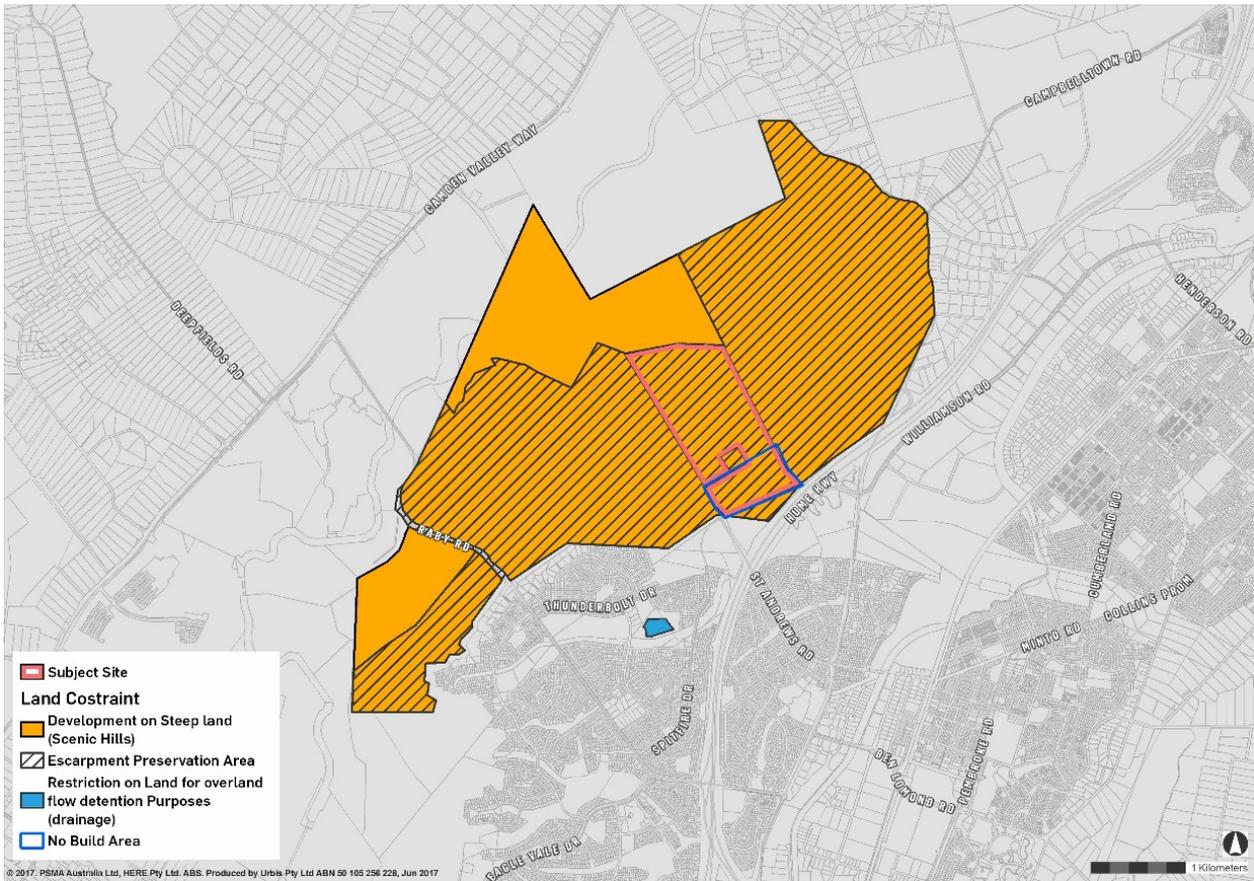
Provision	Design Response
	been proposed to the St Andrews Road Frontage to further reduce Land Use Conflict. Appropriate mitigation methods have been incorporated into the Plan of Management for the proposed site to ensure that land use conflicts will be minimised throughout the proposal.
e) the development will maintain the existing natural landscape and landform and will not affect the stability of the land.	The proposed development will maintain and enhance the natural landscape and will not impact on the stability of the site.

Clause 7.7 - Considerations for Development on Environmentally Constrained Land

As shown in Figure 27 below the southern portion of the site is identified as a No Build Area for the purpose of Clause 7.7 of the CLEP2015 and is considered not capable of accommodating development other than a lawn cemetery and associated fencing.

In accordance with this clause all monuments and grave markers memorialising the interment of deceased persons in the southern portion of the site is restricted to flush lawn plaques which will not extend above the natural ground level as per that outlined in the description of the proposed development earlier in this SEE.

Figure 27 – Environmental Constraints Map



Clause 7.8 - Development on Steep Land in the Scenic Hills

Works are not proposed on land with a gradient of greater than 16%. As such clause 7.8 of the CLEP2015 does not apply to the proposal.

Clause 7.17 - Development in the RE1 zone

Development proposed by this application within land zoned RE1 is restricted to walking trails and a publicly accessible lookout. The proposal will therefore ensure that the RE1 zoned portion of the site will be used for public recreation only in line with the objective of Clause 7.17.

Clause 7.20 - Terrestrial Biodiversity

The site is not identified as either an Area of Biodiversity Significance or Biodiversity-Habitat Corridor for the purposes of Clause 7.20 of the CLEP2015.

6.1.6. Campbelltown (Sustainable City) Development Control Plan 2015

The Campbelltown (Sustainable City) Development Control Plan 2015 (CDCP 2015) applies to the site. An assessment of the proposal against all relevant provisions of the CDCP 2015 is provided in Appendix L.

6.2. VOLUNTARY PLANNING AGREEMENT

No Voluntary Planning Agreement applies to the land and no VPA is proposed as part of this DA.

6.3. THE LIKELY IMPACTS OF THE DEVELOPMENT

6.3.1. Compatibility

In assessing the impacts of the proposal, it is appropriate and necessary to have regard to the Planning Principle established on “compatibility” in the matter of Project Venture v Pittwater Council (2005) NSW LEC 191. Whilst the Project Venture judgement related specifically to “urban environments”, it is considered the principle established have uniform application across all environments where the nature of land uses proposed must have regard to its relationship to surrounding land uses.

Roseth SC stated that:

“24 Where compatibility between a building and its surroundings is desirable, its two major aspects are physical impact and visual impact. In order to test whether a proposal is compatible with its context, two questions should be asked.

- *Are the proposal’s physical impacts on surrounding development acceptable? The physical impacts include constraints on the development potential of surrounding sites.*
- *Is the proposal’s appearance in harmony with the buildings around it and the character of the street?”*

Physical impacts in the surrounding development

Roseth SC stated that:

“The physical impacts, such as noise, overlooking, overshadowing, and constraining future development potential, can be assessed with relative objectivity.”

This list is not exhaustive and the following assessment addresses each of these impacts as well as others considered applicable in this instance being, traffic generation, vegetation management, visual impacts and critically its compatibility in its heritage context.

Noise impacts

An acoustic assessment has been prepared by Acoustic Studios and is attached as Appendix JJ of this report. The assessment considers the relationships between the cemetery use proposed for the Macarthur Memorial Park and the surrounding development

- Traffic Noise Intrusion

Traffic noise intrusion to new buildings including the Chapel, Functions Rooms and Café have been assessed to ensure that levels will meet applicable criteria for nearby educational buildings. Recommendations for controls have been provided where required to achieve the relevant criteria. These matters can be undertaken as a Condition of Consent prior to the relevant Construction Certificate.

- **Traffic Noise Generation**

Based on the traffic generation estimates associated with the MMP, traffic noise levels in 2027 are predicted to exceed the relevant Road Noise Policy criteria at the Mount Carmel Retreat Centre, Parish of Our Lady of Mount Carmel and Mount Carmel College (classrooms). Consideration of feasible and reasonable mitigation is required as per the RNP and recommendations for mitigation options have been provided. These matters can be undertaken as a Condition of Consent prior to the relevant Construction Certificate.

- **Mechanical plant**

At this stage, final plant selections have not been made, therefore, a detailed assessment has not been carried out. Any plant selections will be reviewed to ensure that noise emissions meet the applicable environmental noise criteria. During the detailed design stage, the acoustic consultant shall provide detailed design advice to the architect and mechanical engineer to ensure that noise emissions from mechanical plant are effectively controlled to meet the relevant criteria at the nearest receiver boundaries.

Based on the findings of the Acoustic Assessment subject to appropriate mitigation methods being installed from 2027 onwards the proposed development will be compatible with the Environment on Noise Grounds.

Overlooking and Overshadowing

No overlooking or overshadowing of surrounding properties occurs as a consequence of the proposal.

Future Development Potential

The proposal will not prevent access to adjacent sites, prevent additional services being provided to support additional development or isolate any sites. The proposal is therefore considered to not restrict future development potential on adjacent allotments. The proposed use by its nature is relatively benign as compared to other permitted uses in E3 Environmental Management zone and the design of the site will not place unnecessarily restrictions on adjacent land uses.

Visual Impact

As noted within the Visual Impact Assessment attached as Appendix HH of this report the internal character of views in the parts of the Site that are of low sensitivity to external views will be significantly changed, however the character of the Scenic Hills as perceived from Campbelltown and surrounding and adjacent land holdings would be maintained. The Site will also provide a significant resource of land for public enjoyment, including the opportunity to experience views of Campbelltown and the Scenic Hills that are currently inaccessible. In this respect, the proposed development is considered to be in harmony with the semi-rural nature of the Campbelltown Scenic Hills and will ensure visual compatibility between the varying land uses.

Heritage Context

As noted in the Heritage Impact Statement prepared by Urbis and attached as Appendix X of this report the Macarthur Memorial Park proposal is underpinned by a detailed appreciation 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, Water Sensitive Urban Design and treatment of the dams, conservation and reinterpretation of significant landscape elements, provision for public art, and regeneration of CPW/ MSW.

This underpinning of the heritage values of the site has ensured that the significance not just of the subject site but also the adjacent heritage listed Varroville House will be preserved and celebrated as a result of the proposed works sought by this application. This is considered to ensure the overall compatibility of the proposal; in the broader context of the Campbelltown Scenic Hills both at a localised and regional level.

Traffic Generation

As noted in the Traffic Impact Assessment undertaken by The Traffic Planning Partnership(TTPP) the Level of Service (LoS) currently experienced on St Andrews Road at the intersection of Spitfire Drive will not be impacted by the proposal and will maintain an A LoS with additional capacity remaining within the road

network to accommodate future development should it be proposed by others within the area. This maintenance of the LoS is considered to demonstrate that the proposal on traffic generation grounds is compatible within the greater precinct.

Vegetation Management

The development site represents a significant land holding within the Campbelltown Scenic Hills will multiple watercourses and riparian areas running throughout the site. To ensure the long term health of these waterways and the site holistic in addition to statutory compliance with the relevant Australian Standards and legislation a comprehensive VMP has been prepared for the proposal and is attached as Appendix EE of this report. The VMP has been prepared to ensure the following will occur on the site

- Protection and regeneration of the Cumberland Plain Woodland and Moist Shale Woodland Endangered Ecological Communities;
- Provide alternative revegetation offsets within the site for impacted vegetation;
- Retain and manage hollow-bearing trees and enrichment of habitat resources;
- Ensure an effective and a resilient restoration outcome; and
- Maximise native vegetation cover and species diversity within the site

In doing this the VMP has ensured the long term compatibility of the site as it will ensure the perpetual management of the site and regeneration of endangered ecological communities in a manner consistent with the overall vision for the Campbelltown Scenic Hills as an iconic landscape unit. The Vegetation Management Works are not considered to impact on adjacent land uses and in this regard are compatible in accordance with the Project Venture judgement.

6.3.2. Tree removal

The application seeks consent for the removal includes the removal of 119 trees. To facilitate the potential removal of these trees Travers Bushfire and Ecology have undertaken to a Tree Assessment (Appendix DD) to assess the condition and significance of the 1,418 located on the site. As detailed within the report, trees on the site include endemic species and exotic vegetation. As detailed within the Tree Assessment Report, the impacts, key findings and recommendations of the proposal are as follows:

- *28 trees (1.97% of total trees) are required to be removed to accommodate the proposed development as they are located within or in close proximity to the development footprints.*
- *91 trees (6.42% of total trees) have been deemed unsafe are recommended for removal due to their poor condition.*
- *All other trees (91.46%) trees are to be retained where possible.*
- *Tree protection zones (TPZ) are to be implemented for any retained tree in proximity to any construction in accordance with Australian Standard AS4970.*
- *No tree within the subject site was considered suitable for nomination as a significant tree on Council's significant tree register.*
- *If any tree with a hollow is found and identified for removal, then supervision by a fauna ecologist at the time of removal is recommended to effectively recover and relocate any residing fauna, particularly threatened species, if present.*

Given the significant amount of vegetation proposed as part of the application the removal of 119 trees from the site is an acceptable impact.

6.3.3. Watercourse Management

As previously noted within this report a Watercourse Assessment has been prepared for the application by Travers Bushfire and Ecology. This report as attached as Appendix BB of this report and confirms that the proposal will provide a net gain in riparian protection and revegetation including native vegetation protection zones immediately adjoining the riparian corridors and as such is considered to have a positive impact on the watercourses located on site when considered holistically.

It is further acknowledged that a VMP has been prepared for the proposal (Appendix EE) for all riparian corridors to specify the outcomes of all riparian management works in terms of areas to be protected, revegetation inclusive of planting densities and plant species which will be used.

Ongoing management of the site's riparian zones will generally be in accordance with the Controlled Activity Guidelines for Riparian Corridors as issued by the NSW Office of Water and any General Terms of Approval issued for the project by the NSW Office of Water.

6.3.4. Bushfire

The development site is identified by Campbelltown City Council as being bushfire prone land and as such a Bushfire Protection Assessment has been undertaken by Travers Ecology and Bushfire has been undertaken for the proposal and is attached as Appendix CC of this report. The assessment has sought to review the following matters:

- Review the bushfire threat to the landscape
- Undertake a bushfire attack assessment in accordance with PBP
- Provide advice on mitigation measures, including the provision of asset protection zones (APZs), construction standards and other specific fire management issues
- Review the potential to carry out hazard management over the landscape.

The assessment has concluded that the proposed development will provide compliance with *Planning for Bushfire Protection (PBP) 2006* with the following proposed alternative solutions:

- Road carriageway widths of 6.5m (two-way) and 3.5m (one-way) for all roads regardless of curve radius as well as 2.1m wide grassed parking bays in accordance and in compliance with the pre-DA advice received from the NSW RFS.
- The proposed water services will use a combination of reticulated and non-reticulated water supply. The proposed buildings will be provided with hydrants in accordance with the BCA requirements. Hydrants are not proposed to be installed within the remainder of the road system. In compliance with the pre-DA advice received from the NSW RFS additional water supply is proposed and can be provided via the existing dams.

In addition to the above recommendation, the assessment undertaken by Travers has made a total of seven recommendations which can be enforced for the project as conditions of consent. It is considered that based on this assessment and the subsequent recommendations that appropriate mitigation methods can be put in place to ensure the safe operation of the site in perpetuity.

6.3.5. Geotechnical Considerations and Stability

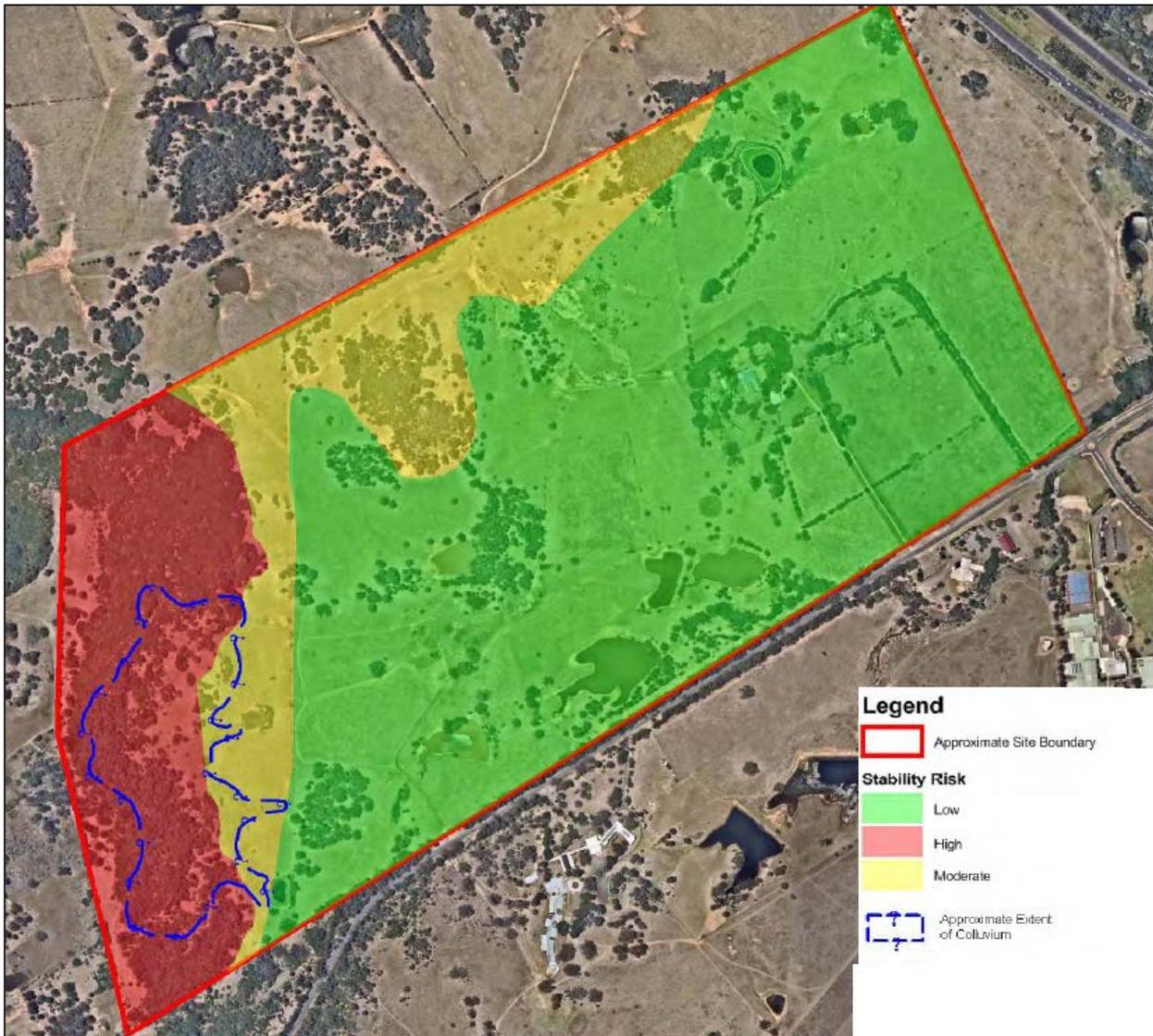
A Preliminary Stability Assessment has been undertaken by Douglas and Partners and is attached as **Appendix R**. The assessment includes a desktop study, site mapping and test pit excavations / testings to analyse the stability of slopes across the site.

As detailed in the report, the natural batter grade of the majority of the site is relatively flat with gentle slopes between 10 – 12%. The general topographical features of the site (including existing ground slopes, dams and vegetation) will generally remain unchanged.

The report provides an assessment of the varying slope grades across the site. The stability assessment classifies land across the site as Low Risk, Moderate Risk and High Risk as indicated in Figure 28 below. As indicated below, the majority of the site is classified as Low Risk, with the report confirming that instability should generally not be expected within Low Risk areas unless major changes to site conditions occur.

The report considers that areas of Moderate Risk have the potential for slope instability. As such the report provides a variety of recommendations to ensure stability of proposed buildings, roads and earthworks on areas of the site identified as Moderate Risk. As identified in the report, no buildings are proposed to be located in areas identified as High Risk. Site preparation, earthworks and batters will be undertaken in accordance with the recommendations detailed in the Preliminary Stability Assessment.

Figure 28 – Stability Assessment



Source: Douglas and Partners

6.3.6. Stormwater

The proposed Stormwater Strategy for the site is detailed in the Civil Engineering Services Report undertaken by Warren Smith and Partners at Appendix P. As detailed in the Report, the stormwater strategy includes the following:

- The proposed stormwater network has been designed to reticulate the majority of the site's catchment to six (6) of the existing dams on site.
- The undeveloped northern portion of the site will reticulate south to several proposed swales which are to be installed along the boundary of the northern most roads. These swales are sized to capture runoff from the 5% AEP storm event and will connect into the stormwater network in Road 1.
- The majority of the site will reticulate over land through the burial areas to be captured by the stormwater pit and pipe network in the roads. In two (2) locations, the stormwater network will be piped directly to an existing dam on site for treatment purposes.
- In areas where the stormwater cannot be piped directly to a dam, water will be discharged over land and captured by the existing stormwater system which ultimately reticulates to an existing dam.

As confirmed within the report, the majority of the development reticulates to the existing private dams onsite, no council assets are immediately affected by the post development runoff. Any overland flow from the site would reticulate across the site's southern boundary or the western boundary after the four (4)

consecutive dams, as per the existing condition. Water reticulating across the southern boundary would reticulate approximately 350m over pervious farmland before reaching Bunbury Curran Creek.

6.3.7. Contamination

A Detailed Site Investigation has been undertaken by Douglas and Partners which is attached as Appendix S of this report. As discussed in Section 6.1.3, a site walkover and soil testings identified localised areas of contamination.

The report recommends that a Remediation Action Plan (RAP) is prepared to inform how the identified impact areas will be remediated and validated. A hazardous materials report should be carried out by a licensed asbestos removal contractor for demolitions works within the outbuildings precinct. The report concludes that the potential for contamination constraints outside of the impact areas is considered to be low and the site is suitable for the proposed cemetery use.

6.3.8. Heritage Impacts

As previously detailed by this report a Heritage Impact Statement has been prepared by Urbis Heritage and is attached as Appendix X of this report. The HIS has considered the proposal in the context of the sites heritage listing and endorsed CMP. The HIS confirms the following:

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

Further the Heritage Impact Statement makes the following recommendations which can be enforced as Conditions of Consent should the application be approved:

- The former Varroville Estate should be subject to archival recording prior to any demolition or earthworks, in accordance with the CMP policy, Heritage Division guidelines and subject to DA conditions of consent. The archival should include (but is not limited to) significant landscape features (dams and remnant trenching) and built elements proposed for demolition (i.e. within the outbuildings precinct).
- Heritage interpretation is a critical aspect of the design and the subject proposal provides for extensive interpretation of the significant European and Aboriginal values as an integrated part of site design and planning. The Heritage Interpretation Strategy should be further expanded including development of detailed interpretation briefs, informed by archaeological test excavation, stakeholder consultation and any additional historical research. Delivery of heritage interpretation should be subject to DA conditions of consent.

6.3.9. Traffic and Parking

A Traffic Impact Assessment has been prepared for the proposed works by The Transport Planning Partnership (TTPP) and is attached as Appendix II of this report. The assessment examines the existing transport conditions, and its interface with traffic movements within and around the site, as well as how the proposed transport and access arrangements for the site.

Traffic Generation and Impact

As noted by TTPP there is currently no traffic generation guidance given within the RMS "Guide to Traffic Generating Developments" (2002) that outlines the traffic generation by cemeteries. As a result the likely traffic generation of the proposal has been determined by considering similar facilities currently operated by CMCT being Liverpool Cemetery and at Rookwood Cemetery. It is noted that public transport access to both cases studies is limited as is the case for the proposed site.

Having considered the known generation of both cemeteries intersection analysis has been undertaken by TTPA. In both a pre and post development scenario the St Andrews Road/Spitfire Drive intersection operates at a Level of Service (LoS) of A indicating that the intersection would continue to operate well.

Having considered this appropriate capacity within the road network is considered to exist to allow the development to proceed.

Internal Road Network

The internal road network of the site has been designed to comply with the requirements outlined in Planning for Bushfire Protection and as such two-way roads are provided with a minimum width of 6.5m which allows for a 7.8m Medium Rigid Vehicle (MRV) to utilise the site

One-way roads are 5.6m wide which are sufficient to allow a MRV to travel through bends at 10km/h. Although the trucks may cross into the parking lane by approximately 70mm, given all kerbs on site will be either flush or roll kerbs. This would allow any truck to mount the kerb for access should a car be parked directly on the bend.

Parking Provision

Parking rates for cemeteries and associated uses are not readily available under either state or local policies and as such a first principle approach has been adopted for calculating the required parking spaces on the site for the varying aspects of the proposal. This approach has confirmed that 345 formal parking spaces should be provided on the site. The quantity and location of parking spaces allocated to each specific land use are summarised in Table 19 below.

Table 15 – Car Parking Provision

Building	Parking Provision	Parking Requirement
Chapel (Including Mortuary)	200	200
Function room	90	90
Flower shop/ café	20	20
Administration office	18	18
Ground staff facilities	12	12
Barns and Cottage	5	5
Total	345	345

To reduce the visual impact of the proposal no formal carpark is proposed adjacent to internment sites There are sufficient internal car parking spaces and the availability of kerbside parking spaces provides excellent parking provision for people wanting to park alongside graves

St Andrews Road Upgrade

Apart from the channelised right hand turn lane from St Andrews Road no augmentation to the road network is proposed by this application.

The existing capacity within St Andrews Road can accommodate the traffic generation associated with the project and is not dependant on any proposed upgrading of St Andrews Road.

6.3.10. Visual Impact

A Visual Assessment has been undertaken in support of the application by Richard Lamb and Associates (see Appendix HH) and was based on the Visual Impact Study undertaken by Virtual Ideas (Appendix GG). The purpose of the Visual Assessment was to assess and demonstrate that the subject site when fully developed was capable and appropriate from a visual standpoint for the sites development in accordance with the indicative masterplan.

Views of the eastern and southern slopes of the Site below Varroville House, which are specifically identified as the 'No build area' on the Environmental Constraints Map ECM_007 in CLEP 2015, are confined to a small area. The area is on the fringes of Raby, St Andrews, Bow Bowling and the Hume Motorway. Views from the closest potential viewing places, the Hume Motorway, are declining as natural revegetation and amenity plantings associated with the Motorway grow toward eventual maturity.

3D modelling of the Site, buildings and landscape in rendered photomontages of representative views prepared by VI on advice from RLA, show that the proposed development of the Site in the DA would not significantly degrade the quality or significantly alter the character of the Site.

As the DA also provides the mechanisms by which the natural attributes of the landscape, such as indigenous native vegetation and riparian corridors will be conserved and enhanced, the natural attributes of the views will be enhanced. The DA also provides the means by which the cultural values of land that is not within the ownership of the Varroville House lot, will be conserved and the historic and cultural values interpreted for the public. None of these outcomes would be likely if the existing use of the Site for rural use was continued.

The internal character of views in the parts of the Site that are of low sensitivity to external views will be significantly changed, however the character of the Scenic Hills as perceived from Campbelltown would be maintained. the Site will also provide a significant resource of land for public use, including the opportunity to experience views of Campbelltown and the Scenic Hills that are currently inaccessible.

The development provides for a combined opportunity for the conservation of the natural, cultural and scenic resources of the Site and public participation in the interpretation or those values, that would otherwise not be likely to occur.

In the intervening period, before the part of the Site that is visible in some localised views would be put to lawn cemetery use (this would be more than 110 years into the future on current assumptions on occupancy rates), conservation works would have been long completed in relation to the significant building resources in the setting of Varroville House, outside its house lot, as required in the CMP. This would include conservation of heritage fabric, both built and landscape and management and interpretation of landscape associated with significant structures.

Based on the above summary from Richard Lamb and Associates and the Visual Impact Study undertaken by Virtual Ideas the project is capable of satisfying the visual impact considerations

6.3.11. Social and Economic Impacts

The proposed use of cemeteries on the subject site will have a range of positive social and economic impacts. A summary of these are provided below:

- The application will facilitate public access to a previously privately owned parcel of land with approximately 36 hectares of the site being for the sole purpose of publicly accessible passive recreation.
- The design of the facility will celebrate the heritage aspects of the site and seek to conserve and interpret the significant areas in perpetuity;
- The application is driven by the strong demand for additional cemetery space in Sydney, and in particular the South West Region. In addition to the providing a supply of much needed cemetery space in Sydney, the future development on the site will provide a range of new job opportunities to the local area. For the first stage alone, this will generate approximately 68 direct and 101 indirect jobs in the construction phase, and 15 direct and 13 indirect jobs per year at the operational stage.

6.3.12. Groundwater

An assessment of the Groundwater conditions of the site was undertaken by Red Earth Geosciences as part of the Planning Proposal to demonstrate the suitability of the site for the proposed use. The report formed part of the package considered by planning authorities in 2016 prior to CLEP being amended to facilitate the cemetery use. It is considered that this report remains current and is again attached as Appendix U of this report.

The Geoscientific Investigations have confirmed that there is no groundwater resource present or related to the site and that there is no recognised underlying aquifer system and no groundwater abstraction sites on or near the proposed site.

It is therefore considered that the proposed use of the site as a cemetery will have a no adverse impact on the natural groundwater aspects of the site as the pathways available for movement of any pollutant

(including pathogens) load from decomposing bodies are extremely limited and comprised of a soil matrix which will rapidly attenuate them.

6.3.13. Sustainability

A Sustainability Strategy has been prepared by Steensen Varming, which has informed various design elements of MMP and details the ongoing ESD principles relating to the site. The Sustainability Strategy is included at Appendix KK. The sustainability strategy addresses a broad range of areas, including sustainability and environmental management, community integration, sustainable and active transport promotion, energy, water, materials and waste efficiency and optimisation.

The key sustainability strategies which have been incorporated into the design of MMP are:

- Strong focus on energy saving;
- Focus on productivity benefits that can flow from sustainable design and an energy efficient building;
- Incorporate sustainability initiatives to provide benefits in both the living environment of individual spaces and long term operational cost savings;
- Consideration of solar energy generation;
- Maximise natural lighting, heating and cooling;
- Stormwater capture and grey water re-use; and
- Other relevant strategies that could help enhance the overall sustainability of the project.

6.3.14. Building Code of Australia

An assessment of each proposed building against the Building Code of Australia (BCA) has been undertaken by Groupe DLA and is included in the BCA Letter at Appendix LL. The letter confirms that compliance with the BCA for these specific works will be able to be achieved by a combination of compliance with the deemed-to-satisfy (DTS) provisions and the documentation of alternative solutions in accordance with Clause A0.5 of the BCA.

6.3.15. Disabled Access

An Access Review for MMP has been undertaken by Morris Goding Accessibility Consulting and is included at Appendix OO. The report provides a preliminary assessment of the proposal against the relevant provisions of the Disability Discrimination Act, Access to Premises Standards and the Building Code of Australia.

The report includes recommendations to be addressed at construction certificate stage to ensure ingress and egress, paths of travel, accessible toilets and circulation areas can comply with relevant statutory guidelines.

6.3.16. Waste Management

An Operational Waste Management Plan (OWMP) has been prepared by Waste Audit to detail and assess the ongoing waste management arrangements for MMP. The OWMP is contained at Appendix PP. the OPWP highlights the following key objectives and actions for waste management across the site:

Objective 1: Minimise the environmental impacts of the operations of the development

- Ensure maximum diversion of waste from landfill through the correct containerisation and transportation of waste materials; and
- Educate staff on the correct segregation of waste materials and appropriate management streams.

Objective 2: Minimise the impact of the management of waste within the development on local residents

- Ensure waste is managed to avoid odour and litter; and
- Undertake waste collection during suitable times.

Objective 3: Ensure waste is managed to reduce the amount of landfill and minimise the overall quantity of waste generated

- Implement systems to segregate waste materials and display signage to encourage recycling.

The OWMP details the bin requirements for each of the six proposed buildings on the site based on the waste and recycling generation estimates contained within the CDCP 2015. The footprints and recommended locations for the external bins relating to each of the buildings are detailed within the OWMP. As detailed, all staff will be adequately trained and educated on the management of waste and recycling to ensure the segregation of materials. Site management are to undertake regular monitoring of waste systems to ensure waste streams are operating effectively.

CMCT will use their own private garbage contractor for waste and recycling collection. The OWMP confirms that the truck is capable of collecting both waste and recyclables generated on site. Waste and recyclables will be transported to Suez Spring Farm Resource Recovery Park.

Collections will occur daily (Monday – Friday), with the truck commencing collection at the Workshop and making its way to each building on site in a clockwise direction. The Workshop and Functions Building will require waste collection five days per week. The Chapel, Gatehouse and Administration buildings will require collection once a week.

6.4. SITE SUITABILITY

In accordance with the matters for consideration under Section 79C of The Act, an assessment of the site suitability has been carried out. The assessment concludes that the site is suitable for the proposed development for the following reasons:

- The use of the site as a cemetery and public recreation is permissible with development consent on the site;
- The proposal responds to an identified need for cemetery space with Metropolitan Sydney particularly within South Western Sydney;
- The proposed development is appropriate for the sites location and has been designed having full consideration for the heritage, scenic and environmental constraints of the site;
- The existing utility infrastructure and services can be extended, augmented or amplified (if required) to accommodate increased demand from the development
- The proposed traffic generation will not adversely affect the existing operations of the surrounding road network; and
- The proposed built form has been assessed to be compatible with the surrounding development and environment.

6.5. PUBLIC SUBMISSIONS

The DA will be notified in by Council and following its lodgement. A formal Response to Submissions can be made following the conclusion of the public notification period.

As mentioned earlier, the DA has been informed by a community engagement process, details of which are included as part of this DA.

6.6. THE PUBLIC INTEREST

Urbis consider that the proposed development is in the public interest as the proposal will have a number of important economic, environmental and social impacts. These are detailed listed below:

- The proposal will provide needed burial space for the South West of Sydney whilst offering choice, at affordable prices in varied settings;
- The proposal will ensure the perpetual maintenance of a significant parcel of land within the Campbelltown Local Government Area;
- The proposal facilitates public access to a previously privately owned element of the Campbelltown Scenic Hills at no cost to the community or Campbelltown City Council. Further it is noted that over 36 hectares of the site will be for the sole purpose of publicly accessible passive recreation;
- The proposal provides for the conservation of more than 35Ha of native habitat through the conservation and management and revegetation of the sites riparian corridors, Cumberland Plain Woodland and Moist Shale Woodland landscapes;
- The proposal is considerate of the heritage contributions of the site itself and adjacent items and looks to celebrate and interpret these aspects for the benefit of all; and
- The proposal is considerate of the scenic aspect of the site and ensure is considered to enhance the overall visual qualities of the site when viewed from the Campbelltown Urban Area.

7. CONCLUSION

The proposed development has been assessed against all relevant planning controls and policies. The overall vision for the site and the manner in which that vision has been translated into this DA is considered to be fully consistent with these controls and policies.

The compelling reasons why a positive assessment and determination of the project should prevail are summarised below:

- The proposal has been designed to comply with all state and local planning provisions which apply to the site with specific reference to the site-specific provisions detailed in the *Campbelltown Local Environmental Plan 2015* and the *Campbelltown Development Control Plan*.
- The design responds positively to the site conditions and the surrounding environment. The design has been formulated having close regard to the known scenic and heritage qualities of the site. The proposed design is highly sympathetic and responsive to site context, conditions and values.
- The proposal provides for the conservation of more than 35Ha of native habitat through the conservation and management and revegetation of the sites riparian corridors, Cumberland Plain Woodland and Moist Shale Woodland landscapes.
- The proposal does not give rise to any significant upgrading of public assets and infrastructure, notably St Andrews Road, to support it.
- The proposal responds to the demonstrable need and demand for cemetery space in Sydney and Macarthur Region, with limited sites and opportunities to meet the long-term spatial requirements of the applicant.
- Accordingly, the proposal is in the public interest as it will long term relief to the identified shortfall in burial plots within the South West Sydney Region; and facilitate public access to a previously privately owned element of the Campbelltown Scenic Hills at no cost to the community Further it is noted that over 36 hectares of the site will be made available for the sole purpose of publicly accessible passive recreation

Having considered all the relevant matters, we conclude that the proposal represents a sound development outcome that respects and responds to the prominent site location and the amenity of surrounding developments. The proposal therefore is considered well-worthy of Council support and ultimately approval from the Sydney Western City Planning Panel.

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