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NSW Independent Planning Commission (IPC)

Level 3, 201 Elizabeth St

Sydney 2001

Dear IPC,

Catholic Metropolitan Cemeteries Trust (CMCT)

A085-18 Crown Cemetery 136,000 Grave Development, Scenic Hills

St Andrews Road, Varroville

This is to recommend that the IPC reject the above Development Application (DA) outright.

It is a totally inappropriate development for the site in question. The 1817 privately owned Varro Ville Homestead (around which it is located) is State Heritage Listed, the surrounding colonial period landscape (on which it is located) is recommended for Listing and both are within the rural heritage landscape of the historic Scenic Hills, identified for preservation in Campbelltown Council's Local Environment Plan (LEP) 2015.

The ribbon of green space identified as Scenic Hills, stretching from Denham Court south to Mt Annan Gardens, is a unique topographical feature, treasured visually and environmentally and as a 'lung' for the local community and broader Campbelltown and Camden areas. Given the unparalleled development (both in its own terms and in NSW terms) that this South Western Region of Sydney has been subjected to, it is essential that those areas of the Scenic Hills that have not already been fatefully compromised by inappropriate and/or over development be preserved for their natural amenity as well as for the unique heritage value of elements of their built and landscaped environments, specifically in this instance those of Varro Ville Homestead and its historic outbuildings and agricultural lands.

All of these matters have been extensively and exhaustively researched, and are undoubtedly familiar to the IPC through their studies of the clearly articulated findings and detailed recommendations from numerous bodies over many years. These include Campbelltown City Council, the NSW Heritage Council, the National Trust, National Parks, the Scenic Hills Association- along with other local interest groups, communities such as the Carmelite Nuns, and concerned individuals.

These documents cover not only foundational arguments, but also objections to various attempts to erode the values that have been demonstrated and accorded recognition and those upon which recognition is pending. It is trusted that the IPC is acquainted with this long and convoluted history, that it need not be re-canvassed here, and that authoritative research and findings will be accorded the credit they are due. It is trusted that the proposed DA will be found to be totally inappropriate in its location; its scale, footprint and range of structures unsympathetic to that location and destructive of highly valued and valuable heritage and public amenity.

Concerning immediate issues about *process* which must also surely contribute to the analysis of this matter by the IPC include:

*The unconscionable delays of the Heritage Minister: findings on the NSW Heritage Commission's recommendation to State list the land now owned by the CMCT have not been delivered within the statutory period afforded by the Heritage Act (1977).

*How the 'spot' rezoning (to permit previously prohibited use as a cemetery) of the land package purchased by the CMCT was deemed appropriate and legitimated: it is most curious that this was achieved *after* the purchase and thereby retrospectively made possible the obvious intent of the CMCT.

*How any decision can be contemplated *before* the curtilage issue is resolved for the Varro Ville Homestead. The sorry outcome for historic Blair Athol at the southern extremity of Scenic Hills was deeply regretted by many. Subsequently this was reflected in the Campbelltown Local Government Area Heritage Review (April 2011), commissioned by Council, with its clear and passionate argument for the protection of the curtilage of heritage items. I trust the IPC is familiar with this document and its salutary recommendations (Section 7.1). (It was deeply puzzling to me that endeavours by one of the speakers at the IPC Meeting (25 March 2019) to raise the example of Blair Athol were halted by the Chairperson on the grounds that it was 'unknown' to her and 'not relevant to the discussion'.)

*Why the CMCT have proceeded with the extensive and expensive DA process and revisions, and why resources have, and continue to be expended on assessing a DA while key and pivotal decisions on heritage listing of land and on curtilage are still outstanding.

I trust that the IPC will reject the present DA. I passionately hope that the ultimate decision will be to find, borrowing from a National Trust' concluding statement, that 'a cemetery development of the Varroville Estate is unthinkable and should be rejected outright.'

Yours sincerely

Sue Way

4 April 2019