



DISCALCED CARMELITES

Mount Carmel Priory
247 St Andrews Road
Varroville NSW 2566
AUSTRALIA
ABN 37 753 805 156

fax: +2+9603 1007

23 March 2018

Campbelltown City Council
PO Box 57
CAMPBELLTOWN NSW 2560

27MAR'18 09:15 RCUD

Sent by email to: council@campbelltown.nsw.gov.au

Re: Development Application, 166-176 St Andrews Road, Varroville – File No. 3293/2017/DA-C

I write as Prior of the Discalced Carmelite Fathers, 247 St Andrews Road, Varroville, NSW 2566.

I oppose the Development Application, for the following reasons.

Noise Impact. The Development Application (DA) site lies directly opposite the Carmelite Retreat Centre and Our Lady of Mount Carmel Parish Church. These facilities are operated by the Discalced Carmelite Fathers, whose mission, and livelihood rely on them. The Retreat Centre has been located for the peace and tranquility it affords people in need of rest and renewal. As such, the Centre benefits greatly from the present serenity afforded by the protected rural environment of the Scenic Hills, as does the Priory, the residence of the Carmelite Fathers whose vocational calling is specifically to ministries within environments of contemplative silence and solitude.

The inevitable rise in noise due to construction, new plant proximity and increased traffic on St Andrews Road and Spitfire Drive, should the cemetery proceed, is of real concern. The traffic noise level is predicted to rise over the next nine years by 7 decibels above the upper threshold indicated by the NSW Road Noise Policy (RNP), and 12 decibels over the present level. And while it is stated that, *"Measures to mitigate traffic noise are recommended to ensure impacts to surrounding receivers are minimized"* (Appendix JJ p.38), I am not convinced there are any measures that will solve this problem. Further, some documents clearly assume that St Andrews Road will soon become a through road to Camden Valley Way. This possibility greatly increases the threat of increased traffic noise and is mentioned should approval of the DA be a contributing factor to this undesirable development.



Scenic and Cultural Heritage. The DA proposes a large cemetery with the claim that it will not compromise the scenic and cultural heritage of the early-mid nineteenth century Varroville Homestead estate. I question that this is possible, given the inevitable non-complementary modification to this historic site caused by monuments, plaques, and concrete roads. I do not believe the DA can overcome the demand of the Campbelltown Local Environment Plan (CLEP) condition for this site that states, "Development for the purposes of a cemetery is permitted with development consent, but only if the consent authority is satisfied... the development will complement the landscape and scenic quality of the site, particularly when viewed from surrounding areas" (CLEP15. C17.8A). Taking "complement" to mean "to add to" or "enhance", it is simply not possible to succeed in this!

Intrinsic to this point of view is the issue of curtilage. The NSW Heritage Council has recently recommended to the NSW Minister for Heritage that the greater part of the DA land be listed on the State Heritage Register (SHR) as curtilage to the Varro Ville Homestead estate. Surely this must be resolved before the DA can proceed as, clearly, if it does proceed the opportunity to retain an immensely important state heritage listing in its integrity will have been irrevocably lost.

I would like to add that, claimed burial space expediency regarding the greater Sydney region, itself in dispute, must not be allowed to override this important issue.

I submit that the cemetery DA not be approved.

Yours sincerely

A large black rectangular redaction box covering the signature of Paul Maunder.

Fr Paul Maunder OCD, Prior