

Regional Panels Secretariat
GPO Box 39
SYDNEY NSW 2001



By email: PlanComment@jrpp.nsw.gov.au

PLANNING PROPOSAL 166-176 ST ANDREWS ROAD, VARROVILLE

Dear Sir/Madam,

The Australian Garden History Society is the leader in concern for, and conservation of, significant cultural landscapes and historic gardens through committed, relevant and sustainable action. It has three branches in NSW and this submission is made on behalf of the Sydney and Northern NSW (i.e., the local) branch (the Branch).

We are pleased to provide this letter of objection to the proposed amendment to the Campbelltown Local Environmental Plan 2015 to permit a cemetery.

The reasons for our objection is as follows,

1. Adverse impacts on the heritage significance of Varroville

A 2001 study specifically commissioned by the Heritage Council to report on the remaining pre-1860 colonial farms on the Cumberland Plain, described Varroville as, 'a *celebrated early farm estate dating from 1810 with early structures, the 1850s homestead, layout, agricultural (vineyard) terracing and evidence of early access road.*' It concluded that it was 'rare as one of the **few larger estate landscapes remaining in the Campbelltown area where the form of the original grant and the former agricultural use of the estate and its rural landscape character may be appreciated.**' (p98, *Colonial Landscapes of the Cumberland Plain & Camden Morris and Britton, 2000*). The proposed rezoning and cemetery development will introduce a more intensive use of the site over time resulting its rural landscape character being dominated by an excess of roads, introduced avenue plantings and formal garden rooms, buildings and memorials that will dominate the simplicity of the expansive pastoral setting that now surrounds Varroville house and garden.

2. Adverse impacts on the curtilage of Varroville house and garden

The subject rezoning and cemetery development is within the curtilage of the historic Varroville estate. Varroville's historic and visual curtilages have survived substantially intact for 200 years and can still be readily understood and appreciated as a Colonial cultural landscape. It is critically important for Campbelltown, the Cumberland Plain (as the site of the earliest Colonial settlement) and the State of NSW that this rare historic complex remains intact and able to be interpreted as a cultural landscape (p84, *Visual*

Analysis of Campbelltown's Scenic Hills and East Edge Scenic Protection Lands, P Davies, G Britton, 2011).

The Heritage Council, through the Minister for Heritage, has given a heritage grant to the owners of Varroville to conduct a curtilage study. This is underway by consultant Orwell & Peter Phillips, but is **not yet complete**. This study will recommend what curtilage this former colonial farm should have. This is likely to include some or all of the subject land of this Planning Proposal. Such advice **should inform any rezoning or development decision**. The AGHS and the NTA (NSW) urge the Joint Regional Planning Panel to **defer any consideration of this Planning Proposal until the subject curtilage study is completed. This document should be considered alongside the Planning Proposal documents.**

3. The proposed rezoning demands reconsideration of the extent of the SHR listing of Varroville

Only Varroville house and garden are listed on the State Heritage Register (#737, listed in 1993). The Morris and Britton study recognised that the current SHR listing provided an inadequate curtilage to express those state heritage values. Their recommendations include the necessity of ***'separate SHR listing for the land adjacent to the current SHR boundary to Varroville. This should include the old outbuildings, agricultural terracing and the extant former access way from Campbelltown Road, and to retain the Scenic Protection zoning, including protective management of the remnant Cumberland Plain Woodland vegetation, for the land adjacent and enclosing high ridgeline.'*** To preserve a preserve the integrity of the rural landscape setting as a result of the change of zoning and proposed cemetery development, the AGHS request that the JRPP make the enlargement of the SHR listing of Varroville adjacent to the current boundary and as described in the planning proposal, a condition of consent.

4. The Traffic Capacity Assessment by GTA Consultants is inadequate

The parking requirements to the cemetery are proposed to be accommodated by almost a kilometre of kerbside parking (600-900m) with only 20 spaces provided in a formal carpark (p36 Traffic Impact Assessment, GTA Consultants, 2015). These numbers have been given by the consultants in the absence of a requirement for cemeteries in the Campbelltown Council's DCP 2014. The comparison with Liverpool Cemetery is a poor one as it is an 100 year old cemetery located in a central urban location with the chapel located on the street frontage within metres of the nearest bus stop. The comparison should be made with the parking requirements for other metropolitan cemeteries with far less adequate public transport, such as Macquarie Park and Northern Suburbs Crematorium. All support expansive formal carparks in excess of 100 cars located in close proximity to the chapels and function rooms. Due to the steep topography of the proposed cemetery, it is likely that this will require extensive cut and fill of the more visually prominent parts of the site, particularly since the designers have chosen to locate the multi purpose chapel on the steeper part of the site. The AGHS urge the Joint Regional Planning Panel to **defer any consideration of this Planning Proposal until there is adequate consideration of the parking requirements for the proposed development.**

5. The Visual Assessment by RLA consideration of the built elements of the site is inadequate

The visual assessment is fundamentally flawed as it has not assessed the true visual impact on both Varroville house and the Campbelltown urban area of the development

proposed. The visual assessment refers to the proposed buildings located across the site as 'few, small and almost totally hidden from view' and the 'potential for landscape to assist in mitigation of the impacts of the development' (p15, 5.1 Visual Assessment, Robert Lamb and Associates, 2015). This assessment disregards the realistic requirement for carparking across the site, noticeably absent from the master plan and the entire design statement documentation. Despite acknowledging that much of the site is in excess of 1:6 grade, the Master Plan by JFLA has not considered the requirement for cut and fill associated with the construction of roads and carparks in association with an cemetery of this size and almost totally reliant on private transport. The AGHS urge the Joint Regional Planning Panel to **defer any consideration of this Planning Proposal until there is adequate consideration of the visual impact of the parking requirements for the proposed development**

In conclusion, we request that the Joint Regional Planning Panel should recognise and preserve the significance of the Scenic Hills landscape that provides the setting for Varroville house, not only its immediate garden surrounds but the wider expansive rural landscape of the Cumberland Plains from which it prospered. We would strongly request that in the absence of realistic traffic impact assessment, the Master Plan and therefore the Visual Assessment fail to consider the full implications of the infrastructure required for this type of development as viewed from the heritage property and the broader Campbelltown urban area. The planning proposal should not be approved for these reasons.

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