

16 March 2016

Regional Panels Secretariat
GPO Box 39
Sydney NSW 2001

Dear Secretariat,

Planning Proposal Submission – Proposed Amendment to the Campbelltown Local Environmental Plan – (Central Hills) to permit a lawn cemetery at 166-176 St Andrews Road, Varroville

The National Trust of Australia (NSW) lodges its strongest objections to the proposal to amend the Campbelltown Local Environmental Plan (Central Hills) to permit a lawn cemetery at 166-176 St Andrews Road, Varroville.

In March, 2015 the Trust expressed its deep concern to the Secretary of NSW Planning & Environment at the planning processes which appeared to be leading towards facilitating this cemetery development proposal.

This proposal would seriously degrade the important curtilage, dating from 1810, of the property Varro Ville at Varroville in the Campbelltown Local Government Area and damage a long term proposal, supported by the National Trust, for statutory recognition of the Scenic Hills Environmental Protection Area.

Specifically, the National Trust urged the rejection of the Joint Regional Planning Panel advice to the Minister for Planning on this development proposal, which recommended that it be sent to the planning gateway process. The Trust understood that Campbelltown City Council had already written to the Minister for Planning also requesting that the JRPP advice be rejected.

Varro Ville and its curtilage was listed on the National Trust Register in December, 1976. The cemetery development proposal is within the Trust's listed curtilage.

The Trust also understands that the Heritage Council has recommended to the Minister for Heritage the making of an Interim Heritage Order over the Varro Ville curtilage, in view of damage which is occurring to very significant historic buildings on the site. The immediate Varro Ville property was listed on the State Heritage Register in 1999, following an earlier Permanent Conservation Order in 1993.

The Statement of Significance for the State Heritage Register Listing commences –

Varroville is a 'celebrated early farm estate dating from 1810 with early structures, the 1850s homestead, layout, agricultural (vineyard) terracing and evidence of early access road.'
(Morris and Britton, 2000, 98)

'Varroville is 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.' (Morris and Britton, 2000, 98)

The development proposal is being widely condemned in the media: -

“Last year, Campbelltown Council rejected a controversial 136,000-grave cemetery at Varroville, in the heart of the Scenic Hills, but developers now want the state government to overrule council's decision.”

Campbelltown City Council had zoned this land Environment Protection (Scenic) (7d1) in its earlier Local Environmental Plan. In the Draft Campbelltown Local Environmental Plan 2014, the land is proposed to be zoned *Environmental Management (E3)*, as recommended in Campbelltown Council's Visual Study by Davies and Britton in 2010-11. Commercial cemeteries are prohibited land use under both plans for the very reason that they would damage and degrade the qualities of this land. The Scenic Hills are also rich in Aboriginal places and artefacts.

The Trust also understands that the NSW Heritage Council wrote to Campbelltown City Council on 28 November, 2013 lodging its objections to the cemetery proposal. Extraordinarily, this proposal is still proceeding.

Two of the National Trust's expert Conservation Technical Committees examined this development proposal in detail and contributed to this submission. The Landscape Conservation Committee deals with Cultural and Natural Landscape Conservation and was formed in 1949. The Cemeteries Conservation Committee deals with the Conservation of historic cemeteries, burial grounds and lone graves and was formed in 1979.

While the Catholic Metropolitan Cemeteries Trust (CMCT) is publicly promoting this development as a “lawn cemetery” the Masterplan for the development in Part 19 of 24 individual files on the website (certainly difficult to locate) indicates that lawn burials “with plaques on a concealed concrete base” are only one of five different burial types, each more intrusive in nature: -

- Lawn burials: These typically consist of lawn areas with plaques on a concealed concrete base. They will typically be on flatter land and close to the main roads. To generate some privacy for grieving families, larger grave expanses will be divided by planting to create “rooms”.
- Monumental lawn burial: These typically consist of flat or terraced lawn areas with concrete beams onto which a low headstone is placed. Height will be limited depending on its location on site, the ability to offer screening or minimise its visual impact from the roads.
- Monumental graves: for the denominations which require it, monuments will be allowed but limited in height to a maximum of 1.5m. These will be concealed in screened rooms and placed furthest away from the main roads.
- Natural Woodland burials: Consisting in single grave sites within an existing woodland area, these respond perfectly to the “green” burial options, where the land is allowed to regenerate between burial events. It uses no chemicals and natural materials only in the burial process. Plots are identified by metal rods and can be found using a metal detector. Memorialisation can only be made of wood or other biodegradable and renewable materials.
- Family Estates Blocks: Nested into the side of the hill, on unencumbered inward facing slopes only, these sculptural elements will already be built, ready for purchase. They consist of cubes



with an expected capacity for 9 interments. Natural materials would be used to “blend” into the environment.

The true “lawn burials” and the “Natural Woodland burials” are the only two types of burial that could conceivably co-exist with an Environment Protection Scenic zoning intended to retain the visual character of this historic pastoral landscape.

Crypts for nine people and monuments to 1.5 metres tall would transform this area from the historic agricultural estate to what is really being proposed here, a massive cemetery.

The Conservation Management Plan confirms that Varroville Estate is of State Heritage Significance and states that this places an obligation for owners, occupants, operators and users of the site to conserve this identified significance.

The CMP also notes that the site is in the vicinity of, and inextricably linked to Varroville House which is in separate ownership on an excised lot within the subject site. Varroville House is listed on the State Heritage Register (SHR) and is a heritage item on the Campbelltown Council Local Environmental Plan. The identified significance of Varroville House and the associated values of the estate must be retained and conserved. This includes significant views and vistas.

The Trust strongly agrees with the Conservation Management Plan’s statement that “the current statutory curtilage for Varroville is considered to be inadequate to maintain, to retain and protect the heritage values of the place and the curtilage for LEP Listing and that the State Heritage Register Listing curtilage should be expanded.

The Trust supports the proposed expanded State Heritage Register Listing Curtilage 2 as indicated by the blue line on Figure 50, page 123 of the Conservation Management Plan.

As argued in the CMP this is essential to incorporate an area around Varroville House comprising the outbuildings, former drive, remnant vineyard terraces and the majority of the potential Sturt dams.

The Trust is also concerned that the Catholic Metropolitan Cemeteries Trust bought this land before rezoning and development approval, apparently confident that the rezoning and approval would be forthcoming. This does not augur well for the proper operation of the planning system which should be responsive to the concerns and objections of other local landholders, the local Council, the NSW Heritage Office and the National Trust.

Yours sincerely

Graham Quint
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