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DARLING PARK, 201 SUSSEX ST
SYDNEY NSW 2000**

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22 August 2016

Ms Michelle Dellagiacoma
Senior Planner
NSW Department of Planning and Environment
GPO Box 39 SYDNEY NSW 2001

Dear Michelle,

MACARTHUR MEMORIAL PARK - SUPPLEMENTARY PLANNING INFORMATION

Further to recent correspondence between Urbis, the NSW Department of Planning and Environment and the Sydney West Joint Regional Planning Panel we have prepared this letter to outline additional measures which can be implemented to further ensure the preservation and conservation of the Campbelltown Scenic Hills as part of the proposed amendments to the *Campbelltown Local Environmental Plan 2015* currently being sought by the Catholic Metropolitan Cemeteries Trust.

We note that these amendments refer specifically to the eastern and southern portion of 166-176 St Andrews Road, Varroville and have been proposed as a direct result of the feedback received by the Sydney West Joint Regional Planning Panel.

IDENTIFICATION AND PROTECTION OF HIGH VISIBILITY AREAS

In conjunction with the project team the proponent has identified land from the Campbelltown Urban Area for which significant views exist and has modelled how the envisaged future development of the site for the purpose of a lawn cemetery will impact on the visual quality of the site when viewed from the Campbelltown Urban Area with specific reference to Spitfire Road, St Andrews Road and the residential areas of St Andrews.

Viewpoints for these areas and photomontages of the envisaged development of the site when viewed from these areas were prepared in support of the application when lodged with the NSW Department of Planning and Environment in October 2015. These images have been reattached as **Appendix A** of this letter.

The analysis has confirmed that the additional landscaping which will be proposed for the site under any future development application will screen all built work associated with the application when viewed from the identified viewpoints.

To ensure that the proposal will further ensure the preservation and conservation of the Campbelltown Scenic Hills we would encourage the Sydney West Joint Regional Planning Panel to adopt an amendment to clause 7.7 of the *Campbelltown Local Environmental Plan 2015* which states the following:

7.7 Considerations for development on environmentally constrained land

3d) For land in Varroville being land identified as a “No build area” on the Environmental Constraints Map - the fact that the land is not capable of accommodating any built works other than a lawn cemetery comprising a road network, additional landscaping with graves marked by in-ground name plates all of which does not exceed the natural ground level

The proponent has also modified the Conservation Management Plan to provide further controls which will ensure the scenic qualities of the site are maintained. This policy is reproduced below:

New Policy 24:

Development of land within Varroville for cemetery uses within the land identified as a “No build area” on the Environmental Constraints Map pictured at Figure 51 (and included in the LEP) should be limited for use as lawn cemetery only. The area is not capable of accommodating any development other than a lawn cemetery comprising road network, additional landscaping with graves marked by in-ground name plates (at natural ground level), in order to minimise visual impacts and impacts on the significant landscape within the conservation zone (refer to Figure 50) as well as views into the site from the Campbelltown Urban Area. Development within the ‘No build area’ should only permit non-reflective name plates of a suitable colour-range in conjunction with an approved Plan of Management (POM). Refer also to Policy 59 for guidance on new landscaping.

The amended Conservation Management Plan will be provided to both the NSW Department of Planning and Environment and the Sydney West Joint Regional Planning Panel.

It is considered that the additional amendment to both the Campbelltown Local Environmental Plan 2015 and the Conservation Management Plan provide a logical response to the overall scenic qualities of the site and clearly demonstrate the commitment of the Catholic Metropolitan Cemeteries Trust to ensuring that High Visibility Areas will be appropriately maintained.

FUTURE LANDSCAPING PLAN

The projects landscape architect Florence Jaquet Landscape Architect Pty Ltd has prepared a landscape plan which identifies all works including additional landscaping which is proposed for the eastern and southern elements of the site in addition to a summary of the proposed works in the proposed no build area and treatment of the eastern slope. A copy of these documents is attached as **Appendix B** of this report.

As demonstrated by the proposed landscape plan the overall aim as it applies to land to the no build area is to also achieve concealment of headstones from both the Campbelltown Urban Area and internal cemetery roads. This is achieved by the landscaping identified by the landscape plan which will ensure that the proposal will satisfactory retain the existing visual resource of the site and guarantee that all structures will be screened when viewed not only from the critical areas identified as part of the Campbelltown Urban Area and internal cemetery roads.

To provide further confidence that the proponent is genuine in its requirement to ensure the scenic quality of the site is maintained it has voluntarily modified the Conservation Management Plan to require that future detailed design of the area be in accordance with the landscape plan. The relevant policy from the Conservation Management Plan is reproduced below:

Policy 65:

Future detailed design of the lawn cemetery within the 'no build area' should be undertaken in accordance with the landscape plan provided at Appendix F.

It considered that both the future proposed landscaping in conjunction with the requirements of the Conservation Management Plan will guarantee that no built works will be visible from the identified critical viewpoints within the Campbelltown Urban Area.

PLAN OF MANAGEMENT

As requested by the Sydney West Joint Regional Planning Panel an additional policy has been inserted into the Conservation Management Plan requiring the Catholic Metropolitan Cemeteries Trust to prepare a Plan of Management for the placement of mementos and fresh flowers within the "No Build Area". The policies are reproduced below

New Policy 25:

A Plan of Management should be prepared for the No Build Area (refer to Figure 51) which details the following:

- *No mementos such as glass cases, ornaments, photo frames, candles, toys should be permitted, with the exception of flowers, within the lawn cemetery area;*
- *Confirmation that decorative borders, kerbing, pebbles, plants or the like will not be permitted with only non-reflective name plates permitted for each burial plot;*
- *The weekly maintenance schedule to be undertaken for the area including a strategy for the removal of non-compliant items;*

Amended Policy 57

Burial markers and conventional headstones are to be located in areas where their visibility does not lead to a perception of a significant change to the existing rural character. Specific controls regarding height, colour, materials etc. must be applicable, to mitigate visual impacts on the rural character, in association with an approved Plan of Management.

The CMCT already enforces the above requirements on multiple of its existing assets throughout the Sydney Metropolitan Area and has demonstrated a clear proof of performance in maintaining lawn cemeteries to the highest quality standard and ensuring no visual impacts on the direct locality of the lawn cemetery.



We trust the above provides the appropriate level of clarification to both the NSW Department of Planning and Environment and the Sydney West Joint Regional Planning Panel to facilitate a favourable consideration of the subject Planning Proposal. If you have any questions please don't hesitate to contact me on 8233 7614. or alternatively Mr David Hoy of this office on 8233 9925.

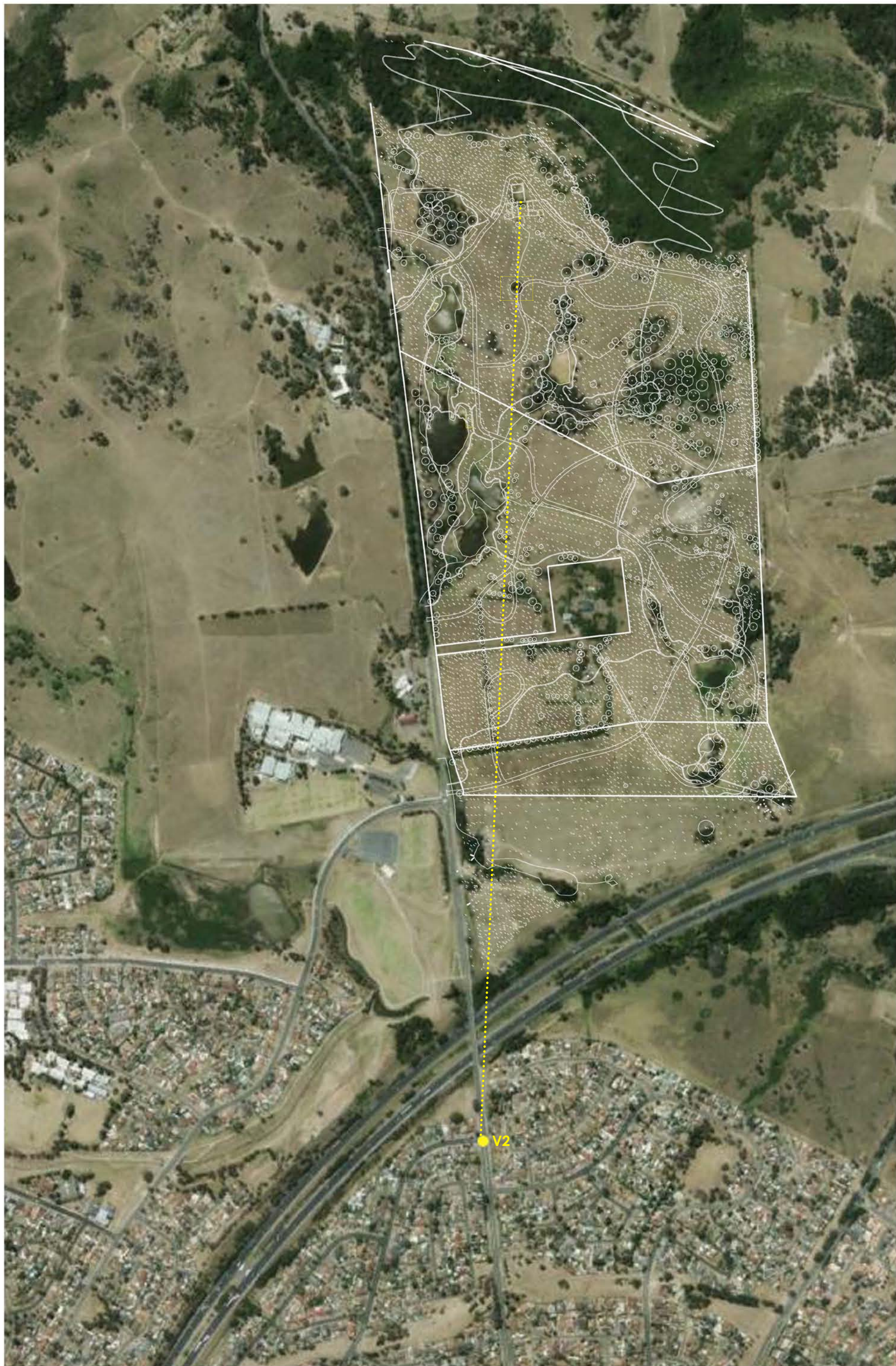
Yours sincerely,

A handwritten signature in blue ink, appearing to read "Cameron Nixon", with a long horizontal flourish extending to the right.

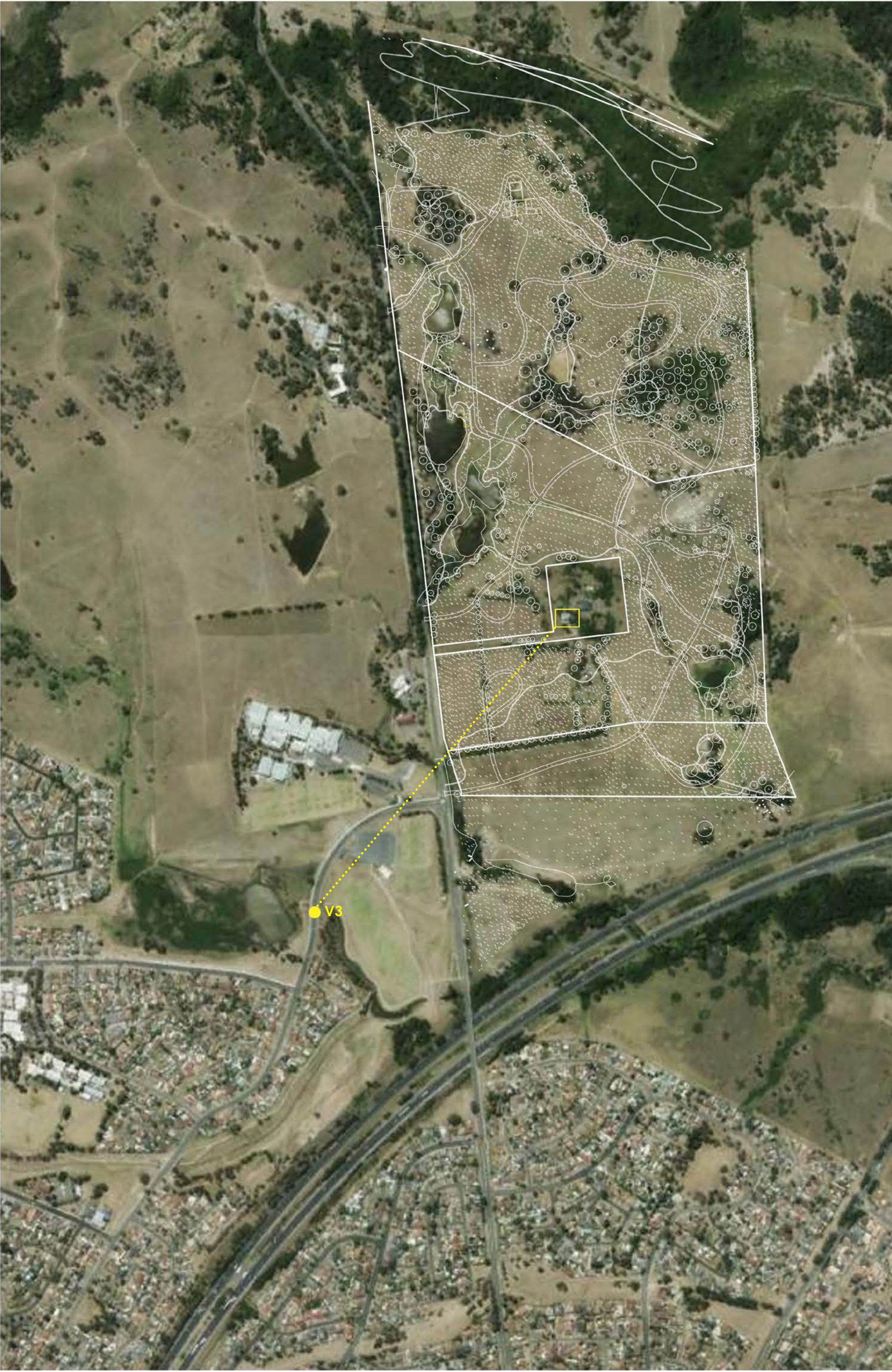
Cameron Nixon
Senior Consultant



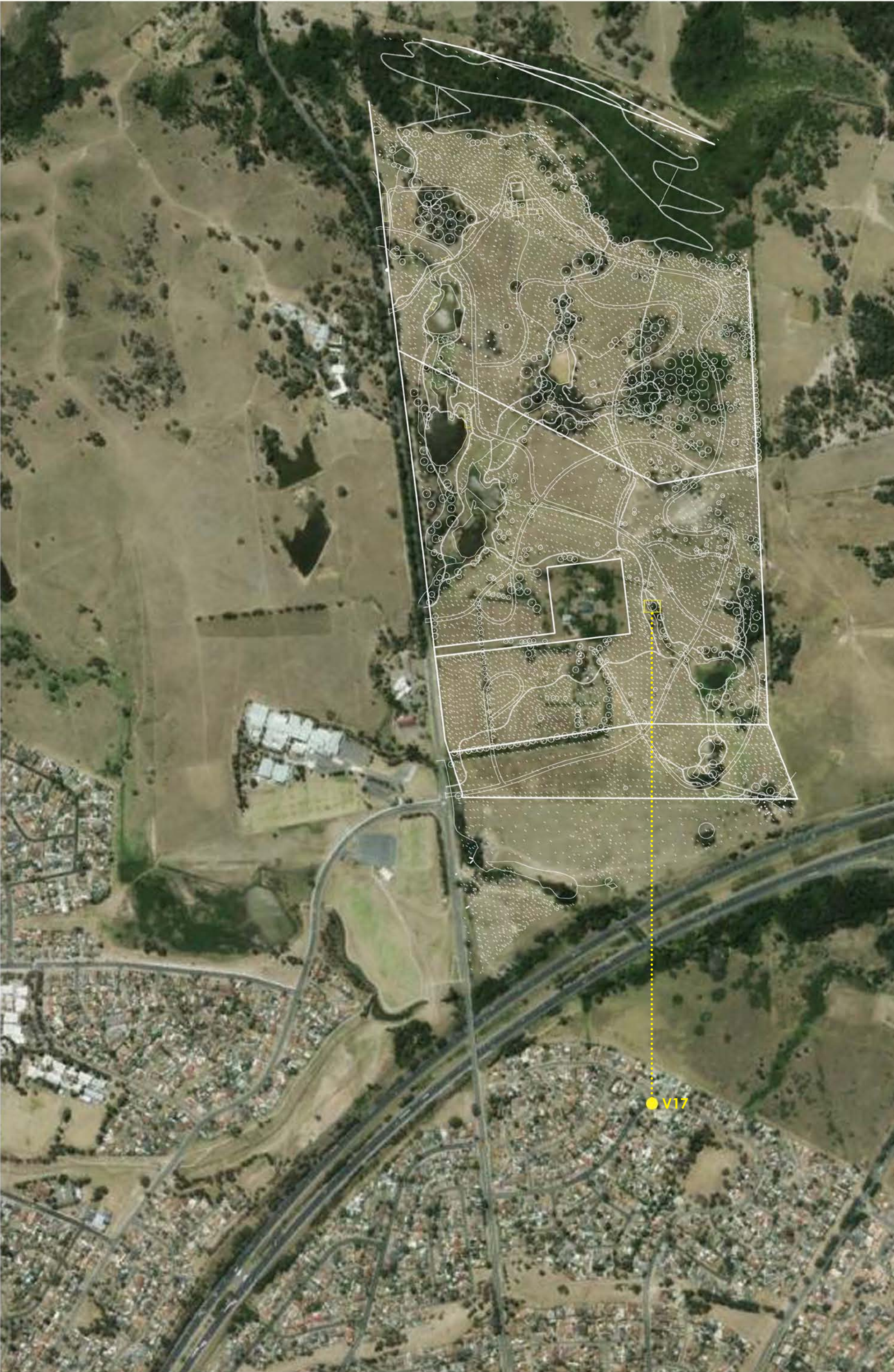
APPENDIX A VIEWPOINT ANALYSIS















APPENDIX B CONCEPT LANDSCAPE PLAN

Florence Jaquet

L a n d s c a p e a r c h i t e c t

C e m e t e r y s p e c i a l i s t

Macarthur Memorial Park

Additional Landscape consideration

Response to request for clarification of the landscape treatment of the Eastern slopes to Varroville House.

Original Design intent:

It is important to reiterate that the original landscape vision is that of a unique landscape cemetery, integrated into its surroundings, one which responds to the site's constraints, whether topographical historical, ecological or otherwise.

As stated in our Masterplan report (Sept 2015, page 4 and 21), the Vision for the site is to "provide concealed, private and low lying burial spaces to minimise visual impact".

What will make it unique is the strong design intent to conceal concrete beams and headstones from view, both from important surrounding viewpoints (eg. St Andrews Rd, Campbelltown, Minto and Hume Highway and where highlighted in RLA's visual Assessment report 2015) and from the main internal cemetery roads.

In order to minimise the visual impact of burial areas, the cemetery has been designed using the concept of "burial rooms ":

- best described on page 33 of the Landscape Masterplan report (Sept 2015)
- best illustrated
 - on page 32, Figures 46 and 50
 - in the "Indicative isometric" (Appendix #6, second last page of the Landscape Masterplan report)

Views from external viewpoints:

A number of photo renders were produced in October 2015, illustrating the "before" and "after" views from important viewpoints nominated by Richard Lamb and Associates in their December 2013 report.

These photo renders were submitted to JRPP in October 2015, as part of the RLA's Visual Assessment - Oct 2015 - Appendix F, page 20-27.

With regards to the Eastern grassy slopes below Varroville House and citing from this report: “The photomontages show that the proposed use of the site will satisfactory retain this existing visual resource. The conceptual MasterPlan is not inconsistent with the retention of a grassy and open character for the landscape that has that character...”.

We understand the importance of these views and are committed to provide lawn graves in this portion of the site.

Views from internal main roads:

As mentioned above and in the Masterplan reports (August 2013 and Sept 2015), the Vision for the site is to “provide concealed, private and low lying burial spaces to minimise visual impact”.

The aim of the landscape design is to also achieve concealment of headstones from the main internal cemetery roads.

Last year we undertook to model the whole site in Sketch-up (a 3D modelling software) to demonstrate to the client the feasibility of the “burial room” concept. We modelled the landscaping of the site to achieve total concealment of headstones from the main internal roads. This resulted in a series of plans positioning three (3) main types of burial options on the site:

- Lawn graves (plaques only on concealed beams)
- Lawn graves (low headstones 300mm max, on concealed beams, in concealed rooms)
- Monumental graves (to a reduced height of 1.2m only, in concealed rooms)

We are happy to share this work to demonstrate transparency and further clarify our approach in the areas of concern (ie the Eastern slope below Varroville House). Please read on for further explanations.

Treatment of the Eastern slopes below Varroville House:

The intention is to provide lawn burial on the entire eastern slopes and eastern portion of the site. The lawn burial will consist of lawn graves, with plaques on concealed concrete beams. (for visual impact, please refer to sample photo #1 below)

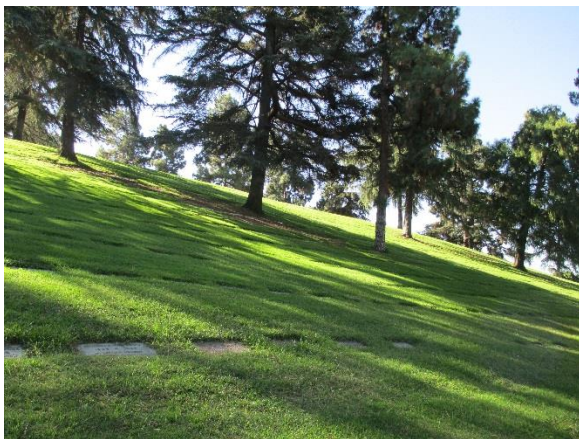


Photo #1

Lawn graves with plaques on concealed beams.
Indicative only
(Forest Lawn Cemetery, LA. USA)

A plan of the layout of these burials areas is also appended for your information.(Please refer to attached drawings L00, L05 & L06, Internment zones, overall site and enlargements)

It demonstrates our intention of provide low visual impact graves on the entire eastern slopes below Varroville House. As demonstrated on Photo #1, plaques will only be visible at close range. They will be invisible from external views.

There are no headstones in lawns (headstones up to 300mm max) nor monumental graves (Headstones up to 1.2m) in this part of the site.

We trust this demonstrates our commitment to respecting this sensitive area of the site.

Florence Jaquet

Principal

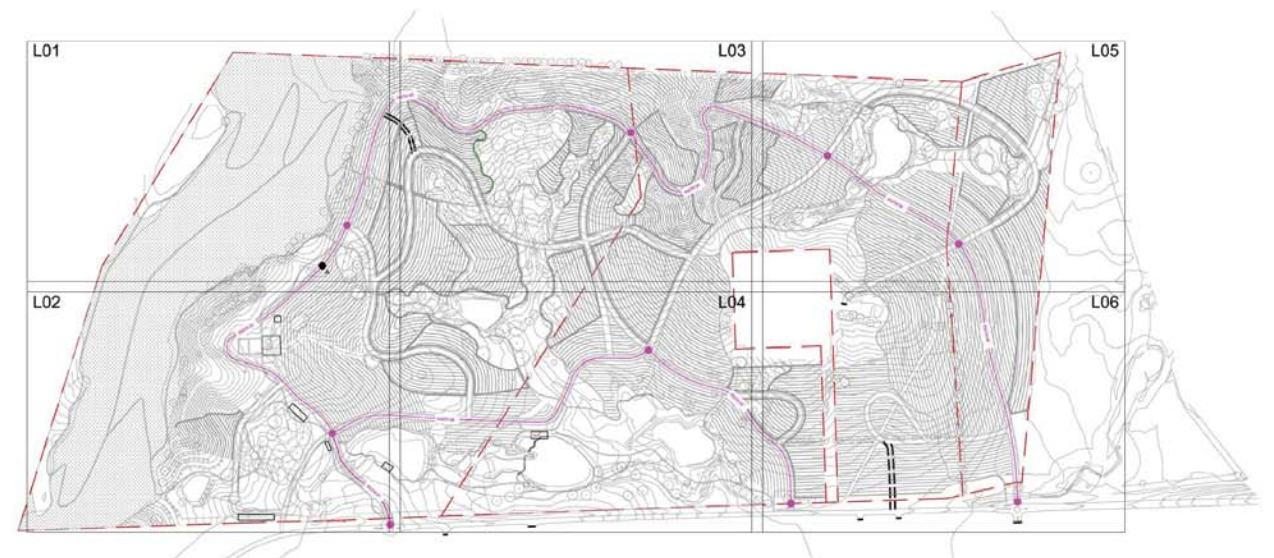
22/08/2016



LEGEND:

SCREEN PLANTING

TYPE A	TYPE I	TYPE Q
TYPE B	TYPE J	TYPE R
TYPE C	TYPE K	ANIMATION TEST ROUTE
TYPE D	TYPE L	
TYPE E	TYPE M	
TYPE F	TYPE N	
TYPE G	TYPE O	
TYPE H	TYPE P	





LAWN GRAVES (plaques only on concealed beams)

- LEGEND:
SCREEN PLANTING
- | | | |
|--------|--------|-------------------|
| TYPE A | TYPE I | TYPE Q |
| TYPE B | TYPE J | TYPE R |
| TYPE C | TYPE K | REVEGETATION AREA |
| TYPE D | TYPE L | |
| TYPE E | TYPE M | |
| TYPE F | TYPE N | |
| TYPE G | TYPE O | |
| TYPE H | TYPE P | |

- LEGEND:
BURIAL TYPES
- | | |
|------|--------------------------------------|
| LAWN | LAWN GRAVES (CONCEALED BEAMS) |
| LOW | LOW HEADSTONE 300mm HIGH |
| H | HIGH HEADSTONE 1200mm HIGH |
| T | TERRACED HEADSTONE IN RETAINING WALL |



LAWN GRAVES (plaques only on concealed beams)

LEGEND:
SCREEN PLANTING

- | | | |
|--------|--------|-------------------|
| TYPE A | TYPE I | TYPE Q |
| TYPE B | TYPE J | TYPE R |
| TYPE C | TYPE K | REVEGETATION AREA |
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