

13 November 2018

Professor Mary O'Kane AC
Independent Planning Commission
Level 3, 201 Elizabeth Street,
Sydney NSW 2000

Dear Prof. Mary O'Kane AC

SUBMISSION REGARDING THE EXTENDED CURTILAGE FOR VARROVILLE (SHR00737)

The Catholic Metropolitan Cemeteries Trust (CMCT) are the owners of 166-176 St Andrews Road, Varroville being land which is presently being considered for the proposed curtilage extension for Varroville (SHR00737). I am writing to you to express our strong dissatisfaction with the proposed extended curtilage as presently proposed by the OEH and Heritage Council.

By way of background, I confirm that CMCT in its submission to OEH as delegate of the Heritage Council on 8 August 2017 supported an extension of the heritage curtilage. This support was conditional on the need for site specific provisions to be adopted for the site prior to any listing occurring to allow the development of the site to proceed as a cemetery and in accordance with the site specific planning controls gazetted for the site in the Campbelltown LEP.

Following our submission, we have become increasingly concerned with the behaviour of OEH when advised that site specific exemptions would not form part of any listing which was contradictory to our understanding. Through a letter to Mr Tim Smith OAM dated 15 June 2018 we withdrew our support for the curtilage extension which appeared to be determined by the subjective opinion of one particular OEH officer.

CMCT has for the past 5 years been seeking the relevant planning approvals to develop the site as a cemetery as an agent of the Crown, CMCT put this proposal forward in direct response to the critical shortage of burial space in Metropolitan Sydney and our responsibility to ensure that the needs of the Greater Sydney community is met. This responsibility extends to all faith groups including the Jewish and Muslim communities that have as little as 5 years of internment space remaining in Metropolitan Sydney. We have worked in close collaboration with many faith groups representing a large percentage of Sydney's population who support our proposal. Many of these groups have made submissions. The protracted time associated with identifying and acquiring a site, intricate landscaping design including heritage planning together with securing planning approvals and physical construction of new cemetery site means that the proposed heritage curtilage in its current form at Varroville will, put simply, result in these faith groups not having adequate internment space in the future.

At a procedural level we are particularly concerned with the conflicting views and misrepresentations made by the NSW Office of Environment and Heritage regarding the proposed curtilage application and their unwillingness to disclose with us the full contents of their investigations and of the site and liaise with us appropriately as land owners.

We would point to the heritage study undertaken by Geoffrey Britton and Peter Phillips, which we understand has in part been used to inform the OEH/Heritage Council assessment before the IPC has **not** been made publicly available.

This is despite both the multiple requests the report be made available for ourselves to review, and simply because the study was publicly funded via a Heritage Council grant. Our confidence in the process has been further eroded by the recent inclusion of information on the IPC website late on Friday 9 November 2018, leaving a mere 2 business days from the conclusion of this public notification period. This has afforded us minimal time to review the documentation and provide a detailed response to the matters raised. We requested that the public exhibition period for the proposed curtilage listing be extended to enable a detailed review of the newly exhibited material.

CMCT an agency of the Catholic Church have a long and proud history of being custodians of significant heritage places and spaces. Our significant presence in the sector, now over 150 year presence at Rookwood Cemetery is testament to this fact where we currently manage a state heritage listed cemetery facility with great success. I feel that through our planning for the new landscaped garden cemetery proposed for Varroville, there has been a failure by heritage authorities and OEH officers to acknowledge the significance and financial commitment of CMCT's work, which seeks to celebrate the historical significance of Varroville through an integrated landscape design response which is sensitive to the historical aspects of the site. Our project will allow public access to the site for the first time in the European history of the site. Over 30% of the site has been set aside for public recreation. The proposed development will also facilitate the implementation of a management regime that will see the preservation and restoration of degraded outbuildings at considerable cost to CMCT together with an investment of \$50 million in building and landscape features. We will deliver a world-class facility that everyone in NSW will be proud of and the public can enjoy for centuries to come.

Our Town Planning and Heritage Consultants Urbis, Architects and our legal representatives at Mills Oakley have prepared submissions on our behalf and provided a copy of these to yourself. I would like you to note that these submissions have the full support and backing of CMCT, the Catholic Archdiocese of Sydney and many other faith groups and government agencies which should be considered in conjunction with this submission.

If you have any questions please do not hesitate to contact me on [REDACTED].

Yours sincerely,



Peter O'Meara
CEO
Catholic Metropolitan Cemeteries Trust