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Department of Planning and Environment  
Housing Land Release  
GPO Box 39  
Sydney NSW 2001

16 November 2015

Dear Sir/Madam,

**Re: Greater Macarthur Land Release Strategy (GMLRS)**

I write on behalf of the Carmelite Nuns, Varroville, and as a member of the Scenic Hills Association (SHA). We refer you to the submission made by SHA which we endorse in its entirety.

We accept the need for new housing in the Greater Macarthur area and welcome the opportunity offered by the Department to contribute our comments in the early stages of the planning process.

Our submission primarily relates to what we see as omissions in the material exhibited. As residents of the Scenic Hills, an area whose scenic beauty has been protected by its zoning for more than 40 years, we openly declare our interest in seeing scenic land conserved here and elsewhere for the benefit of present and future residents. Preservation of its natural amenity includes due care for its associated assets: **aboriginal and colonial/European heritage** (not confined to that listed on the State Heritage Register) and **biodiversity**.

We have personally experienced the encroachment of housing into the Scenic Hills via the seemingly uncontrolled, opportunistic and exploitative mechanism of spot rezoning (viz. the Emerald Hills Estate). We have already seen the negative impact this is having on the amenity and biodiversity of the area. In the light of our experience, we ask that all existing east-west fauna corridors between the Georges and Nepean Rivers be protected. If any infrastructure required by the

GMLRS, such as road widening, will adversely affect any of these corridors, we ask that this be compensated by creating new ones or by rehabilitating existing low-medium corridors.

**Cemetery planning** is the most glaring omission from the GMLRS. Again, we openly declare a personal interest in this matter. At present there is a proposal proceeding through the planning process to locate the Macarthur Memorial Park - a large cemetery with projected capacity for 100 years - at Varroville within the Scenic Hills of Campbelltown. Currently cemeteries are prohibited under the Environmental Protection zoning of the Scenic Hills. Because of public opposition, the proponent is not admitting at this point that the proposal will include a crematorium, though it is inconceivable that a 'state of the art' cemetery with a 'life' of 100 years will not include one.

As it stands, this proposal will lead to a poor outcome for the Macarthur Region and specifically for the Scenic Hills. The semi-rural amenity and scenic beauty of the northern part of the Hills will be lost and important colonial built heritage and landscape will irrevocably be destroyed. It will require widening of St Andrews Road in the foreseeable future to allow traffic flow around slow-moving funeral processions, with possibly a 'through' connection between Camden Valley Way and the F5 Motorway and Campbelltown Road. This will have a devastating negative social and economic impact on the residents and users of the sensitive land uses in the area – schools, monasteries, Retreat Centre and State Heritage Listed Varroville House and landscape. It will also have a serious negative impact on biodiversity. In summary, the proposal benefits nobody but the developer.

The GMLRS provides an opportunity to relocate the proposed Macarthur Memorial Park out of the Environmental Protection area and into the Greater Macarthur Land Release Investigation Area, where it can be properly planned to minimise land use conflicts and ensure adequate access by road, rail and public transport.

We wonder whether the land use conflict noted in the GMLRS reports between urbanisation and land previously or currently used for mining could be overcome by using such rehabilitated land for burial space. We note that the timeframe for phasing out mining in the Region coincides with the time when the shortage of burial space in Macarthur will become critical. We ask planners to investigate this possibility, which could alleviate the concerns of homebuyers.

Cemeteries and Crematoria NSW (CCNSW) is a new government agency set up to oversee the interment industry. Recently it released its Strategic Plan in which it noted that cemeteries and

crematoria are ‘*critical community infrastructure*’ (p.8) and one of its priorities is to ‘*ensure that cemeteries and crematoria are considered during land use planning*’ (p.21).

In 2011, the NSW Government (Primary Industries – Cemeteries) conducted a survey of potential burial sites in the Greater Sydney Metropolitan Area. It identified three (3) sites in Macarthur, all of which are within the Greater Macarthur Land Release Investigation Area. All will be nearer to areas of future population density than Varroville, with better transport access and fewer constraints such as land use conflicts. In the survey, no sites were identified in the Scenic Hills and yet the Macarthur Memorial Park proposal for Varroville has proceeded apace through what is publicly perceived to be a perverted, if not actually corrupt, planning process.

According to the CCNSW Strategic Plan, cemetery space in Sydney generally will not be exhausted until 2050 (2041 in South-Western Sydney according to Urbis), with critical shortages evident by 2036. There is therefore sufficient time to plan wisely and carefully to avoid land use conflicts and to optimise access by road (e.g. proposed Spring Farm Link Road and Outer Sydney Orbital M9) and rail. This will lead to a positive outcome for the Macarthur region as a whole.

The CCNSW is gathering information and putting in place critical guidelines over the next two years to guide proper planning for cemeteries. We submit that no major plan such as that proposed for Varroville should be rushed through the planning process before the CCNSW’s research is completed and proper guidelines are in place. Further, we consider that the proposed Macarthur Memorial Park should be relocated into the Greater Macarthur area where it will serve a region of rapid population growth.

Yours faithfully,

A handwritten signature in blue ink, reading "Jocelyn Kramer". The signature is written in a cursive, flowing style. The first name "Jocelyn" is written with a large, stylized 'J' and 'C'. The last name "Kramer" is written in a more standard cursive script.

Sister Jocelyn Kramer OCD