

13 May 2022

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By email: [info@wspt.nsw.gov.au](mailto:info@wspt.nsw.gov.au)

Dear Oriana,

**RE: Submission on the draft Fernhill Estate Landscape Masterplan**

Thank you for allowing the National Trust of Australia (NSW) to join the stakeholder meeting with the Friends of Fernhill and Mulgoa Valley and staff from Western Sydney Parklands (WSP) on site on 29 April 2022, and for providing a briefing on the draft Fernhill Estate Landscape Masterplan. The National Trust welcomes the opportunity to provide comment on these plans.

As you know, the Trust welcomes the opening up of the Fernhill Estate as public space, allowing this important heritage landscape to be accessed and enjoyed by the Mulgoa and wider Sydney basin community. However, we also have a number of specific comments and concerns regarding the current Draft Landscape Masterplan that we offer in our role as a public advocacy organisation with a commitment to heritage conservation and good outcomes in NSW's cultural and natural heritage.

**Importance of Rural Landscape Setting**

The National Trust first recognised the importance of Fernhill Estate in 1946. The heritage significance of the site rests largely in its position as an outstanding and increasingly rare example of an Australian rural colonial landscape. This rural character is defining feature of the historic setting of both Fernhill House and its associated Landscape Garden. The significance of this rural character is clearly articulated in the SHR listing for the place:

*"The estate is primarily significant for its landscape which is a rare Australian example of the English landscape school's practice of modifying the natural landscape to create a romanticised natural appearance embellished by a richness of cultural features... [t]he estate also demonstrates a unique phase in Australia's history with the rise of the landed pastoral estates"*

As urban development in the Sydney basin has increased, the rural landscape that once characterised the area has becoming increasingly rare and within Fernhill itself there has been a gradual reduction of the rural land as bushland has been reinstated. It is therefore vital that the defining rural characteristic of Fernhill Estate is emphasised, both for its centrality to the established heritage significance of the site and for its future recreational and educational utility as rural farmland in an increasingly urbanised landscape.

**National Trust Recommendation:**

***The Trust is concerned that the importance of the rural colonial landscape in defining the heritage character of Fernhill Estate has not been adequately recognised and accommodated for in the current Draft Landscape Masterplan. More emphasis on the exact nature of this major component of the site should be presented.***

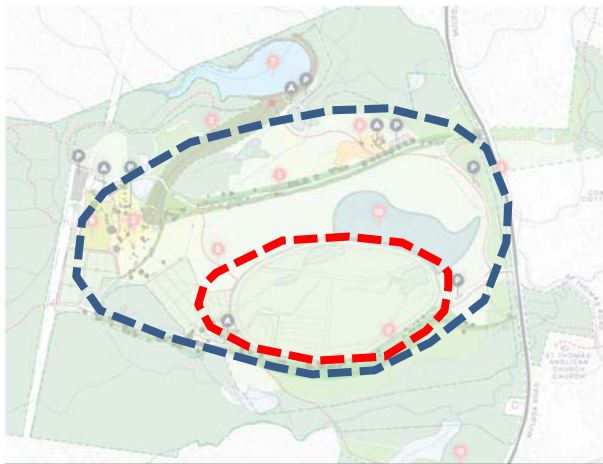


### The Racetrack needs to be considered

As was raised at our consultation, the Trust is greatly concerned that the racetrack has not been included in the Draft Landscape Masterplan for Fernhill. **It is our opinion that this is the major shortcoming of the present document and that this must be reconsidered.**

The Fernhill Estate Conservation Management Plan (October 2019) is very clear on the need for this to occur. In the “Critical Recommendations” listed at the start of that document it notes (with National Trust emphasis in bold):

2. *A masterplan should be undertaken **for the whole site** to determine appropriate uses, suitable locations for those uses, the infrastructure needed to support those uses, suitable locations for any new building elements that may be required and to set out site specific design guidelines for any proposed new built elements.*
3. *The existing heritage fabric should be maintained and **intrusive elements including the racetrack, new stables and stone wall along the driveway should be removed where practicable.***<sup>1</sup>



*The racetrack (in red) and its relationship to the rural landscape (in blue). This is a major component of the site which must be considered in any serious Master Plan for the site.*

The National Trust are very concerned that the entire Draft Landscape Masterplan has been predicated on the basis that this highly intrusive, centrally located and spatially very large component of the site is to remain in place.

At the meeting on site, WSP representatives stated that this plan was to “help shape the next fifty years” for Fernhill. If this is truly the case (and it must be), there is absolutely no way that this component of the site, which occupies nearly a third of the historic rural landscape zone, can be excluded from an overall plan.

More worryingly, further comments made by WSP staff at our meeting that there is “a need to consider quarantine zones” means that the racetrack has actually shaped the Draft Landscape Masterplan for Fernhill, when in fact that document must be shaping its removal.

The Trust is very concerned that the current Draft Landscape Masterplan has not adequately considered the problematic relationship that exists between the identified heritage values of the historic landscape and the 1980s racetrack and associated facilities which have been identified as intrusive elements. The ongoing presence of the racetrack compromises the site’s historic integrity and its positioning presents a significant barrier to both public enjoyment of the site and respectful celebration of the site’s historic character and heritage values. The racetrack negatively impacts significant views within the site, including views to and from Fernhill House. The racetrack additionally obstructs physical movement through a substantial portion of the site.

#### **Trust Position and Recommendation:**

***The Trust agree with the findings of the CMP that the racetrack is part of the whole site, is intrusive, and should be removed.***

***The Trust maintain that the Draft Landscape Masterplan as it currently stands is incomplete and does not consider the whole site. This can only be resolved by considering the future of the racetrack and associated stables.***

<sup>1</sup> JPA&D Australia Pty Ltd. Fernhill Conservation Management Plan, October 2019, pp.7-8



### Cumulative Impact on Overall Cultural Landscape

The Draft Landscape Masterplan proposes a number of physical changes to the site in order to facilitate its future public use and activation, many of which are commendable. However, the Masterplan fails to adequately address or consider the cumulative impact that these individual changes will have on the overall integrity of the cultural landscape and its significance. Basic discussions on site regarding parking areas, entry points, and places to picnic reveal that much is yet to be considered in terms of the site's operation. Seeing a large number of cars parked along a main roadway inside the place will have a major impact on the rural character of the site. These things can be resolved, and need to be considered now.

An understanding of cumulative impact should be considered and WSP should develop ways to minimise this impact, including re-design if necessary. This is an essential step in ensuring that identified heritage values of Fernhill Estate are appropriately maintained, protected and celebrated.

#### Trust Position:

***The Trust is concerned that the current Landscape Master Plan has not adequately considered the cumulative impact of the proposed changes to the sites identified heritage values.***

### Documentation

It is clear, and was recognised by WSP and the landscape architect during our meeting, that many of the concerns raised on the day relate to the actual description of the proposal, in particular the drawing on page 13 of the summary brochure. Confusion regarding the extent of new pathways, tracks, roads and water bodies will be readily resolved with the production of a more detailed plan. In particular, the exact nature of the works in the area surrounding the house need to be clearly shown in order for future consultation to be meaningful and effective.

We accept that this is still a high-level plan but more, clear, detail must be provided.



*The current plan gives little indication of the works that will happen near the main house.*

#### Trust Position:

***A new plan needs to be drawn which clearly shows the proposal, including the racetrack.***



## Conclusion

The future of Fernhill Estate offers a unique opportunity to establish a vibrant community site that both celebrates and consolidates the heritage values of the site whilst allowing for a public enjoyment and use of one of the most important remaining colonial rural landscapes in NSW.

Aspects of the Draft Landscape Masterplan have the ability to achieve this potential, while other components have the ability to perpetuate past wrongs and create lasting negative impacts.

The final Masterplan must consider the whole site – including the racetrack.

The National Trust look forward to the next iterations of this design work and hope that our comments can be taken into account in a way that improves the outcomes for Fernhill Estate, as well as the Mulgoa Valley and wider Sydney community.

We will always be happy to continue this discussion with you.

Yours sincerely,

David Burdon  
Director, Conservation