




Dear Penrith City Council,

Please refer to my attached letter as my submission opposing DA 17/1092



Kind regards,



The General Manager  
Penrith City Council  
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Penrith NSW 2751  
Phone 02 4732 7777  
council@penrith.city  
DA17/1092

Re: DA17/1092  
Lot 2 DP 1108408 and Lot 512 DP 1079728  
13 Park Road, Wallacia

I am lodging a submission to object against DA17/1092.

Summation of the main points of my objections are:

- **There should never be cemeteries and crematoriums built right in the heart of a town/shopping village.** DA17/1092 is right at the heart of Wallacia town. It is destroying the social fabric, design, amenities, ambience and scenic values of Wallacia's town centre.
- The proposed development can lead to **possible contamination of air, drinking water, irrigation water, residents health and wellbeing**
- **Insufficient protection of natural wildlife and rural environment.** There are protected and endangered species on the site and the DA has plans to remove trees that they use as their habitat in order to build internal roads and building facilities
- **The development will change the rural character and landscape of the area.** It will also set and undesirable precedent for local farms to have no choice but be converted into cemeteries too as it is undesirable to be farming in close proximity to cemeteries and crematoriums due to potential contamination of the air and waterways
- **The development will not improve the scenic quality of the area** as there will be parts of the cemetery visible to the main roads
- **Tourism to the area will be negatively impacted** and this will affect locals who are reliant on tourists enjoying a day out to the area and ready to spend their money on local farms and businesses. The cemetery visitors are more likely to use only the onsite facilities and keen to return home and not spend the day immersed in exploring Wallacia and Mulgoa. They would only be in the area to attend a funeral, not to linger and enjoy the scenic beauty of the area and what local businesses have to offer
- **The proposed development will have a negative effect on the reasonable use and enjoyment of local residents lifestyle.** Replacing a social community facility with a cemetery/crematorium can have negative mental health consequences for adults and children alike.
- **Local businesses that are potentially negatively impacted economically:**
  - Market gardeners growing fruit and vegetables for human consumption
  - Cattle, sheep and chicken farms in the vicinity
  - Tourist businesses – Luddenham showground is on Park Road. It will be socially inappropriate to be seeing the festival and show ground on one end of Park Road with carnivals, fireworks, circus shows and celebrations while mourners are driving through to funerals on the other end of Park Road. The country club and Wallacia Hotel has bed and breakfast facilities for tourists and tourists are unlikely to book accommodation to hotels that are adjoining cemeteries.

- **There are residents in the surrounding area who are not on reticulated water and rely on captured rainwater and water tanks to supply their water needs.** Riverina Water County Council<sup>4</sup> released a factsheet that stated, *'The provision of reticulated water supply and sewerage services in Australia has halved the death rate and reduced the rates of infectious disease by a factor of ten. Even now, there are significantly higher rates of infectious illness in Australian communities which do not have reticulated services.'* There will be air pollutants emitted from the crematorium and this will be emitted around Wallacia and can contaminate the tank water of those who aren't on reticulated water. Who will be responsible for any potential disease or illness resulting from drinking water with crematorium contaminants?
- **Burials can result in toxic leakage from the casket.** Toxins from deteriorating plastic from casket insulation and lining, formaldehyde and metals from the body. **All this can contaminate ground water and feed into water that is flowing into the Nepean/Hawkesbury water. This water is used for agriculture (such as fish and prawns) and also for recreational purposes such as swimming, boating and fishing. Ground water studies were only performed during a very dry period.**

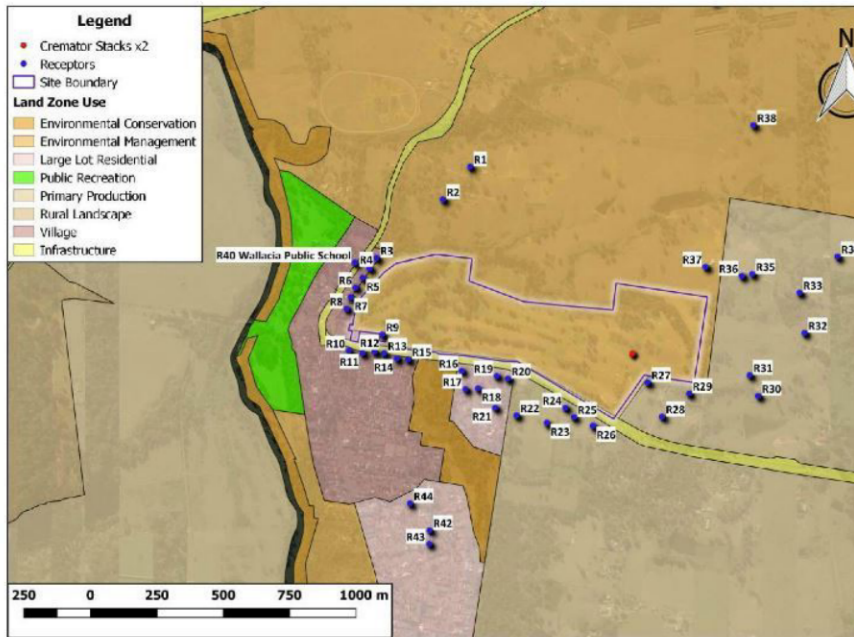
**Cremating human remains will give rise to emission of air pollutants** because of smoke emitted from furnace stacks and also the mixed combusting materials that are contained within coffins (mixed personal items and assortment of casket materials). This will subject our health to a range of pollutants that are airborne, insect borne and waterborne. Odour and noise from cremations/cemetery can carry for several kilometers because it is in the valley.

**Carcinogenic compounds** such as polychlorinated dibenzodioxins (PCDDs) and polychlorinated dibenzofurans (PCDFs) are found to be released by crematoriums which is hazardous to our health. Decomposing corpses release a variety of pathogenic organisms, bacteria and viruses (cemetery leachates, faecal streptococci, staphylococcus aureus for example) and it can be spread by birds, animals and insects that may populate the proposed site and then fly and visit neighbouring farms, crops, livestock and dams in the vicinity.

If filters run inefficiently at the crematorium, contaminants from the crematorium will spread across Wallacia, Silverdale and Mulgoa. If livestock graze upon contaminated lands, consumers could get sick and this could lead to law suits due to infected meat and contaminated animal by products.

- **Increase in noise from the crematorium furnaces and combustion fans have been identified as *'potential key source of noise emissions'*<sup>2</sup> and the furnace noise impact are not accurate as the specifications for the proposed furnace has not been provided.** The noise study refers to *'only one furnace operating'*<sup>2</sup> from the Woronora Crematorium project in 2014. This is not a detailed study or assessment on noise impact. **There are many crematorium furnaces in operation and using the noise data from only one single furnace is not sufficient for analysis and concluding that the furnace noise level complies.** DA17/1092 is quoted to say *'the source noise levels presented...do not reflect the actual noise levels of the proposed furnace'* and only provides the noise indication from one furnace.
- DA17/1092 acknowledges that final plant selections of typical building services have not been made and no detailed assessment has been carried out. Plant selection noise study is crucial *because 'the plant will potentially operate into the evening and night periods to accommodate specific operational requirements (eg The Mortuary)'*<sup>2</sup>.
- Emissions from cremations includes carbon monoxide, oxides of nitrogen, sulphur dioxide, particulate matter, volatile organic compounds, polychlorinated dioxins and furans, polycyclic aromatic hydrocarbons, heavy metals (antimony, arsenic, cadmium, chromium, cobalt, lead, mercury, nickel, selenium and zinc), hydrogen chloride and hydrogen fluoride.<sup>3</sup> **These are toxic air pollutants that will be released into the air in Wallacia and the crematorium is unable to control emissions resulting from burning PVC plastics, usage of paint/metal fittings and construction of caskets, mementos or artefacts inside the coffins<sup>3</sup>.** Also, *'odour has the potential to be emitted from the cremation process,'* should the cremation equipment not be operating efficiently<sup>3</sup>.

Figure 4 Land use zoning and sensitive receptors surrounding the Proposal site



Note: R41 (Warragamba Dam) not shown. Colours taken from the Department of Planning and Environment template

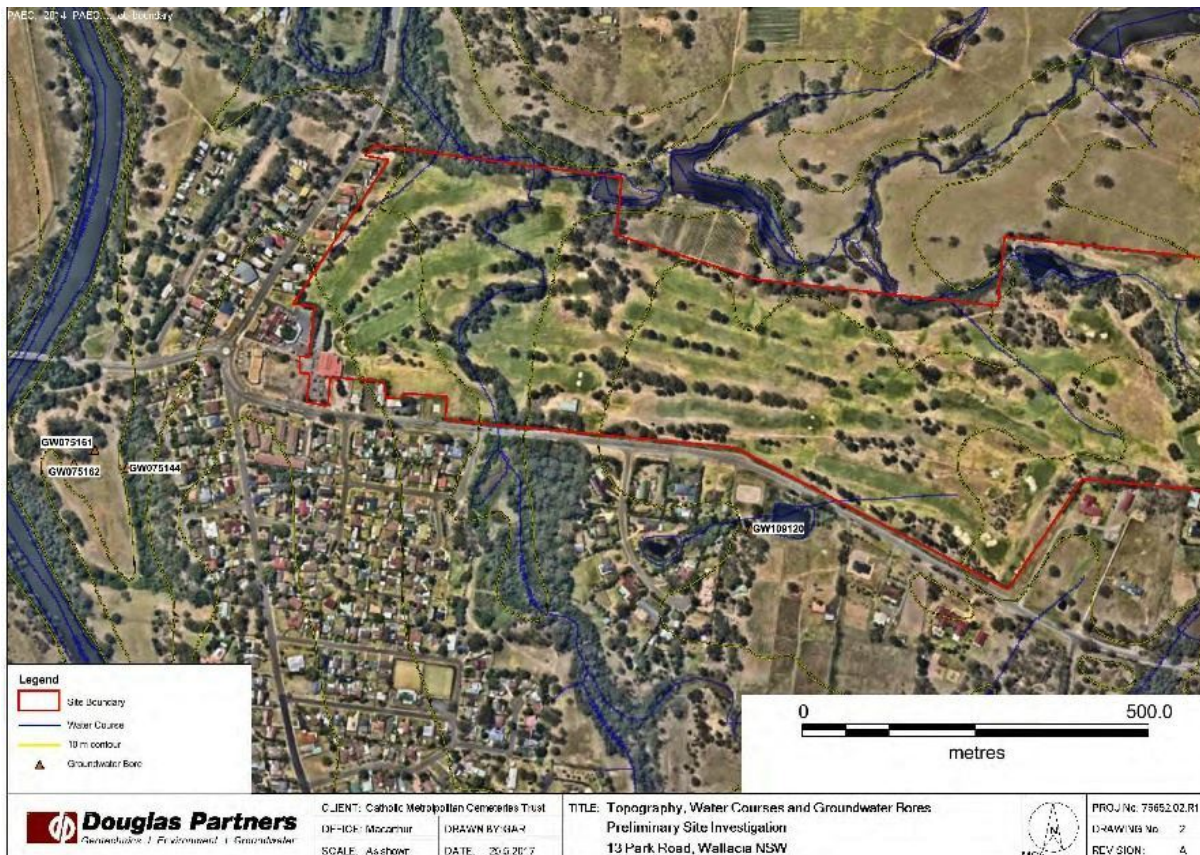
- The above figure from DA17/1092 illustrates the proximity of the proposal to the town, residential houses and Wallacia Public School. The above image is a cross sectional representation of people represented because they are more 'susceptible to changes in air pollution than the general population' and the children at Wallacia Public School are exposed to the air pollutants<sup>3</sup>.
- Northstar Air Quality Report for DA17/1092 has conflicting information about the number of hours of operation when providing the analysis of air pollution. One part of the report states that it will assume worse case scenario calculation at 60 minutes per cremation, eight cremations per day per cremator, 44 per week per cremator over 48 weeks, but later on in the report it uses six to seven cremations per 10 hour day per cremator. *If each cremation was calculated with the original figures of eight per hour, the hourly pollutant emission numbers would be higher than using 90 minutes per cremation calculation.* Why would the report revert to using 90 minutes when they had stated that they would use worse case scenario and why would the hours of anticipated operation be 8 hours in the earlier parts of the report and then changed to 10 hours in the latter part of the report? The report and analysis lacks consistency in its numerical calculations.

The Northstar Air Quality Report concludes that their *assessment 'of potential worst-case (ie maximum cremation rate) has been considered in conjunction with worse case weather conditions, an assumption that both cremators would be operations for the period 6am to 6pm daily has been adopted. Although highly conservative...to provide confidence that the operations can be performed with no exceedances of the relevant air quality criteria'*<sup>3</sup>. The report is full of conflicts and inconsistencies. The first half assumed the worse case scenario with an 8 hour day of operation, the central part of the report assumed that the worse case is with a 10 hour day of operation, and then the conclusion states that the figures are conservatively calculated using a 12 hour day of operation.

- The proposed site has areas that are deemed flood zones, shallow bedrock, a permanent watercourse area, vulnerability to erosions and salinity. The Douglas Partners<sup>4</sup> report states that there are two creeks that runs through the proposed site and both flow towards the Nepean River. Part of the proposed site has limitations which includes, 'high erosion hazard...and localized flooding.' The proposed site contains tributaries which flows to Jerry's Creek, with Jerry Creek flowing to the Nepean River.

**Should the proposed site become flooded, pollutants and contaminants can flow into Jerry's Creek and then ultimately, into the Nepean River.** The report states that 'the primary environmental receptor down-gradient of the site is Jerry's Creek which flows to the Nepean River approximately 300m west of the site boundary' and there is 'groundwater beneath the site'.

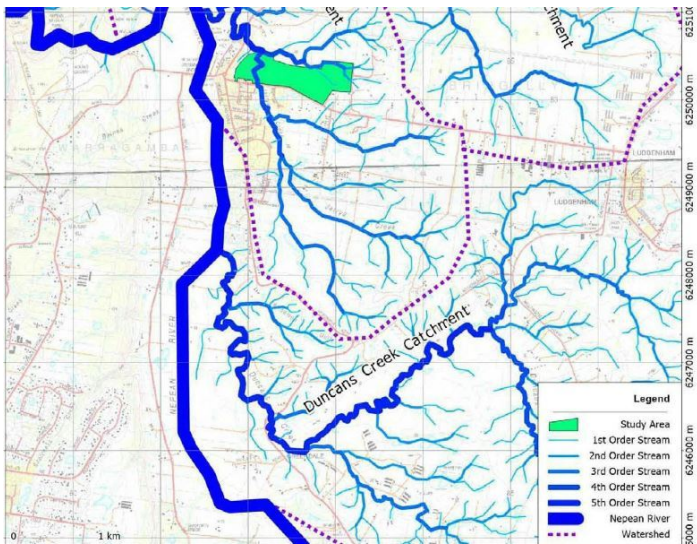
The image below provided by Douglas Partners indicates in blue, the watercourses that flows from the proposed site towards other watercourses and creeks, of which onflows to Nepean River. This means that **any heavy rain periods could result in flooding and rising groundwater collecting contaminants and ultimately flowing into the Nepean River.** Refer to image below for the blue lines indicating watercourses:



- The Austral Archaeology DA17/1092 report illustrates how **Jerry's Creek is a 4<sup>th</sup> order creek, considered to be permanent water source.** There are tributaries, watercourses and streams that flow into Jerry's creek and this will be hazardous should the pollution and the contaminants from the cemetery flow into the creek and ultimately Nepean River/Hawkesbury River. People eat fish and prawns from these rivers. **This could pose health issues** and potential lawsuits from contaminated food caught and eaten from the river. Who will assume liability for anyone sick from the increased contaminants in the river as a result of the proposed development? There have been periods of heavy rains over the year which would have led to flooding and heavy water run off, rising ground water and this flowing into the watercourses and creek. There have been no analysis of the the maximum level that ground water has risen to. **The only ground water analysis was performed during a very dry period** which is not a indicative of long term expectations and consequences.

The below image is provided by Austral Archaeology:





- And from the Urbis Wallacia Memorial Park Landscape and visual impact assessment- The proposed site is subject to flooding and this may lead to potential contamination of the river. As you can see in Urbis' figure below, they write that, **“This low –lying topography is flood prone, with the western part of the site predominantly lying within the floodplain...the land surrounding Jerrys Creek is identified as ‘natural resources sensitive land’”**:



- The proposed development may possibly breach clause 7.3 of the PLEP 2010 ‘natural resources sensitive land’ clause which considers the pollution of waterway health and requires consideration of the velocity of runoff. **The proposal plans to have burial zones within the flood prone areas.**
- **There will be increased traffic congestions and dangerous driving. All the main three roads that lead to and from the proposed site are only single lane in each direction which leads to a lot of frustration for road users and also cases of aggressive driving. They also have only very limited sections for overtaking.** Park Road is single lane road each way with congested traffic during peak times. The *‘majority of Park Road is marked with double continuous white lining, restricting vehicles to no overtaking’*<sup>5</sup>. The road safety review analysis is not reviewing the parts of Park Road which has limited visibility for overtaking. It would make more sense for the study to review the RMS crash data report for Mulgoa Road from Mulgoa town to Wallacia and the length of Park Road, as all traffic that will drive to the cemetery will be driving the entire length of either of these two roads. Mulgoa Road is single lanes and very winding and curvy. Park Road is hilly and has very limited long distance visibility which is why most of the road is marked with double lines to prevent overtaking<sup>5</sup>. With

increased traffic from funeral visitors, Park Road lacks sufficient capacity to accommodate the likely traffic generation. The expected increase of traffic through Mulgoa Road heading towards the proposed development may result in breaching the Penrith Development Control Plan 2014 Part D, 5.8. and Part E9 which states that consent should not be granted if, *“The safety and efficiency of Mulgoa Road will be adversely affected by the design and siting of the proposed access and by the nature, volume and frequency of vehicles using Mulgoa Road to gain access to the development”*.

- **The great majority of cemetery related traffic will be unfamiliar with the roads and area and large numbers of mourners can potentially create traffic hazards and traffic jams.** There has been accidents Park Road that have resulted in a fatality and many accidents on The Northern road. **Many properties along Park Road, Mulgoa Road and The Northern Road do not have turning bays, the roads have many blind spots due to curvature and hilly terrain and this is unsafe if there is an influx of cemetery related traffic who are unfamiliar with the rural roads. This leads to danger for both residents and cemetery visitors.** This will exacerbate existing traffic problems.
- I also object to the Preliminary Geotechnical, Groundwater and Salinity Assessment<sup>6</sup>. There doesn't appear to be any study or research into the depth of casket burials and whether it will be single layer or double layer. The geotechnical report does advise that a large proportion of the proposed site contains ***‘shallow weathered rock area of less than 2.3m depth’, ‘Bringelly Shale’ and ‘erosional landscape unit with deep, stony soil and low water holding capacity’ and ‘possible ephemeral perched groundwater’***. The soil on most of the proposed site either on shallow rock or on flood prone zone.

In conclusion to this submission, I would like to emphasise that constructing a cemetery and crematorium in Wallacia or its surrounds is against the wishes of many in the community. It is also not an ideal location due to the rich history of the area, the beautiful scenic values that the area possesses, the undeveloped and simple single lane rural roads that services the area. The many watercourses and tributaries that ultimately flow into the Nepean/Hawkesbury river where people enjoy recreational activities and also catch seafood to eat. We must also consider the school children and how vulnerable they are to the air and water pollutants from a cemetery/crematorium.

Also, with Badgerys Creek airport in the mid to long term horizon, Wallacia and its surrounding towns could have a multitude of economic and social opportunities that can be enjoyed and this could increase the wealth and prosperity of the area and in turn, increase the social and mental health of residents in the area. The alternative uses of the land such as for tourism and hospitality related could far exceed what the Catholic Metropolitan Cemeteries Trust is trying to force upon the area by ignoring the wishes of the local communities, the Penrith Council and its constituents.

#### References:

1. Riverina Water County Council Fact Sheet, 30/10/2009, 91 Hammond Avenue, Wagga Wagga NSW 2650
2. Acoustic Assessment DA17/1092 Wallacia Memorial Park at 13 Park Road and 512 Mulgoa Road Wallacia
3. Northstar Air Quality report for DA17/1092, Air Quality Impact Assessment DA17/1092
4. Douglas Partners Contamination and Hazardous Material Assessment DA17/1092
5. The Transport Planning Partnership report on DA17/1092