



Dear Sir/Madam

Please find attached my submission for DA Wallacia Memorial Cemetery.

I request my name and personal details are not published.



Penrith City Council
27th February, 2018

Submission re DA17/1092: Proposed staged construction of Wallacia Memorial Park Cemetery and Associated Structures and Works

As a long-time community resident of Mulgoa and the Penrith area I take this opportunity to comment on the proposed Wallacia Memorial Park.

I am totally opposed to land zoned as E3 Environmental Management being used for a cemetery and crematorium and believe Minister Roberts has made a serious error of judgement in giving his consent for the purchase of Wallacia Golf Course by Catholic Metropolitan Cemeteries Trust. I see this as a poorly thought out action by Minister Roberts, one not in the Public's interest and resulting in inappropriate use of land that was not intended to be used as a site for a cemetery and crematorium.

If Minister Roberts approves the cemetery proposal a precedent will have been set. Undoubtedly E3 zoned land throughout EVERY LEP area in NSW will be at risk of cemetery and crematoria developments.

Crown Application

While the DA has been stated as an Integrated Development Application it appears that this may be incorrect. The Urbis document "Statement of Environmental Effects" states that the application is a Crown Application.

It is my understanding that if the DA is a Crown Application then the consent authority must not refuse its consent to a Crown development application except with the approval of the Planning Minister. Also the consent authority must not impose any conditions of consent on a Crown development, except with the approval of the applicant and the Minister for Planning. Equally, if the Planning Minister directs the consent authority to refuse the development, it must do so. (*Environmental Planning and Assessment Act 1979 (NSW), s.89A.*)

Factors not taken into consideration in the DA

The DA failed to take into consideration many important factors including but not limited to the ones outlined below:

1. Proposed Western Sydney Airport (WSA) and proposed Cemetery - cumulative impacts

The WSA EIS in its Cumulative Impact Assessment, Human Health, after consideration of the cumulative impacts of the proposed airport development in combination with increased non-airport related traffic on major roadways near the airport has identified health risks from air emissions in Stage 1 of the proposed airport operation. *EIS, Vol 21, Ch 27 Cumulative Impact Assessment, 27.3.3 Human Health. p603-604*

In fact the final WSA EIS admits air pollutants at Stage 1 were 'determined to be at the upper bound or marginally above levels considered to be acceptable by national and international regulatory agencies' and states:

- *EIS, Vol 21, Ch 27 Cumulative Impact Assessment, 27.3.3 Human Health. P603-604*
'While in general, the health risks of the Stage 1 development were low, some of the air pollutants emitted during the operation were determined to be at the upper bound or marginally above levels considered to be acceptable by national and international regulatory

indicated that the primary causes of the elevated levels of risk were emissions from motor vehicles operating on roads outside the airport site that were non-airport related i.e. background traffic related to increased urbanisation and development. The contributions of these non-airport related motor vehicle emissions varies according to the estimate year and by pollutant but in 2030 includes: 88 percent for carbon monoxide, 70 per cent for volatile organic compounds, 68 percent for nitrogen dioxide and between 90-92 percent for particulate matter.

The health risks identified for the Stage 1 development are all additional to the existing baseline level. In 2006, a Parliamentary Inquiry into the health impacts of air pollution in the Sydney Basin found that despite evidence that air pollution had improved over the last 30 years, these improvements were offset by Sydney's growing population, particularly in the south-west and western areas of Sydney. Evidence provided by NSW Health at that time estimated that in Sydney, there was between 600 and 1,400 deaths per year due to the air pollution in the Sydney Basin'. Additionally, a recent review of the Fuel Quality Act 2000 estimated that in Sydney, NO₂ was responsible for 330 deaths per year and an additional 336 and 371 hospital admissions in 2015.

The proposed Wallacia cemetery will not only add to air pollution from greatly increased traffic in the area but also air pollutants released from the Crematoria. We know that current trends indicate approximately 65% of people are choosing cremation, while approximately 35% are choosing burials.

Comment: In the DA not taking into account the cumulative impacts of the proposed WSA, particularly the impact of increased traffic and air pollution, it appears the public will not be given an accurate picture of the how these increases will affect their health and quality of life and that of future generations.

2. Cemeteries and Crematoria Amendment Regulation 2017 under the Cemeteries and Crematoria Act 2013

It appears the Regulation will be adopted in the very near future with the main change being most cemetery plots will no longer be classed as 'in perpetuity' but a leasing term for burial plots with a lease time of 25 – 99 year.

Comment: Clearly leasing of burial plots will significantly **decrease** the future number of plots that would otherwise have been required. It appears that this factor has not been taken into account when figures have been released stating the dire need for cemeteries.

Conclusion

Significant concerns regarding site location including hydrology and flooding, traffic conditions, air pollution are very valid.

Many community members are questioning the process leading to the approval and purchase of Wallacia Golf Course for a cemetery and crematorium and are not satisfied with the answers being provided by the authorities.

Why has a decision been reached that Wallacia is an appropriate site for a cemetery and crematorium, on what basis was this decision reached when significant reports and the Cemeteries and Crematoria Amendment Regulation 2017 have not been finalised?

The public have the right to demand answers to these questions.

