



**Objection Notice to DA 17/1092 – Wallacia Memorial Park – Cemetery**

We write to notify Penrith City Council of our definitive objection to the DA 17/1092, Wallacia Memorial Park – Cemetery, submitted by the Catholic Metropolitan Cemeteries Trust.

We request that our objection be documented by Penrith City Council and then forwarded to the Western Sydney Joint Regional Planning Panel (JRRP) for consideration.

We provide comment below to demonstrate a number of reasons as to why this development application should be refused, deemed not suitable or acceptable for the intended location.

**Point 1: Penrith City Council has unanimously opposed the DA 17/1092. Their decision and evaluation of this DA should hold considerable weight.**

The Australian Newspaper (September 1 2017) reported that Penrith City Council unanimously opposed the plan to turn Panthers Wallacia into a cemetery, saying it would “irreparably damage the unique landscape and heritage qualities and values of Wallacia” and the Mulgoa Heritage Valley.

Local government in the City of Penrith began with the formation of district councils in 1843. Incorporation of the town of Penrith in 1871 was followed by St Marys (1890), Castlereagh (1895), Mulgoa (1893) and Nepean Shire (1913). On 1 January 1949 all of these local government authorities amalgamated to form Penrith Municipal Council. Ten years later the Municipality of Penrith was proclaimed a City.

Penrith City Council has had a long, proud and rich history of local governance and decision-making that has been instrumental in facilitating the growth, transition and development from Penrith City’s early rural and agricultural origins to now being one of Greater Western Sydney’s major commercial centres.

This council understands the region, understands its people, understands its past and understands its future. To disregard their decision would be a disservice to a proud history that recognises and serves as an attribute to the importance of Australian and State Local Governance dating back to the Municipalities Act of 1858.

We develop DCP's that talk of preserving 'Heritage Items'. We as a society, (and importantly, the JRRP) must also consider the rich history and 'Heritage' of an unbroken chain of Local Governance, and seek to preserve its integrity by acknowledging its presence, valuing its voice, and adhering to its decisions.

### **Point 2 – Development Application not meeting requirements of PDCP E9 – Mulgoa Valley**

The Mulgoa Valley Precinct plays an important role in providing:

- A nature and **heritage conservation** area on the fringe of the Sydney metropolitan area;
- A rural, **recreation and tourism centre for Penrith** and suburbs in the surrounding region;
- An area of limited rural living opportunities **in sympathy with its landscape and heritage values;**

The proposed cemetery development is counterintuitive to these aspects of the Penrith Development Control Plan that serves to preserve these aspects of the community listed above. The DA should be refused for the DA's failure to comply with these aspects.

**Heritage Conservation:** The golf course has a rich history, within the local community, region, State and Australia. The heritage of the nearly 90 year old course must be preserved. This development of the cemetery fails to do so.

The JRRP are presented with a unique opportunity to preserve this asset for our community and region, and see that its heritage is safe guarded for future generations. If we as a society continue to redevelop important historical features such as these, erasing monuments of our past, reshaping footprints of rural villages and landscapes, surgically removing the heart, soul and fabric of small towns, then how do we as a society, a young nation, ever develop a shared history or an appreciation of history. Where does heritage begin if not at 90 years?

**A rural, recreation and tourism centre for Penrith:** PDCP E9 was established to preserve these aspects. The development is not in-keeping with this DCP.

The golf course is a major and vital recreational facility for the immediate township, wider region and Sydney Metropolitan area. Wallacia has a rich, proud and successful history of inter-club competitions. Just last Sunday 18<sup>th</sup> February, Wallacia A Grade Metropolitan Pennant Team hosted none other than the distinguished gentlemen from 'Royal Sydney'. Royal Sydney has hosted Wallacia the previous week. It was a heartily fought battle of equally classed golfers from arguably different worlds. The winners – all who participated. That is the true beauty of recreation and sport.

The Australian Golf Industry Council recently published a Community Impact Study September 2017. I believe the findings in this study reflect the values that such a DCP endeavours to uphold when seeking to preserve 'recreation and tourism' for Penrith.

Please view this report in full:

<http://www.golf.org.au/site/content/document/00038969-source.pdf>

A brief summary was also published in Australian Golf Digest January 2018. "The Economic social and health benefits that golf provides:

- Contributes \$3,614 BILLION annually to the community,
- Contributes \$126,6 MILLION in physical health benefits through the prevention of heart disease, type 2 diabetes, stroke and cancer,
- Generates \$477 MILLION in tourism revenue through visitation, food and beverage spending, accommodation, travel and shopping,
- Provides a strong connection to the outdoors and natural environment,
- Offers Australian golfers an average life satisfaction score of 7.4 by comparison with the Australian population of 7.3 and the OECD average of 6.6."

This comprehensive study reflects the important benefits of preserving this heritage recreational facility for the members of this community and the wider region. The council and community appreciate its true worth. We ask the JRPP to respectfully acknowledge this vital aspect of our community also.

**In sympathy with its landscape and heritage values:** The proposed development is not in keeping with the landscape or heritage values of the Mulgoa Valley and Wallacia community. It does not meet the requirements of the DCP.

Furthermore, the cemetery development proposal is not in keeping with the landscape and heritage values of any Australian community. Find and present to me, any APPROVED development application for a cemetery to be established as close to the geographical heart and soul of a small village as this proposal made by the CMCT, this century. This development application is not in sympathy or keeping with the Australian way of life, or in keeping with the rational human thought process. This DA reflects an attitude of sheer arrogance and ignorance and should be rejected.

**Point 3: Site deemed environmentally unsuitable - Proposed cemetery to be developed on an undulating site situated on top of a water table, featuring several natural watercourses and a major creek, Jerry's Creek, that feeds into the Nepean River.**

Ground water and surface water pollution and contamination will result. This will have effects on downstream properties, farm dams, waterways and the Nepean/Hawkesbury River Catchment. Substantial portions of the subject land are potentially incompatible with the proposed land use. In particular, it is considered that:

- The topographic location of portions of the subject land may represent an unacceptable groundwater pollution and re-surfacing hazard; I
- Intermittent shallow groundwater tables are likely to be found within certain portions of the subject land and that an insufficient buffer distance (vertical height) will be available to protect groundwater and thus manage this issue;
- If the subject land is to be utilised for the burial of human bodies then more detailed investigations will be required to delineate the portions of the subject site that are suitable for this land-use. Given the potential for the spread of disease if appropriate controls are not put in place, it is recommended that a precautionary approach be adopted to this site assessment process.

**Point 4 – Subject to Penrith Council DCP Cemeteries must occupy a minimum site of 10 hectares of suitable burial space. This site contains large portions of unsuitable burial space.**

Cemeteries and crematoria must locate on a site with a minimum of 10ha available for burial plots and memorial walls. Landscaped areas, setbacks, parking, driveways and turning areas, internal congregation areas, places of public worship, and areas where ground water is within 3m of the surface will not be counted toward the minimum 10ha site area.

Given the reductions of this site as listed, a further study should be undertaken to identify if the site contains 10 hectares of suitable burial space. It may prove to be unsuitable on these grounds.

**Point 5 – Region overwhelmed with cemetery development applications. DA should be evaluated on a needs basis, and refused after such evaluation.**

Throughout the merit selection and evaluation of a Development Application processes council and the JRPP must consider the need for and impact of multiple numbers of certain businesses, industries and developments within a region, locality or area. Growing public concern highlights the disproportionate and highly irregular appearance of multiple cemeteries recently approved for development in the Penrith and Liverpool LGAs.

4 Cemeteries have recently been approved for this region.

Sydney area = 12,368km<sup>2</sup>, Liverpool LGA = 305.5km<sup>2</sup>, Penrith LGA = 404.9km<sup>2</sup>

Sydney Population 4,029 million. Liverpool LGA = 204,326. Penrith = 178,467.

The combined areas of Liverpool and Penrith LGAs is 5% of Sydney, combined population is 9%. Yet, the statistics of future burial spaces is highly disproportionate. This village should not become the dumping ground.

We appreciate that Sydney has a need for future burials. The alleged independent study conducted by URBIS that indicates an urgency for burial spaces should be queried considering they are representing and perhaps serving the best interests of their clients, the CMCT.

A hasty decision should not be made. This location is not the right place. The pressure of time should not influence your rational decision.

**Point 6 – The development pricing and evaluation of approx.. \$27 million is too low and incorrect.**

This price compared with other cemetery development applications put before council appears to be worryingly low.

Considering the major works to the site, the redevelopment of an entire 9 hole course (they are not maintaining the original layout), roads, landscaping, buildings, crematorium, chapel etc.

I believe this figure to be grossly inaccurate. This should be reviewed as part of the Development Application process.

**Conclusion.** Given the above Points and after lengthy consideration we feel strongly that this proposal will negatively affect the village of Wallacia, the Mulgoa Valley and the wider Penrith community. We ask the Sydney Western City Planning Panel Members Mr Justin Doyle (Chair), Mr Bruce McDonald, Ms Nicole Gurrán, Cllr Ross Fowler OAM and Mr Glenn McCarthy to refuse this application (Panel Reference 2017 SWT016DA).

Should you wish to contact us to clarify any of these points you may do so.

