

From: [REDACTED]
To: [IPCN Enquiries Mailbox](#)
Cc: [REDACTED]
Subject: Submission regarding A084-18Crown Cemetery Development, Wallacia
Date: Wednesday, 27 March 2019 8:02:16 PM

Dear Independent Planning Commissioners,

Re: A084-18Crown Cemetery Development, Wallacia

The Mulgoa Valley Landcare Group opposes the proposed development of a cemetery in the village of Wallacia located within the boundaries of the Mulgoa Valley.

1. This development is opportunistic and is based solely upon a housekeeping error with the translocation of SREP13 into Penrith LEP 2010 (Please refer to Penrith city council to confirm this oversight). Cemeteries and crematoria were precluded under SREP13 and a commitment was made that the translation of protective mechanisms for the heritage Mulgoa Valley would be full and complete. This did not occur. This has exposed the Mulgoa Valley to inappropriate development proposals such as this one.
2. The Mulgoa Valley Landcare Group has been established for over 25 years. We have been very active in protecting the natural heritage of the Mulgoa Valley and have invested close to \$1 Million in restoration projects along Mulgoa Creek and within the boundaries of the Mulgoa Valley (refer SREPP 13). We have resisted the insidious and capitalistic aspirations of Developers who simply purchase rural lands with the assumption that they will be gifted the rezoning to develop in any form they choose. This is yet another example of that presumption – that any land with an Environmental zoning has capacity to be re-zoned. Developers including the CMCT have no regard for zonings and the original purpose of those zonings. We may well question the use of zonings as they appear to serve no particular purpose. Again and again, community are left to resist these influential developers and their inappropriate development aspirations. Whether or not DPE believe Wallacia Cemetery proposal to be an acceptable and permissible, this large scale development will define the rural Village of Wallacia – it will change the nature of one of the few rural villages that remains on the Cumberland Plain and it will not allow future generations to enjoy the character, charm and amenity that Wallacia affords. It will be gone forever and the green light will be given to more developers to challenge current zonings.
3. CMCT have been audacious in purchasing the site and engaging secret deals with Government Ministers without advising the community. The community of Wallacia have chosen this lifestyle, they embrace it and are continuously forced to defend it.
4. Biodiversity impacts. It is a scientific fact that Critically Endangered Ecological Community (CEEC) Cumberland Plain Woodland (CPW) cannot be reproduced by re-planting. And yet this proposal suggests that a patch of CPW can be cleared – and then a new patch planted elsewhere on the site. Furthermore – the Biodiversity impacts are being measured only for this site and do not reflect losses occurring at EVERY development site across Western Sydney on every day of the year. Listed as ‘critically endangered- likely to become extinct’ by the NSW Scientific Committee – recent analysis undertaken by the

conservation community of Western Sydney (reference: The state of the Cumberland Plain 2018 – Cumberland Conservation Network) shows the continued decline of this CEEC. The NSW government refuse to release figures on the continued decline of this CEEC. WE know that less than 7% of this ecological community that once covered 197,000 Ha of the Cumberland Plain remains and this CEEC still being lost at a steady rate – regardless of the listing and regardless of the NSW Government’s ‘Biodiversity Stewardship Agreements’ program which intends to secure critically endangered communities by implementing an offsetting scheme – However, at the same time DPE allows the removal of hectare by hectare of native vegetation without any offsetting requirements (as seen in this specific development proposal). We call this ‘Death by a thousand cuts’. At the Wallacia Golf Course site, the CMCT proposal will clear 1Ha of endangered Sydney coastal River flat forest and CPW (as stated in the CMCT Statement of Environmental Effects) – this amount is ‘not substantial and there is no offset requirements’ – but a hectare here and a hectare over there adds up. I challenge that this statement does not take into account the **cumulative losses** occurring on a daily basis.

5. Traffic implications: The CMCT have failed to acknowledge that traffic along Park Road is already congested at peak times and will increase exponentially with new ad hoc spot rezoning’s occurring in the suburb of Silverdale. Silverdale has inadequate services, public transport and schools to support burgeoning subdivision – and is a one road in/one road out suburb (ie Wildfire disaster risk) and yet the NSW Government and IPC have consistently approved more and more urban expansion. There are very few jobs in Silverdale (a petrol station, IGA, Post office, a real estate agent). The entire suburb evacuates in the mornings along park Road – and they return like lemmings in the afternoon. With the current NSW Government intention to raise the Warragamba dam wall by 17 metres the traffic flow generated along Park road has been estimated to be in the order of 500 truck movements per day for at least 5 years. Please add this into the traffic flow equation along with the funeral processions and all the Silverdale residents who evacuate the suburb daily to find work. This information cannot be ignored.
6. Microbats: At least 6 species have been recorded at this site. At another site in Mulgoa Valley (approximately 5 Kms away) there are 10 recorded species. They roost under bark of mature trees and in hollows. Their habitat WILL be affected by the removal of almost 400 trees (they don’t really care about the condition of the tree – but generally the tree needs to be mature). We value these bats within our already stressed ecosystem. They assist with balancing insect populations. We do not wish for them to be relocated as suggested by CMCT. It will take roughly 80 -100 years for the mature trees that are being removed to form the necessary habitat hollows that will support not just bats but possums, gliders, parrots and other species that rely on hollows. Microbats in the Sydney basin are in significant decline and most species are listed as threatened. They are impacted by light pollution. Night lighting at the cemetery will permanently impact this site as microbat habitat.
7. Hydrology: Such an inexact science. Hydrology has never been a factor that guides

development on the Cumberland Plain. We know this because our decision makers have allowed 64,000 homes to be placed in peril in the case of a 1 in a 100 year flood. Hence the sudden need to raise the Warragamba dam wall. The CMCT Hydrologist found no problems with the flow studies and this cemetery. Did they take into account the changed hydrology of the Cumberland Plain? The 'wall to wall' concreting of the Cumberland Plain has ensured that in a rain event – all the water runs off – it no longer soaks in. Therefore flash flooding risk is many times worse than decades ago. Indeed in 2016, South Creek experienced flash flooding during a rain event. At one property on South Creek, 6 horses drowned because the rate of water rise had never before been experienced by many long term property owners. Mulgoa Creek is another tributary to the Nepean River and drains the Mulgoa Valley. Penrith council are about to approve a 300Ha extension (3000 homes) as 'Stage 3' of Glenmore Park. The catchment is Mulgoa Creek and when a rain event occurs, the run off will markedly increase flows into Mulgoa Creek, into the Nepean and cause flood water upstream to 'back up'. I don't believe that the Hydrology report takes into account the flow impacts of surrounding development and the long term consequences of Western Sydney's obsession with concrete.

8. Promoting this site as a dual purpose open space (walking trails) and cemetery is bizarre. Personally, I can't imagine walking through a cemetery where people are openly grieving. I can picture young children on scooters asking their parents about death, death of their grandparents or parents, about our custom of putting dead people in the ground. A place of grief and solemnity is not a place for public recreation. I object to the 'selling' of this proposal on the grounds that it provides recreation for the community. I don't frequent cemeteries – and I ask the IPC whether they do?

9. Please consider that the CMCT have deep pockets and many consultants. We are just community that reject a proposal that will impact our lives, our village atmosphere and the heritage /rural nature of the Mulgoa Valley. Approval of this cemetery sets a precedent that tells developers they can roll the dice, present flawed arguments for a development and generally succeed. More developers will be queuing at the door of a heritage valley that we have fought long and hard to protect. As with the Rookwood Cemetery proposal at Fernhill – we were able to suggest other sites, but the GM and the organisation were simply not interested. This plan may 'tick all the boxes' – but it is offensive to the rural village of Wallacia and offensive to the community who live here.

Thank you for the opportunity to provide these comments

Regards

Lisa Harrold