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As a long-term resident of Douglas Park, residing in Mitchell Place for the past 43 years, I have witnessed a lot of changes in our surrounds. For the last 20 years of my employment, being recently retired, I was with the Department of Planning Housing & Infrastructure, working in the Horticultural Research section of the Botanic Gardens. This work involved the conservation of threatened species, such as the Wollemi Pine (*Wollemi nobilis*) project, Rainforest Seed Conservation project, and the most recent was the Myrtle Rust project. I have an understanding of the amount of work involved in trying to conserve threatened species and ecosystems.

The site seeking approval for Stage 1 development of a cemetery at 430-490 Douglas Park, Drive Douglas Park, was previously owned by St Mary's Towers Retreat Centre and was separated off from the main property with the redirection of the old Mount Keira Road (now Douglas Park Drive). This process also allowed the creation of a no-through road called Mitchell Place. I believe this to be the reason for the eventual sale of the property in 17/3/1997.

The new owners installed a caretaker's dwelling and then proceeded to heavily clear the native vegetation, which is classified as Cumberland Plain Shale Woodland and Shale-gravel transition Forest, and Shale sandstone transition Forest. This vegetation is listed as critically endangered at both State and Commonwealth levels. Concerning this act we informed Wollondilly Council in July 2010 of the illegal clearing and a staff member subsequently inspected the property and hear follows the outcome.

(Regarding the comments of illegal clearing, I can advise that Council staff inspected the property in July 2010 and that the clearing has also been investigated by staff at the Office of Environment & Heritage for alleged breaches to the Native Vegetation Act. Compliance action was commenced by OEH. Warning letters and a penalty infringement notice were issued, but due to factors not known to Council the PIN was withdrawn before the matter went to court. I have referred this matter up to Environment staff who will liaise with Officers of OEH to again investigate if any further breaches have occurred since their last investigations. Robyn Cooper | Manager Compliance, Administration & Building Wollondilly Shire Council | PO Box 21 Picton NSW 2571 P (02) 4677 1102 | E [HYPERLINK](#))

Nevertheless site clearing maintained incremental progress, far exceeding the nominated quota allowed by council. This caused me major stress observing this, so that I had to force myself to let it go because of the impact it was having on me. I don't understand how the devastation of this site could have been so easily dismissed, particularly having species such as *Grevillea parviflora* subsp. *parviflora* and *Persoonia bargoensis* identified on site, both scheduled as threatened along with the Woodland Guideline:

Soon after the Applicant submitted a development application plan requiring a rezoning to develop a subdivision of 40 building sites, subsequently rejected by council.

My concerns -

Parking and accessibility:

With the limit of 116 parking spaces in the development stage 1. We fear that Mitchell Place will become an overflow parking area, inconveniencing local residents by having patrons of the cemetery parking on home verges and possibly their driveways. There is no parking possible on the Mitchell Place roadside adjacent to the development, only opposite on existing home owners verges. If, for future development, installation of pedestrian access to the cemetery along Mitchell Place may occur, this will create parking issues in Mitchell Place if cemetery patrons use owners verges (and possibly private driveways) to park.

With the cemetery exit on Douglas Park Drive allowing left turn only, this will encourage the use of the Mitchell Place exit for patrons wanting to turn right on Douglas Park Drive heading in the Sydney direction via the Douglas Park village. This means crossing the Nepean River gorge, which is single lane with stop/go lights incurring delays requiring a multimillion dollar reconstruction. There is no access to Douglas Park village (Sydney) via Mitchell Place. Increased use of the Mitchell Place exit this would create more stress on the Douglas Park Drive/ Mitchell Place intersection may cause frustration and future traffic incidents.

Douglas Park causeway deficiency:

Below is an extract from (CONSTRUCTION TRAFFIC MANAGEMENT PLAN Douglas Park Memorial Park- Concept Plan and Stage 1 430-490 Douglas Park Drive, Douglas Park Reference: 18.048r05v04 Date: June 2025 p.10 4.1)

[Douglas Park Drive: a local rural road that generally traverses in a north-south direction between Camden Road in the north and Wilton Road in the south. It is subject to an 80 km/h speed limit and accommodates one (1) lane of traffic in each direction. Douglas Park Drive is an un-kerbed rural road with table drains along either side. It should be noted that west of the Hume Highway overpass, Douglas Park Drive undulates through the Nepean River gorge and narrows to a single lane at some locations.]

This description of the conditions of Douglas Park Drive fails to include the portion that traverses across the Nepean River causeway, which is controlled with portable stop and go lights, which allow an average of 5-7 vehicles through at one time. The causeway is subject to frequent closure due to flooding or council maintenance for substantial periods of time. This stretch of road is subject to potential rock fall from above and is currently also collapsing in some zones as the 1850's vintage stone foundations are giving way. Again a multimillion dollar rebuild with a greater than one year road closure to correct. Council is still investigating resolution for repair, which highly depends on State (or Federal) financing. Google maps and GPS etc automatically direct Sydney drivers in this direction as being the shortest route; these systems generally do not know that there are weight restrictions on this road (3 tonne limit), one lane limitations and potential flood closures.

A funeral procession can result in having as many, if not more, than 100 hundred vehicles. Traffic delays crossing the gorge will greatly impact any funeral cortege, but also traffic movements in Douglas Park village will increase risk at the Fidgety Frogs childminding centre chokepoint and considerably degrade any aspect of rural living in a small village.

NSW Guidelines:

In the NSW Guide Line on how to establish and run a Cemetery.

Location:

- site not next to residential areas or highly visible from neighbouring areas;
 - Response- *the site is **directly opposite** established residential properties*

Physical characteristics:

- Site does not have a high bushfire or flood risk;
 - Response- *the site has a high bushfire risk, we pay higher insurances because of this*
- Site has sufficient soil depth to allow the top of a coffin to be not less than 900mm below the natural surface (not areas of shallow rock or groundwater)
 - Response- *the site **does not** have enough soil depth as shown on the Geotech results and they are relying on excavating and burying into rock.*

Why were these not red flags in the first place?

Site too small:

If trying to aid in a shortage of burial placements for Sydney residents, this site is far too small. Most cemeteries far exceed the footprint that this has to offer, this being only 16.7 ha. A large proportion of which will be lost with infrastructure such as perimeter buffer zone, internal roads, parking for patrons (which also appears to be inadequate), chapel, café, flower shop and reflection area which could possibly mount up to 1/3 of the property as a loss. It is difficult to reconcile the remaining land area with the projected number of burial sites.

Soil depth:

The two different Geotech surveys appear to conflict. The first one done by Red Earth Geosciences in 25/9/2018 states that standard single depth burial require a depth of 1.3-1.4 of soil depth and quotes the site is typically deficient in the aspect by at least 0.5-0.7.

The second survey conducted by Geotechnique PTY LTD (dated 19/5/2025 p.12 section 6.2) indicates that low strength rock is found at depth to 0.4-1.8m, while medium to very high strength rock occurs between 1.0-2.5m deep. Does this imply that most of the deceased will be buried in rock, meaning we will frequently hear rock hammering or cutting equipment during the work? In the past, we have experience significant wet periods where parts of our property were waterlogged and inaccessible for months. Considering such conditions, how would they prevent these wet periods affecting the rock burials?

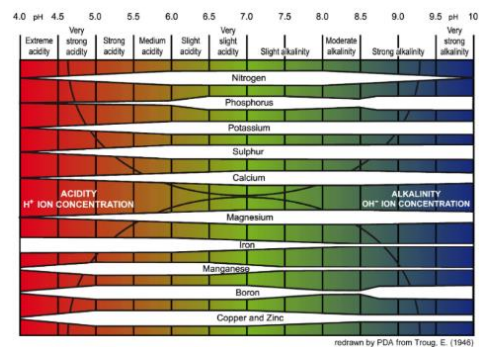
Scattering of ashes in living plant memorials:

As stated in (Travers bushfire & ecology 2025
EPBC offset policy Page 34 – 4.10)

[All ashes intended to be scattered or used in living plant memorials are to be treated to minimise impacts on the natural environment. The key concern regarding ashes is the pH and the salt content. Human ashes are alkaline and have pH level of 9-12. This means that essential nutrients are unavailable for plant use. Human ashes are predominantly made up of Calcium Phosphate and other salts, these have potential adverse impacts but are to be detoxified prior to supply back the patron scattering the ashes or use in living plant memorials. The detoxification process ameliorates the ashes in the following manner:

- *Leaching of Calcium Phosphate (a salt) from the ashes and rinsing*
- *Adjusting the pH (add gypsum) to return to an acceptable level.*
- *Incorporation with organic soil mix (if being used for planting) such as living plant burials REF: HTB03.13 34 EPBC Ecological.]*

Gypsum does not change the pH. Sulfur is the element needed to lower pH and in reasonably large volumes, which causes a substantial pungent odour and may build up to be detrimental to the soil microbiome. Our native flora relies on the nutrients available at a pH ranging from 5.5- 6.5, and the pH levels of human ashes 9-12 means nothing could grow in that. The two threatened species addressed' *Grevillea parviflora* subsp. *parviflora* and *Persoonia bargoensis* both belong to the *Proteaceae* family. *Proteaceae* species have adapted over time to grow in impoverished soils to produce proteoid roots that seek out phosphorus in the soil. If phosphorus becomes too abundant (as showing on the pH chart in the higher levels), will become toxic and kill them.



Crematorium:

I do understand that the Crematorium is not in the Stage 1 proposal but I would like to comment on it. When the first application was submitted (with no proposed crematorium), I have to admit thinking at least it will look better than the damaged state of the property as it is currently. Now feeling far more informed, particularly with the proposal of a crematorium as well, I am heavily opposed to the project. How are we going to be guaranteed that the methods used to incinerate the deceased are not going to produce a pungent odour? The scattering of ashes will be toxic to the soil, also impacting the surrounding vegetation, and in the case of days of heavy rain which have indeed occurred in recent years, there is considerable runoff down across Mitchell Place. Unless the cemetery operator incorporates considerable runoff containment Mitchell Place residents (all downslope from the cemetery) will have their properties flooded with mud and detritus from construction and burial activities at the cemetery.

Property drop in value:

There is a large potential that the current value of ours and surrounding properties will decrease due to people's fears or dislike of living next to or in the vicinity of deceased individuals. We have already had a resident couple sell their home and move away because of the overwhelming thoughts of living across the road from cemetery despite having spent many years renovating their property.

Conflicting requirement between the RFS and Environment authorities:

How are they planning on addressing the RFS's requirement that the tree crowns are to be at least 2m apart and no understory to be planted, with the Environment authorities (DCCEEW) request of no vegetation removal because of its threatened status. Which organisation is going to be ignored?

In Summary:

Despite the projections of the proposer the site appear far too small to be truly viable financially.

Transport and access to the site for large groups of mourners is glaringly inadequate via Douglas Park Village, Wilton (to Picton Road) or Appin (via Broughton Pass) requiring millions of dollars to rectify. The site has no mass traffic access from any direction.

Related to the above the already impacted day to day users of the Nepean River gorge crossing will be further impacted by potentially hundreds of additional daily traffic movements. Mourners themselves will be considerably delayed by the stop/go one way gorge transit. The high traffic delays will be a tantamount periodic road closure for the locals and through traffic. This situation serves no-one.

Village life in Douglas Park itself will be considerably degraded by potentially hundreds of extra traffic movements.

Mourners return access to Picton Road via Almond Street at Wilton to access the Hume Motorway would require an overpass, who will fund this?

Regards,

Amanda Rollason