



****Submission Opposing the Douglas Park Memorial Park Concept Plan and Stage 1****

****Incompatibility with Rural Character, Strategic Planning Objectives and Access Constraints****

Key Points

The Douglas Park Memorial Park proposal should not be approved because it is fundamentally inconsistent with the established rural character of Douglas Park, relies upon a constrained and unsuitable transport network centred on the Douglas Park Gorge corridor, and represents poor strategic planning by locating a metropolitan-scale facility within a small rural community.

Douglas Park already experiences a "gateway" constraint. Unlike many rural locations that have multiple access routes, the village is effectively separated from surrounding urban areas by the gorge and river corridor. Douglas Park also has a level crossing that further constrains traffic each time a train passes, but don't make the mistake of thinking that public transport is an option - there is no way on this earth that anyone would be able to walk safely along the road between the station and the proposed cemetery site (a site visit is essential to grasp the gravity of this statement). This means that any traffic modelling based solely on average daily traffic may understate the lived impact on residents because a relatively small increase in traffic can have a disproportionate effect when concentrated through a single constrained access corridor. This proposal will heavily impact on network resilience, and this has not been identified by simple vehicle counts. A funeral procession through the town at the same time as a train will gridlock access to the shops and school. The constraints posed by the gorge and associated road network are insurmountable and deem this concept unviable. We cannot approve developments assuming future major roads will be delivered - history tells us that in this area, infrastructure is not a priority, and proper business cases are lacking for the OSO2.

The proposal's need case is not adequately justified, as the EIS overstates both the scale and geographic extent of burial demand, relies on outdated capacity assumptions, and fails to account for substantial new and approved burial infrastructure across South-West Sydney and surrounding regions, while also providing no strategic or quantitative evidence to support the inclusion of an onsite crematorium.

Planning assessment must balance demonstrated regional need against site suitability, available burial capacity, infrastructure constraints, environmental impacts and long-term strategic land use outcomes.

Loss of Rural Character

Douglas Park has long been recognised as a rural village distinguished by its bushland setting, low-density development, scenic landscapes and separation from metropolitan Sydney. The village's identity is founded on its rural environment, agricultural history and relationship with the surrounding natural landscape, including the Nepean River corridor and the escarpment country that defines the locality.

The proposed memorial park is not a local community facility. It is a regional-scale development intended to serve a metropolitan catchment extending across Greater Sydney for many decades. With approximately 37,000 burial plots, associated administration buildings, chapel facilities, visitor infrastructure, extensive internal roadways, parking areas and future crematorium facilities, the proposal represents a substantial intensification of land use.

The Environmental Impact Statement places considerable emphasis on landscaping and tree retention. However, rural character is not determined solely by vegetation cover. Character is also defined by land use, activity levels, traffic generation, built form and the relationship between development and the

broader landscape. A regional cemetery attracting visitors from across Sydney fundamentally alters the function of the locality regardless of the extent of retained vegetation.

The proposal would introduce a metropolitan-scale destination into a rural landscape, permanently changing the character of Douglas Park from a rural village to a host location for major regional infrastructure. Such a transformation is inconsistent with the planning objectives that seek to protect the distinctive rural character of Wollondilly and maintain the separation between metropolitan Sydney and its rural hinterland.

Failure to Respect Strategic Planning Objectives

State and local strategic planning documents consistently recognise the importance of protecting the rural landscapes and environmental values of the Wollondilly Shire.

The Wollondilly region performs an important role as part of Sydney's rural interface, containing agricultural land, environmental corridors, scenic landscapes and small rural communities. Strategic planning objectives have historically sought to manage growth in a manner that protects these values while directing major urban development towards areas with appropriate infrastructure and transport capacity.

The proposal conflicts with these principles by introducing a state-significant facility serving a metropolitan population into a location that lacks the transport infrastructure, service capacity and urban context typically expected for regional infrastructure of this scale.

Approval would establish an undesirable precedent whereby the availability of large rural landholdings becomes sufficient justification for metropolitan-scale development, regardless of local character impacts or transport limitations.

Additional Strategic Planning Assessment

Strategic Need and Timing of Delivery

The strategic justification for the proposal has not been adequately demonstrated and the existence of a broad regional demand narrative does not, in itself, establish a planning basis for approval of this site.

Planning assessment requires consideration of both:

- ***whether additional infrastructure is required; and***
- ***whether the proposed site is suitable to accommodate that infrastructure having regard to strategic planning objectives, environmental constraints, access arrangements and long-term land use outcomes.***

The Applicant's justification appears to overstate both the scale and geographic distribution of future burial demand. The EIS characterises burial demand as a broader state-wide shortage without demonstrating that Douglas Park is necessary, appropriately located or strategically preferred to respond to that demand.

The need assessment also appears to rely on assumptions derived from earlier capacity studies that do not reflect material changes in regional burial supply. Since publication of those studies, substantial additional burial infrastructure has either been approved or delivered across South-West Sydney and adjoining catchments, including River Gardens Cemetery at Wallacia, the proposed Wallacia cemetery project, and Macarthur Memorial Park at Varroville. Existing public cemetery capacity also remains available within Wollongong and Wollondilly, including council-operated facilities and approved expansion areas at Picton.

These changes materially alter the regional supply context and create uncertainty regarding both the timing and extent of any future burial demand within the relevant planning horizon. Collectively, they weaken the assertion that an immediate or critical shortage exists requiring delivery of a metropolitan-scale cemetery at Douglas Park.

The assessment documentation does not sufficiently demonstrate why Douglas Park is required within the identified planning horizon, nor why this location represents the preferred strategic response compared with existing, approved or emerging burial infrastructure. The planning case therefore does not establish a demonstrated necessity to deliver a facility of this scale in this location at this time.

The inclusion of an onsite crematorium is similarly unsupported. The Applicant has not provided strategic, demographic or quantitative evidence demonstrating unmet cremation demand within the catchment, nor justified why co-location with the cemetery is necessary, particularly given contemporary planning practice increasingly supports separate siting of cremation facilities where this achieves better land use and infrastructure outcomes.

Site Suitability and Landform Constraints

A further concern relates to the underlying physical suitability of the site for long-term burial operations.

The proposal appears to involve burial areas affected by shallow soils and areas of extensive underlying rock, creating uncertainty regarding whether conventional burial operations can occur without substantial excavation, landform modification or imported fill.

This distinction is important because engineering feasibility does not necessarily establish planning suitability.

If imported clean fill is ultimately required to:

- establish compliant burial depths;***
- create usable burial areas;***
- reinstate excavated areas; or***
- support long-term cemetery operations,***

the proposal should transparently disclose anticipated fill volumes, source locations, truck movements, staging assumptions and final landform outcomes.

Without this information, the full extent of physical intervention and associated environmental and transport impacts cannot be adequately assessed.

The proposal therefore appears to defer important landform and operational consequences beyond the current approval stage.

Environmental Integration and Ecologically Sustainable Development

Environmental constraints should not be treated as issues capable of mitigation after site selection has already occurred.

Where environmental values, landform limitations and infrastructure constraints collectively influence development potential, these matters should be integrated into strategic decision-making from the outset.

The current assessment appears to assess individual technical disciplines separately while providing limited demonstration that environmental constraints have materially informed the broader planning outcome.

This raises concern that the proposal may satisfy isolated engineering requirements while failing to demonstrate that the development outcome itself represents Ecologically Sustainable Development.

Orderly and Strategic Land Use Outcomes

The proposal should ultimately be assessed as more than a cemetery development.

It represents the introduction of metropolitan-scale social infrastructure into a constrained rural setting with permanent land use implications extending well beyond Stage 1 works.

Approval in these circumstances risks establishing infrastructure outcomes that are inconsistent with the intended rural function of Douglas Park and broader strategic planning objectives for Wollondilly.

The central planning question is therefore not whether the proposal can technically be constructed, but whether it represents an orderly, strategic and appropriate long-term land use outcome for this location.

Unsuitable Access via Douglas Park Gorge

The most significant planning concern is the suitability of access.

Douglas Park is effectively accessed through a constrained transport corridor dominated by the Douglas Park Gorge environment. The local road network is characterised by winding alignments, steep grades, constrained geometry, limited overtaking opportunities and significant topographical constraints. These characteristics are not incidental; they are fundamental physical limitations that have shaped the development pattern of the area for generations. The current status of the road is that it is severely degraded, under single lane traffic control with repairs to date unfunded, in addition to the causeway across the river - which is also one way at a time. These sections are unable to cope with long processions of traffic. Google maps, since the Spring farm off ramp was opened, **routes all traffic through the gorge** to access the site. It is not acceptable to assume that "information" given to mourners will result in them driving a different way to what their GPS and phones tell them is the best route. This is an unfixable problem, and an insurmountable constraint.

The traffic assessments accompanying the proposal focus largely on projected traffic volumes and engineering compliance. However, planning decisions should consider not only whether a road can theoretically accommodate additional vehicle movements, but whether it is an appropriate and resilient access route for a major regional destination expected to operate indefinitely.

Of particular concern is the distinction between engineering compliance and planning appropriateness. Technical modelling may demonstrate that infrastructure can operate under assumed conditions; however, this does not resolve whether a constrained rural road environment is an appropriate access arrangement for metropolitan-scale infrastructure intended to operate indefinitely.

The proposal would generate ongoing visitor traffic, funeral processions, maintenance vehicle movements, service deliveries and construction traffic associated with future stages. Potentially it would also generate significant heavy vehicle movements to import fill and soil due to the unsuitable solid rock conditions of the site, which likely will be too expensive and noisy to cut and crush for reuse. These activities would be concentrated on a road network that was never intended to support regional-scale infrastructure.

Particular concern should be given to:

- * The limited alternative access routes available to Douglas Park.
- * The constrained geometry of roads within the gorge environment.
- * Potential delays and congestion associated with funeral events.
- * Emergency access and evacuation considerations.
- * The cumulative impact of future staged expansion.
- * The long-term burden placed upon local road infrastructure.
- * Reduced network resilience during incidents, roadworks or natural disasters.

Inconsistent with Accepted Infrastructure Location Principles

A fundamental weakness in the proposal is that it seeks to place a state-significant regional facility at the end of a constrained local road network rather than adjacent to the major transport corridors that serve the population it is intended to accommodate.

The overwhelming majority of visitors to the proposed memorial park will originate from metropolitan Sydney. Yet those visitors will be required to leave the regional motorway network and travel through Douglas Park and the gorge corridor to reach the site. This arrangement is contrary to established planning and infrastructure principles that seek to locate regionally significant facilities close to major arterial roads, motorways and transport corridors.

Facilities intended to serve large regional catchments are typically directed towards locations that provide:

- * Direct access from arterial road networks.
- * High-capacity intersections.
- * Multiple route options.
- * Network resilience in the event of incidents or closures.
- * Minimal interaction with local residential and rural communities.
- * Efficient access for emergency and service vehicles.

The proposed site satisfies none of these criteria.

Instead, the development would effectively funnel metropolitan traffic through a small rural village and along constrained local roads that were designed to serve local residents rather than a regional destination. This is not merely a traffic engineering issue; it is a strategic planning failure.

The proposal appears to have been driven primarily by land availability rather than by transport suitability. The existence of a large landholding does not overcome the fact that the location lacks the fundamental transport characteristics expected of a state-significant facility.

A site serving the entirety of Greater Sydney should reasonably be expected to have direct and convenient access from major transport infrastructure. The Douglas Park site does not. Visitors must traverse a rural road network and a constrained gorge environment before reaching the development. This creates an inherent mismatch between the scale of the facility and the capacity and character of the surrounding transport network. There is no feasible public transport option to access the site. The gorge is unsuitable for buses and the train station is located on the other side of it. This discriminates against mourners that are unable to drive long distances or do not have the means to own a vehicle. This situation is unlikely to be resolved for the selected site location, ever. It is not on a route that will ever be serviced, due to the constraints of the gorge.

Cumulative and Irreversible Impacts

The assessment of Stage 1 risks understating the ultimate impacts of the full concept plan. While the initial stage may appear relatively modest in isolation, the project must be assessed based on its intended end state.

The cumulative impacts of decades of expansion include increasing visitation, additional infrastructure, greater traffic generation and continuing pressure for road upgrades and associated development. Such upgrades may themselves require vegetation removal, road widening, retaining structures and urban-style infrastructure that further erode the rural landscape character of Douglas Park. It also potentially pushes costs to the community (Wollondilly ratepayers and NSW taxpayers), to upgrade infrastructure prematurely, purely to service the private business of running a cemetery and crematorium in an inappropriate location.

This highlights a critical inconsistency within the proposal. On one hand, the development relies upon the rural setting and natural landscape as a selling point. On the other hand, the traffic demands generated by the development will inevitably create pressure for future transport improvements that undermine those same rural values.

Once approved, the transformation would be effectively irreversible. The loss of rural character would occur incrementally but permanently.

Site Compliance History and Vegetation Clearing Enforcement

Additional concern arises from the site's documented compliance history in relation to native vegetation clearing. Council records indicate that staff inspected the property in July 2010 following allegations of illegal clearing, and that the matter was subsequently investigated by the Office of Environment and Heritage (OEH) for alleged breaches of the Native Vegetation Act. Compliance action was commenced, including the issuing of warning letters and a Penalty Infringement Notice (PIN). However, despite these actions, the PIN was later withdrawn before the matter proceeded to court for reasons not known to Council. Council has further indicated that the matter has since been referred back to Environment staff to liaise with OEH regarding whether any additional breaches have occurred since the original investigation. While the historical enforcement outcome remains unclear, the existence of prior investigated clearing activity and unresolved compliance concerns should weigh heavily in consideration of this proposal. Where a development relies upon public confidence in environmental stewardship and long-term land management, a demonstrated history of alleged vegetation impacts and incomplete enforcement outcomes raises legitimate questions regarding suitability, governance and, most importantly, confidence in future environmental compliance.

Conclusion

The Douglas Park Memorial Park proposal is the wrong development in the wrong location. Having regard to the strategic, environmental, landform and infrastructure findings identified throughout this submission, the proposal would introduce metropolitan-scale infrastructure into a rural village, undermine strategic planning objectives designed to protect Wollondilly's rural character, and rely on a constrained access network centred on the Douglas Park Gorge that is fundamentally unsuited to the long-term demands of a regional facility.

Most importantly, the proposal conflicts with the basic planning principle that regionally significant infrastructure should be located adjacent to major transport corridors capable of accommodating the population it serves. Instead, the development would direct metropolitan-scale traffic through a rural village and along constrained gorge roads that lack the characteristics expected of a state-significant destination.

Regardless of broader regional planning considerations, strategic infrastructure should only be delivered in locations that are demonstrably suitable, integrated with the metropolitan transport network, compatible with surrounding land uses and capable of operating without imposing unacceptable long-term impacts on established rural communities and the environment. The Douglas Park proposal does not satisfy these fundamental strategic planning principles.

The documented history of unauthorised vegetation clearing at the site, including investigation and compliance action by regulatory authorities, further raises concerns regarding environmental stewardship and reinforces the need for careful scrutiny of any proposal that would intensify development pressure on this sensitive rural landscape.

For these reasons, the Concept Plan and Stage 1 application should be refused.

Regards,

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Secretary, Wilton Action Group

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