



OUT18/15711

11 October 2018

Ms Anna Summerhayes  
Secretariat  
Independent Planning Commission NSW  
Level 3  
201 Elizabeth Street  
SYDNEY NSW 2000

**Via email:** [REDACTED]

Mr Matthew Todd-Jones  
Team Leader  
Independent Planning Commission NSW  
Level 3  
201 Elizabeth Street  
SYDNEY NSW 2000

**Via email:** [REDACTED]

Dear Ms Summerhayes and Mr Todd-Jones

### **Crown Cemetery and Crematoria Development Applications (DAs) at Varroville and Wallacia**

Cemeteries & Crematoria NSW (**CCNSW**) is the regulator of the interment sector across NSW, including oversight of Crown cemeteries. CCNSW is a statutory authority with an independent board, which I chair. CCNSW administers the *Cemeteries and Crematoria Act 2013* (the **Act**), which includes reserve powers to acquire land in the public interest for cemetery purposes under Section 14 of the Act. This reserve power exists under the Act to '*ensure equitable access to interment services by one or more religious or cultural groups or the community generally*'. CCNSW would step in here if cemetery capacity was absolutely critical and Crown cemetery operators had not been successful in converting new land for cemetery purposes.

Given this backdrop, CCNSW makes a formal submission in support of the two DAs the Independent Planning Commission NSW is currently considering for two new cemeteries, one at Varroville and one at Wallacia, submitted by the Catholic Metropolitan Cemeteries Trust (trading as Catholic Cemeteries & Crematoria), a Crown cemetery operator.

To provide additional context, Crown cemetery operators require endorsement from CCNSW and Ministerial approval prior to acquiring any land for cemetery purposes, this means that these sites have been acquired in accordance with legislative obligations and have been and are supported by CCNSW.

Further, in November 2017, CCNSW published the *Metropolitan Sydney Cemetery Capacity Report* which analysed the remaining cemetery capacity in the Sydney metropolitan area. The study identified critical shortages of cemetery land, with some religious groups to run out of land in the next six to 10 years. The *Metropolitan Sydney Cemetery Capacity Report* is attached for your information. This means the Greater Metropolitan Area of Sydney is in critical need of new cemetery land to be able to continue servicing its communities.

In October 2018, CCNSW also released a report it commissioned, into the contribution cemeteries make to both environmental and heritage values. The report was authored by Ms Carolyn Tallents, a respected landscape architect. The *Cemetery Land Use – Contribution to Environmental and Heritage Values Report* is attached for your information.

In summary, the report finds that cemeteries have many heritage, environmental and social values and are in line with current policy direction regarding land use for Sydney, including the Plan for Growing Sydney, the Sydney Green Grid and the Greater Sydney Region Plan. Cemeteries provide multi-functional use of land, both delivering a necessary public service of interment, but also many of the functions of open space that parks achieve including visual values and recreation, preservation of landform, Aboriginal cultural heritage, and protection of ecological communities of flora and fauna and green corridors. These are in addition to the cultural, (post-European settlement) heritage, touristic and genealogical values particular to cemeteries.

CCNSW requests that you consider the following in your deliberations:

- the urgent need for the development of cemeteries, critical infrastructure for the community, in the Greater Metropolitan Area of Sydney
- the extensive due diligence undertaken by Catholic Cemeteries & Crematoria as part of the cemetery site investigation, accessibility of the sites to the growing communities in those areas and scarce availability of appropriate sites at affordable prices
- the proposed cemeteries are general cemeteries, and will service all communities of all cultural and religious backgrounds, including those religious groups that are facing critical shortages
- cemeteries form part of the wonderful open space required in NSW and ensure all are able to access, particularly important given the commitment by Catholic Cemeteries & Crematoria to protecting the beauty and heritage of the sites in perpetuity
- the sites include passive recreation areas, gardens and landscaped walkways which protects and emphasises the botanic beauty and heritage and environmental values of the sites.

CCNSW would like to close its formal submission by reinforcing the critical need to obtain a decision on these two DAs this calendar year so plans can be put in place to urgently commence construction of these much needed cemeteries in 2019 to ensure our communities will continue to have space to bury their loved ones in line with their religious and cultural beliefs.

Finally, CCNSW requests an update from you as to your current process, including timing of decisions.

Please do not hesitate to contact me if you wish to discuss this submission in further detail, my contact number is [REDACTED]

Yours sincerely



Dr Stepan Kerkyasharian AO  
**Chair**  
**Cemeteries & Crematoria NSW**

Copy to: Mr Chris Ritchie, the NSW Department of Planning, via email: [REDACTED]