

To:  
Mr Ben Lusher Director Systems and Productivity Policy Planning & Assessment  
Department of Planning, Industry and Environment  
Locked Bag 5022  
Parramatta NSW 2124

From:  
Mr Lee R Squires

Email:

My submission is not confidential.

I am making comments on:

Proposed Amendment to State and Regional Development SEPP to  
identify large scale cemeteries as State Significant Development

Re: Explanation of Intended Effect, October 2021

To enable new or expanded cemeteries with a minimum of 20,000 burial plots to be  
considered as State significant development.

I write as a concerned citizen with extensive experience in the NSW Interment  
industry.

(I was Executive Manager at Rookwood of the Joint Committee of Necropolis  
Trustees for 23 years, retiring in 2011. Since that, an active member and Chair of the  
Cemeteries Conservation Committee of the National Trust NSW.)

In the late nineties a shortage of space for future graves within Rookwood and the  
greater Sydney Region was apparent. It was assessed, re-assessed and reported to  
government departments. Proposals for renewable tenure were presented and  
projections of ultimate capacities made.

So, the current proposals are welcome even though many opportunities for efficient  
transition have been lost.

The proposals announced in the EEI are laudable in so far as they recognize the  
vital community role of cemeteries.

However, there are risks in bringing proposals for new cemeteries into the domain of State and Regional Development where numerous prescribed constraints can be over ridden e.g., protected vegetation or buildings protected under Heritage legislation including the Heritage Act 1977. We all know that projects driven by ambitious Government elements can sometimes crush values held dearly by community interest groups.

Your proposals are commendable for recognising the role of cemeteries in satisfying the passive needs of the bereaved as well as the cultural interests of the wider community.

But, it would be a tragedy if the amendments became a Trojan Horse for destroying aesthetic values that have arisen under other protective legislation.

Can the proposed amendments offer planners guidance to avoid the solution to regional cemetery land shortages becoming another form of cultural loss?

Lee Squires  
18 November 2021