



The Manager
ACEPD Customer Services
ACEPDcustomerservices@act.gov.au

**DA 202138789, Block 1, Section 3, Symonston, ACT, 99 Mugga Lane and
amended DA 202138789**

Dear Sir/Madam

The Tuggeranong Community Council (TCC), like the Inner South Community Council, has similar concerns and objects to the original development application, dated September 2021, which has not been approved and the amended development application lodged 25 March 2022 for a proposed crematorium complex and associated works and carparks.

TCC is very concerned about building a crematorium next to the Callum Brae Nature Reserve. We think the proposed DA being pursued in Merit track is inappropriate and the proximity of the proposed development to the Callum Brae Nature Reserve warrants an assessment in Impact track with an Environmental Impact Statement (EIS) and comprehensive community consultation.

We are concerned for the following reasons:

- Toxins and air pollution from such a crematorium can have adverse environmental impacts to both fauna and flora at the adjacent reserve and potential negative health impacts to visitors of the reserve and nearby residents.
- The actual site is not appropriate nor suitable for such an activity, a crematorium and associated works and carparks and will have negative impacts during the construction and operation phase of the crematorium of 40 years and more.
- Many other negative impacts: noise, odour, dust, light pollution, increased traffic volume, weed infestation and loss of mature native trees and loss of nesting sites for critically endangered fauna visiting and breeding at the DA site and at the adjoining Nature Reserve.

The Callum Brae Nature Reserve is a 143-hectare protected area in Symonston, located on the lower eastern slopes of Mount Mugga Mugga. It is part of an extensive landscape of remnant wooded vegetation that enables wildlife movement through to NSW in the east, the Murrumbidgee River in the west and the southern ACT through Tuggeranong Hill and Rob Roy Range nature reserves.

- Callum Brae Nature Reserve protects Yellow Box and Blakely's Red Gum trees which are on the critically endangered list as well as grassy woodland. Many species of birds, some of which are critically endangered including the Swift Parrot and the Gang Gang cockatoo are found in Callum Brae. Callum Brae is a popular location for birdwatching and walking, accessible to people with mobility issues. [See Appendix](#)

The proposed InvoCare crematorium site and associated works is located on a 9.72 ha site, intrinsically connected with the Callum Brae Nature Reserve and only separated from the Reserve via a see-through chain metal fence on all its boundaries. The DA site has access from Mugga Lane and Narrabundah Lane, with the Narrabundah Lane access close to the Callum Brae Nature Reserve entrance. Across the road of the DA site facing Mugga Lane is Mount Mugga Mugga Nature Reserve.

We note that both the Environmental Significant Opinions (ESO) that accompanied the original DA in September 2021 have expired. An ESO is only valid for 18 months.

- The 2 ESO provided were NI 2020-578 (ACT Heritage Council) and expired on 10 March 2022, the other ESO, NI2020-527 (Conservator of Flora and Fauna) expired on 3 March 2022.
- However, an amended DA was lodged on 25 March 2022 in Merit Track, after both ESOs had expired.
- In the absence of an ESO that is in force the application should be assessed in Impacts tract with a full environmental impact assessment and comprehensive community consultation must be undertaken.
- We also note that the amended DA was referred to the Conservator of Flora and Fauna for advice in April 2022 and on 26 April 2022 the Conservator did not support the application due to concerns about the remnant trees on the site. He requested further information to consider the proposal against the Mature Native Trees Key Threatening Process. (Draft Action Plan).

TCC welcomes the Conservator's advise and hopes that the development will be rejected.

Other issues of concern:

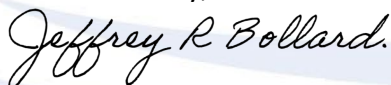
- The DA site is classified NUZ1 broad acre zoning which means a car park is not allowed, yet a 103 parking spaces are proposed.
- The proponent argues that we need more crematoria in the ACT, however only refers to one crematorium in existence for ACT and not two as is the case with the private Norwood park Crematorium and the public crematorium at Gunghalin cemetery.
 - They propose to install 2 cremators on site. How many more will follow?
 - A National Cremation Capacity Survey 2020 (30/6/2020) by the Australasian Cemeteries and Crematoria Association (ACCA) states that the ACT has an oversupply of cremation capacity and is operating cremations at 18% of capacity.
 - The annual average of cremation services performed in the ACT was listed with 1560 cremations. The number that could be performed if required in ACT is listed as 8736.
 - Furthermore, in a response dated 25/5/2022 provided by Minister Chris Steel to Questions on Notice (QON) to him on 6 May 2022, Minister Steel

stated that the public crematorium at Gunghalin *operates a single cremator that has capacity to undertake 24 cremations per week*. This adds further to the already existing overcapacity of cremation services in the ACT.

- What about the ACT Government Southern Memorial Park which will be located in Canberra's South and is supposed to include a cremator. If this crematorium goes ahead at Symonston, what impact will it have on the development of the ACT Government Southern Memorial Park.
 - In a further QON of 6/5/2022 to Minister Chris Steel if *the development of the Southern Memorial Park is likely to satisfy any shortfall we have in crematoria in the ACT*, the Minister responded: *It is expected that Southern Memorial Park will meet the needs of the Canberra community in relation to crematoria, burials and memorialisation in the future.*
- The original DA and associated documents are not available on the amended DA listing. Only the invalid ESOs are accessible. This makes it impossible to compare them to get a better picture of how the amendment DA changes from the original DA.
- The ACT Government has declared a Climate Change Emergency in May 2019.
 - Under these conditions, structures and carparks create Urban Heat Islands and therefore a crematorium that is not needed should not be permitted.
 - we are very concerned that on a hot and dry summer, this additional heat could well do damage to the animals and birds in the Reserve and at the DA site. This could even lead to spontaneous combustion with potential catastrophic outcomes for humans, flora and fauna.
- Purdon have noted that 'Tenure arrangements of the specific site are not a planning matter .' But conditions under which this lease variation and "cemetery" development are considered are important and that is why community consultation is required. The proponent states that they have no intention to operate a cemetery at the site.

We, therefore, ask for full transparency and integrity in the process particularly on such a large block of land intrinsically connected with the Callum Brae Nature Reserve. We would like you to ensure that the DA site be returned to the ACT Government and be incorporated into the existing Callum Brae Nature Reserve for the protection of biodiversity, to maintain connectivity with the Mount Mugga Mugga Nature Reserve and for the enjoyment of visitors to the Reserve for future generations.

Yours sincerely,



Jeffrey R Bollard

President

27 May 2022

Appendix – additional information

Issues that are important for any development in the Callum Brae woodland and surrounding areas would include:

- avoidance of nationally endangered Box-Gum woodland - It is an important and contiguous component of the second largest patch of Yellow Box - Blaklely's Red Gum woodland remaining anywhere (a 11square km patch stretching from Red Hill through Mugga-Mugga, Issacs Ridge, Callum Brae and onto Wanniasia Hills and Mt Taylor).
- It is one of the few places where the ecological gradient from natural temperate grassland - Box-Gum woodland - dry open forest exists.
- Avoidance of known breeding habitat of rare or threatened woodland birds - it is important breeding and foraging habitat of many species of rare and threatened woodland birds – the Gang-gang team has spent a lot of time over the last four years searching for Gang-gang nests within the Callum Brae area. While Gangs-gangs have been observed entering tens of hollows across the area.
- Retention of hollow bearing trees.
- Design and measures that ensure no additional fire protection activates in the nature reserve or woodland areas, such as asset protection zone clearance or increased regularity of fuel reduction burns.
- Landscaping that does not introduce potential weeds to the area and utilises plants species known to be key food species for some of the threatened birds that occur in the area.
- Avoiding direct or indirect impacts on Small-ant Blue Butterfly breeding locations - It is one of only a handful of places where the Small-Ant Blue butterfly is known to breed.
- Measures to ensure runoff from a facility does not cause or exacerbate erosion or significantly increase nutrient load or other pollutant load into waterways.
- Consideration of the noise and light issues as mentioned in your notes.
- Avoid damaging any heritage sites both Aboriginal and more recent.
- Maintenance of the high connectivity value the woodland of this area currently has.

- Avoidance of habitat threatened invertebrate and reptile species known in the general vicinity such as the Perunga Grasshopper, Striped Legless Lizard, Golden Sun Moth and Pink-tailed Worm-lizard.
- Contains historic WW2 ammunition sheds.

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