



## Inner South Canberra Community Council

The Manager  
ACEPD Customer Services

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DA 202138789, Block 1. Section 3, Symonston, ACT

Dear Sir/Madam

The Inner South Canberra Community Council is concerned that this DA - originally from September 2021, amended March 2022 - is being pursued inappropriately in the Merit Track. Crematoria emit toxins, and the proximity of Callum Brae Nature Reserve makes this worthy of an Impact Track Assessment because of the potential for significant adverse environmental impact for both the Activity (crematorium) and the Areas and Processes (proximity to threatened species habitat).

Section 124 of the Planning and Development Act allows for the Minister to make this decision if satisfied on reasonable grounds that there is a significant adverse environmental impact from the development proposed.

In their 'Response to Entity Comments' summary, Purdon Planning note the Conservator of Flora and Fauna recommends that further information is required to support this application.

They also state in the same document under EPSDD impact 're-stated the ESO conditions and other advice received during the referral process.'

We note that ESO's are only valid for 18 months and both ESOs for this site expired in March as per below, an excerpt from the listings at: [https://www.planning.act.gov.au/development\\_applications/da\\_assessment/environmental\\_assessment/environmental\\_significance\\_opinions#Current](https://www.planning.act.gov.au/development_applications/da_assessment/environmental_assessment/environmental_significance_opinions#Current)

Notifiable Instrument Number	Title	ESO given by	ESO Expiry
<a href="#">NI2020-578</a>	Planning and Development (Conditional Environmental Significance Opinion – Block 1 Section 3, Symonston – Symonston Crematorium and Memorial Park) Notice 2020 (No 2)	ACT Heritage Council	10 March 2022

Notifiable Instrument Number	Title	ESO given by	ESO Expiry
<u>NI2020-527</u>	Planning and Development (Conditional Environmental Significance Opinion – Block 1 Section 3, Symonston – Symonston Crematorium and Memorial Park) Notice 2020	Conservator of Flora and Fauna	3 March 2022

We also understand that the EPBC Act approval may have lapsed.

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.

The Callum Brae Nature Reserve protects:

- Part of one of the largest, best-connected and most diverse areas of critically endangered Yellow Box - Blakely's Red Gum Grassy Woodland remaining in Australia
- high-quality breeding and foraging habitat for woodland birds, including threatened or regionally declining species such as Diamond Firetail (*Stagonopleura guttata*), White Winged Triller (*Lalage sueurii*), Varied Sittella (*Daphoenositta chrysoptera*) and Southern Whiteface (*Aphelocephala leucopsis*)
- good habitat for small numbers of [Scarlet Robin \(\*Petroica boodang\*\)](#) and Flame Robin (*Petroica phoenicea*) – especially in autumn and winter – as well as the migratory Dusky Woodswallow (*Artamus cyanopterus*), which makes seasonal visits
- habitat of the vulnerable [Perunga Grasshopper \(\*Perunga ochracea\*\)](#), one of a few known locations for this species

It is one of the few places where the ecological gradient from natural temperate grassland - Box-Gum woodland - dry open forest exists, and is one, of only a handful of places, where the Small-Ant Blue butterfly is known to breed.

Beyond the invalid ESOs, the original DA, and associated documents are not available on the amendment DA listing so we cannot compare them to get a proper picture of how this amendment changes from the original. The degree of change from the original also contributes to the need for further scrutiny.

Pushing this DA through the Merit Track avoids appropriate Impact Track scrutiny:

- It is a NUZ1 broad acre zoning which means a car park is not allowed, however if they include a cemetery then it is. Purdon's documents clearly state burials are not planned for the site (Response to Public Representations under Burial/Cemetery use) so why do they need car parking for 103 car parks?
- In the aforementioned response there is also a heading Bad Location - to which Purdon's have responded that 'There is need for additional Crematoria services in the South of Canberra.' Yet, a National Cremation Capacity Survey 2020 undertaken as a reaction to the Coronavirus Pandemic by the Australasian Cemeteries and Crematoria Association (note, undertaken before the ACT Government cremator opened in Gungahlin) states that the ACT is operating cremations at 18% of capacity. There is also the intended ACT Government Southern Memorial Park which will be located in Canberra's South and include a cremator.
- Why would there be a need for a total of four crematoria in the ACT (2 in the north and 2 in the south) and the associated greenhouse gas emissions in the context of the ACT Government's declaration in 2019 of a Climate Change Emergency?
- We believe there are more individuals and community groups who would have views on this amendment proposal, however the signage placement was poor - none at the Callum Brae entrance - and so have not had the opportunity to comment. Information on the original DA was sufficiently poor that that too was a section in the response under the title Public Notification/DA Submission process.
- Again, the same response, under the heading 'Need for Crematorium' Purdon Planning have stated 'The commercial demand for a private crematorium is not a planning issue. Should the demand not exist, the site will not provide the commercial returns expected, and will stop operating.' The sale price on this site with its proximity to Narrabundah, Fyshwick and Symonston will change considerably with a 103 car park compared to none.
- Purdon have noted that 'Tenure arrangements of the specific site are not a planning matter' under Other Comments. We disagree - the conditions under which this lease variation and cemetery development are considered are important and that is why community consultation is required. Transparency and integrity in the process is very important and this is a large block of land adjacent to an important site.

We urge you to determine the need for an Impact Track assessment, requiring a comprehensive EIS to be done and new community consultation.



Marea Fatseas  
Chair  
31 May 2022