



**CONSERVATION
COUNCIL** ACT REGION

Submission to ACT Government Environment,
Planning and Sustainable Development Directorate

Proposed crematorium near Callum Brae Nature Reserve

May 2023

The Conservation Council ACT Region is the peak non-government environment organisation for the Canberra region. Since 1981, we have spoken up for a healthy environment and a sustainable future for our region. We harness the collective energy, expertise and experience of our more than 40 member groups to promote sound policy and action on the environment.

We campaign for a safe climate, to protect biodiversity in our urban and natural areas, to protect and enhance our waterways, reduce waste, and promote sustainable transport and planning for our city. Working in the ACT and region to influence governments and build widespread support within the community and business, we put forward evidence-based solutions and innovative ideas for how we can live sustainably.

At a time when we need to reimagine a better future, we understand that the changes we need will only happen with the collective support of our community.

For further information please contact:

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Introduction

The Conservation Council ACT Region appreciates the opportunity to provide comment on Invocare's proposed crematorium in Symonston, adjacent to the Callum Brae Nature Reserve, Development Application 202138789.

The proposed development on the Mugga Lane site is not appropriate due to the site's biodiversity and landscape connectivity value, and the use of fossil gas furnaces is inconsistent with the ACT Government's target to phase out fossil gas in the Territory.

Comments on selected aspects of the proposed development

Biodiversity and cultural heritage

Whilst the Council acknowledges that some parts of the site were previously cleared for the Mugga Lane Zoo and are of low biodiversity value, the site is in the midst of and surrounded by remnant woodland containing Yellow Box and Blakely's Red Gum with native grasses and forbs.

The Council acknowledges that the proponent has revised the original proposal to:

- reduce the number of mature trees being cleared,
- reduce the footprint to retain high biodiversity areas and cultural heritage sites
- remove weeds from the site,
- plant native species, and
- develop a Woodland Conservation Management Plan.

However, the proponent still proposes removing mature trees aged between 200-300 years from the Box Gum Woodland site. These irreplaceable trees include nesting sites for endangered Gang Gang cockatoos and nests of Coconut Ants, essential for breeding sites for the rare and protected Small Blue-Ant Butterfly.

The proposed development would impact landscape connectivity. The Callum Brae Reserve and the proposed crematorium complex site provide a valuable wildlife corridor, with connectivity to Mugga Mugga, Isaacs Ridge, Red Hill and Wanniasa Hills Nature Reserves. This is readily apparent in aerial views of the region. A long-term management aim for Callum Brae Nature Reserve is to maintain connectivity with other woodland areas to ensure there is ongoing viable habitat for threatened and declining woodland birds. (p 210, Canberra Nature Park, Reserve Management Plan 2021).

Development of this site would be yet another encroachment of urbanisation into diminishing native habitat, unacceptable in the face of an extinction crisis. The ACT Government should be rejecting development applications that would fragment remnant habitat.

The site should instead be incorporated into the Callum Brae Nature Reserve.

Climate change impacts

The ACT Government has committed to net-zero emissions by 2045 including phasing out fossil gas. The ACT's policy direction has been clearly articulated for over three decades through its

Climate Change Strategies, legislated emissions reduction targets, Climate Emergency Declaration and commitments in the 2020 Parliamentary and Governing Agreement.

The Synthesis Report of the IPCC's Sixth Assessment Report (AR6-SYR) released in March 2023 is unequivocal in its statements about the urgency required in global emissions reductions.

*“Keeping warming to 1.5°C above pre-industrial levels requires deep, rapid and sustained greenhouse gas emissions reductions in all sectors. Emissions should be decreasing by now and will need to be cut by almost half by 2030, if warming is to be limited to 1.5°C.”*¹

Crematorium furnaces are fuelled by fossil gas, with the average cremation using about the same amount of energy and producing about the same emissions as two tanks of fuel in an average car.² The impact of greenhouse gas emissions has not been considered in the development application. As noted in the ACT Government's review of the *Cemeteries and Crematoria Act 2003*, “opportunities for greater use of new technologies and methods like natural burial and alkaline hydrolysis need to be not just contemplated, but facilitated and promoted”.³

Whether or not the crematorium would have greenhouse gas emissions above or below the 1kt threshold for declaring emissions in an EIS, there is no possible justification for approving a development utilising fossil gas in the face of the climate emergency and the Government's own policy. It is imperative that we prevent all new fossil fuel projects, including this crematorium.

Other considerations

The Council recommends conducting a strategic review of previous plans, including a Legislative Assembly inquiry, about the need for burial services and sites in the ACT.

The site is zoned for a cemetery, not a crematorium. It is classified NUZ1 broad acre zoning, which means a car park is not allowed, yet 103 parking spaces are proposed.

A site to the east of Symonston, along Jerrabomberra Ave south of Narrabundah Lane, would be more appropriate for development of this nature.

¹ IPCC, 2023, 'Urgent climate action can secure a liveable future for all', Press release, 20 March, https://www.ipcc.ch/report/ar6/syr/downloads/press/IPCC_AR6_SYR_PressRelease_en.pdf

² Little, B, 2019, 'The environmental toll of cremating the dead', National Geographic, <https://www.nationalgeographic.com/science/article/is-cremation-environmentally-friendly-heres-the-science>

³ ACT Government, 2019, 'Report on what we heard: Community engagement on review of the Cemeteries and Crematoria Act 2003', https://hdp-au-prod-app-act-yoursay-files.s3.ap-southeast-2.amazonaws.com/2015/8198/8553/Listening_report_for_review_of_the_Cemeteries_and_Crematoria_Act.pdf

Summary and Recommendations

Developing the site bounded by Mugga Lane, Narrabundah Lane and Callum Brae Nature Reserve would unacceptably impact landscape and habitat connectivity.

Building a facility that would consume significant amounts of fossil gas is unacceptable given the global climate emergency.

The Conservation Council recommends rejecting the proposed crematorium, and that:

- The Mugga Lane site be incorporated into the Callum Brae Nature Reserve and protected from any future development
- No new crematorium in the ACT be permitted to use fossil gas
- Alternative sites and burial options be investigated