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The Animal Protectors Alliance appreciates the opportunity to comment on Development Application: 202138789 (Crematorium) located at the corner of Mugga and Narrabundah Lanes, but we are concerned that the public consultation period is so short.

The Animal Protectors Alliance (APA) is a Canberra-based affiliation of individuals who are committed to the protection and welfare of all animals.

Having gone through the documents associated with the DA, we are astonished that the development has not considered the impact on animals. This is of particular concern as the proposed site backs onto the Callum Brae Nature Reserve and is close to both Mt Mugga Mugga and Issacs Ridge Nature Reserves, as well as several local livestock farms. The Dog Control Service shelter and the Hanrob Pet Motel are also located only metres away from the proposed site.

During its consideration of the merits of the proposed DA, the APA strongly recommends that the ACT Government review the following points which address gaps in the documentation that, if not considered, will seriously threaten the wellbeing of animals, people and the environment.

Issue 1: Converting undeveloped land for human use is one of the most irreversible environmental impacts on a local ecosystem. Apart from putting pressure on diminishing open space, it further fragments natural habitats by acting as a barrier to animal movement. This, in turn, harms the survival of many different species of wildlife such as kangaroos, birds, and reptiles, including all the local threatened species. Studies have found fragmentation to be a primary contributing factor to disturbance and ultimate extinction in wildlife populations.

While any further loss of habitat kills animals, the conversion of existing remnant land in urban areas has the most obvious and immediate impact on biodiversity, with land-use change often the entry point for non-native invasive plants.

We see these effects on multiple levels. Direct loss in vegetation biomass by removing mature trees, ground cover and underbrush forces animals to seek new homes. With so much habitat already lost, new homes are mostly already occupied and not available without causing death to other individuals. This dispossession and death in turn contributes to a disruption and decline in stable breeding cycles.

Despite being well-recognised problems associated with development of remnant land, these matters do not seem to have been addressed or even mentioned in the DA.

Issue 2: In the ACT, the particulate pollution of the atmosphere (from burning bodies) would be considerably higher, in terms of parts per million, than similar levels of pollution at sea level. This means people and animals breathing the ACT's less dense air of its higher altitude, will be breathing in higher concentrations of dangerous particulates than they would be at sea level.



Air pollution from the development will certainly impact adversely on the welfare of wildlife in all the nearby reserves, as well as animals at the ACT Dog Control Services shelter and Hanrob Pet Motel, and animals grazing on nearby farmlands.

Residents and workers in the nearby suburbs of Red Hill, Issacs and Narrabundah, the Therapeutic Goods Administration and the Dhulwa Mental Health Services, all of which are situated in close proximity to the proposed site, will also be impacted by this harmful air pollution.

In the context of a community fighting a pandemic of COVID 19, a respiratory virus which itself attacks primarily the lungs, subjecting residents to even an only slightly increased risk of lung damage from air pollution would seem nothing short of madness.

Issue 3: This development could also further deteriorate local water quality which will further impact on local wildlife and farm animals.

Issue 4: In addition, single site developments such as this will not only add to traffic congestion but will exacerbate urban sprawl in the “bush capital”. This will result in yet more wildlife deaths due to motor vehicle collisions.

With all animals now declared as sentient beings in the ACT, the quadruple impact (loss of remnant habitat, air pollution, water pollution, and increased risk of road deaths) of this development on the welfare of wild animals, companion animals and farm animals, cannot be ignored.

At first glance, the DA appears to be have similarities to the proposed Southern Memorial Park (SMP) located at the other end of Mugga Lane and opposite the Resource Management Centre (the tip). It is not easy to see whether the DA is equivalent to or in addition to the SMP project. This confusion may be due to the fact the DA has not been widely promoted as perhaps it should have due to the pandemic lockdown. This would suggest the ACT Government ought to consider an extension of time for public submissions to ensure the widest possible consultation.

In summary, the issues raised in our submission, none of them dealt with in the DA, represent multiple risks to animal welfare and health, considerable risks to human welfare and health, and a major environmental threat to the entire ACT community. The proposed site is completely unsuitable for a crematorium. With the planet on the brink of a climate change disaster, this development has the potential to alter Canberra’s climate.

Sincerely

Robyn Soxsmith
Co-founder
Animal Protectors Alliance
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