



PLANNING PROPOSAL FOR MEMORIAL PARK/CEMETERY

QUESTIONS ON NOTICE FOR ONLINE COMMUNITY MEETING

15 SEPTEMBER 2020 – VIA ZOOM

The following 'Questions on Notice', listed in order of receipt, were received prior to the memorial park/cemetery online community meeting.

Questions submitted by: Tamika Potter

- 1. Why did no one from the council reach out to the Mount Pleasant holders?**

Response

Council sent a letter to existing property owners on 20 April 2017 advising of the proposal. Council also advised the property developers of the Mt Pleasant estate.

- 2. Will the council compensate for loss of money for screening on land backing into the cemetery?**

Response

Council will be planting an extended vegetative screen along the southern boundary, within its land, regardless of the outcome of the planning proposal.

Questions submitted by: Leisa Will

- 3. Has consideration been given to the residents who rely on bore water to irrigate their properties given the memorial park will likely utilise a significant amount of water drawn from the water table to irrigate a commercial sized property with landscaped grounds?**

Response

Not all of the memorial park/cemetery will be irrigated. Only high-order landscapes, gardens and lawns will be irrigated. Water will come from a number of sources, as part of an integrated water management plan, including storm water harvesting, some ground water and some recycled water.

4. **Can council provide residents with a guarantee that a crematorium will not be subject to approval in future? There are significant concerns that this will occur at some point which would have a detrimental impact on the air quality of the local area.**

Response

Council resolved on 9 May 2018 to remove a crematorium from the planning proposal. Therefore, even if this current planning proposal is approved by the Minister, a crematorium is not permissible. If a future council chose to reconsider this option it would require another full planning proposal to take place and would again need the Ministers consent. It is highly unlikely this would occur, as to be viable, a crematorium requires mains gas, which is currently not available and is unlikely to ever be required in a rural area.

5. **Is council aware that the majority of residents within Burrabella estate utilise their land as lifestyle blocks, as is their right as private land owners. Most residents partake in motorsports which may impact the ambiance of a memorial park and its associated functions. These activities are approved by the Burrabella body corporate and will not cease.**

Response

For several years, Council has planned a memorial park/cemetery to service the Queanbeyan, Jerrabomberra and Googong communities for a period of 50-80 years. It is expected rural lifestyles on adjacent properties will continue, including any legal uses of neighbouring properties. The current Lanyon Drive Cemetery for example is subject to noise as it is on a busy road and under the flight path.

6. **The FAQ sheet published by QPRC states other land was considered, however the council failed to identify other available parcels of land that met the stated criteria. Is the council still actively looking for alternatives given the number of local residents dissatisfied with the current proposal? E.g Tralee or off the proposed Dunn's Creek Road which would currently impact far fewer residents as these areas are mostly unoccupied.**

Response

In the initial search, there were three search areas (Eastern, Western and Southern). This process ultimately led to selecting the current site as the most suitable. There was no site identified that was more suitable than the one at Burra Road. It is acknowledged that any location will have neighbours that may have differing views on the proposal. With regards to Tralee, this area was reviewed and once again was discounted due to environmental constraints.

7. **Has consideration been given to the land owners and the impact a memorial park may have on their respective land values as a result of:**
- **Increased traffic**
 - **Any views or outlooks that may be obstructed**
 - **Sharing of resources, namely water with commercial grounds**

Response

While these concerns are noted, any impact of these matters may not influence land values. Traffic was examined during the social impact study and recommendations for improvements to Old Cooma Road have been completed.

Impacts to views or vistas is expected to be low, as the site is lower than most surrounding blocks. A well designed memorial park/cemetery should enhance the landscape and will be designed to be in keeping with the rural setting. Landscapes will be watered by a mix of sources identified through an integrated water management plan for the site.

Questions submitted by: Bohun Martin

8. How much is the cemetery going to cost to establish, including the already paid cost of the land?

Response

Stage one is estimated to cost approximately \$7 million, including the land purchase.

9. How much will it cost to run a memorial garden each financial year, and will the gardens be maintained after the site is at capacity?

Response

The annual running costs cannot be finalised until a detailed design is completed. This will not be pursued until the planning proposal has been determined. However, based on the Queanbeyan Lawn Cemetery, and other examples of the type of memorial park Council envisages, the annual running costs are expected to be around \$720,000. The memorial park/cemetery is expected to generate an annual turnover of around \$1,050,000.

The memorial park/cemetery will be maintained in perpetuity.

10. How much land (measured in Hectares) is available for interment, taking into consideration the cultural exclusion zone, shallow bedrock areas, environment restoration areas, dams and any other areas which are not suitable for interment?

Response

The proposed site for the memorial park/cemetery is 36.4ha. Studies indicate approximately 12.2ha are available for actual burial sites (11ha of land suitable for interment plus another 1.2 ha of land that requires mitigation). On current projections, 10ha will service 50-80 years. Nearly 60% of the property would be buffers, landscaping and conservation areas.

11. What is the projected interment rate used to determine capacity?

Response

Queanbeyan's current interment rate is approximately 300 per annum. This rate has been consistent for the last 10 years due to the trend away from burials toward cremation but balanced by increasing population. Capacity is determined by single interments per annum, for minimum term, then extended out to factor second or third interments.

12. What is the calculated estimated capacity in years for the proposed site taking into consideration all the restrictions identified in the reports?

Response

Projected capacity, based on figures above, is 50-80 years for perpetual interments only. This will likely be extended if contemporary cemetery management measures, such as timed tenure, is taken up.

13. Why is it acceptable to add 'Cemetery' as a permitted land use in an E4 zone and not an E3, E2 or E1 Zone which was the reason given for other land ruled out?

Response

The E4 Environmental Living zone generally has lower conservation values than other environmental zones and is predominantly used for rural residential housing and ancillary uses in Queanbeyan-Palerang. The E2 National Parks and Nature Reserves and E2 Environmental Conservation zones generally contain land with the highest environmental values and are the most critical in protecting for the future.

14. The chosen site and proposal does not meet nine out of eleven recommendations from the National Resources Access Regulator for new cemeteries, and does not meet many of council's own criteria for a cemetery location, why is it still going ahead?

Response

In respect to the general recommendations of the National Resources Access Regulator's letter of 22 October 2018:

- (Recommendations 1-6) The proposed development can satisfy these recommendations through an on-going program of groundwater monitoring, continued awareness of rainfall patterns and the corresponding impacts on water tables, and with pumping as required to lower water tables after heavy rain. This will result in the groundwater being maintained at greater than 3m and gravesites can be excavated a minimum of 1.5m above the water table. A large portion of the site allows for this as indicated by the depth of rock which is 6m for much of the site.
- (Recommendation 7) Flood modelling has indicated that there is flooding adjacent to the creek. No gravesites will be located within these areas.
- (Rec 8) Gravesites would be excluded from zones where water tables are consistently shallow; adjacent to the creek and where the shallow substrate is very permeable.

In terms of Council's own criteria, the site is within the 10-15km distance from the urban area and from the 36.4ha of the site, there is a sizeable area with ground water depths and depths to bedrock to allow for burials for the next 50 years. The flood zone adjacent to the creek can be avoided. It is not environmental land with high conservation value and any flora of interest such as native box gum woodland will be retained. It is a relatively flat site, can be accessed from main roads and can accommodate separated exit and entrances.

15. Interment of embalmed corpses in the areas where water tables are above the minimum height below ground level will pose a risk to contamination of the aquifers below, which is used by many local bores for watering animals and vegetables. Will the chemical content of the water be monitored?

Response

Advice from the funeral industry is that embalming is very rare. Embalmed bodies are placed in vaults or crypts above ground or a concrete lined plot in the ground. After embalming, the deceased is placed into a lead lined coffin, which is airtight. Embalmed bodies are not buried directly in the ground.

- 16. Will multiple pumps and generators be installed and maintained for pumping the groundwater into the creek, to ensure water tables are not contaminated during power outages and pump failures/blockages?**

Response

Pumps and other storm water infrastructure will be used as required to best manage surface and ground water levels, if and when the water table rises in the shallow bore on the western part of the site. This shallow bore is more receptive to external stimuli and can be used as a monitoring site that will prompt mitigation measures. Solar power and deep-rooted trees will also be employed as part of the water table management.

- 17. During medium rainfall events Churches Creek floods; won't pumping the groundwater into this creek which is the mitigation suggested exacerbate the issue and threaten landholders downstream?**

Response

Further work on flood mitigation and integrated water management systems will be part of the detailed design stage.

- 18. Where will the water come from to maintain memorial gardens at a scale of 36 Hectares seeing as there is no mains water at the site, and the water from the water table below kills most plants?**

Response

Not all 36.4ha will need to be watered – only the manicured areas. These areas can be watered from a suitable containment structure such as a dam. The results of water quality testing show only moderate salinity (700-1600 EC, or 470 – 1,000 ppm) and being slightly acidic (pH~ 6.4) which should not affect most plants. Use of bore water, storm water runoff and recycled water will be included in an integrated water management system for the site.

- 19. In 100 years, will council still be monitoring and pumping groundwater out of the water table to avoid contamination? What about in 200 years?**

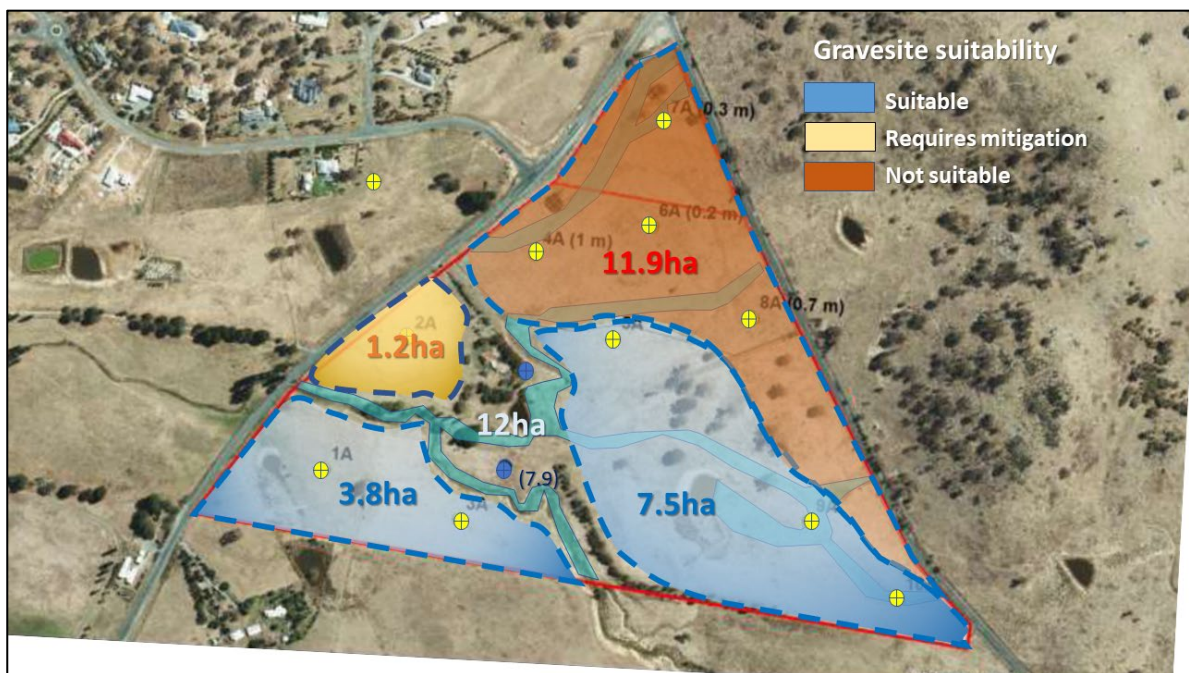
Response

It is expected that there will be ongoing monitoring as part of the site management beyond capacity, therefore the option of pumping will be left in place. Equally it is expected that the extensive tree plantings will be mature and ground water will have balanced out over time. While there is no certainty for how future generations will view interment methods or time periods, Council will adjust its management plan to meet changing trends.

20. The reports provided to the public show an estimated available land area suitable for interment of three and a half to four Hectares if you include areas with high ground water, and around two and a half Hectares if the areas which could contaminate the groundwater aren't used. This will support interment needs of the region for approx. only 5-10 years, is this enough, considering the proposals (undisclosed, so assumed) high costs?

Response

The hydrogeology assessment, Figure 4-8, shows there is approximately 11ha of land suitable for interment plus another 1.2 ha of land that requires mitigation. This excludes the riparian zone from that calculation. This amount of suitable land will satisfy demand for the next 50-80 years. Additionally, other parts of the land with rock are still suitable for other interment purposes such as above-ground mausoleums, ash walls, and memorial gardens for ashes.



21. In response to a request to further investigate ground water by National Resources Access Regulator (NRAR), Council state on the QPRC website that 'The groundwater investigations are considered to be vital in ensuring that Council and the community are confident that there will be no contamination of groundwater as a result of a cemetery being located on any part of the proposed site.' Now that further studies have been completed and show that groundwater is present and higher than the minimum levels, why is the site still being used with no effective mitigation?

Response

The hydrogeology assessment reports that monitoring of groundwater has shown that there is enough suitable land for interments. The consultant clearly responds to the recommendations set out by the NRAR and the planning proposal can be supported subject to these recommendations being met. Council has every intention to adhere to these recommendations to prevent any potential contamination of groundwater.

- 22. Was forced acquisition considered as a means to obtain suitable land for our community which is not in an environmentally protected area, and is suitable for a cemetery? If not why not?**

Response

If there had been a more suitable site that met the criteria for a memorial park/cemetery and if that land was not readily available for purchase, then Council could have considered seeking approval to acquire that site under the *Land Acquisition (Just Terms Compensation) ACT 1991*. However, there was no site more suitable than the one at Burra Road which was made available for purchase through private treaty.

- 23. The social impact study says the mitigation for the loss in value of surrounding property is involvement in the concept design and improvement to local utility access such as internet services. Will this consultation be effective at maintaining value of land which once had views of cows in a paddock, and is now replaced by a 120-space bitumen car park, and will we get fibre to the home NBN (or any improvement at all) for the surrounding properties?**

Response

Concept designs and Development Applications will both involve community engagement. It is envisaged that the design for a memorial park/cemetery in a rural setting will be developed sympathetically to surrounding landscapes. This may well include farm paddocks being continually grazed. Other elements, including parking, will be appropriately landscaped.

- 24. Why has activity stopped to find an alternate site, when this site has many unsuitable aspects and there is not much time remaining to find a suitable site?**

Response

The search for a suitable site that met basic criteria was carried out over the past 11 years with only suitable sites progressing to more stringent assessment. The suitability of the proposed site has been tested by the background studies as part of the planning proposal process. If this site is not supported by Council and the Minister for Planning, then the search will continue. The difficulty is that Queanbeyan is surrounded by large areas of hard rock, protected grasslands and Googong Dam catchment, limiting suitable sites in suitable proximity to Queanbeyan.

- 25. Do the water tables underneath the proposed site interact with Googong Dam in any way? If it is not known, should this not be determined to calculate the risk of contamination and subsequent appropriate mitigation?**

Response

No. All groundwater beneath the site (and surface water across the site) flows to the west. Googong Dam is 4km to the east, with the catchment divide approximately 2km east of the site.

- 26. What were the ground water level readings across all monitoring bores at the site for the month of August 2020 when we experienced some medium rainfall?**

Response

Logger data for August is scheduled to be downloaded in the coming weeks and records will be updated with that information. However, data from February 2020 including the 10 February downpour, has been monitored and is available in the report.

Questions submitted by: Geoff Smith

- 27. On page 9 of Attachment F -Social Report, Coffey Services Australia states that "Five properties to the east of the estate that can be accessed via O'Malley Place are closest to the proposed site. (minimum of approximately 170 metres)." My wife and I have lived at 12 O'Malley Place since May 2007 having been drawn to the valley for it's rural lifestyle. We have attended numerous council meetings voicing our strong objection to the proposed memorial park and yet we were not provided with the opportunity to participate in any of the social impact studies/processes. As we directly face the proposed site, why were we not included? There were 62 residents from Googong who participated in the initial social impact study. Of those, how many live in houses directly opposite the proposed site? How many were from Mt Campbell Estate?**

Response

The Social Impact Study was conducted by independent consultants. The study included semi structured phone interviews with representatives from QPRC Urban Landscapes; NSW Cemeteries and Crematoria; and Mount Campbell Estate Residents.

A Computer Assisted Telephone Interview (CATI) survey of 143 residents within the Queanbeyan-Palerang LGA was also undertaken. There were 61 respondents from the suburb of Googong and 82 respondents from surrounding suburbs, with analysis between areas weighted 50:50.

A Social Impact Assessment focus group was also held with 14 attendees. Participants represented a cross-section of the community including representatives from Queanbeyan and Googong residents' associations; residents of Burra, 'Burrabella', Royalla, and Fernleigh Park; the nearby St Paul's Anglican Church; Googong and Fernleigh Park landcare groups; and the funeral industry. Four of the 14 participants were randomly selected from Mt Campbell.

The views of the focus group, and the results of the telephone survey are included in the Social Impact Assessment Report and is presented as part of the current consultation to seek the views of the community and determine if the broader community agrees or disagrees with the opinions and conclusions reached.

- 28. Page 17 of the Social impact assessment, January 2019 states that the risk to property was identified as a major potential impact. How does council define major potential impact and what compensation measures will council put in place for those residents who directly face the proposed memorial site if it proceeds?**

Response

The study was conducted to identify social risks and impacts on the community. The objective is to design it out or minimise the risk or impact during the detailed design phase.

Questions submitted by: Michael Jones

- 29. When reference is made to the NRAR letter dated 22 October 2018, in particular Point 2 within General Recommendations for Any New Cemetery Site namely "Burial should be at least 250 m from any well, borehole or spring supplying human consumption or used in food production..." given the prevalence of nearby groundwater bores and Church Creek which are used or could be used for both human consumption and/or used to water at times food producing crops, this buffer would prohibit burials 250 m either side of the creek. Combine this buffer with the shallow bedrock and other buffers, only a small area in the eastern part of the site would have any chance of being viable. So why is Council proceeding with this proposal? Council cannot assume that the groundwater will not be used for human consumption or used to grow food which humans will consume.**

Response

Church Creek is an ephemeral creek line which does not fit the criteria within NRAR's list of water supplies for human consumption. The buffer required on Church Creek is a 40m riparian zone.

- 30. How has Council considered effluent disposal for onsite effluent generation? The site is to have permanent staff and up to say 150 visitors at a time. So what is the plan to treat and dispose of effluent? Current Water NSW planning regulations limit the disposal of effluent to at least 100 m away from creeks etc so has Council taken that into consideration? How often will this system be maintained given those from town are not used to these type of systems which would likely put undue pressure on these systems and how will issues like those on chemo treatment etc be managed as Council will have had no advice that people effected by this are using this system.**

Response

All recycled water, storm water harvesting and ground water management will form part of an integrated water management plan for the site. Amenities at the memorial park will be suitably sized and will align with the integrated water management plan. Effluent will be managed through on site sewage management (OSSM). An OSSM is part of the plumbing system on an unsewered property, and normally includes a tank for treating raw sewage and a disposal system. Council will adhere to any NSW Health regulations relating to recycled water use.

- 31. What is the minimum buffer distance that burials can be undertaken to a watercourse? Surely given the biological contamination risk and the risk of contamination from chemicals used in the embalming process there would be a significant buffer such as for effluent disposal.**

Response

Council is required to keep a minimum of 40m from any creek embankment and this riparian zone will be rehabilitated. It is envisage even greater buffers will be applied for actual burials. Embalmed bodies are not ordinarily buried in Australia, rather they are sealed into lead lined air tight coffins and placed into sealed vaults or crypts.

- 32. How is Council proposing to gain access to the portion of the site in the south west corner? Given the key fish habitat buffer, minimum buffer distances for burials close to the creek (plus other heritage buffers) and buffer distances off the southern boundary to existing properties – the available land there would be so small that the cost of constructing a bridge or culvert would be considered a waste of rate payers money.**

Response

As the site has road frontage to both Old Cooma Rd and Burra Rd, all areas can be accessed without constructing a creek crossing. However, the final detailed design and business model will determine whether a crossing is viable or not.

It is important to remember, any memorial park/cemetery project is to be self-funding and not by the rates revenue. Any loan funds Council draws on to purchase and establish a new memorial park/cemetery will be repaid by plot sales into the future, as will annual running costs. If the Planning Proposal is approved, Council will move to detailed design and development of a Business Plan for the memorial park.

- 33. How is Council proposing to mitigate against rising groundwater levels in the event of high rainfall events? What redundancy measures then would be put in place to should the initial measures fail? Has Council costed those mitigation and redundancy measures? If so can Council provide justification to the spending those ratepayer funds in lieu of selecting site which doesn't require groundwater mitigation measures?**

Response

As mentioned in responses to questions 3, 7, 17 and 18, Council will implement an integrated water management plan for the site to include ground water management. Such an approach would consider existing circumstances and would be reviewed periodically to adjust to any changes.

- 34. Long term, once the cemetery is at capacity will Council still maintain the pumping down of the water table etc to keep the site suitable?**

Response

The monitoring and mitigation of ground water will continue throughout and beyond the serviceable life of the memorial park/cemetery. By the time the site has reached capacity, it is envisaged an extensively planted landscape of mature trees will actually replace the need for pumping, however monitoring will continue.

- 35. What evidence/guarantees can Council provide to ensure that the products of decomposing bodies and coffins etc won't have a detrimental effect on local ground water? Particularly considering the higher than recommended water table at this site for this type of development and the existing communities reliance on the bore water.**

Response

The Hydrogeological study indicates that the ground water on site can be managed in accordance with NRAR guidelines and will continually be monitored throughout, and beyond the serviceable life of the cemetery.

- 36. With only 3 locations of monitoring wells (2 being nested), is Council proposing to undertake a more detailed hydrogeology investigation and modelling? The delineation of the area requiring control measures is based on extremely broad information.**

Response

Council's consultants have monitored ground water over the past 18 months and have modelled historic data and the findings support the use of the site as a cemetery. Ongoing monitoring will form part of the operational model, if the Planning Proposal is approved.

- 37. Why weren't more boreholes drilled in areas where the proposed burials are to take place? Subsurface conditions can change rapidly due to the variable nature of alluvial soil deposition and weathering of the parent rock.**

Response

The borehole locations were chosen by Council's consultant to give an understanding of groundwater depths and behaviours across the site. This has been used to help determine areas most suitable for burials.

- 38. Has permeability testing been undertaken on the soils? Particularly in the depth range of 1.5 - 3.0 m?**

Response

This question has been referred to Council's groundwater consultant for further advice. A response will be published on the website when available.

- 39. Many of the local residents rely on bore water to supplement their tank water supply particularly in drought, if Council is planning to also access this water for the maintenance of the large amounts of lawns and gardens in this type of development what impact will this have on the existing users? As there is no potable water to service the site.**

Response

Council will not be irrigating the entire 36Ha, only those higher order and manicured landscapes and gardens. Water will be sourced through various means in accordance with an integrated water management plan.

- 40. How is Council planning to maintain the gardens and lawn areas on the site in terms of water? Previous water testing has indicated the water to be very hard and there is no obvious lab testing for levels of calcium and magnesium salts from these groundwater wells.**

Response

Water quality on site has been tested and is not incompatible with plant life. Ground water is of course only one source to be utilised onsite.

- 41. Also will Council be looking at the plantings as many plants are unsuitable to be maintained by bore water. Has the cost of the turnover of these plants been calculated into the running costs?**

Response

Council's Horticulturists, supported by consultant Landscape Architects will determine an appropriate planting list to the site and available water supplies.

- 42. Given all the constraints that have been presented to Council in the reports provided on the website, can Council justify the spending of ratepayer funds on such a marginal site? Does Council expect ratepayers to pay for expenditures for grossly negligent decisions such as watering plants with hard water which need to be subsequently replaced, contamination of a shallow water table from decomposing bodies and high site assessment and construction costs on a site that is clearly unsuitable?**

Response

Studies have indicated that there is sufficient land available onsite to service Queanbeyan, Jerrabomberra and Googong's needs for the next 50 years. All costs to date and into the future will be covered by plot sales, not rate revenue.

- 43. Why hasn't a detailed impact report been undertaken to the likelihood of land/house falling as a result of this proposal? The previous social impact reports have flagged this as a major social impact. Surely given that it is a major impact it should have been addressed more thoroughly by now. The value of properties with Mt Campbell and Mt Pleasant (Burrabella) are substantial therefore are Council willing to accept on behalf of nearby residents a reduction in their investment in their homes? How does Council plan to compensate these residents for any drop in value?**

Response

Page 19 of the social impact statement notes recent research in Sydney indicates there are unlikely to be impacts on property values arising from the establishment of a cemetery. Regardless, the social impact statement does note that the concern of potential decreases in property values is genuine and Council will continue to liaise closely with industry and nearby property owners as to the progress of the development and ensure opportunities to input into the final design.

- 44. How does Council propose to ensure transparency in terms of the costs associated with the planning, construction and maintenance of the development should the cemetery actually be built?**

Response

All Council projects that form part of Council's accounts are independently audited. Council also has established an audit committee to provide oversight of its key projects and finances.

Question submitted by: John Kidd

- 45. I would like to know the logic used by the then QPRC Administrator for purchasing the proposed site in secrecy without prior consultation with impacted groups and individuals?**

Response

Finding an appropriate site in the catchment of Queanbeyan is challenging. Council needed to act with "commercial in confidence" when taking out an option to acquire, due to developers also seeking properties in the future growth area. Council made all information public at the appropriate time in the process.