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Dear Mr Savery

Federal Golf Course – Draft Environmental Impact Statement (removal of concessional status)

I am writing to comment on the above EIS (reference application number 200900284).

Red Hill Regenerators strenuously objects to the removal of concessional status associated with the Federal Golf Course Development.

Removing the concessional status of land central to the Red Hill woodland remnant, to facilitate residential development, is clearly not in the public interest and would cause significant disadvantage to the community's conservation interests, pursuits and past efforts. The draft EIS inadequately addresses the Terms of Reference and seriously fails to identify community interests in the subject land and the larger development of which removing concessional status is a part. The EIS contains insufficient justification for the Minister to decide that consideration of this matter is in the public interest.

On one hand the EIS justifies the deconcession of part of the lease by the financial return to Federal Golf Course that will result from development of the land for housing, while on the other hand inconsistently states that environmental and social impacts that will flow from the development will be addressed in subsequent development applications. In terms of the detailed investigation of impacts this may be warranted, but surely to meet the requirements of Section 261 of the *Planning and Development Act 2007*, the community concern and disadvantage that will flow from these environmental impacts should have been identified and discussed.

Disadvantage to community environmental aspirations and efforts

The proposed residential development, of which deconcession is the first part, will result in major degradation to one of the most significant remnants of temperate woodland remaining in Australia. The Red Hill woodland is of considerable community interest and the community has expended much effort into its regeneration and protection.

The national significance of the Red Hill woodland remnant relates to the relatively large size (375ha), the very high plant diversity (175+ species) and that it is the

significant habitat of 12 threatened and 18 regionally uncommon plant, bird, lizard and grasshopper species. In a national context a Yellow Box – Blakley’s Red Gum woodland greater than 100ha, with more than 100 plant species or any threatened species is significant.

The Red Hill Regenerators, a Landcare award winning community group in its 21st year and with a steady membership of around 30, has spent tens of thousands of hours enhancing the Red Hill remnant. This includes hundreds of hours within or immediately adjacent to the road reserve and nature park land which is subject to this Federal Golf Course development. Our group has received considerable support from other local community groups in the regeneration of Red Hill, who from time to time have joined us in our on ground activities. The total number of people that have been actively involved in caring for the Red Hill woodland runs at least into high hundreds and probably more than a thousand. Groups that have been actively involved include La Trobe Scouts, Ventures and Cubs, Mugga Cubs, Hughes Scouts, the Hughes Boys Brigade, Canberra Girls’ Grammar School, Deakin High, Canberra Boys Grammar School, Telopea Park High, Red Hill Primary, Hughes Primary, Malkara Special School, Clean Up Australia, Greening Australia, Australian Conservation Volunteers, the Church of Transfiguration, Friends of Hughes Buffer Area Open Space and Hughes Residents Association. Red Hill Regenerators and these groups have been assisted in our enhancement efforts by ACT and Commonwealth government grants and by conservation staff within the now department of Territory and Municipal Services.

Considerable community effort and government resources have been expended on the enhancement of Red Hill’s conservation values. The success of this effort will be significantly undermined by the deconcession and subsequent development.

The EIS provides a community profile, generally consisting of broad statistics, but has failed to utilise the information contained in the Neighbourhood Plans, that in 2002 – 2005 were produced for all suburbs in the vicinity of the proposal and which document the values and desired future directions and planning actions of local residents. The Plans are instructive as they place protection and enhancement of open space and the environment as the key value of local residents.

Forrest and Red Hill residents value “above all else (their suburbs) open space and environment, in terms of the amount of open space, mature trees and the diversity of plants, birds and animals.”

Garran residents “value Garran’s environment, in particular the open space, trees, gardens and Red Hill Nature Park.”

A key objective for Deakin residents is to “conserve, enhance and ensure access to open space, bushland and recreational areas.”

69% of Hughes residents considered open space and environment (notably Red Hill and undeveloped parts of Federal Gold Course) as the most valued feature of their suburb.

The deconcession of the lease and the larger development of which deconcession is an important part are at odds with the expressed values and public interest of the local community.

The value and conservation importance of Red Hill is also recognised more widely by people and community groups that have an interest in conservation. The Canberra Ornithologists Group has been monitoring birdlife on Red Hill for many years. Groups such as Friends of Grasslands, ACT Field Naturalists, ACT National Parks Association, the Grassy Woodland Conservation Management Network, the Canberra and Region Conservation Council and the Australian Conservation Foundation have all supported conservation management and protection of the Red Hill remnant and in most cases have conducted activities within the remnant.

The deconcession of the lease and the larger development of which it is a part will significantly disadvantage local community values and wider conservation interest, and set back the enhancement work undertaken by the Red Hill Regenerators, with support from a host of community groups.

This disadvantage will eventuate because the development will:

- clear in excess of 300 mature native trees. A hundred of these trees have a trunk circumference (at 1m above the ground) of at least 50cm. Fifty-three of the trees have a circumference above 150cm and about 60 of the native trees meet the criteria of being regulated trees requiring the approval of the Conservator of Flora and Fauna to remove. The trees comprise a significant proportion (at least 5% of the total) of hollow bearing trees found on Red Hill. Hollows are a significant and limited resource for Red Hill's wildlife. The lease area is likely to be important to maintaining bird, possum and bat populations within the Red Hill woodland remnant;
- a large area of endangered Box - Gum woodland (including several hectares that the community has spent many hours restoring) will be cleared or directly and significantly disturbed;
- regionally uncommon plant species (whose numbers have been increasing through community restoration efforts) that occur within the area of proposed clearance include *Dianella longifolia var longifolia*, *Calotis lappulacea*, *Solanum cinereum*, *Indigofera adesmiifolia*, *Dichanthium sericeum*, *Lomandra bracteata* and *Pelargonium rodneyanum*. The area of clearance contains a substantial proportion of the total Red Hill population of the last three species, and risks the long term survival of these plants on Red Hill;
- several threatened or regionally uncommon bird species have been recently recorded within the area of proposed clearance including the Flame Robin, Scarlet Robin, Speckled Warbler, Double-barred Finch and Gang Gang Cockatoo (breeding in area). The White Winged Triller and Varied Sitella have also been observed in the vicinity. The area currently provides suitable habitat for these species and may again (if the development does not proceed) be utilised by these threatened birds ; and
- *Grevillea rosmarinifolius* plants occur within the area of proposed road re-alignment/intersection works. It is probable that these plants result from 1917 –1925 plantings by Charles Weston, carrying out the plans of Walter Burley Griffin to regenerate Red Hill with red flowering plants. The development would significantly impact on this historic association.

In addition to the direct loss of the above values, indirect impacts of the development will be devastating to the woodland remnant and community conservation aspirations. Development of the Golf Course land will place residential development within a core, high-condition part of the Red Hill remnant. Experience elsewhere on Red Hill has demonstrated that areas in the vicinity of housing developments are seriously damaged through:

- increased weed invasion, which is already the biggest threat to Red Hill. Weeds will spread both from the lease area and from areas of new works. The linear nature of the infrastructure works and the earth disturbance they will cause will be particularly favourable to the establishment and then spread of weeds. These works include the widening of the Red Hill laneway, the laying of fibre optics from Deakin, the creation of a footpath from Deakin, the laying of gas and water from Brereton Street and the potential upgrading and connection to the existing power line. The road is already a source of new significant weeds into the Park, such as African Lovegrass, which Red Hill Regenerators have repeatedly and successfully controlled, the development is likely to make the task unmanageable;
- increased occurrence of unrestrained dogs and cats. The presence of dogs on leads, or even people on their own, is known to significantly disrupt the breeding success of birds. A study in Sydney woodland found that areas in which dogs were walked had a 35% reduction in bird diversity and a 41% in bird abundance, compared to control areas from where dogs were excluded. Disturbance by people alone resulted in about half the loss of that associated with people walking dogs. The area of Red Hill Nature Park adjoining the proposed development is currently subject to little recreation pressure and supports rare and threatened birds. Ground nesting species such as the Speckled Warbler were found to be particularly sensitive to disturbance. The original flora and fauna assessment for the development concluded that it may result in the local extinction of the Speckled Warbler. The Red Hill Regenerators are also seriously concerned about what the development will mean to the survival of other woodland birds on Red Hill;
- increased local occurrence of other exotic species such as the Indian Myna and Starlings will be favoured by urban development. Our group has observed Indian Mynas feeding on the threatened Perunga Grasshopper, which may occur in suitable habitat in close vicinity to the site of rezoning. The flora and fauna assessment also considered that the area of development provided suitable habitat for the rare Matchstick Grasshopper. However unlike the Perunga we have not observed this grasshopper in the vicinity of the lease area;
- fire protection measures. Even if current required fuel reduction areas could be located within the 4.26 ha of Golf Course land (which seems doubtful – given the amount of vegetation to the north west of the proposed site), there is a possibility (in fact, a distinct probability) that future strengthened requirements would require fuel reduction measures within the reserve due to the development; and
- increased road kill. The development will result in an increase in traffic volume and possibly speed if the road and junction with the summit road are to be upgraded. A blind snake species, blue tongued lizard and several native bird species have already been recorded as road kills along the existing stretch

of the Golf Course road. It appears that road kills along the Golf Course road have already led to the extinction of the Swamp Wallaby from Red Hill.

It is clear that the deconcession and larger development will significantly disadvantage the wider community conservation interest.

Disadvantage to pedestrians, cyclists and local residents from traffic

The EIS also fails to address the disadvantage to the community that will flow from a housing development, in which the car is the only form of access and the only access route is via a narrow bending road much used by cyclists and pedestrians. Through the FOI process the Red Hill Regenerators obtained information that was not provided during the information nights. The planning study estimates that the development will generate an extra 500 car trips a day. Experts in the Department of Territory and Municipal Services consider that this is likely to be an under estimate. Even at 500 this is a 50% increase in traffic on the Red Hill roads. The widening and re-alignment works that are required for the proposal will enable cars to travel faster, while residents who drive the hill daily are likely to travel faster and be less attentive than the tourists, sightseers or weekend golfers who make up a high proportion of the current traffic.

Neither the EIS nor planning study contains information on the number of cyclists and pedestrians that currently use the roads, but it is a large number. Cyclists on the downhill run reach high speeds, with small reaction times. The increased traffic of faster less attentive drivers is a significant risk and disadvantage to the use of the area by cyclists.

Increased traffic and the intrusion of housing within an otherwise “natural” landscape will also detract from the experience of pedestrians, who choose the route because of the natural bush, tranquillity, views, peace, clean air and lack of fast moving cars.

The planning report also predicts that the development would result in a considerable increase in the total numbers of vehicles travelling along Stonehaven Crescent and Mugga Way. These streets already exceed their nominated environmental capacity of 4000 vehicles per day. Adding another 500 vehicles per day will further disadvantage residents along these streets who already have to cope with undesirable traffic loads.

The EIS does not make a case that the development will result in an otherwise unattainable community benefit

The Federal Golf Course has stated that the main rationale for sale and development of the land is to “drought proof” the current course. However pages 8 and 56 of the draft EIS make it clear that around half the expected money to be raised will be spent on improving club house facilities (new locker rooms and bathrooms, a replacement roof, upgrade of the kitchen, expansion of club office space, a new function room) and building a green-keeper’s shed.

In 2008, when asked directly by a group of Red Hill Regenerators, David Nelson (President of the Federal Golf Course) was emphatic in his reply that construction of the new irrigation ponds could be funded within the existing resources of the club and

would not require sale or development of any land. It is relevant that the club has already received a \$250,000 government grant to assist in drought proofing.

The rationale for the development is therefore as much about expanding club facilities as drought proofing the course and certainly the EIS does not demonstrate otherwise.

It is also relevant that Federal Golf Club has decided to maintain the course at a relatively high quality presumably requiring a higher amount of watering, than one in which “rough” drier greens are considered to be acceptable. Page 27 of the draft EIS is telling in the statement that Federal Golf Course is a competition course of very high quality, while other courses are designed to cater for more social and recreational players. The EIS does not provide any rationale for why Federal Golf Course and its declining membership cannot adapt to a competition course of lesser quality and that requires less water.

The draft EIS does not demonstrate that the deconcession is required in order for a golf course to be maintained at Red Hill.

The EIS has not addressed a requirement in the scoping document to “provide evidence that another organization would not be willing to take the lease in its current form.” Given the low rent of \$13,000 it would be surprising if another community group with a wider financial base and/or strong financial management wouldn’t be interested in taking over the lease.

The draft EIS does not explain why housing is needed, or should be progressed, in a fire prone area, remote from any facilities, providing no low cost accommodation, where the car is the only form of transport and where significant degradation to one of Australia’s most significant temperate woodlands remnants will follow. In fact there is much building or ‘on the books’ development of similar housing in both Central Canberra and Woden, close to facilities, having minimal impact on the natural environment and providing better social, housing and environmental return to the community.

#### Consultation was a sham

The Red Hill Regenerators were not consulted by the proponents, despite this being a requirement of the scoping document. If we had been consulted directly, perhaps the draft EIS would not have been so inadequate and other alternatives to pay for drought proofing of less environmental impact may have been given serious consideration.

Despite both CBRE town planning and the Federal Golf Course having been provided with contact details during an information night on the planning study, CBRE chose to send an email to two addresses obtained from an outdated web site. One of the addresses responds with a delivery failure message, the other belongs to a person who moved from Canberra 10 years ago, is currently uncontactable and has had no dealings with CBRE or the Golf Club. Surely a one-way email to defunct addresses different to those specifically provided as contact points cannot be regarded as consultation, and is indicative of the perfunctory approach taken towards consultation.

It is also telling that local residents were invited to information nights, which within the Draft EIS has been transformed to consultation events. The information nights

were just that, they were not conducive to collating the views of local residents on the development. Consultants and members of the golf club displayed some posters and invited questions. Information provided was very selective. It is only through the Freedom of Information process that Red Hill Regenerators have become aware of the extensive infrastructure works that will be required if the project proceeds.

Participants were not encouraged to state their views, and when we did these were not written down, displayed for others to consider, or incorporated into the draft EIS. It appears that forms were available on which to write comments, but it was not explained that these forms would be used to gauge the community attitude to the development. The availability of forms was not pointed out to all participants.

Some Red Hill Regenerators did attend the information night (having being alerted through the *Canberra Times* and letterbox drops) but were not told that consultation with our group was a requirement of the scoping paper, nor were they asked for the views of the group. If we had been properly consulted we would have provided considered and detailed comment.

Many local residents have also advised that they are sick of the Federal Golf Club trotting out this proposal on a regular basis; one look at the advertising for the information night was enough for many to decide that this was a regurgitated scheme that they had no stomach for. To assume that attendance at an information night run by the Golf Club is indicative of community concern is highly misleading. Red Hill Regenerators intends to hold a public meeting in a community hall and requests at a minimum that a decision to grant the deconcession is not made until after this meeting is held, and the community has had a real opportunity to voice their concerns.

The only difference from this scheme and the last is that this proposal does not have transfer of 9 ha of woodland in the Hughes area to Canberra Nature Park; an issue that Hughes residents are particularly passionate about. Given the similarity of the proposal it is surprising that the EIS did not summarise the concerns raised in the 460 objections and 173 written submissions previously and state how they were now going to be addressed. One can only assume that it was not done because these concerns are not being addressed, and analysis would demonstrate a significant disadvantage to the local community.

Un-needed land on the golf course should be transferred into Canberra Nature Park  
As detailed in the flora and fauna assessment for the latest planning study, the club has allowed the condition of native vegetation within the proposed development area to degrade between this and the earlier assessment. The Club is also failing to comply with the *Pest Plants and Animals Act 2005*, in that it is allowing listed plant species such as Chilean Needle Grass and Radiata Pine to flourish on their leasehold land and be a source of weed invasion into the nature park and road side reserve. Red Hill Regenerators, on its own volition, have undertaken most of the weed control within bushland areas on the Golf Course. The Club has expended little effort or care in looking after bushland within its lease area. In fact it has a poor record of:

- minimal weed control;
- dumping piles of wood, soil or other material;
- unnecessarily felling trees; and
- parking or transgressing heavy machinery and vehicles.

Rather than rewarding this poor practice by granting development rights over these areas, those pieces of land that are not required for functioning of the Golf Course should be withdrawn from the lease and added to Canberra Nature Park. The areas of bushland on the Golf Course are important components of one of Australia's most significant temperate woodland remnants. Rather than letting them suffer degradation through the neglect and indifference of Federal Golf Club, addition to the nature park would facilitate their enhancement. The Red Hill Regenerators would be willing to undertake and supervise wider community efforts in restoring these areas. Twenty-one years ago other areas of Red Hill, including Red Hill Laneway, were in a similar condition to that of the proposed area of development; today they are at least in a moderate condition and some of the areas that were first regenerated are now of very high quality and diversity.

Red Hill Regenerators are supportive of the continued functioning of the golf club, but considers that this should not be at the cost of significant degradation to the Red Hill woodland remnant. Those parts of this nationally important bushland that occur on the Golf Course and have been identified as not required for the functioning of the course should be transferred to Canberra Nature Park.

#### Conclusion

Given the national significance of the Red Hill woodland, the demonstrated community value of this remnant and the devastating impact that will result from the development associated with the deconcessionalisation it is clearly not in the public interest for the deconcession to be approved. The draft EIS has not demonstrated that the deconcession is the only means by which payment can be made to drought proof the course or that other arrangements with less disadvantage to the community are not available to ensure continuation of a functioning golf course on site.

Yours sincerely

Julie Toms  
President  
Red Hill Regenerators  
29 March 2010