

Dr Erin Brady  
Deputy Director-General Land, Strategy and Environment  
Environment, Planning and Sustainable Development Directorate  
GPO Box 158  
Canberra City ACT 2601

Dear Dr Brady

In the context of developing the Red Hill Integrated Plan we are writing to you concerning the need to protect the 12.5 hectares of woodland in the North West (NW) corner of the Federal Golf Club (FGC) lease area, together with the need to implement conservation measures in the southern part of the lease area in the vicinity of the prospective retirement village.

An important objective for community organisations has been for the 12.5 hectares of critically endangered woodland in the NW corner to be included in the Red Hill Nature Reserve as a result of developing the Integrated Plan. We are now faced with the possibility of some of the 12.5 hectares of woodland being damaged or destroyed in order for the FGC to reconfigure the golf course to accommodate a retirement village development. Any damage or destruction to the woodland and failure to include the area in the Nature Reserve is not acceptable.

The FGC was granted a lease of 87 hectares of land in the 1950's to develop a golf course. The grant of land, which was much more land than required for an 18-hole golf course, was done on the understanding that excess land would be returned to the government by the FGC following the development of the golf course. This return of land, which includes the NW 12.5 hectares, never occurred. In 2012 the Chief Planner agreed in principle that the NW 12.5 hectares should be added to the Red Hill Nature Reserve. This matter was not progressed. In 2016 this matter was taken up with the Director-General of the Environment and Planning Directorate. The Director-General determined that the best way for the government to consider if the area of woodland should be excised from the golf course and added to the Nature Reserve was through the Federal Golf Course Community Panel stakeholder consultation process, preparation of a Social Impact Assessment and a subsequent public interest test. The Community Panel process did not resolve this matter. It is now imperative that the Integrated Planning process provides for the inclusion of the NW 12.5 hectares of woodland in the Nature Reserve.

The NW 12.5 hectares of critically endangered Yellow Box-Red Gum grassy woodland contains 2,675 native woodland trees over a grassy understorey and has a very high plant richness. The area is contiguous with the FGC lease area. Of the 121 woodland plant species recorded on the land, 35 are considered by the Commonwealth Government as important species of the woodland vegetation type, while 48 species are considered to be of very high significance under the species and habitat protection systems used by the ACT and NSW environmental authorities to assess a site's floristic value. Around 400 of the trees in the area are large with hollows and include trees up to 300 years old. Many species of birds and animals breed in the hollows.

It is acknowledged that it will be necessary for the FGC to reconfigure parts of the golf course in order to enable the development of a 125 unit retirement village. However, even if the NW 12.5 hectares is included in the Nature Reserve this still leaves around 73 hectares of land available to the FGC. Most 18-hole golf courses are located on 40-50 hectares of land. It also needs to be remembered that when the retirement village proposal for the northern part of the golf course was referred for consideration under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) it was determined to be a controlled action requiring assessment and approval. The controlled action decision was made primarily because of a likely significant impact on critically endangered woodland. It is likely that

any proposal which involves damage or destruction of an area of the NW 12.5 hectares will also be determined to be a controlled action under the EPBC Act.

In order to settle this long running important matter and to secure the protection of the NW 12.5 hectares of critically endangered woodland the Integrated Plan needs to provide for the woodland to be included in the Nature Reserve.

In relation to the prospective retirement village development in the southern part of the FGC lease area a great deal of work needs to be undertaken to guarantee the protection of the environmental values and residential amenity of the area. Both this southern part of the FGC lease area and the adjacent Hughes/Garran Public Open Space, through which a driveway may be built, contain many mature and hollow-bearing trees which are vital habitat for a number of animal and bird species including Gang-gang cockatoos. The FGC lease area is part of the largest Little Corella roost in Canberra and also the site for a large Sulphur-crested Cockatoo roost.

It is vital that the Hughes Residents Association, the Hughes Garran Woodland Group along with potentially affected Hughes and Garran residents are properly engaged as early as possible in the planning process for the prospective retirement village and the associated access driveway. This consultation and planning process will need to focus on the protection of trees and associated flora and fauna in the area, the protection of residential amenity and the proper management of traffic impacts. It is also important that before any development work is undertaken that studies are carried out with a view to maintaining the integrity and value of the wildlife corridor between the prospective development area and the adjoining Hughes Garran woodland. The early engagement with the community needs to involve the FGC, MBark or any other development entity and the Directorate.

We thank you and your team for the work you have undertaken on the development of the Integrated Plan and look forward to hearing from you on these important issues.

Yours sincerely

Helen Oakey  
Director  
Conservation Council

Wayne Fletcher  
Co-Convenor  
Garran and Hughes  
Residents' Association

Ruth Cully  
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George Wilson  
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Andrew Reichstein  
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Hughes Garran  
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Ross Kingsland  
President  
Red Hill Regenerators

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