



Red Hill Regenerators Response to the Draft Integrated Plan for Red Hill Nature Reserve and Surrounds

The Red Hill Bush Regeneration Group (**RHR**) is a volunteer group established in 1989 committed to restoring the native bushland ecology of the Red Hill Nature Reserve, one of the largest remaining remnants of endangered Yellow Box - Blakley's Red Gum grassy woodland in Australia.

Integrated Planning Process

The Red Hill Regenerators (**RHR**) thanks the Legislative Assembly for establishing this strategic, transparent and collaborative approach for determining future land use in the vicinity of Red Hill Nature Reserve. It is a far more productive and efficient way of establishing and responding to community views and values than the ad hoc, development-by-development, 'death by a thousand cuts' approach that has typified planning and development approaches in or adjoining Red Hill woodland over the last 30 years. It is an approach that should be utilised elsewhere.

While the Red Hill Regenerators have concerns regarding the future of woodland within the Federal Golf Club (**FGC**) lease and the proposed housing development within the golf course itself, the information behind the plan appears accurate and sufficient for planning purposes.

The Red Hill Regenerators supports the following aspects of the Draft Integrated Plan;

1. Protection of ecological values and green space within and surrounding the Red Hill Nature Reserve as well as formalising existing links and corridors to other areas of high ecological value. (However as discussed below, there are some areas of high ecological value that the plan currently overlooks and it is unclear what the formalisation will involve.)
2. Restricting development at Section 66 to the establishment of commercial offices within the existing developed footprint. (It is appropriate that the land outside this footprint be added to Red Hill Nature Reserve, with which it is contiguous and shares woodland values.)
3. Limiting Gowrie Drive access to the FGC to the existing arrangements; and not providing a vehicle connection to Brereton Street. RHR supports no upgrading of Gowrie Drive beyond the introduction of speed limiting devices and minor safety improvements which do not impact on adjacent heritage plantings at its intersection with Red Hill Drive.
4. Retention of the existing low density Residential RZ1 suburban areas adjoining the reserve;

5. Limiting land use options for the FGC lease to remove current options for hotels, motels and guest houses (possibly apart from the current residential proposal) and providing an appropriate buffer zone to Red Hill Nature Reserve; and
6. Retention of a financially viable 18-hole golf course within the FGC lease area.

In addition:

7. RHR accepts the preferred FGC development option in the Draft Integrated Plan but only if:
 - a. Independent and clear evidence is provided that the FGC could not survive as an operational golf course without it and that the proposed development would ensure the FGC's ongoing viability;
 - b. Clear evidence is provided that ecological values in the development envelope are adequately understood and protected;
 - c. The 12.5 ha area of FGC lease referred to below is incorporated into Red Hill Nature Reserve.

The Red Hill Regenerators further recommend that:

- 1. The 12.5 ha area of FGC lease referred to below should be incorporated into Red Hill Nature Reserve;**
- 2. The currently permitted land use zoning of Block 5, Section 24, Garran is rezoned to exclude development which is inconsistent with its ecological values;**
- 3. All or most of – Hughes Block 3 Section 57; Deakin Block 7 & 8 Section 66 and Block 13 Section 78; Garran Block 74 Section 10 and Block 54 Section 8 – are incorporated into Red Hill Nature Reserve;**
- 4. Any residential development on part of the existing FGC lease should be capable of maintaining the viability of the FGC with an 18-hole course, protect its current ecological values, and allow retention of open space linkages, corridors and buffer zones outside the FGC lease; and**
- 5. The area of tip to be capped should minimise damage to mature trees (noting that the recommendation states that the entire tip site is to be capped and seeded with grasses only). Further consultation is requested.**

The matters referred to above are discussed below:

1. Land adjoining Red Hill Reserve, currently part of the FGC lease, contains important ecological values and should be added to the reserve.

The Draft Integrated Plan barely noted that at least 12.5 ha of the 85 ha FGC lease area contains high-quality woodland and was only considered within the Draft Plan in Option 2 where it stated the area as being 10 ha.

In 2011, in response to a proposal by the FGC and the National Capital Authority to establish embassies on this woodland, RHR produced a detailed report on the area's conservation values. This report is at

<http://redhillregenerators.org.au/wp-content/uploads/2014/08/fgc-conservation-values-report-oct2011-1.pdf>.

In summary, RHR reported that the northern section of the lease contains at least 12.5 ha of high-condition, critically endangered box–gum woodland, of very high plant richness and diversity. It is the habitat of hundreds of rare plants and a large proportion of Red Hill's tree-hollow-roosting/breeding fauna. The woodland contains 2,675 native trees, some of which are over 200 years old.

RHR is disappointed that the report did not address the exceptional ecological value of this part of the FGC lease adjoining the Red Hill Nature Reserve, which is currently undeveloped and the ecological values of this area would preclude any future golf course development, therefore making it of no value to the FGC. **RHR's strong position is that this 12.5 ha area should be incorporated into Red Hill Nature Reserve.**

2. Garran - Block 5, Section 24 – adjoining Rusden Street

The eastern quarter of this Block is within the Red Hill Nature Reserve and supports critically endangered woodland. However, it appears to have a zoning that allows development of community facilities, which would be inappropriate at this location. While it is acknowledged that this area was not initially included in the Integrated Plan boundary, **RHR recommend that the current land use zoning of Block 5, Section 24, Garran is rezoned to exclude development which is inconsistent with its ecological values.**

3. Formalised linking of the Red Hill Nature Reserve with the open space corridors into Hughes and Garran

RHR recommend that all or most of Hughes Block 3 Section 57; Deakin Block 7 & 8 Section 66 and Block 13 Section 78; Garran Block 74 Section 10 and Block 54 Section 8 are incorporated into Red Hill Nature Reserve. The Hughes blocks are contiguous with the reserve and as identified in the Draft Plan they contain important woodland habitat and are key linkages and corridors for wildlife. This is exemplified by recent sightings of Superb Parrots moving through and feeding within

these areas. See

<https://canberra.naturemapr.org/Community/Locations/Map?Species=15095>

At a minimum, management plans should be prepared for the areas and planning conditions imposed that only allow community and utility facilities within these areas if their impact on the woodland and its wildlife is to be minimised.

4. Federal Golf Club

RHR supports the retention of an 18-hole golf course within the lease area.

RHR would prefer that the FGC find options other than lease variations such as the current proposed residential development to ensure its financial security. Independent and clear evidence is needed that the FGC could not survive as an operational golf course without it and that the current proposal would ensure FGC's ongoing viability. In addition, it would be necessary to have clear evidence that ecological values in the development envelope are adequately understood and protected.

There are a number of advantages to the current proposal. The developer contracted by FGC has engaged with community groups and local residents and has proven to be willing to adapt its plans to minimise its environmental and other impacts. In addition, an Over 55s development has advantages over previous residential proposals including its ongoing financial support of the FGC and an ability to manage and control many details of the residential development.

The proposed location of the development at the southern end of the FGC lease has the advantage of less direct impact on the Red Hill Nature Reserve than the previously suggested location. However, it is recognised that it may have a significant impact on adjacent local residents, and the vegetation and wildlife on both the FGC lease and the adjacent urban open space. It is noted that the likely area covered by the proposed development envelope supports Box Gum woodland which may require further consideration, including hollow-bearing trees, both remnant and planted, which are utilised by a high diversity of parrots to breed in, including the Gang Gang cockatoo. The Golf Course is also a major winter roost of both Sulphur Crested Cockatoos (400 birds) and Little Corellas (600 birds) - see Cullaway R. (2018) Census of Sulphur-crested Cockatoos and Little Corellas in Canberra during winter 2018. *Canberra Bird Notes* 43(3) 141-144.

RHR recommend that any planning decision be capable of maintaining the viability of the FGC with an 18-hole course, protect its current ecological values, and allow retention of open space linkages, corridors and buffer zones outside the FGC lease.

5. Capping of Tip Site

RHR supports capping the tip site, but the area to be capped should minimise damage to mature trees (noting that the recommendation states that the entire tip site is to be capped and seeded with grasses only). Further consultation is requested.

It should also be noted that capping will address surface exposure of asbestos and other toxic material, but may not address possible leaching from the tip. In addition, past history of illegal dumping means that areas away from the actual tip site may also be contaminated.

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