



National Parks Association of the ACT Inc.  
1960-2010  
*50 years of conservation, nature protection and education*

Mr Neil Savery  
Chief Planning Executive  
ACT Planning and Land Authority  
GPO Box 1908  
CANBERRA ACT 2601

Dear Mr Savery

Federal Golf Course– Draft Environmental Impact Statement for  
deconcessionalisation of the Crown lease for  
PART OF BLOCK 1 SECTION 56 RED HILL

The National Parks Association of the ACT (NPA) is a voluntary organisation with over 300 members. Its aims are to promote national parks, nature reserves and protected areas for the protection of fauna, flora, scenery, natural features and cultural heritage. The NPA is opposed to this application for a deconcession of lease to permit the Federal Golf Club (FGC) to manage the lease in a manner 'consistent with its best interests'.

The land area is 4.26ha of a total concessional lease holding of 85.90ha. The NPA believes that the objective of this application is not in the long term best interests of nature conservation in the ACT, the Canberra community or the Federal Golf club itself. Our concern is exacerbated by the scant reference to environmental considerations in the application. In Section 3 of the EIS – Existing Conditions, in over 18 pages under 9 headings only 2 references to the natural environment occur.

The first (page 14 para 7) is as follows "Whilst some areas of ecological importance remain these are generally held within reserves or parks such as the Canberra Nature Park in Red Hill". This is a gross oversimplification of the actual situation. NPA would like to draw your attention to the following points:

- Red Hill supports a significant number of threatened and rare species that make it one of the most important woodland remnants in eastern Australia
- Half the boundary of FGC is contiguous with the boundary of the Red Hill component of Canberra Nature Park.
- The landscape of the FGC with remnants of grassy wood land is an extension of the lower slopes of Red hill.
- Creating a development at the end of a long cul de sac right on the boundary of a nature park has many implications for bush fire fuel management asset protection zones, weed spread and management and pet containment within the adjacent reserve.
- The remaining native trees and rough grassy areas on the golf course provide important habitat for birds foraging or dispersing from Red Hill.



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- Clearing land for building on the proposed deconcession area and upgrading the road access will involve the removal of many mature habitat trees the numbers of which have already been depleted by the 2003 bushfire.
- The Red Hill woodland remanent is highly valued by NPA members, The Red Hill Regenerators, other active conservationists and many in the broader Canberra community as a place to study plants and birds, engage in Parkcare activities and enjoy passive recreation.

The second reference to the natural environment is of even more concern. In Section 3.9 Other Statutory Documents part 3.9.3 The Territory Plan, the proponent addresses the Statement of Strategic Directions in Table 3.13 with responses to General Principles, Environmental Sustainability, Economic Sustainability and Social Sustainability. The response to the principles under Environmental Sustainability is as follows:

“Whilst this proposal is required to adhere to statutory processes, its outcome is administrative in nature. It does not propose development, and if approved, neither enables development or infers that approval for future development will be forthcoming. Any future development proposals will be subject to planning processes, which are the appropriate setting in which to consider such matters. As a result these principles are not applicable to the proposal.”

This is contrary to the purpose of the Statement of Strategic Directions - Principles for Sustainable Development which is all about the “Triple Bottom Line” an integrated approach to development. If the deconcessionalisation is approved the FGC will then take the process to its logical completion, that is a housing development which meets the clubs financial expectations. Where we are now is at the beginning of a process which is generating many questions on environmental social and economic sustainability and to claim that environmental sustainability does not need to be considered right from the start is disingenuous.

With the dismissal of environmental values and environmental sustainability in Section 3 we go to Section 5 Social Values and impacts where in 5.1.2 the question is “Define and describe the practical measures for protecting or enhancing social values.” The first sentence of the answer from the proponent is “No potentially significant environmental impacts have been identified.” This is despite such proposals generating significant opposition in the past and in this instance very specific environmental and social concerns being raised by community groups. The remainder of the answer refers to the process being statutory, the Club continuing to exist and operate in its current location and “Therefore no measures to protect or enhance social values are proposed.” This is another example of environmental values being kept out of sight by the proposal.



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Consideration of scenarios 5.2 part 5 calls for any feasible alternatives. None are offered. It might be expected that the potential benefits of amalgamation or merger with one Canberra's 5 large sport or social clubs, which has been a lifeline for several bowling clubs and the Yacht Club, should be considered at some point. The National Parks Association believes that best option for the Federal Golf Club is to abandon this proposal and merge with one of Canberra's large social clubs to ensure its long term future as a golf course which could be enjoyed by many more players.

Yours sincerely

President  
29 March 2010