



Australian Government
National Capital Authority

CONSULTATION REPORT

**WORKS APPROVAL 19210 – BLOCK 2 SECTION 119 &
BLOCK 1 SECTION 121 YARRALUMLA - PROPOSED
REDESIGN OF THE ROYAL CANBERRA GOLF COURSE**

JUNE 2014

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Part 1 - Introduction

Under the *Australian Capital Territory (Planning and Land Management) Act 1988*, the National Capital Authority (NCA) prepares and administers the National Capital Plan (the Plan) to ensure that Canberra and the Territory are planned and developed in accordance with their national significance.

The Plan sets out the broad planning framework for the Australian Capital Territory (ACT). Areas designated as having special characteristics of the National Capital are subject to detailed planning policies and guidelines.

Any buildings or structures, demolition, landscaping or excavation works in Designated Areas require the approval of the NCA. The NCA considers such proposals in the context of the relevant provisions of the Plan.

The NCA received an application from the Royal Canberra Golf Club (RCGC) for proposed works to the golf course including modifications to fairways, tees, greens, bunkers, drainage works and the removal and replanting of trees. Modifications will be made to all holes and the short iron range. These modifications range from minor works to reasonably extensive works to the fairways, bunkers and tees and involve the removal and replanting of trees. A subsurface drainage network is proposed for holes 1-27 as there is no existing infrastructure in place.

A map detailing the location of the application is at [Attachment A](#).

Part 2 - Public Consultation Requirements

2.1 National Capital Plan

Under the Plan, the requirements for public consultation apply, but are not limited to, certain residential developments, telecommunications facilities (that are not considered low impact) and amending or issuing an instrument under the Plan (including Development Control Plans).

2.2 Commitment to Community Engagement

The NCA's 'Commitment to Community Engagement (August 2011)' details how the NCA conducts consultation. The purpose is to achieve a greater level of consistency and transparency in the NCA's decision making process.

The Commitment to Community Engagement describes:

- the minimum requirements for consultation
- the timeframes for amendments to the Plan
- what is involved in preparing a new Development Control Plan
- the process for amending or issuing an instrument under the Plan
- the process by which WA applications, which are released for public consultation, will be assessed.

Part 2 (Consultation Protocol) of the NCA's 'Commitment to Community Engagement (August 2011)' describes the consultation process for WA applications. The consultation protocol includes criteria for which an application will be assessed, in order to determine whether the application should be released for public notification or full public consultation.

For development applications, the NCA undertakes a risk assessment of each proposal against the assessment criteria set out in the Consultation Protocol. The public notification process will include information about the NCA's risk assessment of the proposal against the assessment criteria below.

1. What is the likelihood that the proposal will adversely affect existing public space and / or community amenity?
2. What is the likelihood that the proposal will adversely affect existing environmental, heritage or landscape values?
3. What is the likelihood that the proposal is discordant with the general development and amenity of the locality in terms of materials, finishes, scale, massing, design and quality?
4. What is the likelihood that the proposal is inconsistent with an existing Heritage Management Plan (HMP)? (If there is no HMP, this question is not applicable).

The combination of the likelihood and consequence from the criteria described in the above categorises an overall perceived risk into five ratings being 'negligible', 'low', 'significant', 'high' or 'extreme'. Works assessed as having an 'extreme' risk will be rejected.

Full public consultation for WAs will be required where the NCA's perceived risk rating is 'significant' or 'high', and also for any development where consultation is a mandatory requirement under the Plan.

When a WA application is lodged and consultation is required, the applicant is required to consult with the community and stakeholders. The NCA may stipulate specific requirements for consultation and, for higher perceived risk proposals, may undertake the consultation process itself.

The NCA may set aside the requirement to undertake full public consultation where:

- a. previous consultation has been undertaken
- b. for minor amendments to previously approved works
- c. proposals are exempt, as demonstrated in the 'Commitment to Community Engagement (August 2011)'
- d. the NCA determines it unnecessary and no stakeholders will be affected.

The Plan has specific requirements in relation to consultation for telecommunications facilities, in relation to any new towers, masts or monopoles.

As the application for the proposed works at the Royal Canberra Golf Club was assessed as having a level of risk greater than 'low', therefore the application was subject to full public consultation.

Part 3 – Summary of Public Consultation

3.1 The Public Consultation Process

Public consultation on the application was undertaken between 19 April and 13 May 2014.

The consultation took the form of:

- On Saturday 19 April 2014, publishing a public notice in *The Canberra Times* detailing the proposed works and inviting submissions to be made to the NCA in relation to the proposal ([Attachment B](#) of this Report).
- Between 19 April and 13 May 2014, publishing details of the proposal, including the applicant's plans and planning report on the NCA's website.
- Between 19 April and 13 May 2014, two signs were onsite, one at the driveway entrance and one at the front door of the Royal Canberra Golf Clubhouse.
- On 17 April 2014, the NCA posted letters to the following key stakeholders: the National Trust of Australia (ACT) and Yarralumla Residents Association.
- The NCA referred the proposal to the ACT Heritage Unit, ACT Conservator and Environment Protection Authority.
- NCA also emailed the Walter Burley Griffin Society.

3.2 Submissions Received, Comments and Responses

The NCA received a total of nine public submissions raising issues or objections to elements of the proposed works during the consultation process. A letter of support from the Friends of ACT Trees (FACTT) was provided by the RCGC with the application. FACTT is a formally constituted group of individuals with an interest in the trees in Canberra's landscape and the group conducts monthly walks in Westbourne Woods.

Emails of acknowledgment were sent to the submitters advising them that their submissions will be taken into consideration before a decision is made on the application.

Key issues raised in the submissions are summarised below.

In addition to the public submissions, the NCA received responses from the ACT Government agencies referred to above. See [Attachment C](#) for a summary of their responses.

Part 4 – Response to Key Issues

The key issues raised and the NCA response is provided below. A summary of each submission is provided at [Attachment C](#).

1. Removal of a significant number of trees from the golf course including Westbourne Woods.

NCA Comment

There are approximately 4800 trees in about 651 plots within Westbourne Woods (Holes 1-25 and 27). This figure does not include trees surrounding Holes 21-26 which are located outside Westbourne Woods nor the number of *Pinus Radiata*. A total of 384 trees are proposed for removal (including 153 *Pinus Radiata*) however 319 trees will be replanted across the golf course as part of the works. The proposed removal of trees equates to about 4.5% of the total trees on the golf course.

The RCGC initially proposed to remove 488 trees however a site inspection was conducted in March 2014 with representatives of NCA, FACTT and the RCGC in attendance. The inspection was used to consider tree significance, golf design and strategy, and impact on agronomic conditions. As a result of this inspection, the RCGC significantly reduced the number of trees to be removed and this reduction took the total number of trees proposed to be removed from 488 to 384.

The environmental and heritage impact of the proposed tree removals from the golf course has been assessed in the 'Heritage and Environmental Assessment – 2014' report prepared by Duncan Marshall & Geoff Butler & Associates. The heritage assessment concluded that the proposed works would have a low-moderate impact on a range of heritage issues. The environmental assessment covered the assessment of species and vegetation protected under the *Environmental Protection Biodiversity and Conservation Act 1999* (EPBC). The assessment concluded that no referral would be required under the EPBC Act.

The RCGC has prepared a 'Conservation and Tree Management Plan - December 2010 (Revised March 2014)' for Westbourne Woods. The RCGC propose as a general principle to replant trees in appropriate locations which are consistent with the existing features of the Woods. A total of 319 trees will be replanted across the golf course. The majority of the *Pinus radiata* to be removed are in poor health or decline. The *Pinus radiata* will not be replaced like for like as they are listed on the ACT declared pest plant species list. The RCGC proposes to replace the pines, where appropriate with trees that are in keeping with the nearby trees.

The removal and replanting of trees is proposed to be completed over a three and a half year period with work being undertaken to nine holes at a time and over a 12 month period for each nine holes. The removal of the trees will have some impact on the diversity of the flora in the short to medium term however the removal and replanting strategy over a three and a half year period will substantially lessen the impact. Trees will be gradually removal and replanting undertaken. The proposed works will maintain and enhance the environmental qualities of the golf course within the setting of Westbourne Woods.

2. The Board of the RCGC is trying to pass a plan that many members of the club do not support.

NCA Comment

The RCGC's approval process for the proposed works is a separate matter to the NCA's consideration of the Works Approval application. The General Manager of RCGC has however advised that the Board has acted appropriately and within the limitations of the RCGC's Constitution in lodging the application. The RCGC advises that whilst the Board has endorsed the proposed golf course design as contained within the Master Plan document, it has not intended or proposed to change the overall character or design of the course without the endorsement of the members.

On 27 May 2014, a Special General Meeting was held and the members voted with two thirds majority in support of the proposed works.

3. The course architect of the Master Plan is focused on the redesign of the golf course at the expense of the trees.

NCA Comment

The golf course architects, Ogilvy Clayton were engaged by the RCGC to prepare a Master Plan and the NCA has been advised that they have experience in designing golf courses both on links (minimal vegetation) and tree lined courses. The 'Course Master Plan – April 2013' submitted with the Works Approval application together with the 'Conservation and Tree Management Plan – December 2010 (Revised March 2014)' and the 'Heritage and Environmental Assessment – 2014' report have been used to inform the extent of the proposed works. The proposed course redesign has resulted in the need to remove 203 trees within Westbourne Woods plus 28 trees outside of Westbourne Woods (excluding 153 *Pinus Radiata*). Of the trees within Westbourne Woods, 40% have low value or are in poor health, 53% have medium value and 7% have high value. The RCGC has reviewed the number of trees to be removed and has reduced the original figure of 488 by 104 trees. Westbourne Woods (Holes 1-20 and 27) alone has approximately 4800 trees whilst Holes 21-26 are sparsely vegetated by comparison. In the context of the existing number of trees, the proposed removal of trees represents about 4.5% of total trees and with the replanting of nearly the same amount of trees in appropriate locations, the overall net loss to the golf course will be minimal.

4. The application does not address the potential impact of the proposed works on Canberra's Garbage incinerator and ventilation shaft of Canberra's Main Outfall Sewer nor is there discussion about Walter Burley Griffin.

NCA Comment

Canberra's Garbage Incinerator is located within the grounds of the golf course and Westbourne Woods (Block 2 Section 119 Yarralumla). The incinerator has a special association with Walter Burley Griffin as the only building in the ACT with which he is associated. The incinerator technology firm RIECo engaged the partnership form of Eric Milton Nicholls and Walter Burley Griffin to prepare architectural plans in which to house

their incinerators. The ventilation shaft of Canberra's Main Outfall Sewer is located adjacent to the incinerator. Both are listed on the ACT Heritage Register.

The proposed works do not include any changes to the incinerator nor the ventilation vent. The building is surrounded by mature blue gums (*Eucalyptus globulus ssp maidenii*), part of the Westbourne Woods. None of these trees are proposed for removal.

5. The impact of the proposed works on the heritage values of the site.

NCA Comment

The NCA referred the application to the ACT Heritage Council for advice. The Council has advised that it generally concurs with the findings of the 'Heritage and Environment Assessment – 2014' report and it has no objects to the proposed works subject to conditions. The conditions relate to alternative replacement species being considered for trees that have previously proved unsuccessful and that the RCGC consider updating the existing 'Conservation Management and Tree Management Plan – December 2010 (Revised March 2014)' and submitting it to the Council for approval. The RCGC has confirmed that they will work with the ACT Heritage Council in relation to updating and seeking approval of the 'Conservation and Management and Tree Management Plan' and alternative replacement species will be provided for those trees that have previously proved unsuccessful.

The 'Heritage and Environment Assessment – 2014' report concluded that the proposed works would have a low-moderate impact on a range of heritage values. The moderate impact assessments generally relate to the removal of the large number of trees however it is noted throughout the report that the impact is substantially lessened by the poor condition of a number of trees and the proposed new planting of new species which will continue the scientific and research work undertaken.

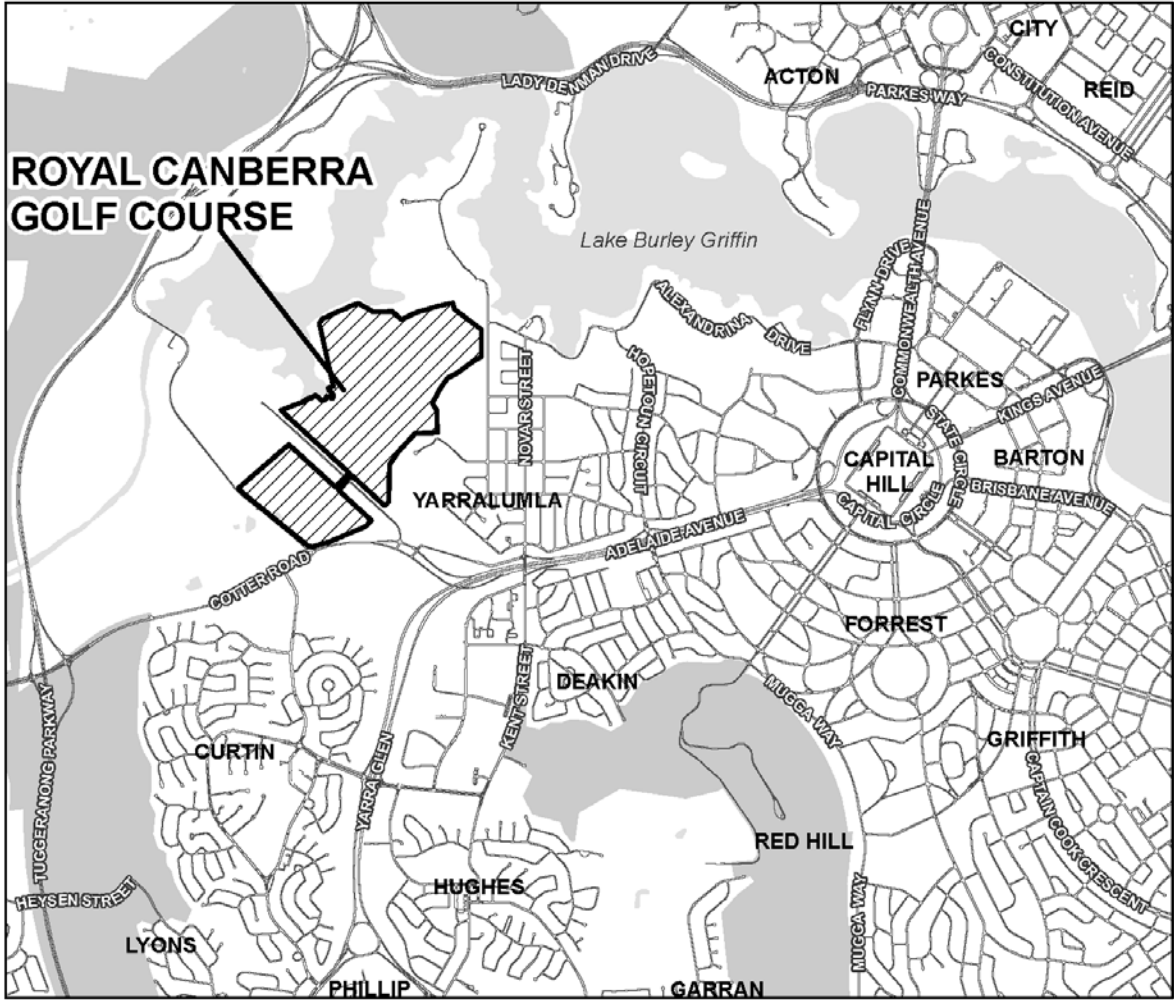
Conclusion

The NCA's consultation process was carried out in accordance with the Plan and the NCA's 'Commitment to Community Engagement (August 2011)'.


A total of nine public submissions were received. The NCA sought further clarification from the applicant on some of the matters raised during the consultation process as noted above.

These matters have been addressed to the satisfaction of the NCA and the proposed works are not inconsistent with the provisions of the National Capital Plan.

Attachment A: Location Plan




Attachment B: Canberra Times – Public Notice

 Australian Government
National Capital Authority

WORKS APPROVAL

**Block 2 Section 119 and Block 1 Section 121
Yarralumla. Proposed works at the Royal
Canberra Golf Course**



The National Capital Authority has received a works approval application from the Royal Canberra Golf Club for works at the golf course including modifications to fairways, removal and replanting of trees, and drainage works.

For comments and more information, visit the NCA's website or contact Sarah Treble on (02) 6271 2888.

Write to us at GPO Box 373 Canberra ACT 2601.

Comments close on COB Tuesday 13 May 2014.

ALL SUBMISSIONS, INCLUDING NAMES AND ADDRESSES WILL BE MADE PUBLICLY AVAILABLE AT THE NCA OFFICE AND ON THE WEBSITE, SUBJECT TO APPROVAL IN WRITING BY THE SUBMITTER, IN ACCORDANCE WITH THE NCA'S COMMITMENT TO COMMUNITY ENGAGEMENT.

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WWW.NATIONALCAPITAL.GOV.AU

4/11/14

Attachment C – Summary of Submissions

Note: The National Capital Authority (NCA) undertakes an open and transparent works application process. Works Approval documentation advised that the NCA would prepare a Consultation Report for publication on the NCA website, and that this Consultation Report would include a summary of each submission, along with the name of each person making the submission. Names of submitters have been omitted where a submitter requested confidentiality.

Issue	NCA response
Submission 1 – Ken Wells	
<p>Members of Golf Club have not yet voted on the proposal. How can the NCA consider the proposal without it first being endorsed by the Club members?</p> <p>Many members are not in favour of the proposed changes to course nor the removal of healthy and beautiful trees.</p>	<p>See Parts 4.1 & 4.2 of this report outlining detailed responses to the issues raised.</p>
Submission 2 – Rod and Olive Macleod	
<p>All members of the club accept that an upgrade of the course is desirable.</p> <p>Many believe that this can be undertaken without altering the present layout of the course.</p> <p>Application should be rejected on the basis that hundreds of trees will be removed within the arboretum which is contrary to responsible management of the arboretum.</p> <p>The golf course architect wants to stamp his style on layout which is admired as one of the finest in Australia.</p>	<p>Noted.</p> <p>See Parts 4.1, 4.3 and 4.5 of this report outlining detailed responses to the issues raised.</p>
Submission 3 – John Hutka	
<p>No trees should be removed.</p>	<p>Noted. See Parts 4.1 & 4.5 of this report outlining detailed responses to the issues raised.</p>
Submission 4 – Name withheld at the	

Issue	NCA response
request of submitter	
<p>Major concern is that the Master Plan proposes the removal of some hundreds of healthy trees and are an integral part of Westbourne Woods.</p> <p>Course can be upgraded without altering the present layout of the course, and certainly without the wholesale destruction of trees.</p> <p>Application should be rejected.</p>	<p>Noted. See Parts 4.1 & 4.5 of this report outlining detailed responses to the issues raised</p>
Submission 5 – Name withheld at the request of submitter	
<p>Object to the removal of any further trees unless they are unhealthy and dangerous.</p> <p>The Board of the Royal Canberra Golf Club is trying to pass a plan that many members object to.</p> <p>Believe the current layout is more than adequate, not requiring any massive alterations however agree that there needs to be upgrading of fairways, bunkers and drainage.</p>	<p>Noted. See Parts 4.1, 4.2 & 4.5 of this report outlining detailed responses to the issues raised.</p>
Submission 6 – Name withheld at request of submitter	
<p>Submitter objects to the removal of several hundred trees on the golf course.</p> <p>The proposal ignores the importance of the trees as part of Westbourne Woods.</p> <p>Most members accept that there needs to be an upgrade to fairways, bunkers, greens and drainage but all of this could be undertaken without major changes to the course layout</p>	<p>Noted. See Parts 4.1, 4.2, 4.3 & 4.5 of this report outlining detailed responses to the issues raised.</p>

Issue	NCA response
<p>and the destruction of trees.</p> <p>The course architect of the Master Plan is focused on the redesign of the golf course at the expense of the trees.</p> <p>Any proposed new planting of trees will take years to reach maturity and will be a poor substitute for the destruction of so many mature trees.</p>	
<p>Submission 7 – Dr David Denham</p>	
<p>An assessment of the changes to the quality of the water in Lake Burley Griffin as a result of the Master Plan should be made as part of the assessment process by the NCA.</p> <p>Hole 14 is of concern as it is adjacent to Warrina Inlet. Several trees have already been felled, and it is proposed to remove all the trees between the fairway and Lake Burley Griffin.</p> <p>An analysis of the situation should be undertaken before any approval is given.</p>	<p>The RCGC is already required to comply with the relevant legislation in relation to environmental matters and will continue to do so.</p> <p>The RCGC uses E-Par which is designed primarily for the environmental management of golf courses and is an ISO 14001 based system endorsed by the Australian Golf Course Superintendents Association. Through this established environmental system, practices are in place to manage nutrient and fertilizer applications to turf and gardens and as an abstractor from Lake Burley Griffin, the RCGC has an ongoing interest in protecting the lake from pollution.</p> <p>The RCGC will provide additional landscaping between the new fairway of Hole 14 and the edge of Lake Burley Griffin to create a buffer between the fairway and lake edge, and also establish a new habitat that will encourage fauna.</p>
<p>Submission 8 – Walter Burley Griffin Society Inc</p>	
<p>The documentation does not mention the incinerator, the sewer vent shaft of Walter Burley Griffin.</p> <p>These heritage assets would be at risk from the proposed works and need to be assessed prior to approval being given.</p> <p>The 'Heritage and Environmental</p>	<p>See Parts 4.4 and 4.5 of this report outlining detailed responses to the issues raised.</p>

Issue	NCA response
<p>Assessment' report should have included potential direct and indirect impacts on these assets.</p>	
<p>Submission 9 – National Trust of Australia (ACT)</p>	
<p>Concerned about the impact that the proposed works will have on the heritage values of the site.</p> <p>The existing 'Conservation and Tree Management Pla'n has shortcomings and does not appear to have been through a consultation process.</p> <p>The Trust suggests that:</p> <ul style="list-style-type: none"> • The 'Conservation and Tree Management Plan' be reviewed and endorsed by ACT Heritage Council. • The MasterPlan be reviewed and amended so that it has minimal impacts on the heritage values and is consistent with conservation policies and strategies. • Masterplan and associated reports be made available for public review before being accepted. 	<p>See Part 4.5 of this report outlining detailed responses to the issues raised, and the NCA response to ACT Heritage comments below.</p>
<p>ACT Heritage</p>	
<p>The ACT Heritage Council does not object to the proposed works subject to the following conditions.</p> <p>Consideration being given to alternative replacements for the following species that have previously proved unsuccessful: <i>Eucalyptus obliqua</i>, <i>Eucalyptus melanophloia</i>, <i>Pinus halepensis</i> and <i>Fraxinus oxycarpa (angustifolia)</i> 'Raywood'</p> <p>The RCGC consider updating the existing 'Conservation and Tree Management Plan' at the earliest</p>	<p>The RCGC has confirmed that they will work with the ACT Heritage Council in relation to updating and seeking approval of the 'Conservation and Tree Management Plan' and alternative replacement species will be provided for those trees that have previously proved unsuccessful.</p>

Issue	NCA response
<p>opportunity to address matters raised in page 4 of the 'Heritage and Environmental Assessment' and to seek approval of the revised 'Conservation and Tree Management Plan' by the ACT Heritage Council.</p>	
<p>ACT Conservator Liaison</p>	
<p>All the trees that are not listed as poor in the assessment cannot be supported for removal.</p> <p>The ACT Conservator Liaison only provided comments on Regulated Trees as defined under the <i>ACT Tree Protection Act</i> that were listed as in poor condition. The Conservator agrees with the majority of assessments to remove and replace the trees in poor condition.</p>	<p>Noted. See Part 4.1 of this report outlining detailed responses to the issue raised.</p> <p>Noted.</p>
<p>ACT Environment Protection Authority</p>	
<p>No advice received.</p>	