Title of Proposal - Robe Golf Club - Golf Course Extension

Section 1 - Summary of your proposed action

Provide a summary of your proposed action, including any consultations undertaken.

1.1 Project Industry Type

Tourism and Recreation

1.2 Provide a detailed description of the proposed action, including all proposed activities.

The Robe Golf Club Incorporated propose to expand their current golf course (by 6 golf holes), which is located on the south western edge of Robe Township. Robe Golf Course currently comprises 12 holes (formally 14 holes when the two holes were operational on land east of Davenport Street). The golf course expansion involves clearance of native vegetation. EPBC records indicate the Little Dip Spider Orchid and Orange Bellied Parrot may occur in the locality. The areas of vegetation to be cleared have been assessed as part of a native vegetation clearance application, which has been approved. The approach taken in designing the golf course expansion includes the following:

1. Avoid clearing vegetation of areas of intact stratum (as assessed as good and excellent condition with SEB Rating of 8:1 and higher) through planning, design and low impact construction methods.

2. Inclusion of areas of moderate (SEB 6:1) good and excellent condition (SEB Rating of 8:1 and higher) on Allotment 3 (former Section 285) as an area for SEB offset and inclusion in a heritage agreement.

3. Avoid clearance of vegetation adjacent the western boundary, which is elevated and contains coastal dunes.

4. Develop proposed golf hole 8 within an area previously utilised for sand mining.

- 5. Minimise clearance of vegetation of moderate condition (SEB Rating of 5:1 and 6:1).
- 6. Retain vegetation between holes and revegetate these areas.
- 7. Utilise former road reserves wherever possible as part of the golf course design.

8. Integrate golf holes onto private land, Sections 133 and Allotment 148 to minimise area of land utilised on Section 285.

9. Limit future residential/tourist accommodation to Sections 133 and Allotment 148 and not incorporate any built form or land use, other than golf course holes within Section 285. In determining the native vegetation clearance application the Native Vegetation Assessment Panel commended Robe Golf Club on the time spent on redesigning, reviewing and negotiating an appropriate concept plan and clearance application following previous recommendations made by the Council. Furthermore, the Native Vegetation Assessment Panel belived the commitment by Robe Golf Club was an excellent example of how the community, tourism and government can work together to manage sensitive environments for a good outcome. It was also stated that managed correctly this project will provide regional economic growth for the area and the community throught the years to come and that it is possible to have development and environmental outcome.

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forms part of the recreational hub for Robe township being located immediately south of the oval, netball and tennis courts.

Robe Golf Club wish to develop the golf course with additional golf holes to complete an 18 hole championship standard golf course, which assists in the provision of the recreational and social needs of the Robe community. In addition, the establishment of an 18 hole course will provide the opportunity for the Robe Golf Club to promote the facility to tourists.

As shown on the Site Plan, the proposed golf course extension is proposed over portion of Allotment 3, portion of Section 133 and portion of Allotment 148.

The preferred design for the golf course expansion has been an iterative process over a number of years. Alternatives for the expanded golf course holes have been considered in response to the findings of ecological assessments, native vegetation assessment, availability of detailed survey information, detailed site inspections, and the availability of privately owned land and road reserves. The attachment plan illustrates the overall master plan of the expanded 6 golf course holes. The design of the golf course expansion has the following elements:

1. Concept plan for four complete new golf holes within Allotment 3, namely holes 8, 9, 10 and 11.

2. Portion of a new golf hole 7 within Allotment 3 and in part on the existing golf course and on private land namely Section 133.

3. A new golf hole, shown as hole 12, over portion of private land of Section 133 and Allotment 148 and within portion of Allotment 3.

4. Retention of the two former WWII radar huts within the golf course.

5. Construction of holes over existing topography of land, no major earthworks will take place within the cleared fairway corridors apart from some minor levelling for tees and minor reshaping of greens sites.

6. Fairways will have existing small scale undulations retained post clearing with the use of a smallsize bunker raking machine to smooth these fine contours.

7. Retention of existing vegetation between golf holes.

8. Weed management of existing vegetation and revegetation of areas outside of fairway and primary turf areas.

9. Irrigation of fairways and primary turf areas.

10. Inclusion of stormwater ponds as desig

1.3 What is the extent and location of your proposed action? Use the polygon tool on the map below to mark the location of your proposed action.

Area	Point	Latitude	Longitude
Robe Golf Course extension	1	-37.169034973533	139.75389671107
Robe Golf Course extension	2	-37.170419954458	139.75381088038
Robe Golf Course extension	3	-37.170402856083	139.75338172693
Robe Golf Course extension	4	-37.170881609125	139.75333881159
Robe Golf Course	5	-37.170898707392	139.75372504969

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Area extension	Point	Latitude	Longitude
Robe Golf Course extension	6	-37.171719419651	139.753639219
Robe Golf Course extension	7	-37.171462948028	139.75091409464
Robe Golf Course extension	8	-37.174762816458	139.75057077189
Robe Golf Course extension	9	-37.174745719065	139.75037765284
Robe Golf Course extension	10	-37.173326622004	139.75054931422
Robe Golf Course extension	11	-37.173326622004	139.74844646235
Robe Golf Course extension	12	-37.171411653599	139.74848937769
Robe Golf Course extension	13	-37.169086269576	139.75033473749
Robe Golf Course extension	14	-37.169069170899	139.75033473749
Robe Golf Course extension	15	-37.169034973533	139.75389671107

1.5 Provide a brief physical description of the property on which the proposed action will take place and the location of the proposed action (e.g. proximity to major towns, or for off-shore actions, shortest distance to mainland).

Immediately south-west and adjoining the township of Robe. The golf course extension adjoins the existing golf course and recreation areas of Robe township. The subject land is within the urban areas of Robe township in terms of land use zoning.

1.6 What is the size of the development footprint or work area?

19.21ha

1.7 Is the proposed action a street address or lot?

Lot

1.7.2 Describe the lot number and title. Allotment 3 - CT 6180/821; Allotment 148 - CT 5674/450; Section 133 CT 5253/358

1.8 Primary Jurisdiction.



South Australia

1.9 Has the person proposing to take the action received any Australian Government grant funding to undertake this project?

No

1.10 Is the proposed action subject to local government planning approval?

Yes

1.10.1 Is there a local government area and council contact for the proposal?

Yes

- 1.10.1.0 Council contact officer details
- 1.10.1.1 Name of relevant council contact officer.

Michelle Gibbs, District Council of Robe

1.10.1.2 E-mail

michelle@robe.sa.gov.au

1.10.1.3 Telephone Number

08 8768 2003

1.11 Provide an estimated start and estimated end date for the proposed action.

Start date 07/2017

End date 10/2018

1.12 Provide details of the context, planning framework and State and/or Local government requirements.

The golf course extension has obtained Development Plan consent from the District Council of Robe, that is, land use approval has been granted. The Native Vegetation Council has granted approval for native vegetation clearance for the land subject to the golf course extension.

1.13 Describe any public consultation that has been, is being or will be undertaken, including with Indigenous stakeholders.

There was no specific or particular community consultation associated with the planning

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consent obtained from the District Council of Robe. Prior to lodging the development application, the subject land was rezoned. The rezoning was undertaken via the Robe Golf Course Expansion Development Plan Amendment (the DPA). The DPA specifically related to the expansion of the golf course onto the subject land. The DPA was subject to community consultation and comment during this process. As part of the DPA process, the Vegetation Assessment Report prepared by SKM was available for viewing and comment by the public. Consultation during the DPA process was also undertaken with a range of State Government Agencies, including Coast Protection and Native Vegetation divisions of the Department of Water, Environment and Natural Resources. No specific consultation has been undertaken with indigeneous stakeholders, as initial research via State Government Department of Aboriginal Affairs indicated there was no known aboriginal sites on the subject land,

1.14 Describe any environmental impact assessments that have been or will be carried out under Commonwealth, State or Territory legislation including relevant impacts of the project.

SKM undertook two assessments of vegetation conditions on the subject land. The SKM Vegetation Assessment - Robe Golf Club and Surrounds report dated December 2013 formed the basis of the native vegetation clearance application and approval granted by the Native Vegetation Council.

1.15 Is this action part of a staged development (or a component of a larger project)?

Yes

1.15.1 Provide information about the larger action and details of any interdependency between the stages/components and the larger action.

The first stage of the Robe Golf course expansion was the removal of two golf course holdes in Davenport Street, Robe. This area is zoned Residential and is now the subject of a staged residential subdivision. This first stage was assessed by both the Native Vegetation Council and EPBC (2014/7178). The second stage of the project is the construction of the new golf course holes.

1.16 Is the proposed action related to other actions or proposals in the region?

Yes

1.16.1 Identify the nature/scope and location of the related action (Including under the relevant legislation).

Approval was granted by the Native Vegetation Council for removal of vegetation at Davenport Street, Robe. EPBC (2014/7178) determined that the development at Davenport Street was not a controlled action.



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Section 2 - Matters of National Environmental Significance

Describe the affected area and the likely impacts of the proposal, emphasising the relevant matters protected by the EPBC Act. Refer to relevant maps as appropriate. The <u>interactive map</u> tool can help determine whether matters of national environmental significance or other matters protected by the EPBC Act are likely to occur in your area of interest. Consideration of likely impacts should include both direct and indirect impacts.

Your assessment of likely impacts should consider whether a bioregional plan is relevant to your proposal. The following resources can assist you in your assessment of likely impacts:

• <u>Profiles of relevant species/communities</u> (where available), that will assist in the identification of whether there is likely to be a significant impact on them if the proposal proceeds;

- <u>Significant Impact Guidelines 1.1 Matters of National Environmental Significance;</u>
- <u>Significant Impact Guideline 1.2 Actions on, or impacting upon, Commonwealth land and</u> <u>Actions by Commonwealth Agencies</u>.

2.1 Is the proposed action likely to impact on the values of any World Heritage properties?

No

2.2 Is the proposed action likely to impact on the values of any National Heritage places?

No

2.3 Is the proposed action likely to impact on the ecological character of a Ramsar wetland?

No

2.4 Is the proposed action likely to impact on the members of any listed threatened species (except a conservation dependent species) or any threatened ecological community, or their habitat?

Yes

2.4.1 Impact table

Species Little Dip Spider Orchid (Caladenia Impact Removal of vegetation. Spring survey targeting Australian Government



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Species richardsiorum) Submission #2222 - Robe Golf Club - Golf Course Extension

Impact

the Little Dip Spider Orchid undertaken by SKM of the subject land did not observe the orchid. It was noted that individual plants may occur in dense vegetation (eg. the vegetation in 'good condition') and a large expanse of similar vegetation occurs south and south east of Section 285 (now Allotment 3) and immediately adjacent the nearby Little Dip Conservation Park. It should be noted that in excess of 8 hectares of vegetation in good condition on the southern side of the subject land is not to be cleared and to be placed in a Heritage Agreement. The SKM report notes that it is unlikely that staged clearance of vegetation in poor to moderate condition for the expansion of the golf course is likely to impact the Little Dip Spider Orchid as a species.

2.4.2 Do you consider this impact to be significant?

No

2.5 Is the proposed action likely to impact on the members of any listed migratory species, or their habitat?

Yes

2.5.1 Impact table

Species	Impact
Orange-bellied Parrot	Clearance of native vegetation, as Orange- bellied Parrot may use habitat within the study area. The SKM report notes that "the most recent information available through DotE through the SPRAT (Species Profile and Threats Database 2010) indicates the Orange- bellied Parrot is expected to use habitat within the Coorong National Park and near Carpenter Rocks (a significant overwintering site for the parrot), both in the broader region of the study are. However key breeding habitat for the OBP is known for Tasmania". It is noted that records
	of OBP around Robe are historical/very old (78

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Species

Impact

years) and reliability of the location data is poor. The historical records are for 'sign/slough/skin' and not actual birds. SKM further note "the study area is not in a key breeding, key migration or key overwintering area for the OBP". If a small proportion of vegetation was cleared for the proposed development >3,000 hectares would be available in SA for rare and occasional overwintering habitat. SKM conclude that "It is not considered likely that the Orangebellied Parrot is directly reliant upon vegetation occurring within the study area".

2.5.2 Do you consider this impact to be significant?

No

2.6 Is the proposed action to be undertaken in a marine environment (outside Commonwealth marine areas)?

No

2.7 Is the proposed action likely to impact on any part of the environment in the Commonwealth land?

No

2.8 Is the proposed action taking place in the Great Barrier Reef Marine Park?

No

2.9 Will there be any impact on a water resource related to coal / gas / mining?

No

2.10 Is the proposed action a nuclear action?

No

2.11 Is the proposed action to be taken by the Commonwealth agency?

No



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2.12 Is the proposed action to be undertaken in a Commonwealth Heritage Place Overseas?

No

2.13 Is the proposed action likely to impact on any part of the environment in the Commonwealth marine area?

No



Section 3 - Description of the project area

Provide a description of the project area and the affected area, including information about the following features (where relevant to the project area and/or affected area, and to the extent not otherwise addressed in Section 2).

3.1 Describe the flora and fauna relevant to the project area.

Native vegetation throughout the study area (the Robe Golf course and 5 nearby Allotments) was

relatively homogenous, with tall coastal shrubland communities comprising the majority of native

vegetation. Sandy swales supported more open communities, however the species composition

and structure align with shrubland associations, rather than sedgelands which are typically more

common on heavier soils. Weeds were prevalent throughout the study area, including some

species Declared under the Natural Resources Management Act 2004 (NRM Act).

No flora species or vegetation communities of conservation significance, listed under the

Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act), or the

South Australian National Parks and Wildlife Act 1972 (NPW Act) were recorded within the study

area during the field surveys. Records for the Little Dip Spider Orchid (EPBC, Endangered) occur

1.5 km south of Section 285, hence a search for this species and suitable habitat was undertaken

in Spring 2013. The species was not located, but common orchids were located in the habitat

defined as 'good condition' (SEB 8:1). Lack of leaf litter in vegetation of poor and moderate

condition, as well as the presence of Bridal Creeper, Milkwort and Coastal Wattle (all known to

impact Little Dip Spider Orchid habitat), throughout section 285 suggest that it is unlikely to occur



in areas of poor to moderate quality vegetation in Section 285. It is therefore unlikely that any

clearance of poor to moderate quality vegetation in section 285 would significantly impact the

species, however it is recommended that the Commonwealth Department of the Environment are

consulted to determine whether an EPBC referral may be required.

No fauna species of conservation significance, listed under the Commonwealth Environment

Protection and Biodiversity Conservation Act 1999 (EPBC Act) were identified, however historic

records for Orange-bellied Parrot (EPBC, Critically Endangered, Listed Marine, Migratory) from

1934 do occur in the area. It is unlikely that the study area provides significant habitat for this

species, however consultation with the Department of the Environment (DotE) would be required

to determine whether a referral under the EPBC Act would be required for the Orange-bellied Parrot. In addition, evidence of one fauna species, the Common Wombat, with a rating of Rare

under the NPW Act was identified within the study area and surrounds. This species is locally

common and was observed in good vegetation through to poor vegetation and existing residential

peri-urban properties. Further discussion with the Department for Water Environment and

Natural Resources (DEWNR) about the presence of this species is recommended.

Throughout the study area (5 allotments and Robe Gold Course) native vegetation was noted as

being of moderate quality, and in many cases, edge effects, as a result of historic clearance or

ongoing human disturbance, contribute to a poorer quality of overall vegetation. In addition,

some patches of vegetation were observed to be in poorer condition than compared with

assessments undertaken in 2006 and 2011 (DEWNR 2006, EBS 2008, Anderson 2012). This may be

as result of ongoing impacts from exotic species, rabbits and anecdotal human activities (e.g.



public rubbish dumping, off-road vehicle use and camping). If vegetation clearance for the

purposes of development within some areas of the study area is approved by the NVC, Significant

Environmental Benefits (SEBs), under the Native Vegetation Act 1991 (NV Act) would apply.

Several areas of high quality vegetation (with an SEB rating of 6:1 to 8:1) in Section 285 and

Section 135 were identified as potential suitable SEB offsets. These areas are not proposed for

clearance.

3.2 Describe the hydrology relevant to the project area (including water flows).

Not applicable.

3.3 Describe the soil and vegetation characteristics relevant to the project area.

Refer to SKM Vegetation Assessment report December 2013.

3.4 Describe any outstanding natural features and/or any other important or unique values relevant to the project area.

The study area occurs in an area defined as Cell SE10 in the SE Coastal Action Plan. This broader

area also includes key habitat areas to the south of the study area such as Lake Robe Game Reserve, Little Dip Conservation Park, Lake Eliza, Coastal vegetation from Cape Dombey to Nora

Creina. Little Dip Conservation Park and Lake Robe Game Reserve comprise 2438.6 hectares of

protected vegetation and habitat (Caton et al. 2011). A map showing the location and extent of Cell SE10 (which includes Robe) is provided in Appendix 1 (Background).

Focal conservation species in Cell SE10 include the Orange Bellied Parrot (OBP, EPBC listed Critically Endangered, Marine, Migratory) in dune areas. Existing threats to dune areas south of Robe include degradation by weeds (including garden escapees and pest animals), discharge of

treated effluent from Robe STP, blown in litter from Council Rubbish dump (p375 Limestone Coast

and Coorong Coastal Action Plan). In addition there is an existing pattern of transitional vegetation loss in this Cell through clearance, dune blowout and development (Caton et al. 2011).

Significant floristic communities in the entire Cell SE10 include Leucopogon parviflorus/ Olearia axillaris shrubland (>50% of known sites occur along the SE Coast), and Olearia axillaris /



Leucopogon parviflorus shrubland (>50% of known sites occur along the SE coast).

Within the broader Limestone Coast to Coorong region, the Cells with the highest conservation priorities are SE15 (Coorong), SE7 (Canunda National Park), (SE5) Carpenter Rocks and (SE1) Picanninnie Ponds. The study area occurs in cell SE10 which has an overall medium conservation

priority; 77% of this cell does not occur within protected areas. In addition, compared with other Cells in broader region, CellSE10 has a low rating for Orange Bellied Parrot habitat. Cell SE10 does

have a high rating for threatened mammal habitat, which likely relates to the Common Wombat of which a large area of suitable habitat occurs, particularly in the nearby Little Dip Conservation Park (p 187-189, 576-578 Caton et al. 2011).

3.5 Describe the status of native vegetation relevant to the project area.

Refer SKM Vegetation Assessment report for further details.

Native vegetation occurring within the study area generally comprises tall coastal shrubland, with

many areas subject to edge effects occurring as a result of historic clearance and disturbance. Weeds are prevalent throughout much of the study area, including some plants Declared under the Natural Resources Management Act 2004 (NRM Act).

Vegetation observed was generally of moderate condition, which reflects the proximity to disturbed and developed areas. The Coastal Action Plan (Caton et al. 2011) indicates that species

diversity in the key communities observed within the area is generally higher than what was recorded during the field survey. The poorer diversity observed within the major vegetation communities is indicative of the overall poorer quality and strata integrity, and the proximity of the vegetation in many cases to previously disturbed or cleared zones, roads, tracks and residential areas.

Larger patches of vegetation in better condition also exist within the study area, generally occurring within denser stands of coastal shrubland. Dominant coastal species vary and include: Olearia axillaris (Coast Daisy-bush), Leucopogon parviflorus (Coast Beard-heath) Acacia longifolia

sophorae (Coastal Wattle), Bursaria spinosa (Christmas Bush), and Myoporum insulare (Common

Boobialla). These patches of vegetation are not subject to as many edge effects as the poorer quality vegetation.

Each site was divided in sub areas based on vegetation type and condition. Summary of site description, condition (e.g. SEB rating score), number of species and condition, offset suitability comments and photos for each site are provided below in Section 5.3. Maps for each site and a site overview are provided in Appendix 2 (Field survey results). A map of the photo locations and

a reference table for photo numbers for the February 2013 survey is provided in Appendix 2. BushRAT field sheets for Section 285 are also provided in Appendix 2.



3.6 Describe the gradient (or depth range if action is to be taken in a marine area) relevant to the project area.

Not applicable

3.7 Describe the current condition of the environment relevant to the project area.

Refer Section 5.3 of SKM Vegetation Assessment report.

3.8 Describe any Commonwealth Heritage Places or other places recognised as having heritage values relevant to the project area.

Not applicable

3.9 Describe any Indigenous heritage values relevant to the project area.

Not applicable

3.10 Describe the tenure of the action area (e.g. freehold, leasehold) relevant to the project area.

Freehold

3.11 Describe any existing or any proposed uses relevant to the project area.

Proposed use of portion of the land is golf course. Areas of Section 133 and Allotment 148 Brewer Road have capacity for residential/tourist accommodation integrated with the golf course. Note, no building or development other than the golf holes are proposed on Allotment 3 (formerly known as Section 285).



Section 4 - Measures to avoid or reduce impacts

Provide a description of measures that will be implemented to avoid, reduce, manage or offset any relevant impacts of the action. Include, if appropriate, any relevant reports or technical advice relating to the feasibility and effectiveness of the proposed measures.

Examples of relevant measures to avoid or reduce impacts may include the timing of works, avoidance of important habitat, specific design measures, or adoption of specific work practices.

4.1 Describe the measures you will undertake to avoid or reduce impact from your proposed action.

Techniques to be engaged during the construction of the golf course include:

- initial construction of golf holes occurring in the Autumn period, extending into Winter and complete by Spring;
- when constructing or altering golf holes, stagger works, e.g. where clearance of vegetation is required, construct a maximum of two holes at time. This will prevent exposure of large areas of cleared land, reducing impacts from dust and wind erosion;
- prior to clearance, the "extent of clearing line" would be marked on site by the golf course architect using surveyors' flagging tape. This will enable the final clearing line to take into account any particular stands of vegetation that might be retained. Further, this also allows a more natural appearance of the clearing edge rather than an artificial straight line, thereby improving visual amenity;
- prior to starting works on new golf holes, previous holes will have irrigation installed and operational and laying/planting of turfgrass completed;
- construction of the irrigation system. It is proposed that the irrigation would be put in place by clearing a construction line along the centre line of the golf holes prior to the final vegetation clearance. The irrigation capability is important to minimise the sand erosion hazard. At the time of proposed construction, the availability of water from the common effluent ponds is at its maximum and will be supplemented by seasonal rainfall;
- where larger shrubs are removed during the clearing process they will be pulled out using a small excavator with a claw bucket. Each shrub will be pulled out with as much of its root system as possible and sand would be shaken off the roots and returned into the holes, avoiding the need for large stockpiles;
- disposal methodology of cleared vegetation will be discussed further with DEWNR staff. In some locations it could be beneficial to mulch this material and spread the mulch (with



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seed material) to regenerate native vegetation in areas of the site that have native vegetation of poorer condition. Seed will also be collected to propagate local provenance plants for replanting around the golf course and any future residential developments that may be integrated with the golf course. Care will need to be taken to avoid seed spread from present exotic species;

• undertake weed control of retained patches of vegetation, particularly in Allotment 3 and provide a buffer from edge effects of existing areas of poorer quality (e.g. road reserves);

• fencing of the southern portion of Allotment 3 which is to be included in a Heritage Agreement to restrict access;

• fence vegetation that is retained to allow regeneration and to protect wombat burrows (where appropriate). Use fencing with one or two wire lines will allow local fauna free access;

• dune stabilisation fencing (including log and wire fencing and access control) with shade cloth or similar adjacent any areas adjacent exposed dunes;

• sand bunkers constructed during the development of the fairways would be shaped as part of the construction process of each hole and each bunker would be hydroseeded as part of the turfing process to prevent sand erosion during establishment. After grow-in of each hole is completed and the hole is being readied for golfer play, the grass within each bunker can be then removed;

• sustainable irrigation systems will be installed. Minor trenching approximately 600 millimetres in depth is required for this installation. The system will be designed with perimeter half-circle sprinklers to irrigate away from adjacent native vegetation at the edges of the maintained golf holes. Irrigation water will be acquired from the effluent ponds to the south of Allotment 3. Currently there are easements for drainage (irrigation) from the effluent ponds to the existing golf course within Allotment 3. The existing trenches would be utilised and extended as required;

• following the installation and commissioning of the irrigation system, all golf features are to be fine finished in preparation for turfing;

• turfing is a process where stabilising species will be initially planted before the final desired species are established. For example, the fairways will be over-sown with perennial rye-grass and cereal rye to minimize wind erosion;

- Final Turf is proposed as follows:
- golf fairways: to be row planted with couch grass;

- roughs: hydroseeded with a mix of fescues / couch/rye grass (or as suitable easily established grasses); and

- greens: turf will be laid or hydro-seeded with bent grass;



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• perimeters to golf holes will incorporate native dune grasses (e.g. Austrodanthonia and Coast Sword Sedge) and low plant species (eg Muntries) using only local provenance species. Local indigenous plants will be sourced from local nurseries, such as Teeluk Nursery (Kingston);

• establish turfgrass and grow-in with regular irrigation, mowing, fertilizing and topdressing as required; and

• open holes for play only following successful completion of grow-in. In the cooler maritime climate of Robe, the establishment of the couchgrass holes will take the longest time and this is likely to require more than one summer's growth.

In addition to the construction techniques outlined above, the following general management techniques are also proposed to improve native vegetation:

• removal of perennial weed species Polygala myrtifolia (Milkwort), Lycium ferocissimum (Boxthorn), Pinus spp. (Aleppo pine), Leptospermum laevigatum (Teatree) and declared/Weed of National Significance Asparagus asparagoides (Bridal Creeper);

• removal of exotic annual grasses and herbs including Lagurus ovatus (Hare's-tail Grass), Rostraria pumila (Tiny Bristle-grass), Oxalis spp. (Soursob), Euphorbia terracina (False Caper) and Euphorbia peplus (Petty Spurge); and

• replanting of species typical of tall shrubland, which may include: Leucopogon parviflorus (Coast Beard-heath) / Olearia axillaris (Coast Daisy-bush) Adriana quadripartite (Coast Bitter-bush), Rhagodia candolleana (Seaberry Saltbush), Beyeria Leschenaultii (Pale Turpentine-bush) and Senecio odoratus var odoratus (Scented Groundsel) together with perennial vines Muehlenbeckia gunnii (Climbing Lignum) and Clematis microphylla (Old Man's Beard). Understorey species include Lepidosperma gladiatum (Coast Sword-sedge), Ficinia nodosa (Knobby Club-rush) and Carpobrotus modestus (Pigface) with orchid species such as Glossodia sp (Pink Cockatoo) and Pterostylis pedunculate (Maroonhood).

4.4 Ongoing Land Management

The Robe Golf Club acknowledges its duty in relation to the care of the land and vegetation. The techniques proposed above are incorporated into the draft Construction and Environmental Management Plan.

A Heritage Agreement is being prepared in consultation with DEWNR for portion of Allotment 3 and a management plan will be prepared for this area. The plans and agreements will provide a more comprehensive structure and responsibilities as part of an overall improvement to the environment at Robe.

4.2 For matters protected by the EPBC Act that may be affected by the proposed action, describe the proposed environmental outcomes to be achieved.



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Minimise area of high quality vegetation that is cleared. Include areas of higher quality vegetation (within Allotment 3, formerly Section 285) within a Heritage Agreement. Formalise a management plan for the land, as required through conditions of the Native Vegetation Council approval.



5.1.1 World Heritage Properties

Section 5 – Conclusion on the likelihood of significant impacts

A checkbox tick identifies each of the matters of National Environmental Significance you identified in section 2 of this application as likely to be a significant impact.

Review the matters you have identified below. If a matter ticked below has been incorrectly identified you will need to return to Section 2 to edit.

No
5.1.2 National Heritage Places
No
5.1.3 Wetlands of International Importance (declared Ramsar Wetlands)
No
5.1.4 Listed threatened species or any threatened ecological community
No
5.1.5 Listed migratory species
No
5.1.6 Commonwealth marine environment
No
5.1.7 Protection of the environment from actions involving Commonwealth land
No
5.1.8 Great Barrier Reef Marine Park
No
5.1.9 A water resource, in relation to coal/gas/mining
No



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5.1.10 Protection of the environment from nuclear actions

No

5.1.11 Protection of the environment from Commonwealth actions

No

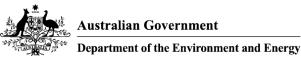
5.1.12 Commonwealth Heritage places overseas

No

5.2 If no significant matters are identified, provide the key reasons why you think the proposed action is not likely to have a significant impact on a matter protected under the EPBC Act and therefore not a controlled action.

The area of vegetation to be cleared has been surveyed and there is no evidence of the existence of Little Dip Spider Orchid. Higher quality vegetation is to be retained, protected and managed and this may provide benefits to individual Little Dip Spider Orchid plants if they occur in the good quality vegetation.

The subject land is not a known breeding ground, key migration or overwintering site for the Orange-bellied Parrot. The proposal is for clearance of a small portion of vegetation (approximately 12 hectares) and there is still significant >3,000 hectares available in South Australia for rare and occasional overwintering habitat. Conditions of the Native Vegetation approval that require land management and hence weed control, rabbit control and revegetation with local coastal species within the subject land (and the SEB offset area) would result in improved coastal habitat.



Section 6 – Environmental record of the person proposing to take the action

Provide details of any proceedings under Commonwealth, State or Territory law against the person proposing to take the action that pertain to the protection of the environment or the conservation and sustainable use of natural resources.

6.1 Does the person taking the action have a satisfactory record of responsible environmental management? Please explain in further detail.

Robe Golf Club Incorporated have not been the subject of any proceedings under Commonwealth or State law.

6.2 Provide details of any past or present proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against either (a) the person proposing to take the action or, (b) if a permit has been applied for in relation to the action – the person making the application.

None applicable.

6.3 Will the action be taken in accordance with the corporation's environmental policy and planning framework?

Yes

6.3.1 If the person taking the action is a corporation, please provide details of the corporation's environmental policy and planning framework.

Robe Golf Club is not a corporation, but an not for profit incorporated body. The development will be undertaken in accordance with the planning consent and associated management plans.

6.4 Has the person taking the action previously referred an action under the EPBC Act, or been responsible for undertaking an action referred under the EPBC Act?

Yes

6.4.1 EPBC Act No and/or Name of Proposal.

EPBC 2014/7178 - Robe Golf Club - Allotment 2 Davenport Street, Robe



Section 7 – Information sources

You are required to provide the references used in preparing the referral including the reliability of the source.

7.1 List references used in preparing the referral (please provide the reference source reliability and any uncertainties of source).

Reference Source	Reliability	Uncertainties
SKM Vegetation Assessment - Robe Golf Club and Surrounds.		None known.
December 2013	and for the purposes of native vegetation clearance assessment.	



Section 8 – Proposed alternatives

You are required to complete this section if you have any feasible alternatives to taking the proposed action (including not taking the action) that were considered but not proposed.

8.0 Provide a description of the feasible alternative?

A variety of alternatives to the design and siting of the golf course expansion have been considered throughout the duration of the rezoning, native vegetation clearance application and development application. There have been numerous designs, each endeavouring to minimise the amount of vegetation cleared and/or potential coastal erosion. Relevant approvals and consents have been granted on the current design and subsequently no other alternatives are considered feasible, other than not undertaking the project.

8.1 Select the relevant alternatives related to your proposed action.

8.27 Do you have another alternative?

No



Section 9 – Contacts, signatures and declarations

Where applicable, you must provide the contact details of each of the following entities: Person Proposing the Action; Proposed Designated Proponent and; Person Preparing the Referral. You will also be required to provide signed declarations from each of the identified entities.

9.0 Is the person proposing to take the action an Organisation or an Individual?

Organisation

9.2 Organisation

9.2.1 Job Title

President, Robe Golf Club Inc

9.2.2 First Name

Scott

9.2.3 Last Name

Fennell

9.2.4 E-mail

president@robegolfclub.com

9.2.5 Postal Address

PO Box 293 Robe SA 5276 Australia

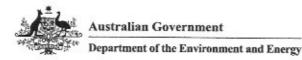
9.2.6 ABN/ACN

ABN

86569259825 - ROBE GOLF CLUB INC

9.2.7 Organisation Telephone

0488 989 087



9.2.8 Organisation E-mail

secretary@robegolfclub.com

9.2.9 I qualify for exemption from fees under section 520(4C)(e)(v) of the EPBC Act because I am:

Small business

9.2.9.1 You must provide the Date/Income Year that you became a small business entity:

Sat, 07/01/2000

Small Business Declaration

I have read the Department of the Environment and Energy's guidance in the online form concerping the definition of a small a business entity and confirm that I qualify for a small business exemption.

Signature: Date: 1.5.2617

9.2.9.2 I would like to apply for a waiver of full or partial fees under Schedule 1, 5.21A of the EPBC Regulations

Yes

9.2.9.3 Under sub regulation 5.21A(5), you must include information about the applicant (if not you) the grounds on which the waiver is sought and the reasons why it should be made

Robe Golf Club is a an Incorporated body and an not for profit organisation. Should further information be required regarding the financial status of the Club, it can be obtained from the Secretary, Robe Golf Club at secretary@robegolfclub.com

Person proposing the action - Declaration

I, <u>JCOTI C TENNEL</u>, declare that to the best of my knowledge the information I have given on, or attached to the EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. I declare that I am not taking the action on behalf of or for the benefit of any other person or entity.

Signature	Date: 1.5.201
•	

Australian Government	Submission #2222 - Robe Golf Club - Golf Course Extension
Department of the Environment and Energy	
1. SCOTT C FENNEL	, the person proposing the action, consent to the
designation of JULIE JANSEN .	as the proponent of the purposes of
the action describe in this EPBC Act Referra	Le di
Signatore: Date:	1.5.2017

9.3 Is the Proposed Designated Proponent an Organisation or Individual?

Organisation

9.5 Organisation

9.5.1 Job Title

President, Robe Golf Club Incorporated

9.5.2 First Name

Scott

9.5.3 Last Name

Fennell

9.5.4 E-mail

president@robegolfclub.com

9.5.5 Postal Address

PO Box 293 Robe SA 5276 Australia

9.5.6 ABN/ACN

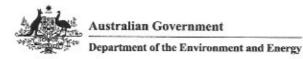
ABN

86569259825 - ROBE GOLF CLUB INC

9.5.7 Organisation Telephone

0488 989 087

9.5.8 Organisation E-mail



president@robegolfclub.com

Proposed designated proponent - Declaration

I, _____, the proposed designated proponent, consent to the designation of myself as the proponent for the purposes of the action described in this EPBC Act Referral.

Signature:..... Date:

9.6 Is the Referring Party an Organisation or Individual?

Organisation

9.8 Organisation

9.8.1 Job Title

MasterPlan SA Pty Ltd

9.8.2 First Name

Julie

9.8.3 Last Name

Jansen

9.8.4 E-mail

juliej@masterplan.com.au

9.8.5 Postal Address

33 Carrington Street Adelaide SA 5000 Australia

9.8.6 ABN/ACN

ABN

30007755277 - MASTER PLAN S A PTY LTD

9.8.7 Organisation Telephone



08 8193 5600

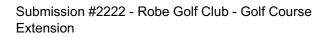
9.8.8 Organisation E-mail

plan@masterplan.com.au

Referring Party - Declaration

I, <u>Julie Jansen of Master Plan SA Pty utd</u> information I have given on, or attached to this EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence.

Signature: Date:



Department of the Environment and Energy

Appendix A - Attachments

The following attachments have been supplied with this EPBC Act Referral:

- 1. 50209_site_plan_a3_3.0.pdf
- 2. 50209cemp01verb.pdf
- 3. dnf_-_21032017.pdf
- 4. dnf_approved_plan_march_17.pdf
- 5. native_vegetation_council_-_dna.pdf
- 6. robe_vegetation_assessment_finalv2.pdf