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Secretary WAPC  
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**MRS Amendment 1293/57 (minor amendment): Shenton Park Hospital Redevelopment**

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**SUBMISSION**

**The Urban Bushland Council WA submits that the rezoning to 'Urban' over the RPH Shenton Park site must be amended so that the bushland strip of 3.4ha on the western side of the lot is rezoned to P & R to protect the bushland strip in its entirety. It is totally unacceptable to have buildings planned within the bushland. This is the time to put this zoning in place to protect this regionally significant ecological linkage. As the land is already government owned, there is no further government cost to secure the linkage for conservation.**

The Urban Bushland Council has been involved with this redevelopment proposal even prior to the public announcement of the redevelopment because RPH staff were concerned about the potential loss of the bushland and trees on the site. We wish to register with the WAPC our complaint about the conduct of community consultation by LandCorp. LandCorp has abused the community consultation process with community representatives who have met with them in good faith and in the public interest on repeated occasions. LandCorp has completely ignored and dismissed community advice, scientific information and government policy on Bush Forever and related lands. This is unacceptable.

**1.0) An 'urban' zoning over the whole of Lot 3240 will not protect the 3.4 ha of bushland on the western side.**

The particular issue that arises from the proposed amendment is:

- 1.01 that by rezoning the whole of Lot 3240 to urban, the bushland on the western side of the lot will not be protected.

**The developer LandCorp has demonstrated that the bushland will not be protected if the whole of lot 3240 is rezoned to urban. The proposals put forward by LandCorp are completely unacceptable.**

We believe the bushland will not be protected if the appropriate zoning to P & R is not put on the bushland area because:

- a) LandCorp in its draft development plan, propose clearing 50% of the bushland on either the western side or the eastern side and having five multi-storied buildings in the cleared 50%.  
Notably the City of Nedlands supports the retention of the whole bushland site and its rehabilitation.

PD06.15 Moved – Mayor Hipkins Seconded – Councillor Hodsdon 24 February 2015

#### Council Resolution

Council: Provides the following feedback to Landcorp in relation to the Shenton Park Redevelopment;

- 1.)It supports neither option A nor B but requests all of the land between the Lemnos Street access and the western boundary of the site be allocated for retention of existing natural bushland, with degraded areas rehabilitated;
- 5.)Buildings and carparks should fit around existing trees as much as possible. New plantings should be local species.

- b.) LandCorp has ignored the advice of the community through its public consultation, whereby 91.6% of participants stated that they would like to see 'Existing Habitat' preserved and 64% of respondents specifically stated 'bushland' and wanted the bushland preserved. At the Community Design Forum held in 2014, the 8 – 10 groups agreed unanimously that the bushland would be saved in its entirety.
- c.) LandCorp has repeatedly and consistently ignored and not acted on advice given from learned community members and from groups such as the Urban Bushland Council, Birdlife WA and the Cockatoo Coalition through many meetings about the importance of the retention of the bushland linkage in total. At one meeting the Chief Operating Officer LandCorp stated: "Why should we have to give up land?" Landcorp has treated their consultation process and expert community advice with contempt and this is totally unacceptable.
- d.) LandCorp has stated that the understorey will be cleared because of new bushfire regulations. This would destroy the habitat for small insectivorous birds and other pollinators which require low shrub cover to traverse the landscape. It would destroy most of the function of the ecological linkage. There is no need for buildings to be located in or adjacent to the linkage as there is plenty of land already cleared of native vegetation.

## 2.0) Bushland description

The strip of bushland along the western side of the site is 100 metres wide at Lemnos Street and runs the length of the site. It is 3.4 hectares. The bushland is Jarrah Banksia woodland over mixed shrubs

and herbs and is in good condition. 109 species of flowering plants were recorded (41 introduced) including approximately 100 *Jacksona sericea* - priority 4. This gives the bushland considerable biodiversity value in its own right.

### 3.0) Minister Redman's statement

In his media statement on 23 May 2014 relating to this redevelopment proposal Minister Redman said:

*"There is also recognition of the key biodiversity corridor, the bushland vegetation in the western boundary of the site, which will be **largely retained** as part of the development."*

LandCorp's proposal does not comply with this statement. The plan does not have the bushland vegetation largely retained and it must be re-designed so that the linkage is retained. Rezoning to P&R will be needed to stop Landcorp from destroying the linkage.

### 4.0) Comments on advice given in the MRS Amendment 1293/57 document.

*'There is an area of Jarrah-Banksia woodland located in the south west corner of the site in good to very good condition.....The subject land is not located within or abutting a Bush Forever site.'* (p1)

This information is deficient in that:

- it does not acknowledge the importance of protection of the whole bushland for its value as a regionally significant ecological linkage between two Bush Forever sites and formally recognized as Greenways 19 under Bush Forever. This is also acknowledged by the OEPA (p3) *'The woodland is in very good condition and provides an important linkage between Shenton Bushland and Underwood Avenue Bushland (both Bush Forever sites)'*. Why then is only the south west corner of bushland identified?
- The bushland is abutting a Bush Forever site ie Shenton Bushland separated only by a road- Lemnos Street and to the north, only the treed Paraquad Industries land is between the bushland and Underwood Avenue Bushland. These two Bush Forever sites and the linkage are all critical links between Kings Park and Bold Park.

### 5.0) Improvement Plan

*When applied, the Improvement Plan will prevail over the MRS and applicable local planning schemes (currently the City of Nedlands TPS no2) (p3) The key objectives stated for the redevelopment include 'sustainability, transport and urban design goals'. A key objective must also be the protection of our natural heritage.*

It is obvious that the site is a perfect one for an excellent redevelopment. The site has a bushland area of 3.4 hectares to the west. The cleared area of 12.385 hectares with some mature trees, can readily provide for development of medium – high density residences and for commercial land uses.

To suggest that only the bushland area on the south west corner or half of the bushland strip should be protected, does not appreciate that for the bushland to have any chance of survival, the greater area which links to other bushland areas is required. The importance of maintaining that linkage is appreciated by scientists and others who have sought to impart their expertise, but is steadfastly resisted by the developer LandCorp. We submit that the WAPC must advise LandCorp that this is unacceptable and that LandCorp has a duty of care to nature and must change its proposal so that the bushland strip is retained and restored and zoned P&R for conservation.

## 6.0) Advice from Research Associate Prof Ric How, WA Museum (pers comm 12 February 2015)

*I know the Cockatoos are the iconic taxon on which so much of the argument runs but natural areas are also critically important for providing so many of the ecosystem services that we rely on - but take for granted - as cloistered urban dwellers. In this vein, the whole biota, particularly the natural soil organisms and fungi, are so essential and to lose more areas to urban expansion instead of in-fill is a huge environmental concern.*

Professor How also commented on the 3 species of reptile LandCorp's Environmental Consultant reported are 'possible' on the site: *Lerista elegans*, *Moretha obscura* and *Menetia greyii*. Another list had the Black Striped Snake and the Carpet Python as 'possible' (The LandCorp officer was not willing to give the name/s of the consultant/s).

Professor How's comment:

*As for the reptiles, I believe that the list of three species provided to you is far from accurate. Any other area that size in an urban bushland should contain between 6 and 8 species of lizard, alone. However, it would be highly unlikely to retain either of the two snake species mentioned, although the Dugite and Jan's banded snake could possibly survive.*

A trapdoor spider was listed as possible but it is confined to the Hills area. However various other species of trapdoor spiders probably survive there. In Underwood Avenue bushland there are around 200 trapdoor spider burrows of possibly 5 species.

This advice about reptiles, and one spider, is included in this document to indicate to the Assessment Committee and to the Secretary, WAPC, that bushland is a place where plants, animals and fungi live and interact. By belittling the importance of bushland, we see that the proponents fail to accept the science relating to our natural heritage, ecosystem functioning and the benefits of retention.

### 6.01) Emeritus Professor Don Bradshaw also commented:

*'I have been approached by members of the Urban Bushland Council (UBC) regarding LandCorp's plans for the development of bushland between UWA's Underwood Avenue land and the recently-vacated RPH hospital site.*

*Natural bushland in urban areas is critical not only for the preservation of native faunal, floral and fungal biodiversity, but it is also important for community health. It provides essential assistance to water filtration, groundwater recharge, nutrient decomposition and recycling, soil enrichment as well as carbon sequestration. These are environmental services on which urbanised peoples depend for their health and wellbeing. Their preservation and management is critical for the education of the next generation that is becoming increasingly detached from the natural environment and its significance.'*

### Graceful Sun Moth

This species is likely to be present in the bushland area as several have been sighted to the west of Bedbrook Place and their host plant, *Lomandra hermaphrodita* is present in the bushland.

## **7.0) State Government Planning Policy 2.8; Bush Forever; EP Bulletin No 8.**

The relevant government policy, State Planning Policy 2.8, states of local bushland that

*Proposals or decision-making should -*

*(v) Proactively seek to safeguard, enhance and establish ecological linkages between Bush Forever areas.*

Further, it is stated in Bush Forever, Volume 1 that

*Bush Forever does not include locally significant bushland sites, but the Government is committed to fulfilling its undertakings in the Urban Bushland Strategy to support local government in developing local bushland protection and greenway strategies as outlined in the plan.*

### **Environmental Protection Bulletin No 8: South West Regional Ecological Linkages.**

This Bulletin was based on the '*South West Ecological Linkages Technical Report*' by WALGA's South West Biodiversity Project and DEC's Swan Bioplan, September 2009. The Environmental Protection Bulletin No 8 briefly considers the Swan Coastal Plain:

*'However, elsewhere on the Swan Coastal Plain native vegetation is highly fragmented. Therefore the maintenance of conservation reserves and all existing bushland patches, and the strategic restoration of ecological linkage function between them is a priority.'*

### **Bush Forever Volume 1**

*'Where possible, greenway concepts should be incorporated into future planning proposals as part of the development of best practice planning and design solutions.'* p39

In this document the map of greenways linkages includes that through the RPH site (p 99)

## **8.0) Carnaby's Cockatoo and Forest Red-tailed Black Cockatoo**

Both Carnaby's Cockatoo and Forest Red-tailed Black Cockatoo roost at separate sites close to each other around 1 kilometre from the RPH site. The Carnaby's Cockatoo roosting site (CAMFLOR001) at the corners of Underwood Avenue and Brockway Road, Floreat, is one of the ten largest and most important sites for Carnaby's Cockatoo. Both species use the RPH bushland regularly not only for feeding but as a route to disperse during the day, and to return to their roost sites in the early evening.

We have already seen that at Perry Lakes, four-storied buildings are having an impact on Carnaby's Cockatoos. Rather than flying above the buildings (under construction) on their route from the East Lake (where they drink) to the roost site, they are forced to take alternate routes to the roost site.

**So too, multi-storied buildings within the RPH Shenton Park Bushland site, would affect the black cockatoos' ability to access what remains of the bushland, as well as eliminating some of the food availability.**

## **8.01) CRITICAL HABITAT AROUND A MAJOR ROOST SITE - DEC REPORT**

### **Carnaby's Cockatoo**

DEC (now DPAW) guidelines for Carnaby's Cockatoo state:

- **foraging habitat within 6 km of a major Carnaby's roost site is critical habitat.** A major site is one where 150 birds or more roost. 445 *Carnaby's Cockatoos* have roosted at the Perry Lakes site. (8 April 2015) and roost there nightly from December to August/September each year.

-all large trees above 8 metres within 1 km of a core area of such a roost site are **potential roosting places**.

*(State Recovery Plans for the endangered Carnaby's Cockatoo August 2012 - 2022).*

*The long-term survival of a robust population of Carnaby's cockatoos depends on the availability of suitable woodland breeding habitat and tree hollows, and foraging habitat capable of providing enough food to sustain the population. (ibid p 12)*

The food resources: Banksia and Eucalypt seeds and nectar, Hakea, Allocasuarina and Marri seeds are eaten by Carnaby's Cockatoos and Jarrah, Marri and Allocasuarina seeds are eaten by Red-tails. Banksia attenuata is considered a critical food resource for Carnaby's Cockatoos (Shah 2006) and many of these Banksias and food trees are in the bushland strip.

### **Great Cocky Count 2014 Birdlife and DPAW**

*Such a rapid decline [15% decrease per year for the last five years for Carnaby's cockatoo] may manifest in the loss of flocks associated with particular roosts and, if this trend continues, it is of serious concern for Carnaby's Black-Cockatoos in the Perth-Peel Coastal Plain. (p 28)*

Birdlife Australia informed its members that

*Preliminary results from the annual Great Cocky Count, to be released shortly, demonstrate a worrying rate of decline. On trend with previous years, research suggests the population around Perth is declining by 10–20 per cent per year as vital habitat continues to be destroyed. (e-mail 7 September 2015)*

### **Forest Red-tailed Black-cockatoo**

In the Great Cocky Count of 2014, 109 Forest Red-tailed Black Cockatoos were counted flying in to their roost site. The results from the 2015 count have not yet been announced.

*Significant Forest Red-tailed Black Cockatoo roosts occurred at Murdoch University (n = 199 birds roosting), Floreat (n = 109), Kensington (n = 94), Munster (n = 92), and Yokine (n = 47).*

The Floreat roost site is the second largest of the areas counted and as stated those Red-tailed Black Cockatoos roosting at Floreat use the RPH Shenton Park site for feeding and for dispersing and returning to the roost site. This bushland is significant habitat for Red-tails.

### **9.0) % of Karrakatta Central and South vegetation complex remaining**

There is only 1.8 % of Karrakatta Central and South vegetation complex secure for conservation in the Perth Peel Region. Only 8% is reserved in Region Schemes as P&R or POS which is well under the minimum target of at least 10%. *(EPA Interim Strategic Advice for the Perth and Peel regions, July 2015).* This alone is reason for the 3.4ha of bushland to be rezoned to P&R in this MRS Amendment.

### **10.0) Summary**

The Convenor of the Cockatoo Coalition, Heidi Hardisty described the RPH Shenton Park bushland as follows:

*Essentially the value of the ecosystems services that this bushland will provide into the future will far outweigh the short term economic gain from clearing part or all of the bushland now. It is up to our government and its agents, like LandCorp to protect our natural heritage.*

In the comments contained in this submission, the UBC has demonstrated the importance of protecting the whole (pitifully small as it is) of the 3.4ha of bushland on the site by giving it the only appropriate zoning of P&R. In its advice on the MRS Amendment document the EPA falls short in stating

*'The EPA supports the proposal to retain the Banksia woodland in POS and to also retain as much remnant vegetation as possible.'*

Rather than retaining 'as much remnant vegetation as possible', LandCorp want to develop as much land as they possibly can. Built heritage is protected, including an 'avenue of Queensland Box Trees', while our unique and natural heritage is unappreciated and potentially squandered. This is totally unacceptable as these Box trees are not natural heritage and do not provide habitat as the 3.4 ha of bushland does.

The bushland and its linkage will be completely wrecked at the expense of endangered species, if protective P&R zoning is not applied to the bushland area.

## **CONCLUSION**

The Urban Bushland Council WA Inc. strongly recommends that the MRS Amendment be revised so that the whole of the bushland strip of 3.4 ha is rezoned to P&R.

We wish to request the opportunity to discuss this submission with you and may be contacted as below.

Yours sincerely

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