

April 29, 2022



WA Planning Commission
Gordon Stephenson House
140 William Street
Perth, WA 6000

Dear Mr Caddy and WAPC Members,

Re: Proposed MRS Amendment to Rezone Lot 556 Curtin Avenue, Cottesloe (The McCall Centre) from Public Purposes - Special Uses reservation to the Urban zone

The Urban Bushland Council has been supporting over 80 volunteer groups for 30 years to restore, maintain, protect and advocate for their remnant bushland.

Please accept our submission which concerns:

1. Environmental loss,
2. Aboriginal Heritage loss,
3. European Heritage loss,

Economic cost, if Lot 556 Curtin Avenue is rezoned for private urban development.

1.0 Environmental Loss:

1.1 State Planning Policy 2.8 Bushland Policy Perth Metropolitan Region objectives:

To protect and enhance native bushland with the intent of long-term protection of biodiversity and environmental values. .

There has been a 40 year community vision as described in the Vlamingh Parklands Report, to establish an integrated parkland, incorporating the link between the sea and river. This was to meet the recreational needs of the community whilst conserving, enhancing and promoting the natural and historic heritage of the area.

The green link of Lot 556 is critical to the functioning of the Vlamingh Parklands Plan endorsed by the State Government as a regional style park in 1998. The date coincided with the 400 year anniversary of Dutch explorer, Vlamingh's landing at the site, climbing the hills behind from which he discovered and named Black Swan River.

- There is no cost-effective alternative.¹
- This link in the chain of natural green areas linking the ocean to the river and to the Perth escarpment which our member groups are working to achieve

This ecological corridor has been identified as the green network in key planning documents to prevent fragmenting bushland and preventing local extinctions and to **avoid and protect areas that have significant regional environmental value.**

¹2020 Christina O'Donnell "Evaluating Connectivity and Ecological Linkages between Perth's Protected Areas to Support Biodiversity. [Naturelink](#) Perth

- i) Perth and Peel@3.5 million
- ii) **Capital Cities Planning Framework 2013 (CCPF)**
- iii) WESROC Greening Plan 2022
- iv) ToMP LPS3

Therefore, the MRS amendment incorrectly states the green network surrounds Lot 556. What surrounds Lot 556 is Regional Road Reserves which give no security of vegetation retention. This places more importance on retaining Lot 556 in the public realm.

- The Environmental Protection Authority advice attached to the proposed amendment warns of the ecological risk of developing the land in question, as the site could provide potential 'crucial' habitat to the **endangered Carnaby's Black Cockatoos**.
- It has never been surveyed or assessed by EPA and could be home to species long lost to our western suburbs.
- There are known and potential endangered species and endangered ecological communities that rely on the vegetation provided by the green corridor and may be found in or depend on the 8000sqm. These include:
 - *Callitris preisii* (Rottnest Pine),
 - *Melaleuca lanceolata* (Moonah Paperbark),
 - *Angianthus micropodioides* P3,
 - *Beyeria cygnorum* P3,
 - *Neelaps calonotos* (Black Striped Snake) P3,
 - *Isoodon obesulus* (Quenda)P4,
- Coastal pines and Melaleucas remain here when the Leighton coastal strip bears no resemblance to how we inherited it, how Whadjuk Noongars valued it, how Vlamingh saw it. Although there are insufficient of these trees to fit the criteria for a Threatened Ecological Community, they tell a story of the area and should be retained and revegetated as soon as areas for roadways are determined.

The vegetation remaining is vital for wildlife but **will be deemed insignificant and insufficient to retain in a pen stroke.**

- An urban development will require vehicular access and carparking which will cause the further unavoidable loss of vegetation habitat and connectivity for wildlife.

Still with the scattered vegetation and abundance of Victorian tea tree, there has been a wildlife increase in numbers and biodiversity up to Leighton Beach. This vegetation has maintained Purple backed fairy wrens. From the revegetation work of the coast and river by volunteers, Cottesloe Coastcare and Friends of Mosman Park Bushland we now see a variety of honey eaters, a small colony of and occasional sightings of white winged fairy wrens and Quenda diggings at the accreting Leighton beach. Records can be substantiated by local Ecologist, Ian Abbott

1.2 State Planning Policy 3.7 - Planning in Bushfire Prone Areas

SPP 3.7 seeks to guide the implementation of effective risk-based land use planning and development to preserve life and reduce the impact of bushfire on property and infrastructure. It

applies to all higher order strategic planning documents, strategic planning proposals, subdivision and development applications in designated bushfire prone areas (unless exemptions apply). The accompanying Guidelines for the Planning in Bushfire Prone Areas (the Guidelines) provide supporting information to assist in the interpretation of the objectives and policy measures outlined in SPP 3.7. They provide advice on how bushfire risk is to be addressed when planning, designing or assessing a planning proposal within a bushfire prone area.

Enhancing the green wildlife corridor here is incompatible with reducing the bushfire risk to an urban settlement. The recent proposal of changes in Fire Regimes as a key threatening process highlights the increase in fire frequency in urban areas. An urban development area in the “to be” restored Wildlife corridor should not be entertained here.

2.0 Aboriginal Heritage Value

Although Aboriginal Heritage values do not have to be considered here and developers will select what information they give to the South West Aboriginal Land and Sea Council (SWALC). This is an opportunity to list the Aboriginal heritage values as they were dismissed in the original report to Town of Mosman Park (ToMP) and further dismissed in the MRS Amendment report by saying that if the rezoning proceeds the SWALSC will be notified to consider the Aboriginal Heritage values.

- The coast in front of Lot 556 is known as Moondarup, the spiritual gateway.
- The limestone hills (Seven Sisters) behind Lot 556 were believed to be pushed up by their earth creator, the Wargle, the rainbow serpent as he travelled through the land creating the hills and waterways.
- Where he rested and left the limestone rocks the people believed if they camped beside his resting place, they would absorb the power of their creator.
- Behind the rocks was fresh water flowing into the sea allowing habitation any time of the year.
- The height of the limestone ridges gave the Whadjuk people a great viewing place to look for migrating salmon during summer.
- Great feasting and celebration occurred as the families got together. The site was a place of corroboree. We believe that today, Whadjuk ancestors still gather here for coroboree.
- Whadjuk tools have been discovered beside the Cable Station, Victoria Street Station and as far as Warton Street.
- Dwerda (Dingo) dreaming story guards the Leighton Peninsula.
- The Ecological linkage from the sea to the Swan River is also a path of traditional Whadjuk ways and dreaming stories. It links the womens area of Point Walter to the fish traps of Minim Cove, to the seven sisters dreaming to the Moondarup Rock (Shark Dreaming) and Muderup Rocks (Place of the yellow fin whiting).

By not further building and concreting an important part of this undeveloped linkage would respect the cultural values of the oldest living culture on earth.

2.1 State Planning Policy 3.5: Historic Heritage Conservation

The objectives of SPP 3.5 include conserving places and areas which are of historic heritage significance and ensuring that **development does not adversely affect the significance of heritage places and areas**

3.0 European Heritage:

Vlamingh Memorial and Vlamingh Parklands:

We have celebrated the first European explorer this furthest south of Western Australian coast, Vlamingh, in 1697, by way of a memorial and a regional style parkland from the coast to Chidley Point reserve on the Swan River, linking remnant bushland from Sea to River.

- The Cable Station built in 1926 is the only heritage value listed in the MRS amendment report. It was significant as it allowed the first international communication by submarine cable, linking WA with the rest of the world. The building is heritage listed for the unique way of living of entire families who manned it 24hrs with a school next door for the children.
- There are the stories here of the colonial early settlers. This beautiful coastal site to Fremantle was developed as petrol storage and the beach used as a rubbish dump with all sorts of waste dumped and burnt here in a smouldering mess. So bad it's smoke and ugliness was screened for the royal visit decades ago.

More frequent and severe storms are undermining this toxic rubbish tip, it is time to make good and restore this coast to the best it can be for the enjoyment of all. The plan for Lot 556 as the northern recreational node with the strong and impressive Cable Station building converted to a café/restaurant to tell the history of the sight should be implemented now the Cable Station is vacant and there are solid plans for rerouting Curtin Avenue and Port Beach road away from the eroding coast.

4.0 Economic Cost

4.1 SPP 2.6 Coastal Planning objectives:

i) *provide for public coastal foreshore reserves and access to them on the coast; and*

ii) *protect, conserve and enhance coastal zone values, particularly in areas of landscape, biodiversity and ecosystem integrity, Indigenous and cultural significance.*

- ***More specifically, SPP 2.6¹ states that in terms of Coastal Hazard Risk Management and Adaptation Planning, an area likely to be subject to coastal erosion in the next 100 years, development should be avoided.***
 - *sets out the matters which should be considered in the planning and development of land within the coastal zone. These matters include the establishment of foreshore reserves, **the protection and enhancement of coastal values** and the management of development and land use change*
 - *SPP 2.6 Coastal Planning: ensuring that development within the coastal zone takes into account coastal processes and hazard.*
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4.2 Coastal Setback:

- The 2000 Leighton Regional Planning Guidelines acknowledged that both Montessori school and the Old Cable Station were in the coastal foreshore reserve. They recommended that the foreshore reserve should be 125m. Lot 556 is within 100m of the high tide mark. Only transportable buildings are suitable within this reserve.
- The MRS amendment report states “A coastal hazard setback assessment prepared in support of the amendment indicates that the amendment area is not likely to be impacted by coastal processes over a 100-year planning timeframe. As such, the amendment is consistent with SPP 2.6.” How can this be consistent with a 125m coastal foreshore reserve?
- The EPA stated in 2004, MRS Amendment 1074/33 that the expansion of Rous Head would only have slight impact on Port Beach. Tax payers money has just been committed to repairs.
- The Vlamingh Memorial, directly in front of the Cable Station, only has 30m of area for buffering and recreation. Insufficient today and for a planned urban development opposite.
- Coastal erosion is already precluding use of the beach in front of Lot 556 over winter, often with no available access to the steps for a detour.

4.3 Coastal Adaption Planning

The Port, Leighton, Mosman Beaches Coastal Adaption [Plan](#) 2016 (PLMBCAP) highlights that:

- “Coastal hazard mapping indicates that short-term triggers **requiring major protection works or retreat** are reached for Mosman Park and Port Beach”,
- Adaption option 1) do not develop 2) retreat infrastructure 4) engineer dunes and sand replenishment.

Development will further reduce retreat leaving no option other than expensive engineering of dunes and ongoing sand replenishment. Not a legacy most want to leave.

4.4 Community Values:

- i) The 2016 community coastal users survey conducted with the PLMBCAP to direct adaption found that 85% of the community coastal users value the coast here for its natural features over development.
- ii) Town of Mosman Park’s 2021 Community Strategic Plan found that residents want climate change and sustainability to direct decision.

Rezoning for sale and an urban development is not what the community desire.

Strengthening the ecological link and ecological values of the coastal foreshore reserve will have a human health saving as is becoming more apparent.

4.5 Local and International Tourism Value:

- The close proximity to the Fremantle to Perth railway line, it’s long paths and beaches for walking can and should be a welcome to all visitors and a showcase of how we respect this area for everyone’s use and not a selective few.

This coastal strip needs to be protected and managed for its tourism values of, natural, Aboriginal and European heritage, active and passive recreation with nature.

4.6 Urban Growth and Settlement:

SPP 3.0 sets out the principles and considerations that guide the development of new urban growth areas and settlements. Its objectives include promoting the growth and development of urban areas in response to the social and economic needs of communities, enhancing the quality of life in those communities, and creating an identifiable sense of place.

- The amendment report says, “The amendment is consistent with SPP 3.0 as the proposed Urban rezoning will facilitate the adaptive re-use of the heritage listed buildings on the site, which will positively contribute to improving the sense of place for the locality and enhancing the quality of life for surrounding communities.”
- The Leighton Regional Planning Guidelines 2000 plans for the Leighton Peninsula beaches will achieve this strategy, enhancing the quality of life for users and create an identifiable sense of place not an urban development. This can occur under the current zoning or Public Purpose Special Use.

4.7 Perth Coastal Planning Strategy Issue paper 5 visual landscape c 2003.

- “Coastal landscapes are highly valued by West Australians, generating widespread community emotion and desire for protection”
- Commuters’ first sight of the open natural coastal stretch from Cottesloe to Fremantle is highly valued for as the first daily connection to nature, weather and seasons.
- This unbuilt coastal vista should be protected for the benefit of as many commuters as possible including from Curtin Avenue, the Fremantle/Perth railway line and Stirling Highway.
- nominal building heights up to three storeys at the Cable Station would interrupt these valued vistas causing anger that our planning authorities have failed us.

Conclusion

Both the initial report for rezoning in 2017 and now, 2022 have been framed for a desired outcome. They do not reflect the good planning policies and strategies our Governments over decades are trying to achieve.

The Urban Bushland Council strongly object to the rezoning to allow sale and urban development of our public coastal foreshore which is set aside for many reasons. We expect to have confidence in our planners that these values will be upheld and not overridden by short term economic advancement.

We would be delighted for you to contact us should you require further information.

Kind regards,

Chair Urban Bushland Council

PO Box 326 West Perth WA 6872

ubc@bushlandperth.org.au

www.bushlandperth.org.au