

WA Planning Commission
RegionPlanningSchemes@dplh.wa.gov.au
Gordon Stephenson House
140 William Street
Perth, WA 6000

Dear Mr Caddy and WAPC Members,

Proposed MRS Amendment 1400/41 Major Amendment, Port Beach

The Urban Bushland Council WA Inc. (UBC) is the peak community organisation for urban bushland recognition and protection and is an association of almost 90 community groups with a common interest in conservation and management of urban bushland. The Council is an incorporated, voluntary, non-government organisation. The Council plays a crucial role in advocating with Government of all levels for bushland protection.

UBC does not support the MRS amendment because:

- 1) Urban deferred implies it will be urban and will prejudice further consultation and possibly cost.
- 2) The EPA have chosen not to assess siting the issues can be dealt at the planning stage now.
However, the report is not only incomplete but has recommendations contrary to it's findings.
- 3) The Fremantle Future community consultation for this area has not occurred.
- 4) The WAPC decision on Lot 556 urban development McCall centre has not be made.

Please accept our submission below which concerns:

1. Social and Cultural surrounds
 - 1.1 Recreational use
 - 1.2 Aboriginal cultural significance
 - 1.3 Tourism
2. Coastal and Terrestrial Considerations
 - 2.1 SPP 2.6 Coastal Management, objectives and planning
 - 2.2 Leighton Planning to date
 - 2.3 Coastal hazard management
 - 2.4 Foreshore reserve function for species conservation and reducing erosion
 - 2.5 Commitment to 30% land for conservation purposes by 2030
 - 2.6 Commitment to 30% canopy cover
3. Economic Considerations
 - 3.1 less costly retreat option in a highly eroding foreshore
 - 3.2 Functioning ecosystem savings
 - 3.3 health savings/ liveability

3.4 Tourism economy

1.0 Social and Cultural Considerations:

1.21 Recreation

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 the foreshore reserve is an opportunity to improve the environmental 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, to discover and name Black Swan River.

There is no cost-effective alternative.¹

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.**

- i) Perth and Peel @ 3.5 million
- ii) Capital Cities Planning Framework 2013 (CCPF)
- iii) **1.2 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'*.

- The Leighton Oceanside Parklands Plan followed on the Vlamingh Parklands to provide 13ha for conservation and recreation so no further area is needed. **This did not include future population increase and urban development.**
- The 13ha is for conservation of the sea to river link and does not serve as recreation.
- For decades the 13ha remains a wasteland as the Leighton Marshalling Yard with no foreseeable change for it's part of the Leighton Oceanside Parklands Plan.
- This 13ha should be discounted in the report for conservation or recreation purposes for the Leighton area.
- The Leighton Oceanside Parkland development of 4ha of Urban has occurred with insufficient public open space for the immediate urban development let alone for the use of surrounding suburbs or greater Perth.
 - There is no room in the existing public open space on summer weekends.
 - Traffic on summer weekends is continuous with little chance of crossing Curtin Avenue to the beach if walking or cycling to the beach.

Future population increase in the Leighton peninsula will require foreshore reserve for recreation with consideration for coastal processes.

There are many existing residential proposals including this residential proposal, the 2 huge residential development proposals on Stirling Highway at the end of McCabe Street (Onesteel and Matilda Bay Brewery), the 22 storey residential proposal on the south bank at Stirling Bridge,

Glyde Street, Mosman Park high rise developments, that will be using the Leighton Beaches for recreation.

1.2 Aboriginal Cultural Surrounds

The Leighton area has significant cultural significance.

Instead of rezoning urban deferred, this is an opportunity to recognise and protect the Aboriginal heritage values as they were dismissed in the former zoning of industrial.

Some of these significant Aboriginal heritage values of this Leighton area are:

- The Fremantle River and coastal areas are places of not only significant cultural importance but of dreaming stories (Sacred Sites).
- The limestone hills (Seven Sisters) behind were believed to be pushed up by their earth creator,
- Great feasting and celebration occurred on the Swan River and on the coast as the families got together for abundant summer fishing.
- Whadjuk tools have been discovered beside the Cable Station, Victoria Street Station and as far as Warton Street only in the 1970's.
- Dwerda (Dingo) dreaming story guards the Leighton Peninsula. The roaming crocodile from the north was spotted and attacked. It's features are part of the coastal landscape.
- The ecological linkage from the sea to the Swan River¹ is also a path of traditional Whadjuk ways and dreaming stories. It links the women's 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).
- What archaeological studies were done of the previous industrial area of Port Beach? Although the area has been disturbed by previous residential and industrial use, the planning for another use should now be considerate of the cultural values here. The new heritage laws/policies would certainly require it.

1.3 Local and International Tourism Value:

- The close proximity of the site to the Fremantle to Perth railway line, its 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.

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

2.0 Coastal Considerations

2.1 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, in an area likely to be subject to coastal erosion in the next 100 years, development should be avoided.*
- *It 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.*
 - *coastal foreshore reserve will include the consideration of, and protection for, significant natural features such as coastal habitats and, for their biodiversity, archaeological, ethnographic, geological, geo-morphological, visual or wilderness, biodiversity and ecosystem integrity, heritage.*
- *SPP 2.6 Coastal Planning: ensuring that development within the coastal zone takes into account coastal processes and hazard.*

2.2 Leighton Planning to date

Coastal Setback:

- The 2000 Leighton Regional Planning Guidelines recommended that the foreshore reserve should be 125m.



- [Digital Earth Australia Map CSIRO](#)

This MRS amendment reports that coastal processes of 3.6m inundation level [AHD](#) to 2115 which would expect 176m water level. Bracks Street is approximately 200m. The

176m figure does not consider storm surges and cyclones so **the MRS amendment recommendation is completely nonsense.**

Some long term locals say the sand in parts of Leighton Beach have only just returned to levels before Cyclone Albi struck in 1973.

Therefore not only will there be no foreshore reserve in 100 years for recreation, wildlife and ameliorating coastal storms, there will be no room for managed retreat the communities preferred option surveyed in the PLM CHRMAP 2016.

- The EPA stated in 2004, MRS Amendment 1074/33 that the expansion of Rous Head would only have slight impact on Port Beach. Now taxpayers money has just been committed to beach repairs and sand nourishment. Will this MRS amendment commit further generations to this financial burden so an urban development can occur here?
- The area for parks and recreation is insufficient for today and for a planned urban development opposite which must plan for 100 years.
- **Coastal erosion is already precluding use of the Leighton beaches over winter, often with no available access to the steps for a detour.**

These hazard risks are all reasons why entire area of MRS 1400/41 should not be rezoned or rezoned to parks and recreation entirely.

2.3 Coastal Adaption Planning:

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

Development would further reduce retreat leaving no option other than expensive but risky ‘engineering’ of dunes and ongoing expensive sand replenishment.

Strengthening the coastal foreshore reserve with appropriate local dune vegetation is recommended for resistance to coastal processes.

2.4 There is no planning for Australia’s commitment to the Cop 15 summit of 30% land for conservation by 2030 in a highly cleared landscape.

2.5 There is no consideration for 30% canopy target in this over cleared landscape.

2.6 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 its 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.
- SPP 7.0 aims to preserve and build sense of place.

3.0 Economic Considerations

3.1 Planning for transportable infrastructure in a highly eroding coastal area would allow a less costly option than engineering and sand nourishment to save built infrastructure. ²

3.2 Restoring a functioning ecosystem next to what will be the passenger terminal, will help reduce the spread of pests brought in by visitors. The Polyphagus Shot hole borer arrived in East Fremantle and in a few years has spread to 40% of Perth with no chemical control and not only a **threat to plantation** timber, orchards but to tree canopy and our remnant bushland. We are committed to the United Nations decade of ecosystem restoration.

3.3 Health Savings

Urban Growth and Settlement SPP 3.0:

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.

Health cost savings for planning cities with nature nearby are well known and importance for public open space for recreation was reinforced with the CoVID pandemic.

3.4 Tourism

If we plan for tourism now to showcase our beaches and nearby Cottesloe reef we are planning for a prosperous future.

²The Port, Leighton, Mosman Beaches Coastal Adaption [Plan](#) 2016

CONCLUSION:

1. The Urban Bushland Council strongly recommends that the proposed MRS ammendment 1400/41 not be changed and if it is changed that the area is entirely Parks and Recreation to uphold our good State Planning policies 2.6, 2.8, 3.0, 7.0 which include for the purpose of **protecting and managing the foreshore reserve for 100 years by planting a local native vegetation buffer for:**

- wildlife corridor and habitat
 - restoring dunes to slow coastal erosion
 - Aboriginal cultural values
 - commitments to 30% land for conservation by 2030 in a cleared landscape
 - Commitments to 30% tree canopy
 - SPP 7.0 liveable cities to maintain local identity, sense of place public open space for recreation.
- We are available for you to contact us as below should you require further information and request a deputation to the WAPC board should this rezoning proceed.
- Yours faithfully,

Chairperson, Urban Bushland Council WA Inc.

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