

FRIENDS OF ALLEN PARK BUSHLAND GROUP



Project Manager
Perth and Peel@3.5million
Department of Planning
Locked Bag 2506
PERTH WA 6001

Dear Sir/Madam,

Submission on Draft for Perth and Peel @ 3.5 million Plan

I write on behalf of the Friends of Allen Park Bushland Group in Swanbourne and wish to provide comment on environmental aspects of the draft and on the Central Sub-Regional Plan, which includes Swanbourne.

It is our understanding that an agreement by both Commonwealth and State governments to provide a framework to direct future land use planning was made in 2011. The resulting Strategic Assessment of the Perth and Peel Region (SAPPR) process is not yet complete and has yet to be released for public comment. Surely the outcome of this assessment is of material importance and input to this plan? Given the importance of this plan in setting the direction for our region to support a population of 3.5 million by 2050 and to live in harmony with our environment, it must await the outcome of the SAPPR process. Failure to do so exposes the draft plan to criticism and weakens it considerably.

A further concern is that there is no indication that consultation has been undertaken with key stakeholders. This is an essential element in crafting a plan to ensure accuracy and completeness of considerations.

Perth is a beautiful city poised on the Swan River. Its surroundings embrace natural areas that are absolutely unique, particularly wetlands and significant Banksia woodlands, which have been nominated for Threatened Ecological Community status. It is concerning that, piece-by-piece, these highly valued areas are disappearing as the city continues to expand relentlessly, making way for unsustainable residential ghettos of the future. This plan should not incorporate development of into Greenfield areas and there should be no further clearing of Banksia woodlands on the Swan Coastal Plain. In fact, we hold that all remnant native vegetation that is not severely degraded should be preserved and categorised as “nationally significant”, given its ecological and social importance.

Many cities around the world have embraced the problem of increasing population by increasing density on existing cleared and occupied lands, while strongly maintaining the integrity of the numerous small areas of bushland and park for the essential amenity. The health issues engendered by clearing the green spaces and having continuous development are well documented, and as such the 'green network' strategy (page 36) is imperative to address these challenges. However, this strategy needs to be manifest in clear actions in the plan to avoid being mere rhetoric.

It is of great concern that approximately 20 000ha of native vegetation is anticipated to be cleared for urban development as evidenced by overlaying the native vegetation maps on the structure plan maps. An unacceptable loss of native remnant will occur. Although Bush Forever sites are dotted throughout the region, highly regarded conservation areas eg. Perth Airport, continue to be cleared for development while employing 'off-sets' to make it appear acceptable. It has been widely demonstrated – both within Australia and internationally – that this strategy of off-sets does not work. This is particularly evident as so often there are no areas of equal value left in the region to swap with. This is clearly a flawed strategy.

There should be greater emphasis on ecological linkages - green corridors in all regions. While there is emphasis on regionally significant landscapes such as Kings Park and Bold Park, it is critical that the smaller bushland reserves are preserved too. A significant proportion of roosting and foraging sites for endangered Carnaby's Cockatoos (*Calyptorhynchus latirostris*) have been lost in the western suburbs in the past decade, and native remnants have become more fragmented. Green corridors should be reinstated through Local Government initiatives (some councils are applying these principles already) on Public Open Spaces and street verges, but mature trees within the built environment (especially on private property), have no protection. Perth and Peel ought to follow other cities, both nationally and internationally, and adopt a policy to preserve mature native remnant trees on private property.

Bushland has social and economic value - homes adjacent to bushland are good real estate and generally more sought after. Bushland provides cooling effects as urban density increases, helping to mitigate urban heat created by more concrete, roads and reflective surfaces. Green network strategies (page 36) to provide an acceptable number of street trees would certainly enhance the public realm in the urban environment and provide cooling effects.

We support the view that urban infill rates should be increased to 80% of new housing and urban expansion should only be permitted on land cleared prior to 2015. It is anticipated the process of bringing this plan to fruition to shape our future will be long and slow. Therefore a moratorium to prevent clearing any more bushland should be declared before any more is lost.

Central Sub-Regional Plan

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It is concerning that the Green Network Map gives no indication that Allen Park remnant bushland and adjacent Public Open Space exist. The areas are shaded grey yet there is no 'grey' in the key. What does grey pertain to? There is only an indication by way of a narrow strip of green to suggest that there is vegetation along the coast. This is correct and does indeed extend northwards from North Street (border of Cottesloe and Swanbourne), along the coast and into the extensive remnant - Swanbourne Reserve

(Bush Forever site 315). Much of site 315 is also obscured in grey, despite its Bush Forever status indicating government recognition of its significance. However, to the east Allen Park Bushland extends from the coast and is bounded by Kirkwood Road and Jameson Street (See attached map) and Seaward Village, adjacent to Campbell Barracks (Special Air Services Regiment). This is most alarming given that the Allen Park bushland has regional significance as foraging ground for class 1 MNES – Matter of National Environmental Significance primarily concerning but not limited to, the Carnaby's Black Cockatoo - officially designated as an endangered species under the Wildlife Conservation Act 1950. Deemed critical habitat as defined by Department of Parks and Wildlife, these feeding grounds at Allen Park are within the 6km radius of a major roosting site at Perry Lakes. Thickets of Banksia Sessilis, a highly nutritious species grows very well in the bushland at Allen Park and explains why visitation is so high here. Accordingly, Allen Park in Swanbourne should be shaded green on the map to recognise the biodiversity values of its bushland.

Within the western suburbs, Allen Park forms an ecological linkage with bushland at Swanbourne Primary School and through to Bold Park via Cottesloe Golf Course, and east to Lake Claremont. To the northeast, Banksia Farm and Underwood Avenue Bushland also support feeding grounds for the large flock of Carnaby's Cockatoos that roost at Perry Lakes. Banksia Farm and much of Underwood Avenue are at risk of being cleared for housing. It is critical that these smaller areas of native remnants are protected to retain habitat for significant fauna dispersal and migration.

With reference to 4.7 Green Network (page 36), this omission as described above suggests that the strategies and policies are not being applied. This is demonstrated by the following omissions in the plan: -

1. There are no actions to preserve or enhance the existing environmental and landscape values of the sub-region for future generations;
2. There is no safeguarding of existing green network components from fragmentation;
3. There are no actions to create or enhancing existing green networks or identification of ecological linkages to connect the green network and assist in the retention of habitat for significant fauna dispersal and migration.

It is our opinion that the draft plan and sub-plans do not provide the detail necessary to guide significant planning decisions that will shape our city and environs for future generations. Our region embodies significant natural attributes, with wetlands, state forests, coastal heaths and Banksia woodlands and these should be protected. Urban infill should be focussed around transit lines as well as in already cleared or significantly degraded land areas. We support the recommendation that the process of SAPPB should roll out before rather than in tandem with the Perth and Peel Plan for 2050 to truly capture its intent and shape our city into the future.

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