



Hon Matthew Swinbourn MLC  
Chair, Standing Committee on Environment and Public Affairs  
Parliament House, 4 Harvest Terrace  
West Perth WA 6005

Dear Chair, *Matt*

**Submission for Petition 21 – Shenton Park Hospital Redevelopment**

Thank you for providing an opportunity to give further comment regarding the planning process around redeveloping the Shenton Park Rehabilitation Hospital site. The site is extremely well-located for an urban infill project, however I share the concerns raised by the petitioners about the process used to design the Improvement Scheme for the subdivision.

I am concerned about the opacity of the planning process that has led to the outcome of half of this bushland being designated for clearing. The community has been very clear about their desire to see this bushland kept and maintained.

The bushland in question is recognised as the major part of the ecological linkage between Bush Forever Sites 119 and 218 – Shenton Park Bushland and Underwood Avenue Bushland respectively.

A number of State Planning documents reference the need to maintain and enhance bushland, particularly bushland that performs the function of an ecological linkage. Specifically, State Planning Policy 2.8 (SPP 2.8) specifically calls out the need for proposals and decision-makers to “proactively seek to safeguard, enhance and establish ecological linkages between Bush Forever areas”.

Similar sentiments about needing to enhance green networks and identify ecological linkages are found in the Draft Central sub-regional Planning framework for *Towards Perth and Peel @ 3.5 Million* and in the *Capital City Planning Framework*.

Additionally, the Vegetation Connectivity Analysis that supported the recommendations of the *Capital City Planning Framework* specifically addresses the linkage between Bold Park and Kings Park as Target Area 1.



**Hon Alison Xamon MLC**

The bushland under discussion falls into this area. The report states "Securing the remaining vegetation between BFS 218 and BFS 119 and improving connections to Bold Park and Kings Park would improve the long term viability of all connected bushland areas." This report also states "... further loss of vegetation in this area will result in significant change of connectivity status of BFS 119 and BFS 218... loss of any part of this bushland would affect not only the viability of the BFS 119 but also BFS 218."

This is an unequivocal statement about the importance of this piece of bushland and the need to retain it as an essential ecological linkage.

This site is in a bushfire prone area. Community safety is and must be an absolute priority when developing in these areas. However, I have yet to see any evidence that any attempt to manage the bushfire risk other than by reducing the quantity and quality of the bushland was considered.

No alternatives that 'safeguarded and enhanced' the ecological linkage were provided to the community. The design that has been provided clears about 50% of the bushland, pushes a building right into the bushland area and removes undergrowth to create a 'parkland'.

I am advised that the community holds that the infill target can be reached in the portion of the site that holds a low bushfire risk while the linkage is fully intact. This would be an ideal outcome that fulfils both the need to maintain the ecological linkage value of the site and meet the need to provide urban infill opportunities.

The principal petitioners have provided me with a substantial volume of letters from recognised experts in Western Australian fauna and flora that have been submitted to the Western Australian Planning Commission.

In addition to the ecological linkage functions, some of the letters discuss the width of bushland required for endangered cockatoos to forage. These needs are not compatible with the limited parkland environment envisaged in the design of the Improvement Scheme.

I ask the Committee to investigate the matter further and to pursue a design for the site that enhances and protects the bushland thereby maintaining the linkage between BFS 218 and BFS 119.

Yours sincerely,



Hon Alison Xamon MLC  
Member for North Metropolitan

04 October 2017