

Submission Supporting “Petition No. 021 Shenton Park Hospital Redevelopment”

By Heidi Hardisty

To The Standing Committee on Environment and Public Affairs:

Over half of the remaining Banksia-Jarrah Woodland on the former Royal Perth Rehab Hospital site in Shenton Park will be cleared as a result of LandCorp’s redevelopment plan. This is not acceptable. The plan should be modified so that all of the remaining native vegetation along the western side of the site (3.4 hectares) is retained and enhanced, the carpark within this area revegetated with appropriate local species, and the two buildings and new roads removed from the bushland area.

By clearing over half of the remaining bushland, and reducing the amount of habitat for wildlife, its role as an ecological corridor is severely diminished, perhaps destroyed altogether.

Why is retaining all of “Lemnos St. Bushland”, a Banksia-Jarrah Woodland, so important?

- It is part of a **regionally significant ecological linkage** between Kings Park and Bold Park, joining two Bush Forever Sites: Shenton Bushland and Underwood Avenue Bushland
- Local canopy, shrub and ground cover species are essential for ecological linkage function
- It provides foraging habitat for the increasingly endangered Carnaby’s Cockatoos and the Forest Red-tailed Black Cockatoos
- It provides habitat and connectivity for fauna including insects, reptiles and small insectivorous birds which are now regionally threatened
- Banksia Woodlands are now listed under the EPBC Act as a Threatened Ecological Community at the level of ‘endangered’. The federal **Conservation Advice** calls for protection **to prevent further loss of extent and condition**. It also calls for retention and improvement in connectivity between patches of Banksia woodlands by decision-makers **at all levels of government**
- There is less than 10% of the original bushland remaining in the Western Suburbs. This is much less than the goal of 30% retention, and already below the target of at least 10% retention in Bush Forever
- It will provide physical and mental health benefits for humans long into the future

The decision to approve the redevelopment (Improvement Scheme 1), made by the former Liberal Planning Minister in December 2017, is contrary to State Planning Policy 2.8 Bushland Policy for the Perth Metro Region, the Bush Forever Program and the WESROC Western Suburbs Greening Plan within the City of Nedlands (among others). Therefore, I challenge the decision making process.

Furthermore, scientific expert and community advice has been ignored. Community members, including Lyn Jennings and me, have been involved in the public consultation process from the outset (over 3 years ago) emphasising consistently the importance of maintaining the bushland linkage in its entirety. This advice is also supported by flora and fauna experts and the City of Nedlands.

Unfortunately, LandCorp has consistently ignored the advice from the community. It was clear from the start that LandCorp was never going to provide an option of retaining the bushland in its entirety.

I tried, for over six months, to obtain the detailed reasons why the State Government is deviating from its own policies and is clearing over half of the bushland. I even launched a formal complaint with the Department of Planning who refused to provide these details, and instead simply stated that the issue had been given “due consideration”. Unsatisfied with this answer, I tried to obtain the details through a request to the Ombudsman as I thought I was entitled to a “fair and just response”. Apparently not. The Ombudsman said if I want more detailed information, I must request it through the Freedom of Information (FOI) Act. It was a time consuming process I wanted to avoid.

I did reluctantly request (through the FOI Act) reports and correspondence (with an environment focus) from Third Party Agencies, Authorities, Corporations or Departments regarding the Improvement Scheme. I just received this information. It is apparent to me from these reports and correspondence that LandCorp did not seek advice on how the plan would affect the linkage values of the bushland. Instead, it seems they deliberately looked for ways to justify developing on the bushland, rather than reviewing and implementing the policies that should protect it. Some emails even contain statements that are incorrect or misleading. For example, one email from a LandCorp author (name redacted) to the Department of Planning infers that no Forest Red-tailed Black Cockatoos nest within 20 km of the former hospital site. This is not true. The birds nest at Murdoch University (approx. 10 km away).

I even suspect that the (then) Department of Planning deliberately focused on the only environmental evidence that they knew would support their argument to develop the bushland, e.g., the Commonwealth Assessment under the EPBC Act (Environment Protection and Biodiversity Conservation Act) for Matters of National Environmental Significance (MNES). In this case the effects on the endangered Carnaby’s Cockatoos were deemed to be insignificant because the assessment process only considers individual proposals on their own, without considering cumulative effects of other ‘actions’. Hence, most ‘Controlled Actions’ of this scale are approved (despite regional impact) and DOP knows it.

Poor Commonwealth legislation aside, it is the duty of the State Government and its Agencies to give “due consideration” to the local and regional significance of “Lemnos St. Bushland” according to State policies; especially as a regionally significant ecological linkage between two Bush Forever sites and Kings Park and Bold Park. This was not done. In fact, advice from the EPA and (then) DPAW, which clearly stated as much of the bushland should be retained as possible, was ignored.

Plus, the long term social, environmental and economic value of saving the bushland was not assessed.

This petition is not just about an isolated case. This petition highlights a systemic problem in Perth involving poor planning regulation and decision making, which often favours the short term monetary gain (for developers and the government) at the expense of the community and the environment. It also highlights Ministers’ sweeping discretionary powers to make development decisions, without having to be transparent or accountable.

Quite frankly, the State Government is failing in its duty to protect “Lemnos Street Bushland” as well as Perth’s remaining biodiversity and natural heritage.

Please accept the petition to save “Lemnos Street Bushland” and launch an overdue enquiry into the decision making processes of the (then) Department of Planning. We need better outcomes for future generations.