



## NATURE RESERVES PRESERVATION GROUP

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**To:** Rhonda Hardy  
Chief Executive Officer  
City of Kalamunda

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**Subject: Submission on City of Kalamunda Draft Public Open Space Strategy.**

Dear Rhonda,

On behalf of Nature Reserves Preservation Group (NRPG) Inc. the following submission is made for consideration, prior to the issue of the final document being produced for public comment, at which point, during the 30 day submission period, further submissions may be made.

In this submission, we list some blocks we consider unsuitable for ‘transfer’ because of their potential environmental/biodiversity values. The list is by no means complete. Given the complexity of this draft Strategy and the difficulty in navigating its appendices, the reserves mentioned are merely a sample, taken from the 21 listed. The submission also suggests possible improvements to the draft format and, comment in general, on the POS Strategy process.

My meeting with you, Mayor, John Giardina, Development Services Director, Natalie Martin Goode and Strategic Planning Officer, Mitchell Brooks, served to allay some of my early concerns on first reading the draft. NRPG members are particularly wary of any plan, or strategy having the potential to threaten remaining areas of natural vegetation within the City. You will be aware of the relevance of a much earlier (1989), Town Planning Scheme 13 ‘Rationalisation of Public Open Space’, which proposed to sell off more than 40 reserves as building sites or, to acquire reserves for development. That Scheme was based on outdated 1981 thinking, was poorly conceived, collated and presented and, was totally out of step with the increasing environmental awareness of 1989.

Following a petition, signed by over 750 residents and, an electors meeting attended by close to 1000, NRPG was formed, the Scheme was abandoned and demands made by NRPG at the meeting were complied with. We soon had an Environmental Officer, a Bush Reserves Advisory Committee (now KEAC) and now have numerous Friends Groups, strongly supported by the City’s Environmental Friends Group Officer, Mick Davis.

In 2011, NRPG was again forced to defend the bushland reserves against another ‘Proposed Rationalisation’ of a much smaller number of reserves. Several were declared “surplus” to the

Shire's requirements, on the basis of their serving no useful function. In assessing any usefulness they may have had, no consideration was given to the environmental values of these reserves. No attention was paid to their function as integral parts of Wildlife Corridors or green linkages. This was despite the Shire's District Conservation Strategy (1995) urging that: "*The community be encouraged to develop their backyards as wildlife corridors...in areas which link reserves*". The Wildlife Corridor Strategy (1988) and the Local Biodiversity Strategy (2008), likewise emphasise the importance of ecological linkages and corridors.

This brief history may help you understand the concern expressed by NRPG members, whenever such a 'rationalisation' process begins. Whilst we acknowledge this Strategy is a planning, not an environmental document, perhaps a request for more input from the Parks and Environment section could have reduced the number of 'transfer' category blocks. The current draft Strategy has 21 reserves considered suitable for 'Transfer'. Once again, NRPG will be submitting its reasons for blocks to be retained as Public Open Spaces, based on their environmental values.

### **Blocks considered worth retaining as reserves:**

The following two reserves, on the current 'transfer' list, were the subject of submissions in 2011.

**Reserve 27721 Wordsworth Avenue, Gooseberry Hill.** This reserve has been maintained by the neighbours and a Friends Group was formed and registered with the Reserves Coordinator. The group rehabilitated the major part of the reserve and established a community garden on the most degraded section. The rehabilitation effort was supported by the Shire. The rehabilitated area, providing a haven for Quenda and other wildlife, is a credit to that group and a justification for the assistance provided by Shire staff. Unfortunately, when the reserve coordinator moved away, the group did not pass on that information to the Friends Group Coordinator. The full NRPG submission, sent to Manager Property and Procurement, Steven McKay, 25 July 2011, will be on record. **Appendix 10**, gives this reserve a '*Local Park*' classification and a '*Recreation, Nature*' function, yet it is still considered for transfer.

**Reserve 37699 Holly Way West.** Whilst not officially under the care of a Friends group, neighbours do look after this valuable link in a wildlife corridor. The almost unbroken tree canopy is an important part of this corridor. It serves as an adjunct to the nearby Mundy Regional Park, through the reserve K20, on the south side of Alpine Road at its south west end and as a link with Whistlepipe Gully, itself a significant wildlife corridor within Mundy Regional Park. This submission, (28 July 2011) will also be on record. **Appendix 10**, gives the reserve a '*Local Park*' classification and a '*Recreation*' function and yet, once again it is on the transfer list.

### **Other reserves.**

Forrestfield.

- Berkshire Rd. Reserve (6). No function. Disappointing to see this so assigned. It is a natural east /west extension of Crummet Creek 2 reserve and creek line wildlife corridor (11), Tyler Mews Park (34), linking to significant Nature areas of Dawson Park, Dawson Avenue Nature Reserve and Pioneer Park just to the west.
- Initially appearing to be an environmental positive, isolated blocks such as Almond Way POS, (D rated) and Blackbutt Way Reserve (C rated), are listed for improvement. The positive aspect rapidly dissolves when it becomes apparent that the

'bigger picture' has not been recognised. The value of Blackbutt Way, Almond Way and Anderson Road Park, as biodiversity stepping stones from Mundy Regional Park (in the Whistlepipe Gully area) to Anderson Road Bushland (a Biodiversity Asset), has not been recognised.

Gooseberry Hill.

Noel Road Reserve (9). Serves as part of a biodiversity corridor, linking bushland in the east via Wordsworth Reserve, Currawong Drive Reserve, Currawong POS, with Mundy Regional Park.

When reserves are proposed for transfer, NRPNG will be making more detailed submissions, where appropriate.

## **General comments and suggestions on the draft.**

### **3.2 City Policy Framework.**

Despite the statement that "*the Environment Strategy and the Local Biodiversity Strategy (2008) will help inform the actions of the strategy relating to environmental protection*" (Observations, p. 28), they are not listed as one of the "*key planning documents the City uses in the development of POS.*" (pp. 12, 13). This should be rectified.

**4.2 Observations.** Care should be taken when linking "*values the community hold*" with the occurrence of Biodiversity Assets and parks, to ensure no offence is given and, to avoid giving encouragement to any divisive Hills, Foothills debate.

### **Appendix 6. POS Rating –Mapping.**

### **Appendix 7. POS Classification – Mapping.**

### **Appendix 8. POS Function – Mapping.**

Whilst the rating information and numbering on the maps is very clear, one has to reduce the image to 25% to have both map and key on the screen, making reading reserve names very difficult. Having to use the document panning device is tiring and frustrating, yet this is the only way of linking the numbered reserves with their names. Reserves listed in the key box, have a map location number only. Neither a reserve number, nor a PIN number is given.

Walliston Rural East is even worse, with a reduction to 10% required, at which point, the key is unreadable. Each map 'key' box is in a different place. Viewers have no idea of which way they must pan to view the key. This is extremely frustrating and, certainly not user-friendly. All the Mapping appendices have this problem which adds greatly to the workload of any resident making a submission.

It would have been a great help if reserves listed for potential transfer on the mapping appendices, were identified, perhaps with an asterisk beside the number on the map.

### **Appendix 10: POS Assessments.**

These tables give only the reserve name and the street address. A reserve number and pin number would help. Eight of the 21 reserves listed for 'transfer' are classified '*Park*' and have a 'function' of '*Nature*' or '*recreation, nature*'.

**Appendix 11: Assessment Matrix.** Sections of this matrix show little relevance to assessing the value of many reserves. This is obviously a Department of Sport and Recreation document, with all the shortcomings that must entail.

**‘Care and Maintenance’.** This section has descriptions which appear totally inappropriate for assessing the score and the rating of blocks categorised as Local Parks with functions of ‘Nature’ or ‘Recreation, Nature.’

The *‘Well Maintained’* section contains descriptors more applicable to manicured parklands and ovals than to naturally-vegetated reserves.

The *‘Aesthetic Value’* table, likewise, whilst having some valid function, fails to recognise the benefit of such *“unappealing”* reserves, to the biodiversity values of that and other nearby reserves.

The *‘Reticulation Present’* section beggars belief. The highest rating of 5 would be the antithesis of a functional, sustainable nature reserve.

### **‘Environment Value’.**

The *‘Vegetation’* table appears to be obsessed with the shape of a reserve. Whilst acknowledging the concept of an ‘ideal’ shape for preserving the integrity of areas of natural vegetation and, accepting the problems presented by areas having an ‘exposed perimeter’, NRPG insists such areas still provide valuable linkages with other, more sustainable natural areas. This is not reflected in the table. Whilst the difficulty in maintaining intact, the biodiversity of such areas is obvious and, as a result, the ranking must suffer, this is a management factor, which should not be used to downgrade the reserve. We doubt the birds, animals and insects using the corridor, pay much attention to its shape, being interested purely in its function.

The *‘Ecological Community’* table. Whilst this draft is a planning document, this is perhaps the most unsettling table in the Assessment Matrix. In producing this draft, who made the assessment of these ecological communities, on which these ratings are based? Was a suitably qualified City officer given this task? At what time of the year was such an assessment carried out?

For Planners, looking to rationalise the City assets, an **Appendix 10** red ‘D’ rating, based on inappropriate descriptors, may ensure the reserve is placed on the ‘Transfer’ list. The fact there are 26 reserves for which the action is, *“improve”*, is encouraging. However, for this to be meaningful, it must lead to on-ground action, which will in turn, require resources to be made available in the budget, before any improvements can be made.

**Appendix 12:** Whilst naming each reserve, this appendix does not provide a reserve number. This is the number by which residents will identify a reserve. Eg. The Local Biodiversity Strategy identifies Reserve 29013, Marie Way Kalamunda, by its reserve number. If, however, it were to be listed on the POS document, it would not be identified by this number but, by its PIN number, not readily available to the public. Where several reserves are parcelled together, this becomes extremely confusing.

**4. POS Evaluation.** This section defines the aim of the POS evaluation process as including the criterion of *“environmental value”*. From the blocks selected for transfer, it is obvious that the value of the selected blocks has not included the points we have mentioned.

### **Appendix 13: Consultation Protocol.**

This appendix lists the process to be followed to ensure residents are aware of the proposals made in the Strategy. If carried out to the letter, this will ensure residents have an opportunity

to ‘defend’ individual blocks against transfer. The ‘Method’ at number 8 states that the protocol is to be reviewed “*every two years and when the strategy is reviewed*”. Is the two-yearly review being carried out and, has this current draft reviewed this protocol?

## **Conclusion.**

‘**Public Open Space Strategy**’, is an extremely misleading title, given the following exclusions:

- Regional Open Space, land zoned as Parks and Recreation (P&R) under the LPS.
- Land identified for the purpose of conservation by the LPS 3 and Bush Forever sites.
- Whilst the small parks which are classified as Local Open Space are included in the classification, they are not part of the Dept. of Sport and Recreation Guidelines.
- Biodiversity Assets - Local Reserves, zoned as Local Open Space under LPS 3 identified by the Strategy for environmental protection purposes. NOT Bush Forever or P&R reserves.
- Whilst the small parks which are classified as Local Open Space are included in the classification, they are not part of the Dept. of Sport and Recreation Guidelines.

Unfortunately, “*The reserves deemed as Biodiversity Assets ... are flagged for future environmental assessment to determine their value*”. Carried out diligently, this assessment will be a lengthy process. Since no timeframe is given for this, when will that assessment take place and, by whom will it be conducted?

Given these exclusions and our reservations over the Strategy shortcomings, how can the City effectively assess the ‘values’ of an individual reserve? The assessment, and subsequent ‘rating’ is done with **no** consideration of that reserve’s relationship to the excluded areas of public open space, to biodiversity linkages, wildlife corridors or to greenways. With such exclusions, this Strategy cannot achieve its stated Purpose and Goal given the constraints of the 2012 Department of Sport and Recreation Guidelines. There must be a better way of assessment.

POS is acknowledged as being important for its ability to reduce the Heat Island effect, universally acknowledged by Local Governments. Developing these small areas of POS containing vegetation (degraded or not), will do nothing to reduce the heat island effect for that locality. If the ‘transfer’ involves sale, and the construction of a dwelling on the block, the heat island effect will be greater for that neighbourhood.

*“The primary role of POS is to support health, recreation, leisure and environmental functions.”* These environmental functions – including habitat, biodiversity, linkage and wildlife corridor ‘functions’, are the foundations for the health of the community and, as such, should be given the highest priority.

We need the value of some of the reserves, currently listed for transfer, to be acknowledged by the City. The value of degraded, “*unappealing*” vegetated reserves must be recognised. Given sufficient initial acknowledgement of these values, several of the 21 blocks would not have appeared on the list of potential transfers.

With pressure on the City to fulfil an ‘infill’ quota, it is important this pressure does not overshadow the need to preserve as much of our ‘greenery’ as possible. Recognition of the value of these green areas and, ensuring their survival, will help their preservation.

Given the foothills have so much less green space (nature areas) suggests that, to retain the biodiversity values remaining, ALL areas of remnant vegetation should be retained and given

the highest priority. Once these areas fall below a ‘critical mass’, the remnants will no longer survive and their biodiversity values will be lost.

It is disappointing to have the Department of Sport and Recreation, together with the Planning Institute of Australia WA, advising local government through the Public Planning and Design Guide WA and State Public Parklands Strategy. Inevitably, whilst within the various POS/Parklands guidelines, there is consideration for the retention and enhancement of environmental values, the major thrust and detail within those documents relates to the provision of sport and active recreation facilities.

Within the City of Kalamunda, Planning and Environment Departments seem to be worlds apart. The Planning section is charged with reviewing its Public Open Space Strategy at designated times. From the list of 21 lots considered for ‘transfer’, we can only assume there was little, if any input from the City’s Environment section and, that the process of “*consultation with internal departments*” (1.7.1, p.8.), failed. If this is so, future reviews of this strategy need to ensure this failure is not repeated.

Whilst acknowledging the amount of work that has gone into the production of this draft and, during the public consultation period, the willingness of planning staff to explain in detail, its complexities, the draft remains a complicated, difficult to navigate, document. Residents find it extremely difficult to make informed comment on such a complex creation.

Yours sincerely,

Tony Fowler

President.