

October 2024

Metropolitan Region Scheme Amendment 1415 (Standard Amendment)



Children's Hospice Site

Report on Submissions
Submissions

City of Nedlands

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The Western Australian Planning Commission acknowledges Aboriginal people as the traditional custodians of Western Australia. We pay our respects to the Ancestors and Elders, both past and present, and the ongoing connection between people, land, waters, and community. We acknowledge those who continue to share knowledge, their traditions and culture to support our journey for reconciliation. In particular, we recognise land and cultural heritage as places that hold great significance for Aboriginal people.

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MRS Amendment 1415 (Standard) Report on Submissions
Submissions

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Submissions

Report on Submissions

Metropolitan Region Scheme Amendment 1415 (Standard)

Children's Hospice Site

Report on Submissions

1 Introduction

At its September 2023 meeting, the Western Australian Planning Commission (WAPC) resolved to proceed with this amendment to the Metropolitan Region Scheme (MRS) in accordance with the provisions of the *Planning and Development Act 2005* and the Planning and Development (Region Planning Scheme Scheme) Regulations 2023.

2 The proposed amendment

The amendment proposal was described in the previously published ***Amendment Report***, and a description of the proposal is repeated below.

The purpose of the amendment is to transfer approximately 5,945 m² in Swanbourne from the Parks and Recreation reservation to the Public Purposes - Special Uses reservation in the MRS, as shown on the ***Amendment Figure - Proposal 1***.

3 Environmental Protection Authority advice

On 31 October 2023, the Environmental Protection Authority determined that the amendment did not require assessment under Part IV Division 3 of the *Environmental Protection Act 1986* and provided advice on flora and vegetation and terrestrial fauna.

The EPA advised that development of the amendment site should ensure bushfire management requirements are contained within the site. Clearing beyond the amendment area should be avoided to retain the environmental values established through revegetation projects.

A copy of the notice from the EPA is in Appendix A of the ***Amendment Report***.

4 Call for submissions

The amendment was advertised for public submissions for a total of 42 days from 30 January 2024 to 13 March 2024.

The amendment was made available for public inspection online at the Department of Planning, Lands and Heritage website.

During the public inspection period, a notice of the amendment was published in *The West Australian* newspaper, and the WAPC made reasonable attempts to notify and invite affected landowners, Local Government(s) and other public authorities to comment on the amendment.

5 Submissions

Forty-six submissions were received on the amendment. An alphabetic index of all the persons and organisations lodging submissions is at Schedule 1.

Thirty-nine submissions were of objection and seven were of general comments, non-objection or no comment. No supporting submissions were received.

A summary of each submission with WAPC comments and determinations is at Schedule 2 and a complete copy of all written submissions are contained within this report.

6 Main issues raised in submissions

Objecting Comments

The main issues of concern raised in submissions are as follows:

- The site is not appropriate for a hospice, there is limited opportunity to expand and should be reconsidered.
- The negative impacts on Allen Park which is used by the community.
- The loss of bushland and impact on the existing fauna.
- There will be significant traffic and parking issues.
- There are governance concerns for the project including the excision of the site from the A-Class reserve.
- The site is bushfire prone and is a safety risk to children and staff.
- *Development Control Policy 5.3 - Use of Land Reserves For Parks And Recreation And Regional Open Space* (DCP 5.3) was not addressed, and the proposal is contrary to the State Planning Framework.

WAPC Comment: The WA Children's Hospice has received development approval following a thorough development assessment process (including bushfire impacts) and a decision from the WAPC.

Construction has begun and the proposed MRS amendment will apply an appropriate reservation to the site reflecting the WAPC's decision and the earlier vesting of Lot 503 for the purpose of a Children's Hospice. Therefore, this amendment seeks to generally align the MRS with this development approval.

The MRS amendment process has been undertaken in accordance with the requirements of the Planning and Development Act 2005 and the Planning and Development (Region Planning Scheme Scheme) Regulations 2023. In this regard, this includes consideration by the WAPC, a determination by the EPA and advertising for the required 42 days.

In relation to the consideration of DCP 5.3, the intent of the MRS amendment is to transfer the site from the Parks and Recreation reservation to the Public Purposes - Special Uses reservation to reflect an approved development application by the WAPC. DCP 5.3 is typically considered when assessing development applications on land that is reserved as Parks and Recreation in the MRS.

The Central Sub-regional Planning Framework reflects the current Parks and Recreation reservation of the site, however the Sub-regional Frameworks are the first step in the

ongoing process of refining and detailing planning proposals for an area. The Sub-regional Framework's state that this refinement will continue through the MRS/PRS, local planning schemes, structure planning, subdivision and/or development. Therefore, as the WAPC has granted development approval for a Children's Hospice the amendment seeks to align the MRS with this development approval.

The submissions are noted but no change to the amendment is proposed.

7 Responses and determinations

The responses to all submissions are detailed in Schedule 2. It is recommended that the amendment be adopted for finalisation as advertised.

8 Coordination of region and local planning scheme amendments

Pursuant to section 126(3) of the *Planning and Development Act 2005* (the Act), where land is being transferred to the Urban zone under a region scheme, the WAPC can resolve to concurrently amend the respective local planning scheme to transfer this land to a zone which is consistent with the objective of the Urban zone.

As no land is being zoned Urban, section 126(3) of the Act is not applicable to this amendment.

9 Conclusion and recommendation

This report summarises the background to Amendment 1415 and examines the various submissions made on it.

The WAPC, after considering the submissions, is satisfied that the advertised amendment as shown generally on the **Amendment Figure - Proposal 1** in Schedule 3, and in detail on the Amending Plan listed in Appendix A should be approved and finalised.

Having regard to the above, the WAPC recommends that the Minister for Planning approves the amendment.

10 Ministers Decision

Amendments to the MRS being progressed as a standard amendment in accordance with the *Planning and Development Act 2005* and regulation 5 of the Planning and Development (Region Planning Schemes) Regulations 2023 require the WAPC to provide a report and recommendation to the Minister for Planning for approval. The Minister may approve, approve with modification, or decline to approve the proposed amendment.

The Minister, after considering the amendment, has agreed with the recommendation of the WAPC and approved the amendment.

Amendment 1415 is now finalised as advertised and shown on WAPC Amending Plan 3.2819 and has effect in the Metropolitan Region Scheme from the date of notice in the *Government Gazette* on 22 October 2024.

Schedule 1

Listing of submissions

Listing of Submissions

Metropolitan Region Scheme Amendment 1415 (Standard)

Children's Hospice Site

Submission Number	Name
1	<i>Name removed at the request of the submitter</i>
2	Pauline Bunce
3	Dr Neville Hills
4	Miria Cummins
5	Lesley Shaw (on behalf of the Melon Hill Bushland Group)
6	Department of Water and Environmental Regulation
7	Department of Biodiversity, Conservation and Attractions
8	Department of Transport
9	Department of Health
10	Main Roads WA
11	S & M Buchanan
12	Peter Taranto
13	Victoria Calabro
14	Steven Lipple
15	Michael Coote
16	Department of Education
17	K L Field
18	Department of Fire and Emergency Services
19	Rod Griffiths
20	Edmond O'Loughlin
21	Dr Denzil McCotter
22	Lynne McGuigan
23	Belinda Williams
24	Barbara Leonard
25	<i>Name removed at the request of the submitter</i>
26	<i>Name removed at the request of the submitter</i>
27	Janet Roddy
28	<i>Name removed at the request of the submitter</i>
29	Allison Manners
30	<i>Name removed at the request of the submitter</i>
31	Roslyn Seale
32	<i>Name removed at the request of the submitter</i>
33	Anya Seabourne
34	<i>Name removed at the request of the submitter</i>
35	Rodney Greedy
36	<i>Name removed at the request of the submitter</i>
37	Rebecca Yde
38	Robert Downie
39	Heidi Hardisty
40	<i>Name removed at the request of the submitter</i>
41	Timothy Tucak
42	Denise Murray
43	Malcolm Murray
44	Joshua Turkington
45	Captain Robert Scoggins
46	City of Nedlands

Schedule 2

Summary of submissions and determinations

REFER TO THE SUBMISSIONS SECTION FOR A FULL COPY OF EACH WRITTEN SUBMISSION AND SUPPORTING INFORMATION

Submission: 1

Submitter: *Name removed at the request of the submitter* (interested residents)

Summary of Submission: OBJECTION

The submitter objects to the amendment and advises as follows:

The pathway between the carpark adjacent to the bridge club and the oval close to the Swanbourne beach is an important element of the urban infrastructure. It is used every day by countless walkers transiting between the suburb and the beach, including myself.

Any further reduction in the land space between these points will substantially impair the utility of the area - cutting off many residents from accessing the beach and sporting facilities. It will further encourage a dependence on car transportation rather than walking as a means of accessing the beach.

The erosion in bushland is a sorry and insidious process. Once the parkland is gone, it will never go back and is lost for ever. It is the thin edge of the wedge. You will make your decision based on the proposal in front of you. However, the flow on decisions to privatise public land is an inherent part of any departure from the public parkland status. You will open the pathway for a process (perhaps in 20 or 30 years) of an application to change the ownership to private in order to underpin a financial decision to upgrade or refurbish the facilities. You can say "well this is not planned so I do not need to take it into account" But it is a natural process and your participation in this is essential. Public land should stay public. There is plenty of private land that can be acquired and used or hospices.

For 7 patients at any time, the land footprint is outrageous - where does it stop?. Please do not consent to any further reduction in the parkland or the public access to the pathways - including for playgrounds. I support the creation of the Ned lands Council pathway to enhance the access from Allen Park playing fields to the beach oval.

I have seen beautiful birds, lizards and snakes in the area. The area under consideration is an important part of the bushland and public open space. A playground that is covered in artificial surface (sand, Astro turf or other) is not bushland. It may as well be a carpark. If we wanted a playground- it would not be there.

There is a public consultation process for a reason - not just an unfortunate process that you have to go through before you give in and agree with the Ian Campbell Developer. It has been an outrageous process and undermines public confidence in due process. No more please.

Planning Comment: Comments noted. Refer to "Part 6 (a) – Objecting Comments of the Report on Submissions".

Determination: Submission dismissed.

Submission: 2

Submitter: Pauline Bunce

Summary of Submission: OBJECTION

The submitter objects to the amendment and advises as follows:

- Does not agree to changing the zoning of the as it is counter to the principles of sue process changing the zoning after a project is approved in the way urban planning should happen.
- The proposal is a tragic comedy, and it is opportune to reinstate and rectify the usual sequence of land use approvals.
- All steps taken has been a last-minute, ill-informed scramble through Government rules and regulations. The brakes need to be applied.
- After the hasty A-Class reserve excision, the next step should have been the rezoning of the land in the MRS. Why was this step missed?
- As the site still reserved as Parks and Recreation there is no need for haste.
- The hospice footprint will extend beyond the yellow area of the amendment. During the construction phase the impact area will be double. Any fire mitigation measures will extend beyond this area.

- The area of land has access limitations, is a fire risk and important part of the ecological corridor from the ocean to the coastal wetlands. Why change this at all?
- There is no need to reclassify this area of land which should remain reserved as Parks and Recreation in the MRS.

Planning Comment: Comments noted. Refer to “Part 6 (a) – Objecting Comments of the Report on Submissions”.

Determination: Submission dismissed.

Submission: 3

Submitter: Dr Neville Hills (interested resident)

Summary of Submission: OBJECTION

The submitter objects to the amendment as the proposed MRS amendment to authorise building a Hospital (children’s hospice) in Allen Park Swanbourne must not to be approved on at least two fundamental grounds.

Risk of failure

The proposed health facility is based on a flawed model of care that is not appropriate to adequately serve families in Metropolitan and Regional Western Australia.

Planning and governance

A substantial hospital construction is incompatible with the land planning purposes for which Allen Park was established a century ago and is needed even more today to balance inevitable growth and urban infill. Constructing a Hospital (Children’s hospice) is operationally and logistically in conflict with many published Government Policies.

The proponents for this project have paid “lip service” to fundamental legal and government policy requirements on many topics, including genuine consultation with all affected parties before making a decision.

There is a case for:

- Preventing the failure to provide much needed accessible Child Health Palliative Care Services to Western Australia, through faulty planning procedures

and lack of genuine community consultation, rendering the proposed project unsafe and unable to meet stated aims.

- Protecting precious, limited public open space, and halting built development in Allen Park, an A Class Reserve, consistent with long standing community expectations and sound planning principles.
- Demanding a return to transparent, respectful and constructive community consultation at all levels of government and media.
- Reviewing the role of Registered Charitable organisations lobbying Ministers and governments on State Health Services and planning decisions.
- Demanding a return to pre-pandemic rules of good governance, the rule of law and observance of the human rights of citizens to express views contrary to governments, without suffering abuse by elected members of Parliament, Developers and Media.
- Insisting that state-wide strategic health planning is done through transparent cooperation between families, patients, health professionals and communities in partnership with government.

Model of Care

An early document (located under an FOI application) is headed Children's Hospice Meeting, dated 16 November 2020 and sub-headed Perth Children's Hospital.

Under Schedule of Accommodation this meeting "noted that Bear Cottage opened in 2005 and is no longer considered best practice..."

Bear Cottage was reported upon in 2013, "Child Hospice struggling to meet demand" published by Amy Corderoy. SMH Health Journalist. The article recorded that,

... it was important that Bear Cottage provided long-term care to children, many of whom were living longer than in the past, and their families. It provides round-the-clock nursing care, music, play and art therapy, and food, cleaning, and counselling services.

Families needing respite will often stay at Bear Cottage for between seven to ten days and are able to receive four weeks booked respite per year dependent on availability. There is no limit put on the length of stay for end-of-life care.

But Bear Cottage has seen a huge increase in growth over the past five years, and is now struggling to meet demand, nursing unit manager Narelle Martin said.

"It's a bit of a catch-22, because we want every family that has got a child with a life-limiting illness to be aware, and we need awareness for fund-raising, too," she said. "We are getting quite a number of referrals ... we have already had to cut back our number of days that each family gets." This year Bear Cottage has been forced to cut the maximum time a family can spend there by a third, from six weeks to four.

Logistics of Proposed Hospice

There has been no policy schedule published indicating how long patients can remain at the hospice, which has only seven patient beds and three family suites. (It appears the family suites are not designed for patients to remain at the same time in the same spaces). The submitters calculations have had to be based on estimates of need as no actual research has been done in WA.

With 7 patient beds only 91 families in WA could have respite support for four weeks once a year. If all beds are occupied every day. (52 weeks divided by 4 weeks = 13 opportunities to stay per year per bed X 7 beds = 91 separate families in a year.) With 3 family suites, families could stay at the hospice on 3 X 13 opportunities in a year = 39 separate families a year. 2,000 WA children estimated in need!

Ethical concerns

With due respect and appreciation for those staff currently providing great care, the ethics of providing an exceptionally high level of care to a very select few must be considered.

One important component of efforts to increase value in healthcare is identifying and minimising use of 'low-value care', defined as use of an intervention where evidence suggests it confers no or very little benefit on patients, or risk of harm exceeds likely benefit, or, more broadly, the added costs of the intervention do not provide proportional added benefits.

Reducing low-value care is important for improving both health outcomes for patients and the efficiency of the health system. Such quality improvement depends on knowing how much low-value care occurs, where and why it occurs.

While there is ample evidence the care offered is greatly appreciated by those fortunate enough to be able to access it, what is the ethical position in respect of those who get little or nothing by way of help? Is it equitable or “compassionate” to deprive the majority of even modest relief?

Lady Lawley Cottage was allowed to be closed down progressively from 2017 onwards, believed due to funding issues, while this much delayed “Developers’ mirage” has been proposed.

Was that ethical or “compassionate”?

Delays have been caused by the failure to consult and wrong choice of site, not by opponents of care for sick children as is so conveniently misrepresented.

MRS planning goals must not be arrogantly dismissed by government and developers.

Building a \$34M hospital in a parkland Reserve that is greatly valued by a wide community of stakeholders, many from a range of suburbs besides Nedlands, is wrong footed at many levels. The waiting lists for most forms of community based professional health care are blowing out while access to the few big hospitals is “ramping up”. This is not an answer. Instead, we have a politically motivated and heavily one-sided media supported campaign of debatable planning or health service validity.

This plan has regional planning implications for many families, in and outside the Perth Metropolitan Region, who will never see benefits from this misallocation and abuse of funding, and precious, historically reserved public land permanently lost.

Planning Comment:	Comments noted. Refer to “Part 6 (a) – Objecting Comments of the Report on Submissions”.
Determination:	Submission dismissed.

Submission:	4
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Submitter:	Miria Cummins (interested resident)
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Summary of Submission: OBJECTION

The submitter objects to the amendment and advises as follows:

- The children's hospice site is not suitable and ill throughout project.
- It was strategically commenced during Covid when the Government introduced new fast-tracked development laws driven by developers, no consultation with the Department of Health, clinicians, City of Nedlands or community consideration to the City's land or ratepayers.
- Consistent interests have not been considered or the enjoyment of the area, bush, fauna or access to the ocean.
- The former sunset hospital site would have been a better site, easier to public transport, no flame zone, no Campbell Barracks more appropriate, no power or sewerage no access. There are other better sites which the Government would be aware of.
- Only a 7-patient facility and therefore the site is not big enough and already the developers wish to control more land. Who holds greater sway?
- Of the opinion that the site, be removed by Government and that a plan be developed for a better site.
- The new laws which allow development should be repealed as Allen Park is not suitable, access is not suitable. Think of the SES, Fire and rescue, medical requirements, essential services and patient emergency evacuation.
- Allen Park hospice will be a lemon in not so many years to come, relocate and repeal.

Planning Comment: Comments noted. Refer to "Part 6 (a) – Objecting Comments of the Report on Submissions".

Determination: Submission dismissed.

Submission: 5

Submitter: Lesley Shaw (on behalf of the Melon Hill Bushland Group)

Summary of Submission: OBJECTION

The submitter I am making a submission on behalf of the Melon Hill Bushland Group in Swanbourne, a volunteer

group that has been rehabilitating and caring for the bushland in this area for almost 30 years.

This proposed site (Lot 503) was A Class Reserve, ensuring the highest level of protection. Whether bushland, wetland, Threatened Ecological Communities, or parkland, all these valuable community spaces are critical and should be retained for future generations. The Climate Council announced there will be twice as many days above 35 degrees by 2050¹. The proposed development will limit the opportunity for our group (in conjunction with the City of Nedlands) to plant more trees as per the Urban Greening policies. The benefits of this would increase canopy, reduce carbon emissions, combat the heat island effect, and importantly, increase biodiversity and resilience by enhancing the critical green corridor linking Melon Hill, Bush Forever Site 315 and the coastal reserves.

A Class Reserve has been lost

The sweeping changes that were made under the government's economic stimulus legislation, Part 17 Special Development Projects has caused dissent in communities, including ours. The site was selected before we were given an opportunity to raise either the importance of the biodiversity corridor, or our concerns about the bushfire risk posed by the proximity of the northern and eastern boundaries to the Allen Park bushland. This is unfortunate.

Given the vulnerability of the site, the excised land could have been located further away from the bushland to ensure that remnant bushland is not impacted. This would have allayed much of the community concern.

In 2017, the City of Nedlands released the Allen Park Precinct Master Plan, having invested time and expense to bring the community together for a vision for Allen Park and its environs, as well as to inform budget for future needs and community expectations. Popular vote determined that the area of the old bowling club should be a community space that "encompasses and promotes physical activity within a natural environment."² This included a nature play area and all-ages fitness area, with the remaining open space for the benefit of the whole community. The Amendment Report statement "The nature play and all-ages exercise area will be occupied by the Hospice building and garden, however, the community active space will perform a similar role to the exercise

area". It is now apparent, in reference to the Post Newspaper report 'community active space' (16/2/2024, Neds responds on hospice) that identified more land (3000m²) is being sought to expand into the exercise area, with a \$4 million price tag.

The long-awaited Norn Bidi Whadjuk Trail is proposed to traverse the now targeted open space. Again, the community was involved in the process with the City of Nedlands, and arrived at a very workable and appealing trail. This is now in jeopardy.

State Planning Policy 2.8 - Bushland Policy for the Perth Metropolitan Region

'State Planning Policy 2.8 - Bushland Policy for the Perth Metropolitan Region' aims to provide a policy and implementation framework that will ensure bushland protection and management issues are addressed and integrated with broader land use planning and decision-making.

In general, the policy does not prevent development where it is consistent with policy measures and other planning and environmental considerations. The site is located within land that is primarily cleared of vegetation and does not contain any Threatened or Priority Ecological Communities, and it is not within or abuts a Bushforever area'.

Applying land use planning and decision-making principles as highlighted above, there is an urgent need to maintain public open space for recreational use, allowing for more green corridors, growing the urban forest, and increasing biodiversity to increase the resilience of our communities.

Not only are green spaces essential to counter the heat island effect, but there is an increasing body of evidence showing the critical role of natural areas and biodiversity in ensuring resilient, healthy, liveable communities. The impact of natural areas on physical and mental health is well documented. There is also a developing understanding of how important biodiversity and bio abundance (measures of biomass and percentage cover) is likely to be, in providing the resilience needed for a changing climate. An excellent example of this is the growing evidence of the role quenda play in reducing fuel loads in bushland by burying litter. Quenda have been successfully reintroduced in a number of urban areas,

including Lake Claremont nearby. The Melon Hill Bushland Group is doing work this year to encourage quenda into the bushland with the hope that a population can be established.

It should be noted that Bush Forever site 315 is in fact close to and diagonally opposite the site, and that the bushland corridor to the north of the excised Lot is a critical biodiversity corridor linking the bushland to Bush Forever site 315 and the coastal reserves. This corridor needs to be protected and widened, not diminished, to ensure it can perform this important role.

EPA Assessment

MHBG gave a presentation in a deputation to the EPA, to appeal their decision not to assess the project, as approved by the WAPC. A precautionary approach could have been granted here to allow for a minor relocation of the site to position it further from the bushland, thus reducing fire risk and unnecessary ongoing maintenance of the surrounding bushland.

Conclusion

In this time of accelerating climate change, any development that impacts our green spaces, biodiversity and wildlife corridors requires very careful consideration. Failure to do so risks a flawed development that fails to meet its duty of care to the children and families that so desperately need these services, and the broader community.

Planning Comment: Comments noted. Refer to “Part 6 (a) - Objecting Comments of the Report on Submissions”.

Determination: Submission dismissed.

Submission: 6, 7, 8, 9, 10, 16

Submitter: Department of Water and Environmental Regulation,
Department of Biodiversity, Conservation and Attractions,
Department of Transport, Department of Health, Main Roads WA, Department of Education

Summary of Submission: COMMENT/SUPPORT

The above State Government agencies raise no objections, no comment or provide general comments on the amendment.

Planning Comment: Comments noted.

Determination: Submissions noted.

Submission: 11

Submitter: S & M Buchanan (interested residents)

Summary of Submission: OBJECTION

The submitter disagrees with the site for Children's Hospice. It is not appropriate place to care for sick children given the noise and fire risks. This is a land grab as there are much better sites around Perth.

Planning Comment: Comments noted. Refer to "Part 6 (a) – Objecting Comments of the Report on Submissions".

Determination: Submission dismissed.

Submission: 12

Submitter: Peter Taranto (interested resident)

Summary of Submission: OBJECTION

The submitter objects to the amendment and advises as follows:

Errors and Omissions in Amendment Report

Section On 'Strategic Context', Perth And Peel Urban Greening Strategy

The Amendment Report makes no reference to the 'Perth and Peel Urban Greening Strategy' or (PPUGS').

The PPUGS recognises how the impact climate change increases the need for measures such as, 'planning for green neighbourhoods, more tree canopy and green spaces in our communities'.

The same measure identified by the Amendment Report which states management of the remnant bush

surrounding the hospice site will be required, is the same measures which runs counter to PPUGS.

Allen Park Master Plan ('APMP')

The Amendment Report observes the APMP as follows: ... 'It is a comprehensive plan that includes, " a review of the current situation, analysis of potential future demand ... " In 2020, not only was the APMP not re-visited by the WA government creating an opportunity for 'extensive consultation with the community and shareholders', but the City of Nedlands also never received an excision proposal from the WA government, prior to the excision proposal being laid before the WA parliament.

State Planning Policy 2.8 – Bushland Policy for the Metropolitan Region

This section of the Amendment Report relies on the fact that proposed site is primarily cleared of vegetation. The report does not consider the tuart plantings adjacent to the east boundary which will not be permitted to grow because they will otherwise pose a bushfire threat in an already bushfire prone area.

State Planning Policy 3. 7 - Planning for Bushfire Risk Management

At no stage has the Department of Fire and Emergency Services (DFES) ever supported the Bushfire Management Plan (BMP). It did not support as to, 'location, siting and design and vehicle access ... '. When one government department DFES did not support another (the Department of Health), the Department of Planning, Lands and Heritage brought in a private sector contractor.

The private sector contractor's assessment was that it accepted the position of a consultant for the proponent that the problem of 'vehicle access' was addressed by the private driveway (through a heavily used carpark) being the subject of an easement between Child and Adolescent Health Service (CAHS) and the City of Nedlands. Contrary to State policy, CAHS will rely on third parties (the City of Nedlands) to manage fire risk on the children's hospice reserve.

Section On Statutory Context

Wastewater and drainage infrastructure

The Amendment Report itemises the deficits of 'wastewater', 'servicing demands' and 'general' affecting the site.

Aboriginal Cultural Heritage

No referral or assessment has been initiated by the responsible Minister under the Aboriginal Assessment Act.

Substantiality

It is difficult to understand how building a facility taking up 6,000 square metres of former class A reserve land the purpose of which is 'parks and recreation', does not reflect a regional change in the philosophy for the metropolitan region.

Development Control Policy 5.3 - Use of Land Reserves For Parks And Recreation And Regional Open Space

The *Amendment Report* does not address DCP 5.3. The proposal is not consistent with the planning framework. This is evidenced by the errors or omissions in the Amendment Report as outlined above. The proposal has not been suitably planned and designed. Indicators of this include:

- Contrary to section 23 of the Disability Discrimination Act, there is no wheelchair access from Odern Crescent to the proposed hospice site.
- The so-called 'private driveway' for the hospice is design to go in the wrong direction through a heavily used carpark.
- A bushfire risk assessment report advised that in the event of a bushfire in Allen Park, it was unlikely that vulnerable children could be safely evacuated from the site before fire impacted on the building.
- As the site is surrounded by Class A reserves, there is no opportunity for expansion.
- Despite claims to the contrary, the site is not readily accessible to the Perth Children's Hospital.
- The local beach, Swanbourne Beach which has been put forward as a drawcard for a hospice facility is essentially an unsafe beach for most of the year due to the wave breaks.
- No noise assessment was ever conducted during Blackhawk training periods.

Additional Information

Incomplete information provided by Amendment Report
1415

Section 1 - Planning Objective

- Section 1 states that the amendment, 'seeks to align the MRS amendment with the Western Australian Planning Commission's (WAPC) development approval for a children's hospice'.
- As a function of good and orderly planning, one would have expected that, rather than the proposed MRS amendment being sought 'after' the development approval for the proposed project has been obtained, approval for a proposed amendment to the MRS would have been sought first in order of time.
- A further anomaly is the fact that the Amendment Report does not advise the public that their submissions are not required as a pre-requisite to the Minister making a decision to amend the MRS.
- The fact that a 'sod turning' ceremony for the proposed project was held on 8 February 2024 to mark the commencement of construction of the proposed project - and that this ceremony was held during the public submissions period for the proposed amendment - only serves to underline the cynicism which WA citizens may have regarding the statutory approvals which have been obtained for this project. Refer below.

Section 2 - 'Background' section

- The 'Background' section of the Amendment Report is incomplete in a number of respects

Subject land was formerly 'Class A' reserves classified 'parks and recreation'

- The Background section omits to provide submitters with the following information regarding the subject land:
 - The subject land and the land surrounding it is 'Allen Park', Swanbourne.
 - Those lands were classified in 1901 and 1926 as 'Class A reserves (Parks and Recreation). They remained so classified until they were excised by order of the Minister for Lands in May 2021.
 - In August 2020, each of the Minister for Lands, the Minister for Health, and the Department of Planning, Lands and Heritage either failed or refused to submit a proposal to the Council of the City of Ned lands for the excision of the subject land from the Allen Park Class A reserves prior to such

an excision submission being laid before the WA parliament.

- This can be verified by referring to the minutes of the Ordinary Meeting of the Council of the City of Nedlands held on 25 August 2020. The minutes show that no such excision proposal was put before the council of the City of Nedlands.
- Section 14 of the then Land Administration Act 1997 obligated the Minister for Lands to consult the local government before exercising any power in relation to crown land. No such consultation ever occurred in terms of paragraph 6(c) of this submission.
- As a result of a Class A reserves excision proposal not having been put to the Council of the City of Nedlands on 25 August 2020, ratepayers and the public were denied the scrutiny of the excision proposal by the Council of the City of Nedlands prior to the commencement of the 'public comments' period which ran from 12 September 2020 to 12 October 2020.
- The 'offer' which was put by the Perth Children's Hospital Foundation Limited before the Council on 25 August 2020, was an offer to participate on a 'Project Control Group' for the development of the hospice.
- The Executive Summary for that offer included the following observation by the City's Administration:
- 'The offer for the City to participate in the project group, aligns more with the 'consult' or 'involve' engagement model, however this offer assumes the project is proceeding.
- On 13 October 2020, 'Submission 18/2020' was laid before the WA parliament proposing the excision of the subject land from the Allen Park Class A reserves. That submission contained no reference of course to any consultation with the Council of the City of Nedlands because no such consultation was ever conducted.

Main entrance to the hospice

- The 'Background' section to the Amendment Report states:
'Access to the site is via Odern Crescent from existing lot 504 Clement Street which is a crown land title subject to a management order vested in the City of Nedlands. This is for the purpose of 'public access' and is proposed to accommodate the main entrance to the Hospice.'

- The Amendment Report does not inform submitters that Lot 504 was created in 2020 as part of a plan of subdivision of Allen Park which was created in August 2020. That plan of subdivision supported the errant statutory excision process referred to in paragraph 6 of this submission.
- Without any regard to the existence of the heavily used car park which exists between Odem Crescent and the main entrance to the Hospice), all of which was Class A reserves until 2021, the developers simply drew a line (Lot 504) through that carpark to serve as the private driveway for the proposed hospice. The existing heavily-used car park through which Lot 504 was drawn services the 'Parks and Recreation' Class A reserves of Allen Park.
- The developers did this without any regard for the effect the development of a private driveway would have on the operability of the existing carpark and on Allen Park itself.
- And just like something out of 'yes Minister', the DPLH will disregard the above information because it does not fall into the criteria for considering a proposed amendment to the MRS.

Section 3 – Discussion

Perth and Peel Urban Greening Strategy

- The Amendment Report makes no reference to the 'Perth and Peel Urban Greening Strategy' or (PPUGS').
- The PPUGS recognises how the impact climate change increases the need for measures such as, 'planning for green neighbourhoods, more tree canopy and green spaces in our communities'.
- The same measure identified by the Amendment Report which states management of the remnant bush surrounding the hospice site will be required, is the same measures which runs counter to PPUGS.

Allen Park Master Plan {APMP}

- The Amendment Report quotes from the APMP as follows: ... 'It is a comprehensive plan that includes, "a review of the current situation, analysis of potential future demand ..."
- Despite the Amendment Report seeking to leverage off the APMP by referring to, 'a review of the current situation' and 'analysis of potential future demand', no such review or analysis have ever been carried out.

State Planning Policy 2.8 - Bushland Policy for the Metropolitan Region

- This section of the Amendment Report relies on the fact that proposed site is primarily cleared of vegetation.
- The report does not consider the tuart plantings adjacent to the east boundary which will not be permitted to grow because they will otherwise pose a bushfire threat in an already bushfire prone area.

State Planning Policy 3. 7 - Planning for Bushfire Risk Management

- The Amendment Report does not mention that at no time has the Department of Fire and Emergency Services (DFES) ever supported the Bushfire Management Plan (BMP). DFES has never supported the BMP as to, 'location, siting and design and vehicle access ... '.
- When one government department (DFES) did not support the proposal of another government department, (the Department of Health), the Department of Planning, Lands and Heritage brought in a private sector contractor and then followed the advice of the private sector contractor over a co-government department.
- Contrary to State policy, the Management Body of Lot 503, child and Adolescent Health Service (CAHS) will rely on third parties (the City of Nedlands) to manage fire risk on the children's hospice reserve.

Failure of Amendment Report to take into account Development Control Policy 5.3 Reserves for Parks and Recreation and Regional Open Space

- The Amendment Report does not address *Development Control Policy 5.3 - Use of Land Reserves for Parks and Recreation and Regional Open Space*.
- The proposal is not consistent with the planning framework. This is evidenced by the errors or omissions in the Amendment Report as outlined above.
- The proposal has not been suitably planned and designed.
- Indicators of this include:
 - Contrary to section 23 of the Disability Discrimination Act, there is no wheelchair access from Odem Crescent to the proposed hospice site.

- The so-called 'private driveway' for the hospice is design to go in the wrong direction through a heavily used carpark.
- A bushfire risk assessment report advised that in the event of a bushfire in Allen Park, it was unlikely that vulnerable children could be safely evacuated from the site before fire impacted on the building.
- As the site is surrounded by Class A reserves, there is no opportunity for expansion.
- Despite claims to the contrary, the site is not readily accessible to the Perth Children's Hospital.
- The local beach, Swanbourne Beach which has been put forward as a drawcard for a hospice facility is essentially an unsafe beach for most of the year due to the wave breaks.
- No noise assessment was ever conducted during Blackhawk training periods.

Planning Comment: Comments noted. Refer to "Part 6 (a) – Objecting Comments of the Report on Submissions".

Determination: Submission dismissed.

Submission: 13

Submitter: Victoria Calabro (interested resident)

Summary of Submission: OBJECTION

The submitter objects to the proposed amendment as follows:

- They do not support the proposed MRS amendment.
- They do not support the arrogant, bullying tactics engaged by the PCHF.
- They are a community member who fully supports the development if a Children's Hospice in WA, such as the invite only ribbon cutting event.
- They are forging ahead with complete arrogance to the submission process.
- A-Class reserves need to be protected diligently and the proposed development is inappropriate considering the final outcome will only benefit approx. 100 families per year given there are 2,000 families in Perth hoping to access the site.

Planning Comment:	Comments noted. Refer to “Part 6 (a) – Objecting Comments of the Report on Submissions”.
Determination:	Submission dismissed.

Submission:	14
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Submitter:	Stephen Lipple (interested resident)
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Summary of Submission:	OBJECTION
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The submitter objects to the amendment as follows:

- The submitter has been living close to Allen Park since 1974 and is familiar with the communities’ convictions and aspirations.
- There is broad support for a children’s hospice and the proposed site is unsuitable – unsafe, poorly accessible and environmentally problematic.
- There are concerns with the proposal given the bushfire requirements including the potential to clear the adjacent flammable vegetation which has very high biodiversity value within the coastal and inland linkage corridor.
- Other more suitable sites exist nearby and would provide safe, more accessible and much greater value for the \$35 million project – for only 7 children.
- The need exceeds 7 children, and a facility that better located is urgently needed. Allen Park is the wrong location.
- The natural bushland conviction and aspiration is the natural bushland biodiversity and unique role of the environment from surf to inland Karrakatta complex is highly valued.
- Under SPP 2.8, bushland protection and management should not be compromised by inappropriate development which is what is proposed for this site.
- Allen Park functions as a place for social interaction with the community and the proposal will block an important corridor to the beach. This has been documented in community surveys.
- The proposal will have a detrimental impact on the community’s wellbeing
- It is ironic that the care of needy children should be placing them in an unsafe environment at the expense of the regional community.

- The adjacent rugby club is large and will be accompanied by loud noise and traffic.
- Such a project must be located in a safe, accessible locations elsewhere which is fit for purpose free of major social and environmental impacts.

Planning Comment: Comments noted. Refer to “Part 6 (a) – Objecting Comments of the Report on Submissions”.

Determination: Submission dismissed.

Submission: 15

Submitter: Michael Coote (interested resident)

Summary of Submission: OBJECTION

The submitter is concerned that the amendment to the original building plan will impact on the surrounding Resource Protection Area (RPA) by complying with Bushfire Protection Regulations. The surrounding RPA contains native bushland that contains habitat for native fauna including the endangered Carnaby species Black Cockatoo, the critically endangered red-tailed black cockatoo, the Priority 4, Rare, Near Threatened and in need of monitoring quenda and the migratory rainbow bee-eater, which have recently been observed in the area immediately adjacent to the building envelope.

I worked for 22 years with DBCA and was the coordinator of the Bushcare Program which used Commonwealth funds to revegetate the RPA at this site, which was then all classed as A Class Reserve. The fire protection zones that are being introduced in the amendment will remove the reduce the habit value of the surrounding bushland which is already going to be compromised by the building envelope and access roads, increased noise and vibration during construction and ongoing use after construction.

The EPA have overlooked the significant threat that this amendment will have on the reserve which is already under pressure from the small size, its proximity to urban development and the sport and recreation activities that are conducted on the adjacent playing fields and access paths. For these reasons, the application of fire protection activities will compound the pressure that the habitat is under and will act as a cumulative stress on the fauna that are using the critical habitat for their survival.

Public consultation for the amendment has not been adequate and I have only just been able to access the submission and complete it.

Planning Comment: Comments noted. Refer to “Part 6 (a) – Objecting Comments of the Report on Submissions”.

Determination: Submission dismissed.

Submission: 17

Submitter: K L Field (interested resident)

Summary of Submission: OBJECTION

The submitter disagrees with the site for Children's Hospice. It is not appropriate place to care for sick children given the noise and fire risks. This is a land grab as there are much better sites around Perth.

Planning Comment: Comments noted. Refer to “Part 6 (a) – Objecting Comments of the Report on Submissions”.

Determination: Submission dismissed.

Submission: 18

Submitter: Department of Fire and Emergency Services

Summary of Submission: COMMENT

The Department of Fire and Emergency Services (DFES) advises that the subject site is bushfire prone on the Map of Bushfire Prone Areas, and as such is subject to assessment against *State Planning Policy 3.7 – Planning in Bushfire Prone Areas* (SPP 3.7) and the associated *Guidelines for Planning in Bushfire Prone Areas* (Guidelines).

DFES has several responses to DPLH regarding previous proposals on the subject site for a proposed MRS amendment and a development application (SDAU). The most recent response was attached to this submission.

As no BMP has been included (noting the comments provided in the MRS Amendment Report regarding previous referrals to DFES) and the previous SDAU application has already been approved, previous DFES responses should be reviewed to ensure any comments raised by DFES are considered as part of the assessment for the MRS Amendment.

Planning Comment: Comments noted. Refer to “Part 6 (a) – Objecting Comments of the Report on Submissions”.

Determination: Submission noted.

Submission: 19

Submitter: Rod Griffiths (interested resident)

Summary of Submission: OBJECTION

The submitter is not convinced by the proponents (PCHF and a myriad of sections of WA Government) that this project can be made to work within the confines of Allen Park. This chunk of Park is better kept as Park. And the local authority should be supported in implementing their agreed plan for it. Otherwise, an asset and a large amount of public money will be wasted.

The site is boxed in – as shown by attempts by PCHF to enlarge it; parking is too tight, particularly as the nature of the construction has apparently expanded beyond a conventional hospice to a respite centre, with implications for increased traffic and parking, particularly on those days when a rugby match overlaps with a bridge tournament. And WAPC has overruled FESA on fire risk for overnight accommodation – leaving accountability unclear. It should be noted that overnight accommodation is already banned elsewhere in the park.

Accountability is also unclear between the various public agencies during planning, construction and operation.

In view of the above, I believe the MRS should not be amended for this project and the proponent should be encouraged to find a location that meets its own criteria and does not have these complications. It is an important project and needs to be sited in a location that has the ingredients of success rather than failure. Failure will also reflect on the Government and its agencies.

Planning Comment:	Comments noted. Refer to “Part 6 (a) – Objecting Comments of the Report on Submissions”.
Determination:	Submission dismissed.

Submission:	20
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Submitter:	Edmond O’Loughlin (interested resident)
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Summary of Submission:	OBJECTION
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The submitter objects to the amendment as follows:

- They support the need for an appropriate Children’s Hospice to be built in the Perth metropolitan area. I disagree with the decision to build a hospice in Allen Park, Swanbourne, by the excision of land within an A Class reserve. How can conservation objectives for a natural resource area be consistent with the proposed hospice, and proposed extensions, and extensions yet to be revealed?
- The planning process adopted since day 1 for the proposed hospice by the Chairman of the Perth Children’s Hospital Foundation (PCHF) has lacked honesty; provided misinformation; and displayed minimal governance. The many Board members of PCHF have not uttered a squeak in this period and are guilty by association.
- The ‘planning’ process of PCHF SHOULD be the subject of an independent inquiry into all aspects. Will DPLH recommend this? Of course, not. But it should do so. So much for proper consultation and community engagement. It is widely recognised that the State Government is in bed with selected developers and proper planning processes are just bulldozed aside. The chairman of PCHF has been highly opportunistic in this situation. Meanwhile planning authorities are mute and sidelined.
- As one example of duplicity, I attended an information session organised by PCHF and held at the WA Bridge Club in 2021 /22. It was pretty much a farce. However, I asked the CEO of PCHF if additional land would be sought by PCHF. The CEO said that no additional land would be needed. Currently, PCHF has begun negotiations to obtain additional land within Allen Park and construction of the hospice has not yet

begun. Planning? I do not think so, rather manipulation.

- The claim by PCHF that it undertook an extensive search for a site for the hospice but could not find anything, other than Allen Park, is just ridiculous and unbelievable. Nothing in the Perth metro area? This nonsense underlines the question: why is the chairman of PCHF totally focussed on the Allen Park site? This question needs to be thoroughly examined as government does not appear to have done so.
- The Chairman of PCHF operates from a position that everything he wants from the Allen Park site will be forthcoming. How/Why is this so? A recent example is the sod- turning ceremony on the site of the proposed hospice, to which dignitaries were invited and local residents were turned away. Also, the sod-turning took place before the current DPLH amendment process has been completed. Something is rotten in the State of Denmark.
- The proposal by PCHF is for a seven-bedroom facility to accommodate children and parents and to provide other functions which are largely unspecified. It is widely recognised that there are 2000 or more children in this sickness category. The proposal is duplicitous. Planning? I think not. Allen Park is a totally inappropriate site for PCHF's first venture into real estate.

Recommendation

The total "planning" process adopted by the chairman of PCHF in relation to the Allen Park excision needs to be the subject of an independent review before Amendment 1415 is progressed.

Planning Comment: Comments noted. Refer to "Part 6 (a) – Objecting Comments of the Report on Submissions".

Determination: Submission dismissed.

Submission: 21

Submitter: Dr Denzil McCotter (interested resident)

Summary of Submission: OBJECTION

The submitter objects to the amendment and advised of issues lodging a submission as follows:

- A proposal to build a children's hospice including residential and respite outreach services is supported.
- However, the process to select this site has been flawed.
- In July 2022, the CAHS advised in a submission to the Joint Health Select Committee Inquiry that a children's hospice was required in the northern suburbs.
- Ian Campbell, Chair of the PCHF was cycling along the coast and spotted this site.
- Mr Campbell shook hands with the then Minister for Health, Roger Cook and the A-Class reserve (where the bowling club was) became a C-Class reserve. This occurred without meaningful consultation with the City of Nedlands or community groups in August 2020, the then Premier unveiled plans for the hospice site.
- There was no effort in considering other sites e.g. Lady Lawley Cottage or McCall Centre. The PCHF went into planning a facility for the site rather than planning the facility and then closing the site.
- From the beginning, the small size of the facility (7 beds) was concerning including the lack of examination of the demographics of the population.
- The submitters own research indicated that with a population increase in WA of 2.5 % PA (Revised ABS statistics for WA July 2023) and the rate of Brain Tumour and Congenital Conditions (Australian Institute of Health and Welfare July 2022) stable at 8.3/100 000, the proposed facility was not going to be fit for purpose.
- In response it was stated that the small facility would epitomise a 'cottage' atmosphere and that there were no plans for expansion. However, Project Control minutes information obtained by FOI indicated that in 2022 expansion was being considered.
- In this regard, the PCHF attempted in 2023 to obtain more land by offering to develop a 'community garden', this was rejected by the CON. More recently in a letter dated 9 February 2024 Ian Campbell stated 'we would now like to formally progress our proposal to design fund and landscape the area between the Children's hospice and the WA Bridge Club'. I have attached the letter, which, as with all matters pertaining to this project is couched in terms that indicate it is definitely going ahead!
- At various times in 2022 and 2023 Ian Campbell announced that work was about to start and the site was fenced off. More recently on 8 February 2024 the 'Turning of the sod' occurred. How can this be if the amendment has not yet gone through? From day one

this project has been presented as a fait accompli and all Legitimate concerns regarding size, fire, the bush, the Norn Bidi Trail, parking, and traffic have been dismissed whilst the powers of Local government have been further reduced by The Local Government amendment Bill 2023.

- Strongly oppose this amendment going through as WA needs a facility geared to ongoing population demands, in a location where expansion will not be a continual 'salami slicing' of Allen Park.
- The submitter doubts if there is any point in myself or others making these submissions as from day one, on the basis of Ian Campbells 'whim' and a 'handshake', the project has been a 'done deal'.

This submission was supported by additional information.

Planning Comment: Comments noted. Refer to “Part 6 (a) – Objecting Comments of the Report on Submissions”.

Determination: Submission dismissed.

Submission: 22

Submitter: Lynne McGuigan (interested resident)

Summary of Submission: OBJECTION

The submitter objects to the amendment and advises as a long-term resident of Swanbourne who lives close to the Allen Park precinct. They walk almost daily through the park and pass the proposed hospice site to the beach. Having worked for many years as a social worker including in health and children's services, they support the Western Australian Government's commitment to building the state's first children's hospice. However, they believe the site of the hospice is inappropriate.

The current plans of the Children's Hospice provide respite and palliative care for 7 children and their families. The small number is consistent with the recommendations of specialised child palliative care services here and other parts of the world.

Given the WA population growth in the Perth metropolitan region, the demand for child palliative care can be expected to grow and put pressure of the hospice for more

services. It can be expected that to meet increased demand the hospice will seek to acquire more land.

There is some media suggestion that this already happening. If there is already a push to expand before the hospice is even built, it suggests flaws in the planning of the hospice and reinforces the concern of many local people that the site is inappropriate given its location in the fire risk zone and next to a military base and its attendant noise arising from gun fire and explosion practice.

Odern Crescent which would be the sole access to the proposed hospice is used by several community groups and public accessing the beach. It has been the subject of complaint from residents adjacent to the road because of amount of vehicle traffic turning into and leaving the area. An expansion of the hospice would bring greater traffic and demand for parking, which is already limited.

A public review of the planning process is required to throw light on how the site was chosen.

Planning Comment: Comments noted. Refer to “Part 6 (a) – Objecting Comments of the Report on Submissions”.

Determination: Submission dismissed.

Submission: 23

Submitter: Belinda Williams (interested resident)

Summary of Submission: OBJECTION

The submitter objects to amendment and advises as follows:

- The use of Allen Park as a hospice is in a fire prone area. One entry & exit and cut off from views and people. Not near transport for family friends and outings.
- Interference with native bee zone and natural bushland.
- Many other areas stripped and ready, far more suitable including Leighton(fabulous view of the ocean and public transport), Buckland Hill, the Cable Station, Port Beach’s massive area between the railway & Port Beach Road.

Planning Comment: Comments noted. Refer to “Part 6 (a) – Objecting Comments of the Report on Submissions”.

Determination: Submission dismissed.

Submission: 24

Submitter: Barbara Leonard (interested resident)

Summary of Submission: OBJECTION

The submitter advises that it is the wrong position for a hospital because it is a fire risk with limited access and is surrounded by volatile bush.

There is no room for expansion which will be needed and no nearby accommodation for families of the patients.

The beach often has dumpers, waves that are dangerous for weaker swimmers who are not familiar with them. Making it a danger rather than an asset.

The place would need a dog proof fence because of the proximity of the dog exercise oval. A much better place would be Sunset Dalkeith, the old men’s home there had no impact on locals, it is safe and answers all these criticisms and is not on land given and designated as an A class reserve.

Planning Comment: Comments noted. Refer to “Part 6 (a) – Objecting Comments of the Report on Submissions”.

Determination: Submission dismissed.

Submission: 25

Submitter: *Name removed at the request of the submitter* (interested resident)

Summary of Submission: OBJECTION

The submitter advises that the site is an A class reserve and should not be built on as this can set a precedent for future A-class reserves being built on. A class reserves should be protected at all costs.

There were other more suitable places with more room for a hospice and playground. Money should not be able to be used to persuade politicians that A class reserves can be purchased.

Planning Comment: Comments noted. Refer to “Part 6 (a) – Objecting Comments of the Report on Submissions”.

Determination: Submission dismissed.

Submission: 26

Submitter: *Name removed at the request of the submitter* (interested resident)

Summary of Submission: OBJECTION

The submitter advises that the Swanbourne site chosen for the Children’s Hospice is unfortunately inappropriate and flawed as follows:

- Allen Park is a mixture of sports grounds and natural bush area. The bushland within the park has been classified by the National Trust for its high conservation value and are highly valued by the City of Nedlands and the local and broader Western Australian community. It is part of a very unique bushland corridor from the City to the Ocean utilised and enjoyed by many Western Australians.
- The Park provides for a variety of native flora and fauna - specifically fauna, including Boobook Owls and the endangered Black Cockatoos, who will be impacted by the low-level noise & light pollution generated by the Hospice 24/7. Dugite snakes and Bobtail Goannas are abundant throughout the park and siting’s of dugites are numerous in summer around the chosen site for the Children’s Hospice and beach tracks.
- At times this site is anything but peaceful and tranquil which one would anticipate families of terminally ill children would require. With the Campbell Barracks immediately north of the Hospice site there are often Black Hawke Helicopters flying overhead. These helicopters are not just seen and heard but felt in every cell of the body as they fly overhead, they are extremely loud. It is useless to attempt to talk when a Black Hawke passes overhead. Intermittent gun fire and explosion type noises from the Campbell barracks

can also happen at any time of the day. During Rugby season the noise from the ovals to the east can be very loud not just during a weekend home game but also during the weekly evening training sessions. I can often hear the whistles and yelling from my home in Lyons Street which is around 1km away.

- The budget for this development has now blown out to around \$35 million for just 7 children with life-limiting conditions. There are over 2000 children in WA in need of hospice care. There is no room for expansion at this site other than taking more A Class reserve land away from the Western Australian public. As it is the Perth Children's Hospital Foundation are wanting another 3,000 sqm of land to the south of the current site for a playground and want to raise a further \$4 million dollars for this playground. This land is used extensively by the Western Australian public to access Swanbourne beach and the highly utilised Swanbourne oval. Unfortunately, there will be no public access through this land if the PCHF gains access to this further 3,000 sqm. The City of Nedlands have plans and a budget to connect the Whadjuk Trails for the Western Australian public and tourists to experience through this land south of the Hospice site. These plans would come to an abrupt ending if the PCHF acquires this land for a playground.
- The original plan was a one storey building, now it is two stories and now more land is already needed due to the site being in a fire zone.
- With only one access road shared with the WA Bridge Club from Odern Crescent, in the event of a bush fire when many people may be present at the bridge club, I fear there would be casualties if the Hospice and Bridge Club needed to evacuate at the same time. Many members of the bridge club due to age, would be unable to run to safety to either Odern Crescent or Swanbourne Oval. In the event the Hospice acquires the extra 3,000 sqm for the \$4 million playground there would actually be no access to escape to Swanbourne oval.
- Public transport is minimal. The 102 bus which stops on North Street only runs every half hour from 6am to 9pm. There is no bus between 9pm and 6am. The nearest train station is a 25-minute walk away.
- With the lack of public transport this site really isn't easily accessible for families and staff who may need to use public transport to get to and from the Hospice.

In summary, the location chosen for the Children's Hospice is completely inappropriate & there are numerous

more tranquil locations which would be much more suitable for this wonderful and much needed facility.

Planning Comment: Comments noted. Refer to “Part 6 (a) – Objecting Comments of the Report on Submissions”.

Determination: Submission dismissed.

Submission: 27

Submitter: Janet Roddy (interested resident)

Summary of Submission: OBJECTION

The submitter advises that the proposal to put a children’s hospice in bush land with high fire rating shows poor planning or it was intentional by planners wanting to develop this protected bushland. The current proposed amendment to increase the building envelope to “reduce the fire risk” suggests the plan has always been to bulldoze this protected bushland which provides a safe sanctuary for many threatened species.

Everyone wants a peaceful, beautiful safe place for terminally ill children. Surely this should not be in bush land with high fire risk, only one road in , next to a beach with notoriously difficult surf especially for inexperienced swimmers and relatively removed from health care facilities . There must be equally peaceful, safer, more child friendly places to build this facility which do not put the children at risk and do not entail destroying recognised habitat.

For example, on the old hospice site on the river which is close to the Children’s hospital. There are several other metropolitan beaches or beautiful parklands which are already developed, would be safer and would not require habitat destruction.

Planning Comment: Comments noted. Refer to “Part 6 (a) – Objecting Comments of the Report on Submissions”.

Determination: Submission dismissed.

Submission:	28
Submitter:	<i>Name removed at the request of the submitter</i> (interested resident)
Summary of Submission:	<p>OBJECTION</p> <p>The submitter advises that the process to put the hospital in an A-Class reserve has been flawed from the onset. Residents, Council and opponents have been ignored.</p> <ul style="list-style-type: none"> • It should never have been planned near the SAS. • The entire Park should have remained an A Class Reserve. • The Nedlands Council Master Plan should have been implemented. • The hospital is in a high-risk fire area. • The hospital has been placed in an environmentally sensitive area. • The hospital is bigger and glossier than it ever first appeared. • There is no room for parking and for other activities to occur in Alan Park, with the hospital there. <p>The amount of people the hospital serves, does not justify the size of the building or the damage to the area in which is going to be implanted. All public space is precious and should be protected from such vain developments. This was a bushland recreational area designed to serve all people. Of course, there should be a hospice for sick children, but not at the expense of existing bushland.</p>
Planning Comment:	Comments noted. Refer to “Part 6 (a) – Objecting Comments of the Report on Submissions”.
Determination:	Submission dismissed.

Submission:	29
Submitter:	Allison Manners (interested resident)
Summary of Submission:	<p>OBJECTION</p> <p>The submitter advises that there are a number of reasons why they oppose the proposed amendment to the MRS to authorise building a children’s hospice in Allen Park Swanbourne. The concept of a children's hospice is an</p>

excellent one, and I support this development. However, the choice of location within an A-Class Reserve presents significant risks and challenges to the hospice inhabitants, the surrounding environment and the local community.

- Location: the hospice location within Allen Park is not consistent with the purpose of the Park, nor with the community's expectations. It's location raises considerable fire risk to the hospice's inhabitants and it's limited area means that any required increased capacity over time, will directly impact the surrounding flora and fauna in addition to directly impact the very community purpose of Allen Park as designated a century ago. A more suitable location would be one that is free of fire risk, able to expand as required over time without negative impact on surrounding environment and community and be one that enables family members of the children in the hospice to access easily via public transport.
- Elitist model: the hospice will only cater to a very limited number of children at any given time. With 7 patient beds, calculations suggest that only 91 families in WA could have support for 4 weeks once a year. There are over 2000 children in need of this hospice and this figure will only increase over time. Thus, a building of this size does not nearly cater for all those in need, and more to come in the future. And the impact of expanding the hospice area in this location will have significant negative impact on the surrounding natural environment and the large numbers of community members utilising it. This is simply a flawed model, totally based on poor location choice. There is already growing community concern over the developer proposing to take another 3000sqm of Allen Park to expand the footprint of the hospice. This is unacceptable and further confirms the poor location choice.
- Lack of Community Consultation: the process from the early concept of the hospice in this location has been driven by arrogance and ego. The local community staged a number of town hall style meetings to garner information from the developers and government entities, only to be dismissed and to be misrepresented in the media with incorrect quotes and hearsay. It has been a very disappointing handling of a proposed development and many of the community feel let down and ignored.

The Government, PCH and associated entities have together pursued a relentless mission to build this hospice in

Allen Park with dogged determination and lack of due diligence. Without doubt, it is a flawed decision that will lead to countless issues and high-risk incidents. The chances that this development becomes a white elephant are very high.

Sadly, the cost of this flawed planning is also high. Primarily to the children and families promised a hospice that can only cater for 7 children at a time. And then for a hospice with limited capacity for expansion without impacting the precious public open space of the A-Class Reserve that surrounds it. And finally for the regional planning implications for numerous families, in the Perth region and beyond, that will never see the benefits due to poor decision making and funding misallocation. For the general public it is a loss of reserved public land that is permanent.

Planning Comment: Comments noted. Refer to "Part 6 (a) – Objecting Comments of the Report on Submissions".

Determination: Submission dismissed.

Submission: 30

Submitter: *Name removed at the request of the submitter* (interested resident)

Summary of Submission: OBJECTION

The submitter objects to the amendment as follows:

- This is a designated class A reserve. It should not be possible to amend the scheme to allow for any development in such a reserve, let alone the building of a hospital, bearing in mind all the ancillary services that will also be required to sustain such a facility. Such a facility will necessarily involve a lot of additional parking, ambulance and hospital vehicle movements and, during construction, significant dislocation to the surrounding residential and parkland areas.

That is why it has been designated as such - to prevent development of an area which is considered of such importance from an environmental and societal perspective that it is designated class A. It should be preserved for, and to allow future generations to enjoy, and for important species of flora and fauna to survive.

- We all support a hospital for children. That goes without saying. But there are a variety of far more suitable

locations, and this one is an entirely inappropriate area to locate such a facility, including for the welfare of the children, their families and the staff of the proposed facility. The reasons for this include:

- It is located next to the SAS facility. That in itself is quite bizarre. Let me repeat that - it is quite literally right next door to a very active SAS military facility! Future generations will look back at this whole exercise, and the decision makers involved (when looking to allocate responsibility and liability), with disbelief. It is clearly unsafe. The noise alone from the firing range, various military exercises and related equipment, including helicopters, makes the location a ridiculous choice.
- The bush fire risk clearly has not been mitigated to the extent required for the location to be designated safe.

Planning Comment: Comments noted. Refer to “Part 6 (a) – Objecting Comments of the Report on Submissions”.

Determination: Submission dismissed.

Submission: 31

Submitter: Roslyn Seale (interested resident)

Summary of Submission: OBJECTION

The submitter advises that the proposed amendment is inappropriate as it is a bushfire prone area and the loss of natural landscape and make a precedent if the MRS is amended from Parks and Recreation reservation to the Public Purposes - Special Uses reservation.

Planning Comment: Comments noted. Refer to “Part 6 (a) – Objecting Comments of the Report on Submissions”.

Determination: Submission dismissed.

Submission: 32

Submitter: *Name removed at the request of the submitter* (interested resident)

Summary of Submission: OBJECTION

The submitter advises that the Allen park precinct was originally set aside as a park and recreation area, and never thought of to be a public area. Significant collaboration occurred within our area to build a multilegged recreation play area so that there would be equipment for the aged to improve balance , muscle strength and exercise endurance alongside play equipment for children . The idea is to get cross generational interaction for both groups to benefit from. I think ideally the council should continue with its original plan, there is adequate left in this area.

This play could be designed to meet the needs of the hospice children. How wonderful to have the aged exercising and being of support to children in need , the situation would be mutually beneficial. By transferring the area to public use land there may be the misfortune that a play area will never be created.

Planning Comment: Comments noted. Refer to “Part 6 (a) – Objecting Comments of the Report on Submissions”.

Determination: Submission dismissed.

Submission: 33

Submitter: Anya Seabourne (interested resident)

Summary of Submission: OBJECTION

The submitter is concerned about the proposed amendment as I believe keeping Allen Park intact and protected in its entirety is of the utmost importance. Having been a resident in Swanbourne for over 25 years I have been able to personally witness the significance of this bush park as a wildlife corridor. There are so few such like areas in Perth metro that conserving A Class Reserve and Crown land is critical to the wellbeing of future generations of Perth residents and any person that wants to be able to access nature spaces. The social benefits of biodiversity, tree canopies and wildlife corridors cannot be underestimated.

I do not object to the proposed children’s hospice project. I object to the footprint of that project, with its allied services and development, encroaching on the Allen Park

Bushland. That land is a legacy for generations of people in Perth.

Planning Comment: Comments noted. Refer to “Part 6 (a) – Objecting Comments of the Report on Submissions”.

Determination: Submission dismissed.

Submission: 34

Submitter: *Name removed at the request of the submitter* (interested resident)

Summary of Submission: OBJECTION

The submitter objects to the amendment as follows:

- This site was A Class reserve until 2020, when it was reclassified. The original basis for its A Class status remains - it is an important portion of remnant public open space in a “beach to bush” flora and fauna/ wildlife corridor, and rehabilitation for this purpose was imminent. This should be respected, and the proposed MRS amendment should not be made.
- The area is a thoroughfare for recreational users of the Allen Park precinct including rugby and other sporting teams, school groups, bush walkers and the proposal will create an obstruction that will require clearing of yet more remnant bushland to allow passage. The proposed amendment will cause a cascade of further destruction of the of the precinct.
- The area is in a very high-risk bushfire area. It would be irresponsible to allow this location to be used to house some of our most vulnerable children in a known high fire risk environment. The Department of Fire and Emergency holds grave concerns about such a development at this site, and for this reason did not sign off on the proposal - this fact should be taken very seriously and in any reasonably mean that the proposed Metropolitan Regional Scheme Amendment should not be allowed.
- The lack of DFES approval, in combination with the ever-warming climate and increasing severity and frequency of bushfires, means that losses and trauma from a devastating fire at this location would reflect very poorly on, and could in fact implicate DPLH for facilitating an inappropriate and unsafe development.

As such this scheme amendment should not in good faith, proceed.

- There is a huge need for a children's hospice in the populous northern corridor of Perth (as per previous Health Department advice). A Children's Hospice should be easy to access by public transport for stressed families and visitors. Tucking a very expensive, small capacity Children's Hospice in a bushfire prone area, with no public transport and in a location that is inappropriate to serve the public need., and with no room to expand to accommodate growing need, is non sensical and cannot be in the interest of WA families and taxpayers.
- That is to say the basis for the requested MRS amendment is flawed and not in the public's best interest. This MRS amendment is too significant to be made to facilitate public expenditure on a flawed proposition (a Children's Hospice in this location) it would be extremely unwise to approve the proposed amendment.

Planning Comment: Comments noted. Refer to "Part 6 (a) – Objecting Comments of the Report on Submissions".

Determination: Submission dismissed.

Submission: 35

Submitter: Rodney Greedy (interested resident)

Summary of Submission: OBJECTION

The submitter objects to the amendment as follows:

- State abuse of emergency planning powers provisioned for the purpose of the CV19 pandemic. The planning approval mechanisms used by the State Government to place a hospice in a totally inappropriate area of the suburb was an abuse of emergency planning powers. Had the normal planning processes occurred the facility would never have been given planning approval because it is poorly sited, has consumed recreational community space, will be further degrading our limited natural coast environment, and as identified by this submission located in a hazard area and is unsafe.

Bypassing due process has now created the problem for the government of retrofitting and justifying policy and process to create the conditions which are required for this poor decision to go forward. This is both an abuse of State power and fraudulent. The community, the environment and the public generally are being impacted because of extremely poor planning decisions exercised by the state government by using an emergency planning process for an illegitimate reason and purpose.

- Changes to state and bushfire risk management practices for the wrong purpose and counter to standard controls. I provide bushfire risk management advice and risk management services to DFES and OBRM. Amending risk control documentation designed to protect the public in order to justify a bad planning decision is something which should never be done. The hazard to the community which is being created by attempting to render safe a development placed within a hazardous zone goes against every safety principle typically put in place to stop developments of any kind being created within hazardous areas. Attempting to render safe the bushfire environment to justify the progression of a hospice where patients are going to be highly immobile is unconscionable.

Fires are inconsistent in their nature, highly volatile and irregular. Even adjusting the policy to create a paper based and somewhat fictitious justification that the Site by destroying even more of our rare coastal environments and public use areas is not going to remove the bushfire risk for the facility. It is actually going to increase the risk and likelihood of a fire event occurring because of the change of use in the area. In context had proper planning approval process for this development been used, this Site would not have been approved, numerous seas side options within existing built environments without any environmental or social impacts would have been selected requiring no changes to land use, public policy or retrofitted and ill-conceived process to justify this development.

- We are destroying public space and the natural environment, and our community is being impacted. The basis of this proposed amendment is simply irrational and an abuse of state powers. The impacts are being felt by the broad community and the natural environment. There is no requirement for a facility of

any kind to be placed in that location. There is no requirement for the hospice to be sited in that location. Therefore, there is no need for any changes to the natural environment to accord with emergency management process of the state to be considered.

The only reason the community is being further impacted is because due process was not followed in the first instance. The metro region and the local communities are now at risk of losing more natural bushland in the suburb and in the area. There is very few of these areas left in our local communities, and especially in proximity to the ocean - they have all been built out and destroyed. Now as a result from what is clearly a very bad and unethical planning decision to place a hospice in Allen Park, an action which has destroyed some of this natural environment for absolutely no reason, further natural environment must be destroyed to make the bad development approval safe. This is simply unacceptable and evidences a series of clearly bad and manipulated processes, and smacks of pork barrelling.

Unethical behaviour has led to an unethical decision and an illogical set of decisions all with negative consequences. What is worse, the general public are simply unaware. Whilst this specific process of consultation which I am responding to is an attempt to evidence an aspect of due processes, the real communities which are impacted are totally unaware of what is being requested in this land use and planning change. The true impact in destroying this natural environment are the children of our communities who are not yet born. The people who do not have a voice in this matter, but whose natural resource is being removed from them. This exact process and basis for change (bad decision followed by a series of more bad decisions to justify the end) is the process by which global warming and climate change issues were created. These natural environmental locations will become more and more precious to our communities as our population grows, our land consumption increase and sprawls and the densities around our cities increase. Perth is forecasted for extremely strong population growth predicted by government, yet the government is suggesting that destroying scarce coastal bushland because of a planning decision which was incorrect and flawed in the first place is the solution. How can this be ethical? How can this possibly be considered

to be reasonable? How can this kind of planning precedent ever be set?

The community cost does not justify the nature of the development in any way. It is short sighted and unnecessary. The reason that it is now occurring is because the state government has already contracted and commenced construction activities on the Site. It is now trying to ensure that their unethical and fraudulent behaviours do not come undone and be exposed within the fiscal environment, and because due planning processes were bypassed, the only option is to destroy more bushland in order to create an environment which meets the safety requirements of state policy. This must stop, the amendment must be rejected, it is simply not justifiable.

Once the bushland is gone, so are the animals. Our children enjoy the natural environment of Allen Park. They love the nature, they love the ability to play in the bushland, explore, look at and chase animals, enjoy the bird life. They are not alone. It is very common to see the local children playing games in the bush. The children are so lucky, so many other councils need to invest in nature playgrounds, and right in Allen Park is a truly natural playground filled with animal life. The man made "nature" playgrounds have no animal life. There are no surrounding developments, the natural environment is almost exclusively surrounded by recreational park land. This also supports the health animal life that exists in the area. This environment must be protected.

In considering these changes the following items must be reviewed:

- *The nature and scale of the proposal is compatible with the use and zoning of surrounding land, the nature and purpose of the reserved land and the environmental character of the location;*
No it is absolutely not. It is entirely out of character and not in alignment with anything development in that area.
- *There is a community need for the proposed facility in the proposed location*
There is not a single community need for the development of the hospice in that specific location. It is possibly the worst location for that facility and numerous other sites within the surrounding area of Cottesloe are far better locations which are already

appropriately zoned, are of extensive size and are located in greater proximity to the ocean and public transportation for the families of the patients.

- *The community and local government(s) support the proposal;*

No the community does not support the proposal and the community has been fighting this development from inception.

- *The proposal can be integrated with other planned facilities and sharing of facilities by more than one incorporated club, community group or private business;*

There is nothing else there to integrate with. The nature of the sporting facilities and the land use in the area are generally incompatible with the development in it's original condition. Destroying more bushland does not change this, it exacerbates the problem.

- *The proposal is consistent with existing and/or proposed land use and management plans.*

Clearly the fact that the land use needs to be changed because the development is inconstant with land use plans evidence that the planning decision was flawed in the first place. The proposal for the hospice was not consistent with land use plans as the site destroyed designated public space and need to be specifically rezoned, and now the state government is seeking to change the land use and zoning to make the original decision safe from bushfire within what is the worst rating of hazard possibly in the bushfire setting.

There is literally nothing which is consistent with existing or proposed land use and management plans. This development is simply wrong. The suggestion that the answer to fix a bad decision is to destroy even more bushland to make it right is utterly insulting to the community and the future community whom will be deprived of this natural public resource, and plainly unethical.

Planning Comment:

Comments noted. Refer to "Part 6 (a) – Objecting Comments of the Report on Submissions".

Determination:

Submission dismissed.

Submission: 36

Submitter: *Name removed at the request of the submitter* (interested resident)

Summary of Submission: OBJECTION

The submitter objects to the amendment and understands that as Perth gets bigger there is a need for higher density infill residential development to take place. There is a need for higher rise buildings, infill development and reduction in the size of residential blocks. There is a housing crisis and the government and councils need to facilitate more residential development. All this make sense. I also understand that for every development in Perth and change to planning schemes there is an active group of objectors as they are unhappy about higher density in their back yard. These objectors no doubt often get dismissed as unfortunate victims in meeting the needs of higher density and higher populations.

However, the hospice is not about higher density residential. The issue with the Children's Hospice in Swanbourne should not be dismissed as nimbyism. It is about loss of park land that will never ever be returned. It is about the incremental insidious creep of development into park land, loss of native vegetation and ecosystems for birds and other animals. It is about preserving our important urban amenity. Yes, it might be only 3% of Allen Park. But then in 5 years' time, there will be another Ian Cambell who will have another pet project and want another 3%. Where does it stop - when it is all gone?

Yes, we need hospices - no one would dispute this. But we need parkland. Hospices do not need to consume and erode our precious natural habitat. Hospices can be located in many locations that are under-utilised and already developed. You are paving paradise to put up a parking lot.

The whole concept of the hospice is extremely poorly conceived. Such a large footprint for such a small number of patients. It is outrageous. Why do these patients get to overrule the community requirements, not just for this generation but for generations to come? We don't need playgrounds there, we need bird habitats, we need trees and woodland for native flowers, native bees, reptiles and paths for humans to walk through – not around.

Once it is developed, who knows what incremental development you will be facilitating – easy to say, “but that is not my responsibility, and it is not in my scope for approving this”. Don’t absolve yourself of those other decisions that you know will follow.

Please don’t dismiss the community concern with platitudes of “I am sorry but in this instance your objection is not successful”. These are real issues and you as an individual are fulfilling an important planning role. That role should not be to rubber stamp a poorly conceived and planned development that has been politically supported just because it has momentum. I urge you to reconsider this and not facilitate this odious development on precious parkland.

Planning Comment: Comments noted. Refer to “Part 6 (a) – Objecting Comments of the Report on Submissions”.

Determination: Submission dismissed.

Submission: 37

Submitter: Rebecca Yde (interested resident)

Summary of Submission: OBJECTION

The submitter objects to the amendment as follows:

- Bad planning from day one. It is wrong to amend risk control documentation designed to protect the public in order to justify a bad planning decision. It is wrong and immoral to plan to build a hospice in a bushfire zone in the first place and then attempting to render safe the bushfire environment to justify this bad decision. It is unjustifiable to just destroy even more of our rare coastal environments and public use areas. Especially now when we know we need to protect our natural environment and bushlands.
- This proposed amendment is simply irrational and total abuse of state powers. There will be huge impacts on the broad community and the natural environment. There is no requirement for a hospice to be placed in that location of Allen Park bushland. It would be much better in a more easily accessible area and outside a natural bushfire zone.
- We are now at risk of losing even more of our natural bushland in the suburb. We will not just lose bush land, but also lots of wildlife, animal and especially bird life. We need to protect our natural bushland and wildlife.

- It's also good to have lots of bushland between Campbell Barracks and the residential areas, as at times there are a lot of noise and loud sounds coming from Campbell Barracks when they do training. We can't move Campbell Barracks and it is essential that our defence forces do their training.
- It is just so wrong and immoral to just destroy more bushland and to rezone more A-class land in order to rectify a bad decision made by government. It is just not right to just keep destroying our precious bushland. The development of this hospice is simply in the wrong place. The worst part is that the majority of the community is simply kept in the dark and not being informed about what is going on in the background.
- Do not destroy more any of our precious bushland, please find a more suitable location for the children's hospice instead. I do not support this planned amendment and I do also not support the development.

Planning Comment: Comments noted. Refer to "Part 6 (a) – Objecting Comments of the Report on Submissions".

Determination: Submission dismissed.

Submission: 38

Submitter: Robert Downie (interested resident)

Summary of Submission: OBJECTION

The submitter objects to the amendment as changing the zoning sets a precedent for other reserves in all councils. The building of a hospice (or any facility that has only a very small number people using it) shouldn't be permitted on the small number of reserves left in Perth.

Once this small exclusive facility is established the almost immediate call will be for permission to expand, more parking better access etc. The facility in question would never have passed without heavy political interference and lobbying. The location should have been in Nedlands (Sunset hospital site) - a way more appropriate location with room to expand.

Planning Comment: Comments noted. Refer to "Part 6 (a) – Objecting Comments of the Report on Submissions".

Determination: Submission dismissed.

Submission: 39

Submitter: Heidi Hardisty (interested resident)

Summary of Submission: OBJECTION

The submitter objects to the amendment as they have been vehemently opposed to the location of this hospice from the start. It is irresponsible and distressing to see green space and a Class A Reserve being removed for a hospice. Just because this proposal has conditional 'development approval', I maintain that this development is wrong and should not go ahead.

Hence, I am opposed to the rezoning of the land from Parks and Recreation to Public Purposes. How can you say the proposed amendment is not considered regionally significant? The loss of park space is highly significant in a local and regional sense both to the community and the wildlife. As the population and density of our suburbs increase, we need to maintain, enhance, and even increase our remaining park space – not destroy it.

There are alternative locations – on land that had previously been developed - for this project. The Sunset Hospital in Dalkeith is an ideal choice and should be repurposed for this hospice. Going forward, better planning decisions must be made. The State Government recently sold off the land of the former Princess Margaret Hospital for housing development. This was an extremely poor decision. That land should have been kept to build places like the children's hospice and other medical facilities.

I would like to reiterate the following points, as I must express my frustrations and hope decisions such as these never happen again. *DC Policy 5.3- Use of Land Reserved for Parks and Recreation and Regional Open Space*. If this hospice is built, the parks and recreation land will be lost forever. The land should not be rezoned as the building of this hospice at this site goes against all of the policy statements in DC 5.3:

- the nature and scale of the proposal is compatible with the use and zoning of surrounding land, the nature and purpose of the reserved land and the environmental character of the location; the building is not compatible with the current zoning;

- there is a community need for the proposed facility in the proposed location; the building can be located elsewhere – it is not for just the local community;
- the community and local government(s) support the proposal, the community is opposed;
- the proposal can be integrated with other planned facilities and sharing of facilities by more than one incorporated club, community group or private business; the facility is not for local community use; and
- the proposal is consistent with existing and/or proposed land use and management plans. the building is not consistent with existing land use.

DC Policy 5.3 should have been followed from the beginning and the hospice should never been proposed for this area. open space may be used for:

- passive recreation;
- active sporting pursuits;
- cultural and or community activities;
- activities promoting community education of the environment; and/or
- uses that are compatible with and or support the amenity of the reservation (i.e. cafe, restaurant) where specific facilities for such purposes have been approved by the WAPC.

The space should not be used for a hospice and should remain as park.

Environment: DWER has verbally said the amendment is unlikely to raise any environmental concerns. This is not good enough. Where is the evidence for this statement? The land could be rehabilitated. As density increases, any reduction in green space will have a significant impact on the environment – slowly destroying local habitat for wildlife, increasing runoff and urban heat island effects.

Servicing Demands: It is also extremely concerning that the Water Corporation would not have initially allowed for water and wastewater demands to the proposal given the existing landuse. It appears that these critical matters have yet to be finalised. This is an oversight and the project should not proceed in this location.

Planning Comment:

Comments noted. Refer to “Part 6 (a) – Objecting Comments of the Report on Submissions”.

Determination:

Submission dismissed.

Submission:	40
Submitter:	<i>Name removed at the request of the submitter</i> (interested resident)
Summary of Submission:	OBJECTION The submitter objects to the amendment as follows: <ul style="list-style-type: none">• The governance for excising the land from an A Class reserve was highly questionable.• The proposed change in use impinges on important habitat and corridors for native wildlife and biodiversity in the area that Allen Park was set aside to protect.• At a time when there is increasing need for protection and enhancement of natural areas and biodiversity, it makes no sense to reduce these important pockets of protected natural areas in our suburbs.• There are multiple other locations for the hospice. In addition, the viability of the ongoing operation of the hospice is uncertain. A hospice should be more closely located to the support facilities provided by hospital and not located in a quiet residential area adjoining an extreme bush fire zone.
Planning Comment:	Comments noted. Refer to “Part 6 (a) – Objecting Comments of the Report on Submissions”.
Determination:	Submission dismissed.

Submission:	41
Submitter:	Timothy Tucak (interested resident)
Summary of Submission:	OBJECTION The submitter objects to the amendment as there has been a failure of the planning process with no valid site selection process for the hospital proposal. This has resulted in the chosen site negatively impacting the hospital proposal. The bushfire risk from the location has been addressed by making the building into a 'bunker' and substantially increasing the cost. The proposed site is not a suitable location for our vulnerable and sickest children. The Office of Bushfire Risk Management has designated both the building site and the single access road in and

out, as a Bushfire Prone Area. Part of the building site is rated as “Flame Zone”, the most dangerous bushfire risk rating.

The Department of Fire and Emergency Services does not support a vulnerable use building in this location, highlighting location, siting, design and vehicular access as areas of concern.

As a consequence of the location difficulties, the proponents are already seeking to use more of Allen Park’s A Class Reserve.

Development Control Policy 5.3: Use of Land Reserved for Parks and Recreation and Regional Open Space (DC 5.3)

- the proposed hospital does not meet the circumstances under which the WAPC may approve the use and development of land reserved for Parks and Recreation for different purposes. Therefore, the MRS should not be amended to allow for an inconsistent/incompatible use, as the intent of the reservations would be prejudiced by an inappropriate development.

- The nature and scale of the hospital proposal are compatible with the nature, purpose, use and zoning of surrounding land and the environmental character of the location;
- The Child and Adolescent Health Service (CAHS) did not identify a community need for the proposed hospital in Allen Park, but rather specifically identified the need in the northern suburbs of Perth.
- The local community and the City of Nedlands do not support the proposal, with the Allen Park Masterplan clearly identifying the desire of the community and the City to not develop this area with a building, but rather nature play and an all-ages exercise area.
- The hospital proposal is not integrated with other planned facilities nor is there any sharing of facilities with the community.
- The hospital proposal is inconsistent with existing and/or proposed land use and management plans, being the Allen Park Precinct Master Plan Report, Final Report November 2017.

Under DC 3.5 the use and development of land reserved for Parks and Recreation under the MRS for purposes inconsistent with the purpose of the reserve will not be supported. The hospital proposal is inconsistent with the Allen Park Precinct Master Plan and therefore the land should not be used nor developed for the hospital proposal. Similarly, the MRS should not be amended to

allow for the inconsistent and incompatible hospital proposal.

The hospital proposal will not allow for Allen Park (currently land reserved for Parks and Recreation) to be used in a manner compatible with the purpose of the reserve and will prevent public access to and enjoyment of Allen Park. Under DC 3.5 the use and development (the hospital proposal) of land reserved for Parks and Recreation (Allen Park) would result in restrictions to public access (notwithstanding the possible benefit which could be derived from the use and development to the general community) is not to be supported.

The WAPC should not be amended the MRS as the hospital proposal is inconsistent with the planning framework. The hospital proposal is not suitably planned nor designed, as it is located in a bushfire prone area, and the hospital proposal is not of low risk nor can measures be implemented to ensure that it is classified as such.

The middle of Allen Park in Swanbourne is not an appropriate location for the proposed hospital. There will be noise and parking pressures that will adversely impact the care of very vulnerable children and their families. Allen Park is recognised by the Heritage Council as being an important open space asset, valued by the community. In 2017 the Allen Park Precinct Master Plan for the park was finalised and adopted. It is currently being implemented.

As residential densities in the western suburbs increase, all existing parks will become more valuable and have to be protected. Irrespective of the current land tenure, the City of Nedlands acquired the land for a park and wants it to be used for that purpose. In order to make the proposed hospital safe, bushland outside the building site will need to be managed and the habitat that is vital to bird and wildlife, as well as people who enjoy the bushland, will be affected.

The beautiful Rainbow Bee Eaters which travel from the north of the state to Allen Park every year to breed, are currently nesting right next to the temporary fence surrounding the proposed hospital.

Planning Comment:

Comments noted. Refer to “Part 6 (a) – Objecting Comments of the Report on Submissions”.

Determination:

Submission dismissed.

Submission: 42

Submitter: Denise Murray (interested resident)

Summary of Submission: OBJECTION

The submitter objects to the amendment as follows:

Preserve the integrity of the MRS as it was intended.

The MRS defines the future use of land and provides the legal basis for planning in the Perth metropolitan region, dividing it into broad zones and reservations. Current political decisions have tended to reduce the significance of this vital planning tool.

Hasty amendment for unresearched and unsubstantiated building development on land that has been thoughtfully reserved for "Parks and Recreation" will have long reaching, and possibly disastrous, consequences for the well-being of future generations.

The current awareness of growing heat effect, need for increased green spaces and canopy, increased infill resulting in little or no play and recreational spaces for many residents means the Metropolitan Region Scheme has never been more important. It is to be hoped that the experts within the Department of Planning Lands and Heritage who will be considering this amendment will base their decisions on science and research and not on political imperatives.

Avoid damage and/or loss of more Class A Reserve

Class A Reserve is the highest form of protection for land in our current system. King's Park, Bold Park and Allen Park have been categorized as Class A. Until its excision from Class A Reserve in 2021, the almost 6000 square metres of Allen Park land that is under consideration for reservation amendment had been earmarked for rehabilitation that would bring benefit to the community into perpetuity.

Alarmingly, the proponents of the hospital have proposed using a further 3000 square metres of Class A Reserve because the initial, hasty excision process did not reveal the bushfire classification of the site that is the subject of this proposed amendment. Areas that were designed for the hospital's parking and play area are situated in Flame

Zone so the proponents are offering \$4million to the City of Nedlands to “persuade” the city to hand over a further 3000 square metres which would be used exclusively by the hospital at times of their choosing. This would have the effect of denying the huge community of users of Allen Park 9,000 square metres of land that was intended as public parks and reserve. There is no doubt, that the extra land would eventually also be lost from Class A Reserve.

Allen Park Master Plan

The Allen Park Master Plan (see link) was adopted by City of Nedlands in December 2017 after many years of consultation with the broad Allen Park community including all sporting clubs and stakeholders who use Allen Park. Extensive research and consultation with community, sporting clubs and diverse users of both the sporting precinct and the bushland area of Allen Park identified the area that has now been excised from Class A Reserve as an area for the wider community to undertake recreation – both active and passive – as well as rehabilitative and adventure play. It was an ideal, level location for recreation and the promotion of physical activity for all abilities. These cannot easily be replicated in other areas of the park. In summary, this excision of Class A Reserve has permanently removed opportunities for use of green spaces as they are currently planned in the MRS and reflected in the Allen Park Master Plan.

It should be noted that the delay by the City of Nedlands in commencing implementation of the Allen Park Master Plan was partly due to the site’s categorization as “contaminated” which required the City of Nedlands and State experts to undertake further studies. It was amazing to those of us who know the amount of asbestos and other contaminants that lie under the soil in that area, that the category of “contaminated” was lifted with little effort or investigation.

Consider the far-reaching consequences of this amendment.

The amendment will affect not just the 6000 square metres already excised from Class A Reserve, but the adjoining bushland and green spaces in the remaining Class A Reserves of Allen Park. The proposed development will limit the opportunity for plans to green the area as per the Urban Greening policies. The benefits of this would increase canopy, reduce carbon emissions, combat the heat island effect, and importantly, increase biodiversity and resilience by enhancing the critical green corridor

linking Melon Hill, Bush Forever Site 315, and the coastal reserves.

Nesting sites of the Rainbow Bee Eaters currently lie in the path of the development vehicles, and it should be noted that these birds return every year to nest in this area. Quenda have returned to nearby reserves, and it is a project of the Melon Hill Bushland Group to encourage their return to Allen Park via bushland corridors. If the amendment is approved, and the development proceeds, the return of quenda, and their recognised valuable contribution to soil health, is unlikely to happen. Lengthy and invasive building construction followed by intrusive activity and night light from an established hospital are not sympathetic to wildlife, especially nocturnal animals, and birds.

The Red-tailed Black Cockatoo and the Carnaby's Cockatoo are known to fly over and rest in the area. Tuart trees that are only partly grown were part of a canopy revegetation project two decades ago and they will not be able to grow to maturity if the amendment goes ahead.

The area under consideration of amendment has been rated as high bushfire risk (for development) and the proposal to build a hospital contravenes the State's own policy on developments for vulnerable use (State Policy 3.7 Planning for Bushfire Prone Areas).

The Department of Fire and Emergency Services has not agreed to sign off on the development for reasons of location, siting and design and vehicular access. It is acknowledged that in the event of a bushfire, there would not be enough time to evacuate the vulnerable patients, their families and the staff that support them. The patients would need to "shelter in place".

If the development proceeds, the City of Nedlands would be obliged to reduce the natural bushland on Class A Reserves surrounding the hospital site. More green space, canopy and habitat will be lost.

We all recognise that there is an urgent need to maintain public open space for recreational use, allowing for more green corridors, growing the urban forest, and increasing biodiversity to increase the resilience of our communities. Not only are green spaces essential to counter the heat island effect, but there is an increasing body of evidence showing the critical role of natural areas and biodiversity in ensuring resilient, healthy, liveable communities. The

impact of natural areas on physical and mental health is well documented.

Avoid setting a dangerous precedent which could have a snowball effect.

The excuse for passing this amendment is that it is not uncommon and only affects an area of approximately 6000 square metres. However, we are already seeing that the area under consideration of amendment does not meet the needs for the proposed development, with proponents seeking the use of a further 3000 square kilometres under a \$4 million incentive proposal to the City of Nedlands. It is possible to foresee a situation in the near future where the community use of the western side of Allen Park is so affected as to be not viable as public open space. Within a decade, we could see the complete loss of the public reserves and recreation areas on the western portion of Allen Park. This is surely against the spirit of the original MRS preservation scheme which aimed to maintain the integrity of green parks and reserves as a legacy for the future.

Shenton Park Cottage hospice failed after proving too costly; services needed closer to where people live

The Cottage Hospice in Shenton Park was a purpose-built hospice for adults. It was constructed in 1984 in a bushland setting in Shenton Park. By 2005, the Shenton Park hospice was closed as a hospital and the building is now used as training rooms. The reasons for closure were cited as cost and a decision by the then Government “to ensure that palliative care services are provided closer to where people live”.

Evidence indicates that a proper clinical assessment of the cohort of patients intended for this hospital was either not undertaken or ignored. The 2020 Child and Adolescent Service submission to the 2020 Joint Select Committee Inquiry into Palliative Care concluded that the need for a children’s hospice was in the northern suburbs. A hospital on the Allen Park site may not, therefore, survive for more than the “honeymoon” stage of the project.

The proposed children’s hospice is based on Bear Cottage in New South Wales, but recent reports reveal that Bear Cottage is already too small for the number of patients it is intended to serve.

The MRS amendment 1415 is being proposed to facilitate a 35-million-dollar hospital in Allen Park with 7 beds for children with life limiting conditions. Data provided by the WA health Department has indicated there are 2000

children with life-limiting conditions. The proposed hospice cannot possibly meet the needs of that number. It is not located in the area that was identified as being of greatest need – the northern suburbs.

In a public/private partnership arrangement, the building is being procured by a private company . The government will use the building under a lease or licence arrangement. In the event that the project does not succeed as a hospital, the building will continue to be owned by private concerns and can be used for another purpose. No doubt the building would remain. The site is unlikely to ever be returned to green space.

The construction of the first children's hospice should therefore be on a safe site that has capacity space for expansion, in an area of greatest need. Not in the middle of a public park and reserve that is well used and valued by the wide community of Western Australia.

Allen Park and King's Park were both set aside for recreational use and classified as Class A Reserves more than 120 years ago. An amendment that removes any portion of Allen Park from Parks and Recreation should not be approved.

Planning Comment: Comments noted. Refer to "Part 6 (a) – Objecting Comments of the Report on Submissions".

Determination: Submission dismissed.

Submission: 43

Submitter: Malcolm Murray (interested resident)

Summary of Submission: OBJECTION

The submitter objects to the amendment as it would have a negative effect on the operation of Allen Park as a community recreational reserve.

Such a plan would be inconsistent with the Allen Park Master Plan (2017) and represent an insult to John Allen and other far-sighted individuals who set the land aside more than 120 years ago "...as a garden for the people for all time."

The legacy of such vandalism at Allen Park will be a diminished positive environmental yield from the Park's

areas that remain their natural state for all-Western Australians. In addition, the proposed buildings and increased associated vehicular entries to the site will intrude into and disrupt the potential of the land as a much-valued resource for healthy recreational pursuits for thousands of people of all ages who depend upon it for good health, exercise and social activities.

In addition, the determination of the proponents to secure the site for their dream project is already creating significant public concern about the bush-fire risk implications of the chosen site and the dangerous threat it poses to the patients, their families and staff at the facility. It will be a sad day for the profession of Planning in Western Australia if it cannot see the downside of this project in this location and recommends that the site classification be changed to 'Special Purposes'

Planning Comment:	Comments noted. Refer to "Part 6 (a) – Objecting Comments of the Report on Submissions".
Determination:	Submission dismissed.

Submission:	44
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Submitter:	Joshua Tukington (interested resident)
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Summary of Submission:	OBJECTION
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The submitter objects to the amendment as a resident and regular user of the area of Allen Park, the class A reserve to be affected by the construction of the hospice and related fire breaks, I am deeply distressed at the loss of sanctuary for animals and people alike.

The colourful and sonorous Rainbow Bee Easter birds which nest in the large area the hospice would occupy are one of the many examples of native wildlife and fauna that will lose their habitat.

People from all over Perth regularly walk through Whadjuk trail for recreational purposes and to access the beach. Instead of the sanctuary of quiet open bushland they currently enjoy, they will have to divert their paths to built-up areas not in keeping with the peaceful juxtaposition with nature that Allen Park is known for.

Why when there are many other site options which are less intrusive to our scarce native habits and can

accommodate a far larger hospice than the one possible on the Allen Park site (which will no doubt be attempted to be expanded upon), is so much time and public money being spent on this project which is not fit for purpose?

The City of Nedlands invested considerable time and money in community consultation to determine the 2017 Master Plan in keeping with the community's wishes, why is this being ignored?

Please don't turn the people's park and nature sanctuary into a concrete jungle and parking lot! Instead, give the sick children and their families what they deserve, a bigger hospice in an easy-to-access location.

Planning Comment: Comments noted. Refer to "Part 6 (a) – Objecting Comments of the Report on Submissions".

Determination: Submission dismissed.

Submission: 45

Submitter: Captain Robert Scoggins (interested resident)

Summary of Submission: OBJECTION

The submitter objects to the amendment as follows:

- It is unsuitable given the potential nearby fire impacts.
- The old Deaf School site in Mosman Park would have been a better alternative.
- The close proximity of the hospice will have a negative effect on the coal residents and visitors to Allen Park

Planning Comment: Comments noted. Refer to "Part 6 (a) – Objecting Comments of the Report on Submissions".

Determination: Submission dismissed.

Submission: 46

Submitter: City of Nedlands

Summary of Submission: OBJECTION

The City of Nedlands Council advises the WAPC as follows:

- Not support the reclassification of Lot 503 Odern Crescent from the Parks and Recreation reserve to Public Purposes – Special Uses reserve as Council seeks to retain the long-term status of Parks and Recreation as opposed to the short-term purpose stated in the management order that it is “To be utilised for the designated purpose of ‘Children’s Hospice’ only”.
- Not support the reclassification of Lot 504 Odern Crescent from Parks and Recreation reserve to Public Purposes – Special Uses reserve as it is unnecessary and has no effect on vehicle access to Lot 503.

Planning Comment:

Comments noted. Refer to “Part 6 (a) – Objecting Comments of the Report on Submissions”.

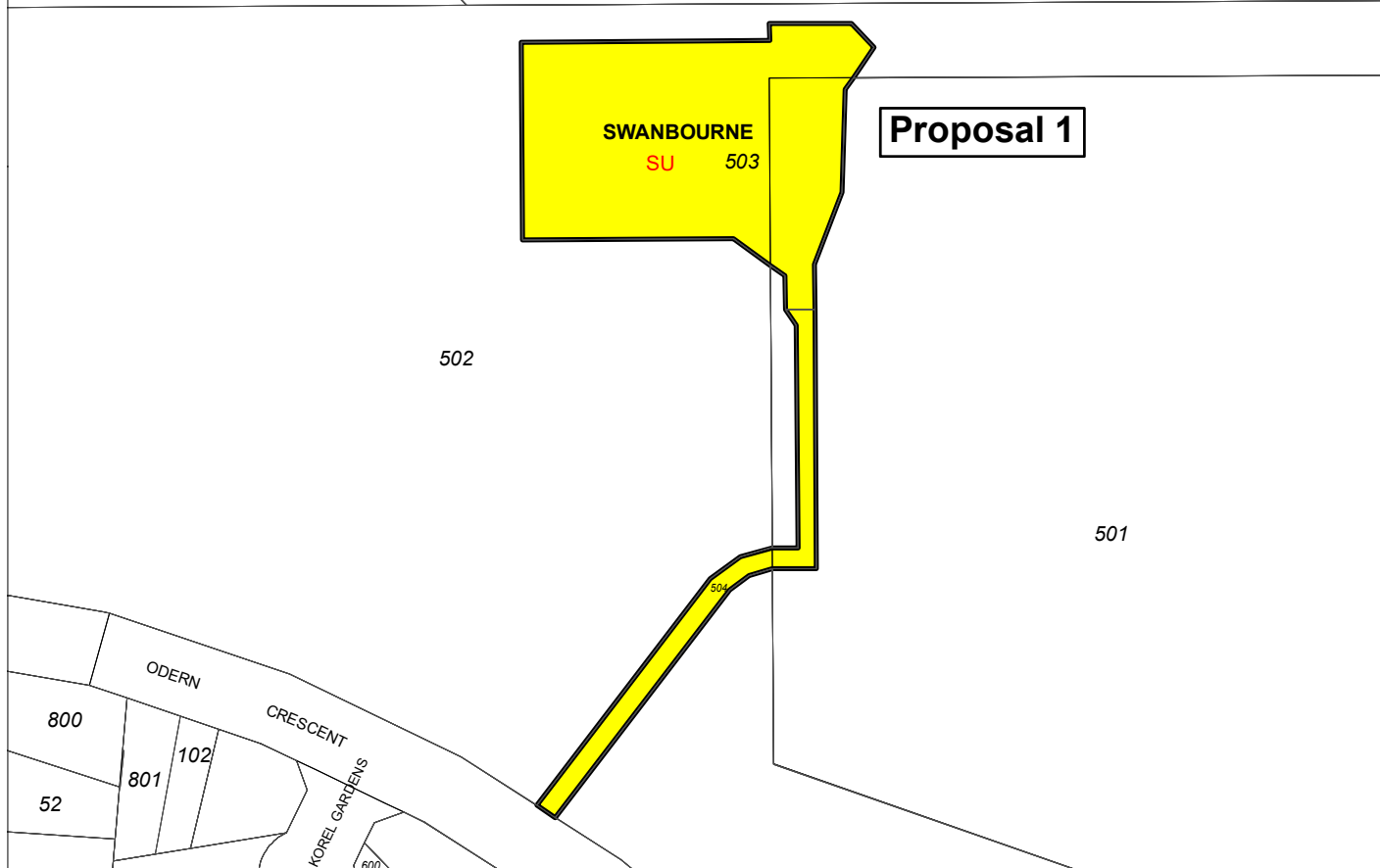
In relation to the reservation of Lot 504 Odern Road to Public Purposes – Special Uses in the MRS, this is supported as it aligns the use of this road access for the proposed site and existing facilities.

Determination:

Submission dismissed.

Schedule 3

**Amendment Figure - Proposal 1
(as advertised)**



Children's Hospice Site Proposed Standard MRS amendment as advertised

13 September 2023

Proposal 1

Proposed Amendment:

SU Parks and Recreation reservation to Public Purposes reservation - special uses

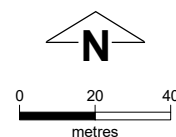
Reference no: 3733

File no: RLS/1014

Version number: 2



Date: 21/09/2023
Produced by Data Analytics, Department of Planning, Lands and Heritage, Perth WA
Base information supplied by Western Australian Land Information Authority SLIP 1180-2020-1



Appendix A

List of plans (as advertised)

Metropolitan Region Scheme Amendment 1415 (Standard)
Children's Hospice Site

as advertised

Amending Plan 3.2819

Detail Plans

1.6339

Submissions

Regulation 7
Planning and Development (Region Planning Schemes) Regulations 2023

Amendment (Standard)
Submission Form

Submission
Metropolitan Region Scheme Amendment 1415

Children's Hospice Site

Secretary
Western Australian Planning Commission
Locked Bag 2506
PERTH WA 6001

FILE
RLS/1014

Title (Mr, Mrs, Miss, Ms) First Name
Surname (PLEASE PRINT CLEARLY)
Name and contact details removed at the request of the submitter
Address Postcode
Contact Number .. Email Address

Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission? ☒ Yes ☐ No

Submission

(Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

See attached.

turn over to complete your submission

The pathway between the carpark adjacent to the bridge club and the oval close to the Swanbourne beach is an important element of the urban infrastructure. It is used every day by countless walkers transiting between the suburb and the beach, including myself.

Any further reduction in the land space between these points will substantially impair the utility of the area - cutting off many residents from accessing the beach and sporting facilities. It will further encourage a dependence on car transportation rather than walking as a means of accessing the beach.

The erosion in bushland is a sorry and insidious process. Once the parkland is gone, it will never go back and is lost for ever. It is the thin edge of the wedge. You will make your decision based on the proposal in front of you. However, the flow on decisions to privatise public land is an inherent part of any departure from the public parkland status. You will open the pathway for a process (perhaps in 20 or 30 years) of an application to change the ownership to private in order to underpin a financial decision to upgrade or refurbish the facilities. You can say "well this is not planned so I do not need to take it into account" But it is a natural process and your participation in this is essential. Public land should stay public. There is plenty of private land that can be acquired and used or hospices.

For 7 patients at any time, the land footprint is outrageous – where does it stop?.

Please do not consent to any further reduction in the parkland or the public access to the pathways – including for playgrounds. I support the creation of the Nedlands Council pathway to enhance the access from Allen Park playing fields to the beach oval.

I have seen beautiful birds, lizards and snakes in the area. The area under consideration is an important part of the bushland and public open space. A playground that is covered in artificial surface (sand, Astro turf or other) is not bushland. It may as well be a carpark. If we wanted a playground – it would not be there.

There is a public consultation process for a reason – not just an unfortunate process that you have to go through before you give in and agree with the Ian Campbell Developer. It has been an outrageous process and undermines public confidence in due process. No more please.

Amendment (Standard)
Submission Form

Submission

Metropolitan Region Scheme Amendment 1415

Children's Hospice Site

Secretary
Western Australian Planning Commission
Locked Bag 2506
PERTH WA 6001

FILE
RLS/1014

Title (Mr, Mrs, Miss, Ms) MS First Name PAULINE
Surname BUNCE (PLEASE PRINT CLEARLY)
Address 23 REEVE STREET, SWANBOURNE Postcode 6010
Contact Number 0416 704 084 Email Address paulinebunce@hotmail.com

Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission? ☐ Yes ☒ No

[I am responding via this form as there is a glitch in your online Form. I cannot get past Q4. I have provided Feedback on the problem.]

(Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

- I do not agree with the proposal to alter the zoning of this site.
 - To alter the zoning in this way - retrospectively - runs counter to the principles of due process. Changing the zoning of a site after having approved a project on it is not the way that urban planning should happen.
 - This entire saga has been a tragicomedy from the very outset. Now is an opportune time to reinstate and rectify the usual sequencing of land-use approvals.
 - Almost every step that has been taken with regard to this parcel of land in Swanbourne has been a last-minute, ill-informed scramble through government rules and regulations. The "brakes" need to be applied.
 - After the hasty excision of this land parcel from an A-Class Reserve, the next step should have been this one - the rezoning of the land under the Metropolitan Region Scheme.
- turn over to complete your submission

P.T.O. →

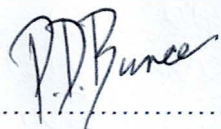
- Why was the re-zoning step "leapfrogged"?
- As the site is still zoned as Parks and Recreation, there is no need for haste (either implied or imposed) to change it. We are still at the zoning stage.
- The "footprint" of the proposed hospice will extend well beyond the yellow zone on Amendment Plan 3.2819. During the construction phase alone, the impact-zone will be at least double this area. Any future fire mitigation measures will extend this impact well into the surrounding bushland.
- Let us put the idea of the hospice to one side and turn back the clock to look at what the re-zoning of this isolated pocket of coastal bushland might entail. This parcel of land has access limitations, a risk of fire and it is an important part of a significant ecological corridor from the ocean through to the coastal wetlands.
- Why "punch a hole" in this corridor? Why change the zoning at all?
- There is no clear need to reclassify this piece of coastal bushland, and it should remain zoned as Parks and Recreation.

You should be aware that:

- The Western Australian Planning Commission (WAPC) is subject to the *Freedom of Information Act 1992* and as such, submissions made to the WAPC may be subject to applications for access under the act.
- In the course of the WAPC assessing submissions, or making its report on these submissions, copies of your submission or the substance of that submission, may be disclosed to third parties.

To be signed by person(s) making the submission

Signature



Date

10 March 2024

**Note: Submissions MUST be received by the advertised closing date on 13 March 2024.
Late submissions will NOT be considered.**

Regulation 7
Planning and Development (Region Planning Schemes) Regulations 2023

Amendment (Standard) Submission Form

Submission

Metropolitan Region Scheme Amendment 1415

Children's Hospice Site

Secretary
Western Australian Planning Commission
Locked Bag 2506
PERTH WA 6001

FILE
RLS/1014

Title (Mr, Mrs, Miss, Ms) Dr First Name NEVILLE
Surname HILLS (PLEASE PRINT CLEARLY)
Address UNIT 38, 80 MOORO DR, MT CLAREMONT Postcode 6010
Contact Number 0418934198 Email Address nrills1934@bigpond.com

Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission? ☐ Yes ☒ No

Submission

(Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

turn over to complete your submission

(Please attach additional pages if required)

ATTACHED ON EMAIL ~~1/4~~
⑤ POST MAIL

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- In the course of the WAPC assessing submissions, or making its report on these submissions, copies of your submission or the substance of that submission, may be disclosed to third parties.

To be signed by person(s) making the submission

Signature

N. F. Hills

Date

11 MARCH 2024

**Note: Submissions MUST be received by the advertised closing date on 13 March 2024.
Late submissions will NOT be considered.**

Telephone: (08) 6551 8002

Email: RegionPlanningSchemes@dph.wa.gov.au

Website: www.wa.gov.au/dph/regionplanningschemes

Metropolitan Region Scheme submission (MRS)

The proposed amendment to the MRS to authorise building a Hospital (children's hospice) in Allen Park Swanbourne must not to be approved on at least two fundamental grounds.

1. **Risk of failure.** The proposed health facility is based on a flawed **model of care** that is not appropriate to adequately serve families in Metropolitan and Regional Western Australia.
2. **Planning and governance.** A substantial hospital construction is incompatible with the land planning purposes for which Allen Park was established a century ago and is needed even more today to balance inevitable growth and urban infill.

Constructing a Hospital (Children's hospice) is operationally and logistically in conflict with many published Government Policies, e.g.

DLPH Strategic Plan 2019 – 2024.

Greening Perth's urban communities.

Native Vegetation Policy for Western Australia May 2022.

State Planning Policy 2.8. Bushland Policy.

State Planning Policy 3.7 for Bushfire Risk Management.

Coastal Development Policy.

The proponents for this project have paid "lip service" to fundamental legal and government policy requirements on many topics, including genuine consultation with all affected parties before making a decision.

There is a case for.....

1. Preventing the failure to provide much needed accessible Child Health Palliative Care Services to Western Australia, through faulty planning procedures and lack of genuine community consultation, rendering the proposed project unsafe and unable to meet stated aims.
2. Protecting precious, limited public open space, and halting built development in Allen Park, an A Class Reserve, consistent with long standing community expectations and sound planning principles.
3. Demanding a return to transparent, respectful and constructive community consultation at all levels of government and media.
4. Reviewing the role of Registered Charitable organisations lobbying Ministers and governments on State Health Services and planning decisions.
5. Demanding a return to pre-pandemic rules of good governance, the rule of law and observance of the human rights of citizens to express views contrary to governments, without suffering abuse by elected members of Parliament, Developers and Media.
6. Insisting that state-wide strategic health planning is done through transparent cooperation between families, patients, health professionals and communities in partnership with government.

Model of Care

An early document (located under an FOI application) is headed Children's Hospice Meeting, dated 16 November 2020 and sub-headed Perth Children's Hospital.

Under Schedule of Accommodation this meeting "noted that Bear Cottage opened in 2005 and is no longer considered best practice..."

Bear Cottage was reported upon in 2013, "Child Hospice struggling to meet demand" published by Amy Corderoy. SMH Health Journalist. The article recorded that,

... it was important that Bear Cottage provided long-term care to children, many of whom were living longer than in the past, and their families. It provides round-the-clock nursing care, music, play and art therapy, and food, cleaning, and counselling services.

Families needing respite will often stay at Bear Cottage for between seven to ten days and are able to receive four weeks booked respite per year dependent on availability. There is no limit put on the length of stay for end-of-life care.

But Bear Cottage has seen a huge increase in growth over the past five years, and is now struggling to meet demand, nursing unit manager Narelle Martin said.

"It's a bit of a catch-22, because we want every family that has got a child with a life-limiting illness to be aware, and we need awareness for fund-raising, too," she said. "We are getting quite a number of referrals ... we have already had to cut back our number of days that each family gets."

This year Bear Cottage has been forced to cut the maximum time a family can spend there by a third, from six weeks to four.¹

Logistics of Proposed Hospice There has been no policy schedule published indicating how long patients can remain at the hospice, which has only seven patient beds and three family suites. (It appears the family suites are not designed for patients to remain at the same time in the same spaces).

My calculations have had to be based on **estimates of need** as **no actual research** has been done in WA.

With 7 patient beds **only 91** families in WA could have respite support for four weeks once a year. If all beds are occupied every day.

(52 weeks divided by 4 weeks = 13 opportunities to stay per year per bed X 7 beds = 91 separate families in a year.)

With 3 family suites, families could stay at the hospice on 3 X 13 opportunities in a year = 39 separate families a year.

2,000 WA children estimated in need!

¹ Bear Cottage was visited in 2019 by Roger Cook, PCHF Chairman and PCHF CEO.

Ethical concerns

With due respect and appreciation for those staff currently providing great care, the ethics of providing an exceptionally high level of care to a very select few must be considered.

One important component of efforts to increase value in healthcare is identifying and minimising use of 'low-value care', defined as use of an intervention where evidence suggests it confers no or very little benefit on patients, or risk of harm exceeds likely benefit, or, more broadly, the added costs of the intervention do not provide proportional added benefits.

Reducing low-value care is important for improving both health outcomes for patients and the efficiency of the health system. Such quality improvement depends on knowing how much low-value care occurs, where and why it occurs.²

While there is ample evidence the care offered is greatly appreciated by those fortunate enough to be able to access it, what is the ethical position in respect of those who get little or nothing by way of help? Is it equitable or "compassionate" to deprive the majority of even modest relief?

Lady Lawley Cottage was allowed to be closed down progressively from 2017 onwards, believed due to funding issues, while this much delayed "Developers' mirage" has been proposed.³

Was that ethical or "compassionate"?

Delays have been caused by the failure to consult and wrong choice of site, not by opponents of care for sick children as is so conveniently misrepresented.

MRS planning goals must not be arrogantly dismissed by government and developers.

Building a \$34M hospital in a parkland Reserve that is greatly valued by a wide community of stakeholders, many from a range of suburbs besides Nedlands, is wrong footed at many levels. The waiting lists for most forms of community based professional health care are blowing out while access to the few big hospitals is "ramping up". This is not an answer.

Instead we have a politically motivated and heavily one-sided media supported campaign of debatable planning or health service validity.

This plan has regional planning implications for many families, in and outside the Perth Metropolitan Region, who will never see benefits from this mis-allocation and abuse of funding, and precious, historically reserved public land permanently lost.

Dr Neville Hills.

Unit 38, 80 Mooro Drive,

Mount Claremont 6010.

March 11, 2024.

² Badgery-Parker T, Pearson SA, Chalmers K, Brett J, Scott IA, Dunn S, Onley N, Elshaug AG. Low-value care in Australian public hospitals: prevalence and trends over time. *BMJ Qual Saf.* 2019 Mar;28(3):205-214. doi: 10.1136/bmjqs-2018-008338. Epub 2018 Aug 6. PMID: 30082331; PMCID: PMC6559783.

³ Lady Lawley House: Dozens of workers to lose jobs and families their respite care, ABC June 6, 2017.

Amendment (Standard) Submission Form

Submission

Metropolitan Region Scheme Amendment 1415

Children's Hospice Site

Department of Planning, Lands and Heritage Received	
Scanned	13 MAR 2024
Attachments	<input type="checkbox"/>
Scan QA	<input type="checkbox"/>
Doc No.	<input type="checkbox"/>
File No.	

Secretary
Western Australian Planning Commission
Locked Bag 2506
PERTH WA 6001

FILE
RLS/1014

Title (Mr, Mrs, Miss, Ms) MRS First Name MIRIA
Surname LUMMINS (PLEASE PRINT CLEARLY)
Address 17 REEVE ST SWANBOURNE Postcode 6010
Contact Number 0450956109 Email Address mca.clubclassembroidery.com.au

Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission? ☐ Yes ☒ No

Submission

(Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

THE CHILDREN'S HOSPICE SITE IS NOT SUITABLE AND AN ILLTHOUGHT OUT PROJECT. STRATEGICALLY COMMENCED DURING COVID WHEN THE GOVERNMENT INTRODUCED NEW FAST TRACKED DEVELOPMENT LANDS, DRIVEN BY DEVELOPERS, NO ESSENTIAL CONSULTATION WITH THE HEALTH DEPT CLINICIANS, CITY OF NEDLANDS OR COMMUNITY OR CONSIDERATION TO NEDLANDS COUNCIL'S LAND OR RATEPAYERS. CONSTITUENTS INTERESTS HAVE NOT BEEN CONSIDERED OR OUR ENJOYMENT OF THE AREA, BUSH OR FAUNA, OR ACCESS TO THE OCEAN.

THE FORMER SUNSET HOSPITAL INSTEAD. A BETTER SITE, PROXIMITY TO PERTH CHILDREN'S HOSPITAL, EASIER PUBLIC TRANSPORT, NO FLAME ZONE, NO CAMPBELL BARRACKS, MORE APPROPRIATE, NO POWER OR SEWERAGE, NO ACCESS. I CAN THINK OF OTHER SITES BETTER SUITED - I'M SURE THE GOVERNMENT WOULD BE AWARE.

A 7 PATIENT FACILITY? SURELY WILL NEED GROWTH, THE SITE IS NOT BIG ENOUGH EVEN NOW. ALREADY THE DEVELOPER WISHES TO CONTROL MORE LAND. WHO HOLDS SWAY - DEVELOPER OR RATEPAYERS? DEMOCRACY REQUIRED. WE ARE OF THE OPINION THAT THE SITE BE REMOVED BY THE GOVERNMENT AND THE DEVELOPERS AND THE PLAN ALTOGETHER FOR A MORE SUITABLE SITE.

BETTER STILL, A REPEAL. THE LAW OVERTURNED SAME AS THE ABORIGINAL CULTURAL HERITAGE LEGISLATION WHEN THE GOVERNMENT WOKE UP. ALLEN PARK IS NOT SUITABLE.

turn over to complete your submission

ACCESS NOT SUITABLE. THINK OF SES. FIRE + RESCUE. MEDICAL REQUIREMENTS.
ESSENTIAL SERVICES. PATIENT EMERGENCY EVACUATION.
THERE ARE BETTER SITES NORTH ALONG THE OCEAN.
PLEASE CONSIDER. THANK YOU. ALLEN PARK HOSPICE WILL BE A LEMON IN NOT SO
MANY YEARS TO COME. RELOCATE + REPEAL.

You should be aware that:

- The Western Australian Planning Commission (WAPC) is subject to the *Freedom of Information Act 1992* and as such, submissions made to the WAPC may be subject to applications for access under the act.
- In the course of the WAPC assessing submissions, or making its report on these submissions, copies of your submission or the substance of that submission, may be disclosed to third parties.

To be signed by person(s) making the submission

Signature M. J. Lema Date 8 MARCH 2024

**Note: Submissions MUST be received by the advertised closing date on 13 March 2024.
Late submissions will NOT be considered.**

Regulation 7

Planning and Development (Region Planning Schemes) Regulations 2023

Amendment (Standard)

Submission Form

Submission

Metropolitan Region Scheme Amendment 1415

Children's Hospice Site

Secretary
Western Australian Planning Commission Locked Bag 2506
PERTH WA 6001

Title (*Mr, Mrs, Miss, Ms*)Mrs..... First Name
Lesley.....Surname
Shaw..... (PLEASE PRINT CLEARLY) Address9
Greenville Street Swanbourne..... Postcode
6010..... Contact Number0431728230..... Email Address
.....melonhillbg@gmail.com.....

*Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission? ♦ Yes ♦ **No***

Submission

(Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

turn over to complete your submission

Submission to: Metropolitan Region Scheme Amendment 1415 –Children's Hospice Site

I am making a submission on behalf of the Melon Hill Bushland Group in Swanbourne, a volunteer group that has been rehabilitating and caring for the bushland in this area for almost 30 years.

This proposed site (Lot 503) was A Class Reserve, ensuring the highest level of protection. Whether bushland, wetland, Threatened Ecological Communities, or parkland, all these valuable community spaces are critical and should be retained for future generations. The Climate Council announced there will be twice as many days above 35 degrees by 2050¹. The proposed development will limit the opportunity for our group (in conjunction with the City of Nedlands) to plant more trees as per the Urban Greening policies. The benefits of this would increase canopy, reduce carbon emissions, combat the heat island effect, and importantly, increase biodiversity and resilience by enhancing the critical green corridor linking Melon Hill, Bush Forever Site 315 and the coastal reserves.

¹ <https://www.climatecouncil.org.au/resources/how-hot-will-your-neighbourhood-be-by-2050/> (28.02.24)

A Class Reserve has been lost

The sweeping changes that were made under the government's economic stimulus legislation, **Part 17 Special Development Projects** has caused dissent in communities, including ours. The site was selected before we were given an opportunity to raise either the importance of the biodiversity corridor, or our concerns about the bushfire risk posed by the proximity of the northern and eastern boundaries to the Allen Park bushland. This is unfortunate.

Given the vulnerability of the site, the excised land could have been located further away from the bushland to ensure that remnant bushland is not impacted. This would have allayed much of the community concern.

In 2017, the City of Nedlands released the Allen Park Precinct Master Plan, having invested time and expense to bring the community together for a vision for Allen Park and its environs, as well as to inform budget for future needs and community expectations. Popular vote determined that the area of the old bowling club should be a community space that "encompasses and promotes physical activity within a natural environment."² This included a nature play area and all-ages fitness area, with the remaining open space for the benefit of the whole community. The Amendment Report statement "The nature play and all-ages exercise area will be occupied by the Hospice building and garden, however, the community active space will perform a similar role to the exercise area". It is now apparent, in reference to the Post Newspaper report 'community active space' (16/2/2024, **Neds responds on hospice**) that identified more land (3000m²) is being sought to expand into the exercise area, with a \$4 million price tag.

The long-awaited Norn Bidi Whadjuk Trail is proposed to traverse the now targeted open space. Again, the community was involved in the process with the City of Nedlands, and arrived at a very workable and appealing trail. This is now in jeopardy.

State Planning Policy 2.8 - Bushland Policy for the Perth Metropolitan Region

'State Planning Policy 2.8 - Bushland Policy for the Perth Metropolitan Region *aims to provide a policy and implementation framework that will ensure bushland protection and management issues are addressed and integrated with broader land use planning and decision-making.*

In general, the policy does not prevent development where it is consistent with policy measures and other planning and environmental considerations. The site is located within land that is primarily cleared of vegetation and does not contain any Threatened or Priority Ecological Communities, and it is not within or abuts a Bushforever area'.

Applying land use planning and decision-making principles as highlighted above, there is an urgent need to maintain public open space for recreational use, allowing for more green corridors, growing the urban forest, and increasing biodiversity to increase the resilience of our communities.

Not only are green spaces essential to counter the heat island effect, but there is an increasing body of evidence showing the critical role of natural areas and biodiversity in ensuring resilient, healthy, liveable communities. The impact of natural areas on physical and mental health is well documented. There is also a developing understanding of how important biodiversity and bio abundance (measures of biomass and

² Allen Park Precinct Master Plan Report – FINAL ABV Leisure Consultancy Services, endorsed by City of Nedlands December 2017.

percentage cover) is likely to be, in providing the resilience needed for a changing climate. An excellent example of this is the growing evidence of the role quenda play in reducing fuel loads in bushland by burying litter. Quenda have been successfully reintroduced in a number of urban areas, including Lake Claremont nearby. The Melon Hill Bushland Group is doing work this year to encourage quenda into the bushland with the hope that a population can be established.

It should be noted that Bush Forever site 315 is in fact close to and diagonally opposite the site, and that the bushland corridor to the north of the excised Lot is a critical biodiversity corridor linking the bushland to Bush Forever site 315 and the coastal reserves. This corridor needs to be protected and widened, not diminished, to ensure it can perform this important role.

EPA Assessment

MHBG gave a presentation in a deputation to the EPA, to appeal their decision not to assess the project, as approved by the WAPC. A precautionary approach could have been granted here to allow for a minor relocation of the site to position it further from the bushland, thus reducing fire risk and unnecessary ongoing maintenance of the surrounding bushland.

Conclusion

In this time of accelerating climate change, any development that impacts our green spaces, biodiversity and wildlife corridors requires very careful consideration. Failure to do so risks a flawed development that fails to meet its duty of care to the children and families that so desperately need these services, and the broader community.

FILE

RLS/1014

You should be aware that:

- The Western Australian Planning Commission (WAPC) is subject to the *Freedom of Information Act 1992* and as such, submissions made to the WAPC may be subject to applications for access under the act.
- In the course of the WAPC assessing submissions, or making its report on these submissions, copies of your submission or the substance of that submission, may be disclosed to third parties.

To be signed by person(s) making the submission

Signature  Date 11 March 2024

Telephone: (08) 6551 8002 Email: RegionPlanningSchemes@dph.wa.gov.au Website: www.wa.gov.au/dph/regionplanningschemes

Note: Submissions MUST be received by the advertised closing date on 13 March 2024. Late submissions will NOT be considered.

From: Jim Mackintosh <jim.mackintosh@dwer.wa.gov.au>
Sent: Tuesday, 6 February 2024 8:22 AM
To: Region Planning Schemes
Subject: FW: Proposed Metropolitan Region Scheme Amendment 1415 (Standard) - Children's Hospice Site - RLS/1014

OFFICIAL

Dear DPLH,

Thank you for the above referral. The Department of Water and Environmental Regulation (DWER) has considered the proposal and has no objections and no further comments.

Regards

Jim Mackintosh

Department of Water and Environmental Regulation

Program Manager

Swan Avon Region

Planning Advice Section

T 08 6250 8043 |

E jim.mackintosh@dwer.wa.gov.au

Visit our website www.dwer.wa.gov.au

From: Jacqui Clinton <jacqui.clinton@dbca.wa.gov.au>
Sent: Tuesday, 6 February 2024 11:06 AM
To: Region Planning Schemes
Subject: RE: Proposed Metropolitan Region Scheme Amendment 1415 (Standard) - Children's Hospice Site - RLS/1014

You don't often get email from jacqui.clinton@dbca.wa.gov.au. [Learn why this is important](#)

OFFICIAL

Hi Marija,

DBCA has reviewed the above MRS amendment and has no comment to make at this time. Thank you for the opportunity to comment.

Regards

Jacqui Clinton

Senior Planning Officer
Swan Region
Parks and Wildlife Service
Department of Biodiversity, Conservation and Attractions
Phone: (08) 9442 0312 Mobile: 0439 977 455
Email: jacqui.clinton@dbca.wa.gov.au

** I currently work part-time Monday to Thursday*



Department of Biodiversity,
Conservation and Attractions



*We're working for
Western Australia.*

From: Golestani, Shanthi <Shanthi.Golestani@transport.wa.gov.au>
Sent: Tuesday, 6 February 2024 4:49 PM
To: Region Planning Schemes
Subject: 20240206 DoT comments re: Proposed Metropolitan Region Scheme Amendment 1415 (Standard) - Children's Hospice Site - RLS/1014

OFFICIAL

Your ref: RLS/1014

Our ref: DT/15/05120

Enquiries: Shanthi Golestani (9216 8774)

Ms Sam Boucher
Secretary, Western Australian Planning Commission
Department of Planning, Lands and Heritage
140 William Street
PERTH WA 6000

Attention: Anthony Muscara

Dear Anthony

RE: PROPOSED Metropolitan Region Scheme Amendment 1415 (Standard) - Children's Hospice Site

Thank you for your email dated 31 Jan 2024 inviting the Department of Transport (DoT) to provide comment on the above proposed amendment. The Urban Mobility (UM) division of DoT has reviewed the submitted documents and advises that, given the nature of the proposed amendments, DoT supports the proposal.

We have liaised with the Public Transport Authority who have no comment to add.

If you wish to follow up, please do not hesitate to contact me on 9216 8774.

Kind regards,

Shanthi Golestani
Senior Transport Planner|Urban Mobility|Department of Transport
GPO Box C102, Perth WA 6839
Tel: (08) 92168774
Email: Shanthi.Golestani@transport.wa.gov.au | Web: www.transport.wa.gov.au

Part time - Tues/Thurs/Fri



Government of Western Australia
Department of Transport

Empowering a
thriving community



We acknowledge the Traditional Custodians of this land and pay respect to the Elders past and present.



Your Ref: RLS/1014
Our Ref: F-AA-90535-15/ D-AA-24/46633
Contact: System Performance 9222 2000

Mr Anthony Muscara
Principal Planning Officer
Department of Planning, Lands and Heritage
140 Willian Street
PERTH WA 6000

Via email: regionplanningschemes@dplh.wa.gov.au

Dear Mr Muscara

**PROPOSED METROPOLITAN REGION SCHEME AMENDMENT 1415
(STANDARD) – CHILDREN'S HOSPICE SITE**

Thank you for your email dated 31 January 2024, requesting comment from the Department of Health (DoH) on the above proposal. The DoH provides the following comment:

Water Supply and Wastewater Disposal

Deep sewerage is not currently available to the site. However, there appears to be a connection point to deep sewerage on the northern adjoining lot approximately 40m from the northern boundary of the proposed lot. Therefore, with the above in mind and in relation to wastewater management, the DoH has no objection to the proposal subject to all future developments being connected to reticulated deep sewerage in accordance with DoH's legislation.

As medical wastes may be a component of the sewage, it is recommended the proponent contact the Water Corporation to ascertain if any pre-treatment infrastructure will be required prior disposal of sewage into the mains sewer line.

Should you have any queries or require further information, please the System Performance Team on 9222 2000 or eh.eSubmissions@health.wa.gov.au.

Yours sincerely

Dr Michael Lindsay
**EXECUTIVE DIRECTOR
ENVIRONMENTAL HEALTH DIRECTORATE**

11 March 2024



Enquiries: Belinda Hill on (08) 9323 4572
Our Ref: 24/1145 (D24#)
Your Ref: RLS/1122

19 February 2024

Marija Bubanic
Department of Planning Lands and Heritage
140 William Street
PERTH WA 6000

Email: regionplanningschemes@dplh.wa.gov.au

Dear Marija,

PROPOSED MRS AMENDMENT – CHILDREN’S HOSPICE SITE – LOTS 503 AND 504 CLEMENT STREET, SWANBOURNE – REQUEST FOR COMMENTS – RLS/1014

Thank you for your correspondence dated 31 January 2024 to comment on the proposed rezoning for Lots 503 and 504 Clement Street, Swanbourne from Parks and Recreation to Public Purposes – Special Uses.

Main Roads has no objection to the proposal.

Main Roads requests a copy of the WAPC’s final recommendation to be sent to planninginfo@mainroads.wa.gov.au quoting the file reference above.

If you require any further information, please contact Strategic Planning Officer Belinda Hill on (08) 9323 4572 or via email at belinda.hill@mainroads.wa.gov.au.

Yours sincerely

Lindsay Broadhurst
Director Road Planning

From: Marl Buchanan <bruno4852@hotmail.com>
Sent: Tuesday, 12 March 2024 3:51 PM
To: Anthony Muscara <Anthony.Muscara@dplh.wa.gov.au>
Subject: Mrs Amendment1415

You don't often get email from bruno4852@hotmail.com. [Learn why this is important](#)

I Disagree with this Amendment 1415.

I also disagree with the site for children's Hospice, it is not appropriate place to care for sick children reason, noise ,and fire risks . All so land grab, much better sites around Perth. S & M Buchanan

Get [Outlook for Android](#)

From: Peter Taranto <peterdtaranto@gmail.com>
Sent: Tuesday, 12 March 2024 9:20 PM
To: Region Planning Schemes
Subject: MRS Amendment 1415 Submission
Attachments: MRS Amendment 1415.pdf

Dear Region Planning Schemes,

I attach my submission opposing the above proposed amendment.

Could you kindly confirm receipt of this email.

Yours faithfully

Peter Taranto
29 Lynton Street
Swanbourne
Mobile - 0417 177 466

Amendment (Standard)
Submission Form

Submission

Metropolitan Region Scheme Amendment 1415

Children's Hospice Site

Secretary
Western Australian Planning Commission
Locked Bag 2506
PERTH WA 6001

FILE
RLS/1014

Title (Mr, Mrs, Miss, Ms) First Name PETER
Surname TARANTO (PLEASE PRINT CLEARLY)
Address 29 LYNDON ST SWANBURNE Postcode 6010
Contact Number Email Address peterdtaranto@gmail.com

Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission? ☐ Yes ☒ No

Submission

(Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

ATTACHED

turn over to complete your submission

- The Western Australian Planning Commission (WAPC) is subject to the *Freedom of Information Act 1992* and as such, submissions made to the WAPC may be subject to applications for access under the act.
- In the course of the WAPC assessing submissions, or making its report on these submissions, copies of your submission or the substance of that submission, may be disclosed to third parties.

(AS PER
EXTENSION)

12th

2/4/2024

Website: www.wa.gov.au/dplh/regionplanning/schemes

SUBMISSION

METROPOLITAN REGION SCHEME AMENDMENT 1415

INTRODUCTORY NOTE

At the commencement of the public submission period for MRS Amendment 1415, I endeavoured to speak with the Department of Planning Lands and Heritage (DPLH) regarding concerns I had about the statutory process for the proposed amendment.

I was advised by DPLH to include my concerns as to 'process' in my public submission which I now do. I look forward to my submission being included in the report to be published following the closing date for public submissions.

Incomplete information provided by Amendment Report 1415

Section 1 – Planning Objective

1. Section 1 states that the amendment, *'seeks to align the MRS amendment with the Western Australian Planning Commission's (WAPC) development approval for a children's hospice'*.
2. As a function of good and orderly planning, one would have expected that, rather than the proposed MRS amendment being sought *'after'* the development approval for the proposed project has been obtained, approval for a proposed amendment to the MRS would have been sought first in order of time.
3. A further anomaly is the fact that the Amendment Report does not advise the public that their submissions are not required as a pre-requisite to the Minister making a decision to amend the MRS.
4. The fact that a 'sod turning' ceremony for the proposed project was held on 8 February 2024 to mark the commencement of construction of the proposed project - and that this ceremony was held during the public submissions period for the proposed amendment – only serves to underline the cynicism which WA citizens may have regarding the statutory approvals which have been obtained for this project. Refer paragraph 6.

Section 2 – 'Background' section

5. The 'Background' section of the Amendment Report is incomplete in a number of respects.

Subject land was formerly 'Class A reserves classified 'parks and recreation'

6. The Background section omits to provide submitters with the following information regarding the subject land:
 - (a) The subject land and the land surrounding it is 'Allen Park', Swanbourne.
 - (b) Those lands were classified in 1901 and 1926 as 'Class A reserves (Parks and Recreation). They remained so classified until they were excised by order of the Minister for Lands in May 2021.
 - (c) In August 2020, each of the Minister for Lands, the Minister for Health, and the Department of Planning, Lands and Heritage either failed or refused to submit a proposal to the Council of the City of Nedlands for the excision of the subject land from the Allen Park Class A reserves prior to such an excision submission being laid before the WA parliament.
 - (d) This can be verified by referring to the minutes of the Ordinary Meeting of the Council of the City of Nedlands held on 25 August 2020. The minutes show that no such excision proposal was put before the Council of the City of Nedlands.

- (e) Section 14 of the then Land Administration Act 1997 obligated the Minister for Lands to consult the local government before exercising any power in relation to crown land. No such consultation ever occurred in terms of paragraph 6(c) of this submission.
- (f) As a result of a Class A reserves excision proposal not having been put to the Council of the City of Nedlands on 25 August 2025, ratepayers and the public were denied the scrutiny of the excision proposal by the Council of the City of Nedlands prior to the commencement of the 'public comments' period which ran from 12 September 2020 to 12 October 2020.
- (g) The 'offer' which was put by the Perth Children's Hospital Foundation Limited before the Council on 25 August 2025, was an offer to participate on a 'Project Control Group' for the development of the hospice.
- (h) The Executive Summary for that offer included the following observation by the City's Administration:

'The offer for the City to participate in the project group, aligns more with the 'consult' or 'involve' engagement model, however this offer assumes the project is proceeding'.
- (i) On 13 October 2020, 'Submission 18/2020' was laid before the WA parliament proposing the excision of the subject land from the Allen Park Class A reserves. That submission contained no reference of course to any consultation with the Council of the City of Nedlands because no such consultation was ever conducted.

Main entrance to the hospice

- 7. The 'Background' section to the Amendment Report states:

'Access to the site is via Odern Crescent from existing Lot 504 Clement Street which is a crown land title subject to a management order vested in the City of Nedlands. This is for the purpose of 'public access' and is proposed to accommodate the main entrance to the Hospice.'

- 8. The Amendment Report does not inform submitters that Lot 504 was created in 2020 as part of a plan of subdivision of Allen Park which was created in August 2020. That plan of subdivision supported the errant statutory excision process referred to in paragraph 6 of this submission.
- 9. Without any regard to the existence of the heavily used car park which exists between Odern Crescent and the main entrance to the Hospice), all of which was Class A reserves until 2021, the developers simply drew a line (Lot 504) through that carpark to serve as the private driveway for the proposed hospice. The existing heavily-used car park through which Lot 504 was drawn services the 'Parks and Recreation' Class A reserves of Allen Park.
- 10. The developers did this without any regard for the effect the development of a private driveway would have on the operability of the existing carpark and on Allen Park itself.
- 11. And just like something out of 'yes Minister', the DPLH will disregard the above information because it does not fall into the criteria for considering a proposed amendment to the MRS.

Section 3 – Discussion

Perth and Peel Urban Greening Strategy

- 12. The Amendment Report makes no reference to the 'Perth and Peel Urban Greening Strategy' or (PPUGS').

13. The PPUGS recognises how the impact climate change increases the need for measures such as, 'planning for green neighbourhoods, more tree canopy and green spaces in our communities'.
14. The same measure identified by the Amendment Report which states management of the remnant bush surrounding the hospice site will be required, is the same measures which runs counter to PPUGS.

Allen Park Master Plan ('APMP')

15. The Amendment Report quotes from the APMP as follows: ...'It is a comprehensive plan that includes, " a review of the current situation, analysis of potential future demand..."
16. Despite the Amendment Report seeking to leverage off the APMP by referring to, '*a review of the current situation*' and '*analysis of potential future demand*', no such review or analysis have ever been carried out.

State Planning Policy 2.8 – Bushland Policy for the Metropolitan Region

17. This section of the Amendment Report relies on the fact that proposed site is primarily cleared of vegetation.
18. The report does not consider the tuart plantings adjacent to the east boundary which will not be permitted to grow because they will otherwise pose a bushfire threat in an already bushfire prone area.

State Planning Policy 3.7 – Planning for Bushfire Riiks Management

19. The Amendment Report does not mention that at no time has the Department of Fire and Emergency Services (DFES) ever supported the Bushfire Management Plan (BMP). DFES has never supported the BMP as to, 'location, siting and design and vehicle access...'
20. When one government department (DFES) did not support the proposal of another government department, (the Department of Health), the Department of Planning, Lands and Heritage brought in a private sector contractor and then followed the advice of the private sector contractor over a co-government department.
21. Contrary to State policy, the Management Body of Lot 503, child and Adolescent Health Service (CAHS) will rely on third parties (the City of Nedlands) to manage fire risk on the children's hospice reserve.

Failure of Amendment Report to take into account Development Control Policy 5.3 - Use of Land Reserves for Parks and Recreation and Regional Open Space

22. The Amendment Report does not address Development Control Policy 5.3 - Use of Land Reserves for Parks and Recreation and Regional Open Space.
23. The proposal is not consistent with the planning framework. This is evidenced by the errors or omissions in the Amendment Report as outlined above.
24. The proposal has not been suitably planned and designed.
25. Indicators of this include:
 - (a) Contrary to section 23 of the Disability Discrimination Act, there is no wheelchair access from Odern Crescent to the proposed hospice site.
 - (b) The so-called 'private driveway' for the hospice is design to go in the wrong direction through a heavily used carpark.

- (c) A bushfire risk assessment report advised that in the event of a bushfire in Allen Park, it was unlikely that vulnerable children could be safely evacuated from the site before fire impacted on the building.
 - (d) As the site is surrounded by Class A reserves, there is no opportunity for expansion.
 - (e) Despite claims to the contrary, the site is not readily accessible to the Perth Children's Hospital.
 - (f) The local beach, Swanbourne Beach which has been put forward as a drawcard for a hospice facility is essentially an unsafe beach for most of the year due to the wave breaks.
 - (g) No noise assessment was ever conducted during Blackhawk training periods.
-

Regulation 7
Planning and Development (Region Planning Schemes) Regulations 2023

Amendment (Standard)
Submission Form

Submission
Metropolitan Region Scheme Amendment 1415

Children's Hospice Site

Secretary
Western Australian Planning Commission
Locked Bag 2506
PERTH WA 6001

FILE
RLS/1014

Title (Mr, Mrs, Miss, Ms) MRS First Name VICTORIA
Surname CALABRO (PLEASE PRINT CLEARLY)
Address 3 JAMESON STREET Postcode 6010
Contact Number 0435 796 033 Email Address hillsvickie@gmail.com

Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission? ☐ Yes ☒ No

Submission

(Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

- I lodge this submission by email and hand-written as I have had no success providing an online submission - the online process blocks me after the first stage and will not allow completion. I sincerely hope the closing date for submissions is extended.
- I am a community member who fully supports the development of a Children's Hospice in W.A.
 - I do not support the current proposed M.R.S. amendment 1415.
 - I do not support the arrogant, bullying tactics engaged by the PCHF.
- (The recent "ribbon cutting" - invite only event is further proof - as the MRS Amendment has not been approved). They are forging ahead with complete arrogance to the submission process.

turn over to complete your submission

(Please attach additional pages if required)

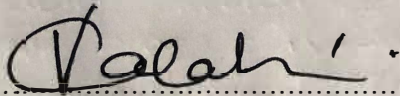
- A Class Reserves need to be protected diligently and the proposed development by the PCHF is extremely inappropriate considering the final outcome (of a \$34 million+ project) will only benefit approx 100 families per year when there are approx 2000 families in Perth hoping to access this service.

You should be aware that:

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To be signed by person(s) making the submission

Signature



Date

13/3/2024

**Note: Submissions MUST be received by the advertised closing date on 13 March 2024.
Late submissions will NOT be considered.**

Amendment (Standard)
Submission Form

Submission
Metropolitan Region Scheme Amendment 1415

Children's Hospice Site

Secretary
Western Australian Planning Commission
Locked Bag 2506
PERTH WA 6001

FILE
RLS/1014

Title (Mr, Mrs, Miss, Ms) Mr First Name Stephen
Surname Lipple (PLEASE PRINT CLEARLY)
Address 30 Lynton Street Swenbourne Postcode 6010
Contact Number 0439 845612 Email Address Lippestephen@gmail.com

Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission? ☐ Yes ☒ No

Submission

(Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

As a resident of Swenbourne living very close to Allen Park since 4 February 1974, I have long been involved and familiar with the community convictions and aspirations. Two convictions are that there is broad support for a children's hospice and that the proposed site is totally unsuitable - unsafe, poorly accessible and environmentally seriously problematic. There is great concern that the proposed project will be expansionist, and the remedy to the severe fire hazard would be to clear the adjacent flammable vegetation despite its very high value for biodiversity and role within the coastal - inland bio-linkage corridor. Other far more suitable sites exist ^{even nearby} and would provide safer, more accessible and much greater value for the enormous \$35 million project expenditure - that for only 7 children! Since the need far exceeds seven children, a facility that is better located and structured is urgently needed. Allen Park is the wrong location.

turn over to complete your submission

A further community conviction and aspiration is that the natural bushland biodiversity and near unique role as an environment transect from surf to the inland Karrakatta Complex is very highly valued - treasured - and the real threat created by the Ropie proposal is creating broad distress.

I note that the criteria under State Planning Policy 2.8 - Bushland Policy for the Perth Metropolitan Region, for bushland protection and management not be compromised by adverse or inappropriate developments is arguably not addressed by the Ropie proposal in its current site.

Allen Park functions, and has functioned over decades as a location of diverse social interaction, both within the community at large and small ^{scales} and between community and the natural environment. The site will block an important access corridor for residents to the beach. This has been long documented in repeated community surveys and planning instruments by the City of Nedlands. Clearly the proposed Ropie in the Allen Park location will have a major and detrimental impact on such community well-being. It is ironic that care for needy children should be pursued by placing them in an unsafe location and that at the expense of the regional community. I note that the adjacent Arsonde Rugby Club is both large and boisterous and games will be accompanied by sustained and loud noise and traffic.

In summary, such a major project must be sited in a safe, accessible location elsewhere, as a fit-for-purpose development, free of the major social and environmental defects and losses.

- You should be aware that:
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To be signed by person(s) making the submission

Signature

A. J. Dyke

Date

13/3/2024

**Note: Submissions MUST be received by the advertised closing date on 13 March 2024.
Late submissions will NOT be considered.**

Amendment (Standard)
Submission Form

Submission 15

Submission

Metropolitan Region Scheme Amendment 1415

Children's Hospice Site

Secretary
Western Australian Planning Commission
Locked Bag 2506
PERTH WA 6001

FILE
RLS/1014

Title (*Mr, Mrs, Miss, Ms*)Dr..... First Name
.....Michael..... Surname Coote(PLEASE PRINT CLEARLY)
Address30 Reeve Street Swanbourne.....
Postcode6010.....
Contact Number .0417 905 399..... Email Address michaelco@inet.net.au
.....

Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission? ☐ Yes ☐ No NO

Submission

(Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

I am concerned that the amendment to the original building plan will impact on the surrounding Resource Protection Area (RPA) by complying with Bushfire Protection Regulations. The surrounding RPA contains native bushland that contains habitat for native fauna including the endangered Carnaby's species Black Cockatoo, the critically endangered red-tailed black cockatoo, the Priority 4, Rare, Near Threatened and in need of monitoring quenda and the migratory rainbow bee-eater, which have recently been observed in the area immediately adjacent to the building envelope. I worked for 22 years with DBCA and was the coordinator of the Bushcare Program which used Commonwealth funds to revegetate the RPA at this site, which was then all classed as A Class Reserve. The fire protection zones that are being introduced in the amendment will remove the reduce the habit value of the surrounding bushland which is already going to be compromised by the building envelope and access roads, increased noise and vibration during construction and ongoing use after construction.

The EPA have overlooked the significant threat that this amendment will have on the reserve which is already under pressure from the small size, its proximity to urban development and the sport and recreation activities that are conducted on the adjacent playing fields and access paths. For these reasons, the application of fire protection activities will compound the pressure that the habitat is under and will act as a cumulative stress on the fauna that are using the critical habitat for their survival.

Public consultation for the amendment has not been adequate and I have only just been able to access the submission and complete it.

.....
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.....
.....
.....

This image shows a full page of white paper with horizontal dotted lines. The lines are evenly spaced and run across the width of the page, providing a guide for handwriting practice. There are no margins, text, or other markings on the page.

- The Western Australian Planning Commission (WAPC) is subject to the *Freedom of Information Act 1992* and as such, submissions made to the WAPC may be subject to applications for access under the act.
- In the course of the WAPC assessing submissions, or making its report on these submissions, copies of your submission or the substance of that submission, may be disclosed to third parties.

Signature . 

Michael Coote..... Date ..13 March 2024.....

Page 2 of 2



Your ref: RLS/1014
Our ref: D24/0115078
Enquiries: Jack Sirett

Western Australian Planning Commission
Department of Planning, Lands and Heritage

Email: regionplanningschemes@dplh.wa.gov.au

Attention: Anthony Muscara
Principal Planning Officer

Dear Anthony,

Proposed Metropolitan Region Scheme Amendment 1415 – Perth Children’s Hospice, Swanbourne

Thank you for your email dated 16 February 2024 providing the Department of Education (the Department) with the opportunity to comment on the proposed Metropolitan Region Scheme (MRS) amendment on the subject site.

The Department has reviewed the MRS amendment and has no in-principal objections in accordance with *Operational Policy 2.4 – Planning for School Sites* (OP 2.4). This is because the subject site is located a substantial distance from any public schools, including its catchment school of Swanbourne Primary School.

Should you have any questions in relation to the above, please do not hesitate to contact Jack Sirett, Senior Consultant – Land Planning on 9264 5374 or email jack.sirett@education.wa.edu.au.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "M Turnbull".

Matt Turnbull
Manager Land and Planning

12 March 2024

**METROPOLITAN REGIONAL SCHEME
AMENDMENT1415 (STANDARD) – CHILDREN’S HOSPICE SITE -WADPLH-CITIZEN SPACE
OBJECTION**

The undersigned has been a resident of Swanbourne for over 40 years. Amongst the reasons for choosing my current abode was its proximity to Allen Park which I assumed, given that it has been designated as an **A class Reserve** since shortly after Federation, that there would never be an attempt to change its status. Sadly, it appears that my faith in the integrity of our government and associated public service systems which support it, has been misplaced.

INTRODUCTION

I am not an activist but feel very passionate in my objection at the manner in which the proposed excision of land in an A Class Reserve has been progressed. I have independently researched the carriage of the Hospice Project from commencement and developed objections based on fundamental principles of good governance as follows:

- Citizens of Western Australia have every right to expect that their government will observe and commit to its own planning policies as established by way of legislation (especially in respect of continuity of long held community land in the form of A Class Reserves); also, to respect the views of local government bodies and their associated communities in relation to projects which affect them significantly.
- In the case of excision of land from the A Class Allen Park Reserve, it appears that the proposed excision of land for a children’s hospice was NOT generated by government; rather it was led by the Perth Children’s Hospital Foundation, essentially by its Chair, who has assumed the public face of the Hospice project.
- Those who raised initial concerns based on principles related solely to the required incursion into an A Class Reserve for the building of the Hospice, have been branded as opposers to a hospice *per se* and as NIMBYs.

Nothing could be further from the truth as any thinking person who undertakes research into the facilities and services of the WA Health Department is only too well aware of the need of the WHOLE Perth Community for Hospice and Respite facilities. Unfortunately, the proposed Hospice in Allen Park will cater only for 7 children and their families with the rest of the building dedicated to offices and non-clinical related accommodation. My contention is that considerable taxpayer funds and community donations would be better served by a larger facility to cater for long term community needs. This was pointed out at the time in a genuine attempt to persuade PCHF and Government to consider the longer-term needs of the whole-of-Perth community and I understand that a blanket “NO” by the Chair of the PCHF was forthcoming when other larger and more appropriate sites were suggested. Clearly there seemed to be no intention of approaching the broader needs of the community in a collaborative manner which has long term implications for the wider Perth community.

- It is also my understanding that the ongoing operational costs of the Hospice will be borne predominantly by the Perth Children’s Hospital/Child and Adolescent Health Service and will form part of their annual budget as approved by the Health Department/Government. My personal enquiries have revealed that oncological clinicians at PCH are very concerned about the future cost impost of the Hospice

and that it is likely to be a significant drain on their future budgets in which case it would necessitate diversion of operational funds from other areas; clearly this is concerning when PCH continues to be under severe strain even in terms of delivery of its current services. I would have thought that it would also have been a primary consideration of government especially given the related reputational issues of PCH over the last several years.

SPECIFIC OBJECTIONS

- **Non-Adherence to the Western Australian Planning Commission's Policy 5.3 – Use of Land Reserved for Parks and Recreation and Regional Open Space Own**

Allen Park has been designated as an A Class Reserve for over a century and its community should have had every expectation that this would be preserved into perpetuity.

For those of us who believe in the imperative of integrity in government for the preservation of democracy, I believe that we have the right to view Class A reserves as affording the greatest degree of protection for reserves of Crown land. It is my understanding that the "A" classification is used solely to protect areas of high conservation or high community value. Where a Class A reserve is to be amended, cancelled, have the purpose or classification changed, or an easement is to be granted over it, the Department of Planning must **follow the established protocols**.

Accordingly, when the issue of excision of land from the Allen Park Reserve to cater for the building of a Hospice arose, it is my contention that the Department of Planning on behalf of the Western Australian Planning Commission, should have advised government that a change in usage was ill advised and **did not meet the requirements of their own DC Policy 5.3, extract of which is attached as Appendix I**, in particular attention is drawn to Section 5 (*Policy Measures*) which states that: ***".....the use and development of land reserved for Parks and Recreation under the MRS or Regional Open Space under the GBRS or PRS shall be restricted to that which is consistent with furthering the enhancement of the reserve and facilitating its use for recreational and conservation purposes.***

The use and development of land reserved for Parks and Recreation or Regional Open space for the purposes inconsistent with the purpose of the reserve will not be supported..."

Note: this section continues in this vein with the full text attached for reference.

It is clear that Policy 5.3 disallows the building of the hospice or similar edifice and that it has given rise to the need to excise land accordingly.

It is my view that it is therefore incumbent on the Western Australian Planning Commission to recommend/advise against any changed usage of any part of the Allen Park Reserve as it is totally inconsistent with government's own policy.

It should also consider whether they would advise similarly if such a proposal was presented in respect of King's Park. I am certain that this would never be proposed, and the same considerations should accordingly be applied in relation to Allen Park Reserve if we are to preserve the integrity of government processes.

- **Aboriginal Heritage Act 1972**

The Aboriginal Heritage Inquiry System (AHIS) provides information concerning Aboriginal heritage places in Western Australia.

The Allen Park precinct has been assessed as meeting Section 5 of the Act. The Department of Planning is well aware of the development of the Whadjuk Trail with Nedlands Council budgeting for the building of the final stage in 2024; this will, at last, enable the community to walk the entire length of the trail consistent with the original vision supported by WA's Aboriginal community. Nothing should interfere with the completion of this project; unfortunately, the establishment of the hospice building will necessitate a re-routing of the trail which is unfortunate if forced to do so.

- **Preservation of Biodiversity and Community Health and Well-being**

Allen Park is obviously of benefit to residents and sportspeople alike but is also host to a range of native plants and animals. The protection and preservation of this area for plants and wildlife has been a focus of interest for the Friends of Allen Park who have worked assiduously for over 20 years to create what is considered by conservationists and environmentalists alike to be a space of exceptional value. Additionally, it is a known fact that such an environment contributes to the health and well-being of the broader community which utilises this Reserve to a huge extent.

Preservation of the whole Reserve should also be considered against the backdrop of increased residential densities in the Western suburbs (refer recently published recommendations in relation to a huge section of Cottesloe) and the ever-growing need for open space in the face of extended high-rise and high-density developments. The role of the Department of Planning in providing advice to government should surely be taking such long-term considerations into account.

- **Fire Hazard considerations in Location of proposed Hospice**

Much has been written about the serious issue related to a potential fire risk for the proposed hospice based on the considered assessment of the relevant fire authority. **The Office of Bushfire Risk Management has designated the building site as Bushfire Prone** and right up until very recently the designation of the area was such that no government should consider the risks associated with a children's hospice so close to bushland; the fact that there is only a single access for ingress and egress from the site exacerbates the danger. It remains of concern especially to those (like me) who hail from the country and know all too well the ravages arising from bushfires. The rather weak late commentary which allowed the project to proceed should a number of fire mitigation modifications be undertaken to the overall hospice design/location/access, remains of serious concern and should be revisited by the Department of Planning in these considerations.

Concluding Remarks/Observations

- I trust that the Department of Planning shall take seriously the comments of the affected communities and advise government without fear or favour whether it is in the State's best interest to take the proposed action in respect of Allen Park, given that it contributes significantly to the erosion of trust in government.
- It is hoped that the Department of Planning, when assessing the merits of the land excision proposal, will set aside the emotive media and lobbying activities which have plagued this project and base their decision solely on whether the proposal is in the spirit of its Policies in respect of A Class Reserves in this State. This will necessitate the setting aside of the merits of the proposed Hospice which is in truth a separate issue which should be approached from a whole-of-state strategic health service perspective; in short, the issue of the use of land reserved for Parks and Recreation should not be clouded by other issues extraneous to compliance by government with its own planning policies. It should also be recognised by the Department of Planning that the above observations would apply no matter where excisions of Class "A" Reserves were being proposed, whether it be South of the River, Northern Suburbs, the Hills or even Regional locations.... the principles related to "land grabs" in Class "A" Reserves are the same wherever they are attempted.

I trust that the Planning Department shall give due consideration to these deeply held views and that they will be genuinely received with reciprocal good intentions to that of the undersigned who remains concerned at growing distrust in government at all levels. Issues such as the excision of "A" Class Reserves such as that proposed for Allen Park simply add fuel to the rising distrust and faith in government.

For your consideration

With thanks

K Field *Name and contact details removed in part at the request of the submitter*

Resident , Swanbourne

Appendix I

Western Australian Planning Commission's Policy 5.3 – Use of Land Reserved for Parks and Recreation and Regional Open Space – Relevant Sections highlighted.



Department of
Planning

Western
Australian
METROPOLITAN REGIONAL SCHEME

AMENDMENT 1415 (STANDARD) – CHILDREN'S HOSPICE SITE - WADPLH-CITIZEN SPACE

OBJECTION

BY

Name and contact details removed at the request of the submitter

APPENDIX 1

(Western Australian Planning Commission's Policy 5.3 – Use of Land Reserved for Parks and Recreation and Regional Open Space – Relevant Sections highlighted)

January 2017

5.3

- Use of Land Reserved for
Parks and Recreation and
Regional Open Space

Development Control Policy 5.3

- Use of Land Reserved for Parks and Recreation and Regional Open Space

[click to follow](#)

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1. Citation

This is a Development Control Policy prepared under Section 14(b)(ii) of the *Planning and Development Act 2005*.

This policy may be cited as *Development Control Policy 5.3: Use of Land Reserved for Parks and Recreation and Regional Open Space* (DC 5.3).

2. Policy intent

This policy establishes the Western Australian Planning Commission's (WAPC) position regarding the use and development of land reserved for Parks and Recreation in the Metropolitan Region Scheme (MRS) and Regional Open Space in the Greater Bunbury and Peel Region Schemes (GBRS and PRS).

The policy also sets out the procedure for handling requests from sporting clubs and community groups for the use of reserved land.

3. Background

The purpose of this policy is to outline the circumstances under which the WAPC may approve the use and development of land reserved for Parks and Recreation and Regional Open Space for different purposes. Specific additional guidance is provided where the land is in the ownership of the WAPC.

Over 112,000 hectares has been reserved for Parks and Recreation under the MRS and over 55,000 hectares has been reserved for Regional Open Space under the GBRS and PRS. This land is either Crown land vested in a public authority or land owned by the WAPC or owned privately.

Under Clause 13 of the MRS, Clause 24 of the GBRS and Clause 18 of the PRS approval of the WAPC is required for any development on land reserved for Parks and Recreation or Regional Open Space. The WAPC or local government as the case may be in its determinations about developments on reserved land must ensure that the intent of the reservations is not prejudiced by inappropriate development.

Where the WAPC is the landowner specific guidance is required to ensure that applications for the use of WAPC owned land can be dealt with consistently and in harmony with the reserve purpose.

Subject to this policy, the WAPC accepts that there will be occasions when it may be appropriate to permit incorporated clubs, community groups and in some circumstances private business to locate on land reserved for Parks and Recreation or Regional Open Space, provided that the applicant demonstrates that:-

- (i) the nature and scale of the proposal is compatible with the use and zoning of surrounding land, the nature and purpose of the reserved land and the environmental character of the location;
- (ii) there is a community need for the proposed facility in the proposed location;
- (iii) the community and local government(s) support the proposal;
- (iv) the proposal can be integrated with other planned facilities and sharing of facilities by more than one incorporated club, community group or private business; and
- (v) the proposal is consistent with existing and/or proposed land use and management plans.

This policy was originally adopted by the WAPC in 1999. The policy is amended from time to time to reflect refinements and revisions to other WAPC policies and region schemes.

to the purpose of the reserve and likely to enhance the public access to and enjoyment of the reserve may be supported.

4. Policy objectives

- To provide guidance on development which may be permitted on land reserved for Parks and Recreation under the MRS and Regional Open Space under the GBRS & PRS.
- To set out procedures for obtaining approval for the use and development of land reserved for Parks and Recreation or Regional Open Space.
- To provide specific guidance where the land is owned by the WAPC.

5. Policy measures

The use and development of land reserved for Parks and Recreation under the MRS or Regional Open Space under the GBRS or PRS shall be restricted to that which is consistent with furthering the enhancement of the reserve and facilitating its use for recreational or conservation purposes.

The use and development of land reserved for Parks and Recreation or Regional Open Space for purposes inconsistent with the purpose of the reserve **will not be supported**.

The use and development of land reserved for Parks and Recreation or Regional Open Space for commercial purposes ancillary and or compatible

6. Implementation procedures

The process for assessing proposals for land reserved for Parks and Recreation or Regional Open Space consists of three steps:

1. Sporting and social clubs and community groups wishing to establish/develop within a Parks and Recreation or Regional Open Space reserve should seek support from the respective local government in the first instance. Under Clause 29 of the MRS, Clause 34 of the GBRS and Clause 28 of the PRS, a Form 1 application for approval to commence development should be lodged with the local government which forwards the application and its recommendation to the WAPC for determination. In the case of sporting facilities it is desirable for the proponent to consult with the Department of Sport and Recreation at this stage. Where leasing arrangements are required it is also desirable to consult with the Department of Lands at this stage.
2. The application may be referred to any relevant agency by the WAPC for its comment and recommendation(s).
3. The WAPC makes a decision on the application based on a planning assessment and the comments of the local government and other referral agencies.

The use and development of land reserved for Parks and Recreation or regional space which would result in restrictions to public access, notwithstanding the possible benefit which could be derived from the use and development to the general community or to a specific educational or religious group within the community, will not be supported.

Land reserved for Parks and Recreation or Regional Open Space may be used for:

- passive recreation;
- active sporting pursuits;
- cultural and or community activities;
- activities promoting community education of the environment; and/or
- uses that are compatible with and or support the amenity of the reservation (i.e. cafe, restaurant) where specific facilities for such purposes have been approved by the WAPC.





The WAPC may grant its approval only where:

1. The proposal is consistent with the planning framework.
2. The proposal is suitably planned and designed. Plans should clearly show information about the planning context including the setbacks of buildings, impacts on adjoining land uses, location of playing fields, landscaping and car parking requirements.
If located in a bushfire prone area, BAL assessments and/or a Bushfire Management Plan should be submitted with the application demonstrating the proposal is of low risk or measures can be implemented to ensure that it is classified as such.

3. The use of reserved land is restricted to:

- (a) incorporated sporting clubs and/or community groups, which:
 - (i) have a constitution which does not restrict membership (by way of sex, race or creed);
 - (ii) provide public access to sporting facilities;
 - (iii) includes provision for finance and membership of club/ organisation; and

- (iv) includes wind up provisions for the club; and
- (b) private businesses, which:
 - (i) are in accordance with a management plan endorsed by the WAPC;
 - (ii) are open to and provide services for the public; and
 - (iii) have a purpose which is ancillary and incidental to the primary purposes of the reservation.
4. Building plans include access for the disabled and siting complements other facilities in the complex, e.g. public access to 5 toilets from the outside and sharing of parking facilities and playing fields.
5. The design of the building is consistent with the building standard applied to other buildings in the complex.
6. The sporting grounds and facilities, when not in club use, are available to the public (with prior agreement where necessary with the sporting and social groups).

7. No development should commence unless and until all planning approvals have been obtained and conditions met.

7. Matters to be covered by lease agreement

Unless special circumstances determine otherwise, it is expected that all WAPC owned land to be used by sporting and social clubs and community groups will be leased to the relevant local government with power to sub-lease to sporting, social clubs or organisations and in certain circumstances private businesses. This will allow the local government to allocate grounds buildings and facilities for each entities use. The lease will cover the following matters:-

- (a) Sub-letting:
There should be no sub-letting by the sports, social club or organisation and private business to others without prior written approval by the local government and the WAPC.
- (b) Development:
The development of sporting fields will be the responsibility of the club and local government. The general principle in the development of sporting fields is that the club or organisation develops and maintains the playing fields, provided that some assistance may be given by the local government. This needs to be resolved and agreed between club officials and local government officials before development proceeds. The



construction of permanent buildings on WAPC owned land will generally become the property of the WAPC.

(c) Financing:

The financing, construction and maintenance costs of any building will be the responsibility of the club, organisation or business subject to any, grant assistance which may be available. Under no circumstance will the WAPC be involved in financing buildings for clubs.

(d) Supply of Services:

The supply of services (water, sewerage, electricity and telephone) to a recreation complex should be the responsibility of the club, organisation or business and the local government and payment for such should be as agreed between the club and local government.

(e) Insurance and Security:

The club, organisation or business and local government will be responsible for general insurance and day to day security for buildings and playing fields. The WAPC should be indemnified against any claim for damage or injury that may occur on the land.

(f) Maintenance Standard:

The standard of maintenance should be determined by the local government, Health Department of Western Australia and the WAPC. The club, organisation or business should be obliged to keep a high standard of maintenance as outlined by the relevant authority.

(g) Liquor Licence:

Where liquor is likely to be involved, the granting of liquor licence should comply with the relevant provisions of the Liquor Act, and be subject to support from the local government. The licence should stipulate the type and purpose and should also be subject to WAPC approval. The liquor licence cannot be transferred without prior approval by the WAPC.

(h) Social Functions:

The staging of social functions and the associated repercussions, such as noise, crowds, bands and hours of operation, should comply with relevant provisions of the Liquor Act and local government requirements.

(i) Other:

All of these conditions, and any other relevant conditions, should be included in the Lease Agreement between the local government and the club, organisation or business.

From: DFES Land Use Planning <advice@dfes.wa.gov.au>
Sent: Wednesday, 13 March 2024 3:46 PM
To: Region Planning Schemes
Cc: Anthony Muscara
Subject: Proposed Metropolitan Region Scheme Amendment 1415 (Standard) - Children's Hospice Site - RLS/1014 - DFES Response
Attachments: SDAU-051-21 - Portion Of 61 (Lots 503 504) Clement Street Swanbourne - DFES Response.pdf

OFFICIAL

DFES REF: D24255
DPLH Ref: RLS/1014 and RLS/1415

Dear Mr Muscara,

In reference to the above application, the following comments are provided.

The subject site is shown as bushfire prone on the Map of Bushfire Prone Areas, and as such is subject to assessment against *State Planning Policy 3.7 – Planning in Bushfire Prone Areas* (SPP 3.7) and the associated *Guidelines for Planning in Bushfire Prone Areas* (Guidelines).

DFES has several responses to DPLH regarding previous proposals on the subject site under reference numbers D24255 and D23526, for proposed MRS amendments and a development application (SDAU). A full list of responses can be provided if required, however the most recent response (dated 17 February 2023) is attached for review.

As no BMP has been included with this referral (noting the comments provided in the MRS Amendment Report regarding previous referrals to DFES), and the previous SDAU application has already been approved for the intended use, previous DFES responses should be reviewed to ensure any comments raised by DFES are considered as part of the assessment for the MRS amendment (against SPP 3.7).

Please call me on 9395 9819 if you have any queries regarding the above

Kind regards,

Michael Ball
Senior Land Use Planning Officer

20 Stockton Bend, Cockburn Central, Perth WA 6164
T: 08 9395 9819 | **E:** advice@dfes.wa.gov.au | **W:** dfes.wa.gov.au



FOR A SAFER STATE



Acknowledgement of Country: DFES acknowledges the Traditional Owners of Country throughout Australia, and their connections to land, sea and community. We pay our respects to Elders past and present.



Our Ref: D23526
Your Ref: SDAU-051-21

State Development Assessment Unit
Department of Planning, Lands and Heritage
SDAUreferrals@dplh.wa.gov.au

Dear Katrina

RE: VULNERABLE LAND USE - LOTS 503 & 504 (61) CLEMENT STREET, SWANBOURNE CHILDREN'S HOSPICE

I refer to your email dated 3 February 2023 regarding the submission of a revised Bushfire Management Plan (BMP) (Version F) prepared by Emerge Associates and dated October 2022, for the above development application. DFES have also reviewed the document titled 'Bushfire Management Plan and Bushfire Emergency Evacuation Plan Clarifications Perth Children's Hospice' prepared by Emerge Associates, dated 16 December 2022.

This advice relates primarily to *State Planning Policy 3.7: Planning in Bushfire Prone Areas* (SPP 3.7) and the *Guidelines for Planning in Bushfire Prone Areas* (Guidelines). DFES' Land Use Planning has also provided some commentary and recommendations in relation to broader DFES responsibilities, which may require further review at subsequent stages. It is the responsibility of the proponent to ensure the proposal complies with relevant planning policies and building regulations where necessary. This advice does not exempt the applicant/proponent from obtaining approvals that apply to the proposal including planning, building, health or any other approvals required by a relevant authority under written laws.

Assessment

- DFES was originally consulted on Version B of the BMP and provided advice to the SDAU, dated 1 March 2022, outlining concerns including location, siting and design, vegetation classification and management, vehicle access and 'use' within BAL-40/FZ. DFES provided a revised response on 27 May 2022 following reviews of versions C and D of the BMP together with additional correspondence from Emerge dated 7 April 2022, which partly addressed the original concerns.
- Comments in this response are provided in relation to version F of the BMP and supplementary information from the bushfire consultant, as well as additional information regarding landscape management agreements from the City of Nedlands. It is noted that version F does not fully address comments made in relation to previous iterations, including those relating to the lack of clarity in relation to proposed evacuation and/or shelter actions. It should be noted that comments in this response are made in addition to previous comments.
- The decision maker has confirmed this to be intensification of development and the application of SPP 3.7 is triggered.
- It is critical the BMP and Bushfire Emergency Management Plan (BEEP) address any issues and non-compliance with the Guidelines for the proposed development.
- Further clarification is required within the BMP of the requirements of SPP 3.7, and the supporting Guidelines as outlined in our assessment below.

1. Policy Measure 6.5 a) (ii) Preparation of a BAL contour map

Issue	Assessment	Action
Vegetation Exclusions and Management	<p>Evidence to support the exclusion of Plot 7 in its entirety as managed to low threat in accordance with AS3959 is required. A number of areas, as shown in Figure 4 and referenced in section 3.1.1. of the BMP, will require ongoing management to a standard of low threat in accordance with AS3959 or to an APZ standard. This includes the area immediately to the south of the proposed development site.</p> <p>The additional commentary from the City of Nedlands is noted, however the commitments to manage the required surrounding areas do not specifically state 'managed to low threat in accordance with AS3959' or to an APZ standard.</p> <p>An enforceable mechanism is required to provide certainty that the vegetation exclusion in these areas can be achieved in perpetuity and is enforceable. If unsubstantiated, the vegetation classification should be classified as per AS3959, or the resultant BAL ratings may be inaccurate.</p>	<p>Clarification required.</p> <p>The decision maker to be satisfied with the vegetation exclusions and vegetation management proposed.</p>
Slope Assessment	<p>A review of the updated development plans and City of Nedlands Intramaps service (showing 0.5m and 1m contours respectively as opposed to the submitted BMPs 5m contours provided in Figure 1) has shown that some areas of Plot 4 and Plot 5 are 5-10 degrees downslope from the site, as opposed to the flat/0-5 degree slopes stated in the BMP. In particular, Plot 5 to the north of Plot 4 to the north of the development site. It is acknowledged that this has not been raised previously and further that it would be unlikely to alter BAL contours on the site. However, for accuracy the details should be modified to ensure that the BMP is accurate.</p>	<p>Modification to the BMP is required.</p>
References to 10kW/m²	<p>References to 10kW/m² are not considered relevant for assessment of the planning application. Within SPP 3.7 and the Guidelines, 10kW/m² is referenced as a pathway for approval of vulnerable tourism uses and has no basis in other types of development. Where it is considered, it applies to the entire building envelope.</p> <p>It is noted that Emerge's additional statement references the New South Wales Guidelines – <i>Planning for Bush Fire Protection</i> (2019) as the source for the 10 kW/m². However, this has not been endorsed as an approach in WA and has been taken as a standalone reference from the</p>	<p>Modification to the BMP is required.</p>

	<p>document rather than being considered within the context of the full assessment required as part of the NSW Guidelines.</p> <p>It should also be noted that 10kW/m² is not considered a suitable environment in which to undertake an evacuation of patients and their families. Radiant heat flux at this level is considered to be critical and potentially life threatening in less than 60 seconds even with protective equipment.</p> <p>The exact area proposed to be 10kW/m² has not been clearly defined on plans and the methodology and demonstration of how the 10kW/m² would be achieved has not been provided. DFES has therefore not validated the indicated radiant heat flux of 10kW/m² noted in the BMP and additional statement. It should also be noted that any calculations that do not follow the Method 1 or Method 2 calculations as prescribed in AS3959 would also be considered performance solutions for the purpose of building assessments.</p> <p>AS3959:2018 and the Guidelines do not contain any references to 'BAL-10'. The correct terminology should reflect 10kW/m². DFES recommends the BMP is amended accordingly.</p>	
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2. Policy Measure 6.5 c) Compliance with the Bushfire Protection Criteria

Element	Assessment	Action
Location, and Siting & Design	<p>A1.1 & A2.1 – not demonstrated</p> <p>The BAL ratings cannot be validated for the reasons outlined in the above table.</p> <p>The Guidelines state “<i>An APZ should be contained within the boundaries of the lot on which the building is situated, except in instances where it is demonstrated that the vegetation on the adjoining land is managed in a low threat state, as per cl. 2.2.3.2 of AS 3959...</i>”. This has not been demonstrated and, as above, a legally binding and enforceable mechanism is required to ensure appropriate management in perpetuity is implemented.</p> <p>The proposed APZ relates to the building envelope at ground floor level. It is noted that the basement and rooftop extend beyond this towards the vegetation to the north. The BMP should reflect the entire development boundary, acknowledging encroachment into areas above BAL-29 and if this occurs, whether they would result in a need for further management or mitigation.</p>	Modification to the BMP required.

	<p>Use in BAL-40/FZ DFES notes updates to the BMP - Section 4.1 Location and Siting. It remains that DFES does not support a vulnerable land use within areas of BAL-40/FZ, specifically the location of the outdoor play areas and other associated structures.</p> <p>It is recommended that any adjacent structures associated with the outdoor play areas are separated by a distance of not less than 6 metres from the main building in line with the general construction requirements in Section 3 of AS3959. If this separation is not achieved, the adjacent structures may be considered part of the main building resulting in the development being impacted by a higher potential radiant heat.</p>	
Vehicular Access	<p>A3.1, A3.2a, A3.2b and A3.6 – Not demonstrated The BMP confirms that the site is accessed by an existing public road, Odern Crescent, which meets the required standards and will provide public road access in two directions to two destinations.</p> <p>While discussion regarding an EAW has been removed from the updated BMP, DFES confirms that the inclusion of a compliant EAW providing additional access to Odern Crescent would be supported if it could achieve compliance with the standards set out in the Guidelines.</p> <p>The proposal incorporates a “private driveway” to access Odern Crescent through the car park of the bridge club and adjoining reserve. The design, construction and maintenance of the access road should be to a sufficient standard to ensure that unhindered access and egress is available for emergency vehicles attending the site and evacuating occupants from the hospital and other users of the route. For this reason, DFES considers the development to be of a scale that requires a public road standard rather than a private driveway. The decision maker must be satisfied that an enforceable mechanism is available to provide for appropriate access and egress at all times and the BMP should be updated to reflect this.</p> <p>References in the BMP to provide a compliant turning area with 50m of the building should be updated to reflect the current Guidelines requirement of a turning area within 30m of the development.</p>	Modification to the BMP required.
Water	<p>A4.2 – Comment only The BMP confirms that reticulated water will service the site, and that hydrant connections will be provided.</p> <p>It is noted that while compliance with water requirements as per SPP 3.7 can be achieved, structural firefighting may have further requirements that may arise. Please refer to additional comments below provided by DFES Built Environment Branch.</p>	Comment only.

3. Policy Measure 6.6.1 Vulnerable land uses

Issue	Assessment	Action
Bushfire Emergency Evacuation Plan (BEEP)	The referral has included a ' <i>Bushfire Emergency Evacuation Plan</i> ' for the purposes of addressing the policy requirements. Consideration should be given to the Guidelines Section 5.5.4 'Developing a Bushfire Emergency Evacuation Plan'. This contains detail regarding what should be included in a BEEP and will ensure the appropriate content is detailed when finalising the BEEP to the satisfaction of the decision maker. It is noted that outdated references are provided in the BEEP. The BEEP should be updated to reference the current AFDRS ratings, and as discussed below include additional information provided in the document ' <i>Bushfire Management Plan and Bushfire Emergency Evacuation Plan Clarifications Perth Children's Hospice</i> ' (clarifications document) prepared by Emerge Associates, dated 16 December 2022	Comment only.
Evacuation & Shelter	<p>The updated BMP remains unclear as to the primary action in the event of a bushfire with section 4.5 providing discussion regarding evacuation and shelter in place, however not detailing the primary option. The BEEP has been updated to clarify that shelter in place is the primary option. It is important to ensure that all documents are updated to reflect information provided in the clarifications document.</p> <p>DFES recognises complexities associated with movement of patients, however promotes evacuation as the preferred course of action to protect life in the event of a bushfire, in line with messaging in the ABCB Design and Construction of Community Bushfire Refuges (2014) document. DFES acknowledges that shelter in a refuge, built to the ABCB standards, may be a useful option where it has not been possible to evacuate a site. In sites where this is contemplated, a building designated as a bushfire shelter must comply with ABCB Design and Construction of Community Bushfire Refuges. A bushfire shelter building should be designed to withstand bushfire attack in the form of wind, smoke, embers, radiant heat and flame contact. A refuge building needs to have a sufficient separation distance from the predominant bushfire prone vegetation to avoid exposure to a radiant heat flux exceeding 10kW/m².</p> <p>Questions remain regarding the suitability of the entire building as a shelter in place / refuge option, with conflicting statements regarding construction to ABCB refuge standards and, BAL-29 construction standards, in addition to evacuation areas of 'BAL-10' discussed above. It is understood that a number of performance solutions are proposed for components of the building, however it is also understood that discussions with DFES fire engineers have not highlighted that the building is being proposed for</p>	Comment only.

	<p>shelter. While this is most relevant at building stage, given the potential for such matters to influence design and layout, appropriately validated fire engineering solutions should be identified and agreed. DFES recommends the BMP and BEEP are reviewed to ensure both documents confirm the primary and secondary emergency actions and clarify compliance with the ABCB Design and Construction of Community Refuges 2014 standards, given the changing references to building standards throughout the documents.</p> <p>The decision maker should be satisfied that a proposed shelter in place, consistent with ABCB standards, is both achievable and enforceable at this site. Compliance with ABCB standards has not been demonstrated at this time.</p>	
--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

The additional information provided by Emerge Associates dated 16 December 2022 is noted however must be included in the BMP and BEEP where relevant to ensure that clarity is provided surrounding construction standards, and the necessity for shelter in place to be considered as a primary option.

In addition, the proposal was sent to the DFES Built Environment Branch (BEB) for comment, who have provided the following advice:

- The proposed building is greater than 500 sqm, thus will need to be assessed in accordance with the FES Commissioners Operational Requirements and a submission provided to DFES Built Environment Branch as per regulation 18B of the *Building Regulations 2012*.
- The building will require a booster assembly located at the main entry to the site to allow firefighters to boost the hydrant /sprinkler system should the proposed fire pumps fail.
- The fire hydrant system should be installed compliant with AS2419.1 *Fire Hydrant Installation* as a minimum.
- Fire water tank sizing should allow for a four hour hydrant supply plus minimum 60 minute sprinkler supply.
- The electric vehicle (EV) charging stations and electric bicycle/scooter enclosed charging room should have their hazard assessed and the appropriate building fire safety systems installed to mitigate. For example, moving the EV car charging spaces to the entry of the carpark to allow for ease of removal, location of hydrants and considering the effectiveness of ventilation and installation of sprinklers.

Recommendation – not supported modifications required

It is critical the bushfire management measures within the BMP are refined, to ensure they are accurate and can be implemented to reduce the vulnerability of the development to bushfire. If the decision maker is of a mind to approve the proposal the above assessment of compliance with SPP 3.7 is provided to aid decision making.

The proposed development is not supported for the following reasons:

1. The development design has not demonstrated compliance to:
 - Element 1: Location,
 - Element 2: Siting and Design, and
 - Element 3: Vehicle access.

If you require further information, please contact Michael Ball, Senior Land Use Planning Officer on telephone number 9395 9819.

Yours sincerely



Naomi Mynott
DIRECTOR LAND USE PLANNING

17 February 2023

CC Katrina.Shoobridge@dplh.wa.gov.au

From: Rod Griffiths <griffiti@bigpond.net.au>
Sent: Wednesday, 13 March 2024 5:20 PM
To: Region Planning Schemes
Subject: MRS Amendment 1415 Submission.

Categories: SUB

You don't often get email from griffiti@bigpond.net.au. [Learn why this is important](#)

I have not been convinced by the proponents (PCHF and a myriad of sections of WA Government) that this project can be made to work within the confines of Allen Park. This chunk of Park is better kept as Park. And the local authority should be supported in implementing their agreed plan for it. Otherwise an asset and a large amount of public money will be wasted.

The site is boxed in – as shown by attempts by PCHF to enlarge it; parking is too tight, particularly as the nature of the construction has apparently expanded beyond a conventional hospice to a respite centre, with implications for increased traffic and parking, particularly on those days when a rugby match overlaps with a bridge tournament. And WAPC has overruled FESA on fire risk for overnight accommodation – leaving accountability unclear. It should be noted that overnight accommodation is already banned elsewhere in the park.

Accountability is also unclear between the various public agencies during planning, construction and operation.

In view of the above I believe the MRS should not be amended for this project and the proponent should be encouraged to find a location that meets its own criteria and does not have these complications. It is an important project and needs to be sited in a location that has the ingredients of success rather than failure.

Failure will also reflect on the Government and its agencies.

R Griffiths
Swanbourne

0417 992 049

Amendment (Standard)
Submission Form

Submission
Metropolitan Region Scheme Amendment 1415

Children's Hospice Site

Secretary
Western Australian Planning Commission
Locked Bag 2506
PERTH WA 6001

FILE
RLS/1014

Title (Mr, Mrs, Miss, Ms) First Name EDMOND
Surname O'LOUGHLIN (PLEASE PRINT CLEARLY)
Address 12 WALBA WAY, SWANBOURNE Postcode 6010
Contact Number 9384 9398 Email Address ed.loughlin@vnet.net.au

Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission? ☐ Yes ☒ No

Submission

(Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

INTRODUCTION:

This submission is being made ~~on~~ paper because DPLH's electronic submission system has been inoperable in recent days and submissions are required by 13 March 2024.

Submission attached.

Department of Planning, Lands and Heritage	
Received	
Scanned	14 MAR 2024
Attachments	<input type="checkbox"/>
Scan QA	<input type="checkbox"/>
Doc No	<input type="checkbox"/>
File No	<input type="checkbox"/>

turn over to complete your submission

[illegible]

- The Western Australian Planning Commission (WAPC) is subject to the *Freedom of Information Act 1992* and as such, submissions made to the WAPC may be subject to applications for access under the act.
- In the course of the WAPC assessing submissions, or making its report on these submissions, copies of your submission or the substance of that submission, may be disclosed to third parties.

Signature W. J. J. J. J. Date 13-3-24

Website: www.wa.gov.au/dplh/regionplanningschemes

AMENDMENT 1415

1. I support the need for an appropriate Childrens' Hospice to be built in the Perth metropolitan area. I disagree with the decision to build a hospice in Allen Park, Swanbourne, by the excision of land within an A Class reserve. How can conservation objectives for a natural resource area be consistent with the proposed hospice, and proposed extensions, and extensions yet to be revealed?
2. The planning process adopted since day 1 for the proposed hospice by the Chairman of the Perth Children's Hospital Foundation (PCHF) has lacked honesty; provided misinformation; and displayed minimal governance. The many Board members of PCHF have not uttered a squeak in this period and are guilty by association.
3. The 'planning' process of PCHF SHOULD be the subject of an independent inquiry into all aspects. Will DPLH recommend this? Of course, not. But it SHOULD do so. So much for proper consultation and community engagement. It is widely recognised that the State Government is in bed with selected developers and proper planning processes are just bulldozed aside. The chairman of PCHF has been highly opportunistic in this situation. Meanwhile planning authorities are mute and sidelined.
4. As one example of duplicity, I attended an information session organised by PCHF and held at the WA Bridge Club in 2021/22. It was pretty much a farce. However, I asked the CEO of PCHF if additional land would be sought by PCHF. The CEO said that no additional land would be needed. Currently, PCHF has begun negotiations to obtain additional land within Allen Park and construction of the hospice has not yet begun. Planning? I do not think so, rather manipulation.
5. The claim by PCHF that it undertook an extensive search for a site for the hospice but could not find anything, other than Allen Park, is just ridiculous and unbelievable. Nothing in the Perth metro area? This nonsense underlines the question: why is the chairman of PCHF totally focussed on the Allen Park site? This question needs to be thoroughly examined as government does not appear to have done so.
6. The Chairman of PCHF operates from a position that everything he wants from the Allen Park site will be forthcoming. How/Why is this so? A recent example is the sod- turning ceremony on the site of the proposed hospice, to which dignitaries were invited and local residents were turned away. Also, the sod-turning took place before the current DPLH amendment process has been completed. Something is rotten in the State of Denmark.
7. ~~6~~ The proposal by PCHF is for a seven bedroom facility to accommodate children and parents and to provide other functions which are largely unspecified. It is widely recognised that there are 2000 or more children in this sickness category. The proposal is duplicitous. Planning? I think not. Allen Park is a totally inappropriate site for PCHF's first venture into real estate.

(over)



RECOMMENDATION

The total “planning” process adopted by the chairman of PCHF in relation to the Allen Park excision needs to be the subject of an independent review before Amendment 1415 is progressed.

From: Denzil McCotter <denzil.mccotter@iinet.net.au>
Sent: Tuesday, 12 March 2024 5:22 PM
To: 'info@dplh.wa.gov.au'
Subject: COMPLAINT Metropolitan Region Scheme Amendment 1415

To whom it concerns, long with many others I have been trying unsuccessfully to put my submission on this amendment into the DPLH system. I am now registering my frustration at this situation. It is totally unacceptable to have a website that is your preferred means of the public inputting submissions but it is inaccessible! Tomorrow I will deliver in person my submission to your office.

Dr. Denzil McCotter 12 Walba Way Swanbourne.



Amendment (Standard)
Submission Form

Submission

Metropolitan Region Scheme Amendment 1415

Children's Hospice Site

Secretary
Western Australian Planning Commission
Locked Bag 2506
PERTH WA 6001

FILE
RLS/1014

Title (Mr, Mrs, Miss, Ms) Dr First Name Denzil
Surname McCOTTER (PLEASE PRINT CLEARLY)
Address 12 WALBA WAY SWANBOURNE Postcode 6010
Contact Number 0407 156 382 Email Address denzil.mccotter@inet.net.au

Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission? ☐ Yes ☒ No

Submission

(Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

- 1 A proposal for WA to build a children's Hospice including residential respite or outreach services has my full support
2. However from day one the process whereby the proposed site was selected has been flawed.
- 3 In July 2020 the Child and Adolescent Health Service (CAHS), in its submission to the Joint Health Select Committee Inquiry into Palliative Care - WA, indicated a children's Hospice was required "in its Northern suburbs"
- 4 Around this time Ian Campbell, Chair of the Perth Children's Hospital Foundation (PCHF), was 'sailing' along the coast and spotted the site under consideration.

turn over to complete your submission

* I have had to handwrite this as I could open the submission pages but not go further and key in my input!

- 5 Mr Campbell shook hands with the then Minister for Health, Roger Cook and the A class Reserve on which the now demolished Bowling Club had stood, became a C Class Reserve. This occurred in the absence of any meaningful consultation with the City of Nedland (CON) or community groups. On 7 August 2020 The then Premier unveiled the plans for the hospice on its Swanbourne site.
- 6 There was no genuine effort at considering other possible sites, eg the Lady Lawley Cottage or the McCall Centre. In a completely back to front fashion the PCHF effort went into planning a facility for the site, instead of planning the facility & then choosing its site. Why was there this obsession with this particular site?
- 7 From its beginning the small size of the proposed facility (7 beds originally) & the small size of the site were concerning, the more so given the absence of any meaningful examination of the demographics of its population under consideration.

You should be aware that:

- The Western Australian Planning Commission (WAPC) is subject to the *Freedom of Information Act 1992* and as such, submissions made to the WAPC may be subject to applications for access under the act.
- In the course of the WAPC assessing submissions, or making its report on these submissions, copies of your submission or the substance of that submission, may be disclosed to third parties.

To be signed by person(s) making the submission

Signature Deirdre McCall Date 13/3/24

**Note: Submissions MUST be received by the advertised closing date on 13 March 2024.
Late submissions will NOT be considered.**

Amendment 1415 Submission continues:

8 My own research indicated that with a population increase in WA of 2.5 % PA (Revised ABS statistics for WA July 2023) and the rate of Brain Tumour and Congenital Conditions (Australian Institute of Health and Welfare July 2022) stable at 8.3/100 000, the proposed facility was not going to be fit for purpose.

9 In response it was stated that the small facility would epitomise a 'cottage' atmosphere and that there were no plans for expansion. However Project Control minutes information obtained by FOI indicated that in 2022 expansion was being considered.

10 In this regard the PCHF attempted in 2023 to obtain more land by offering to develop a 'community garden', this was rejected by the CON. More recently in a letter dated 9 February 2024 Ian Campbell stated 'we would now like to formally progress our proposal to design fund and landscape the area between the Children's hospice and the WA Bridge Club'. I have attached the letter, which, as with all matters pertaining to this project is couched in terms that indicate it is definitely going ahead!

11 At various times in 2022 and 2023 Ian Campbell announced that work was about to start and the site was fenced off. More recently on 8 February 2024 the 'Turning of the sod' occurred. How can this be if the amendment has not yet gone through? From day one this project has been presented as a fait accompli and all legitimate concerns regarding size, fire, the bush, the Norn Bidi Trail, parking, and traffic have been dismissed whilst the powers of Local government have been further reduced by The Local Government amendment Bill 2023.

12 I strongly oppose this amendment going through as WA needs a facility geared to ongoing population demands, in a location where expansion will not be a continual 'salami slicing' of Allen Park.

13 I doubt if there is any point in myself or others making these submissions as from day one, on the basis of Ian Campbells 'whim' and a 'handshake', the project has been a 'done deal'.

Deirdre McCotter 13/3/24

The I Campbell

Letter

Perth
Children's
Hospital
Foundation

9 February 2024

Tony Free
A/Chief Executive Officer
City of Nedlands
PO Box 9
NEDLANDS WA 6009

DONE DEAL

Dear Tony

I refer to our meeting of 23rd of January last when you and I and Carrick discussed next steps relating to our proposals in relation to revegetating, rehabilitating, and landscaping the balance of the former Swanbourne Bowling Club land in the Allen Park precinct adjacent the WA Bridge club and the proposed Children's Hospice, Sandcastles – Booja Mia.

We appreciated the time we spent with you and for your well-considered advice. As you know, our meeting followed on from previous meetings, discussions and correspondence held with the former City of Nedlands CEO and the Mayor.

As you will be aware, yesterday we achieved a substantial milestone with the breaking of ground at the Children's Hospice site. We expect to sign a contract with a builder in the next month and commence substantive work around Easter.

We would like now to formally progress our proposal to design, fund and landscape the area between the Children's Hospice and the WA Bridge Club and raise funds to provide for the ongoing maintenance of the upgraded area. Our final financial contributions will be determined once a formally agreed design has been priced by a suitably qualified construction company. However based on our experience at the QEII Medical Centre Northern Greenspace project we would anticipate a capital cost of circa \$4 million as well as ongoing maintenance.

scribble?

We would broadly see the area being made available to Perth Children's Hospital Foundation under a license arrangement with conditions to be determined after consultation and discussion with the City of Nedlands and all relevant approvals by the Council.

We would ensure:

- The landscaping design is aligned with the "Allen Park Master Plan",
- Strong engagement with Noongar elders to reflect the cultural and heritage significance of the land and to share this history with the community,
- The Council and local Community would be closely involved in the design,
- The parkland created would achieve very important and mutually agreed ambitions agreed through an iterative process,
- Achievement of world class sustainability outcomes,

PO Box 8249
Subiaco East WA 6008
t (08) 6456 5550
e admin@pchf.org.au
ABN 18 604 862 071



pchf.org.au • @pchfwa

- Substantial increase in shade and amenity,
- Substantial revegetation with endemic native flora,
- Engagement with local schools to see 'hands on' involvement by students of all ages in the environment and cultural aspects of the park.

PCHF will appoint and contract the same landscape architectural consultancy and project management firm involved in the current Children's Hospice design team for efficiency and to take advantage of their site knowledge.

We also plan to appoint and contract Barry Macguire and Carol Innes from Soft Earth as cultural advisors on this project to take advantage of their extensive experience in helping to create culturally appropriate community spaces. Barry, Carol and our team are energised by the possibility of creating a park that is a place for healing, for the display of one of the world's most unique and ancient cultures, the special stories of this section of the Wadjuk Trail and the opportunity to heal our communities through thoughtful collaboration and design.

To achieve a high level of engagement with the community PCHF will fund a professional Community Consultant to conduct the desired community liaison and communication to ensure maximum participation by the local residents in the design process and to keep a quality flow of information.

We need to urgently resolve an in-principle agreement to this proposal to ensure the time line for the rehabilitation of this site aligns with the landscaping of the Hospice curtilage.

NO PLANNING APPROVAL

As stated at our meeting, our motivation, and now a sense of urgency to achieve the required agreement is to ensure that this land has been transformed no later than the day when the Hospice receives its first guests. As we witnessed yesterday at the official sod-turning and construction launch ceremony by the Premier and Health Minister, the site is in a dreadful condition, unloved and uncared for in decades. It would be a terrible travesty if through the windows of the gleaming new Children's Hospice, the views are of a dust bowl in summer and a quagmire in winter. It would be equally sad if the community were not to benefit from an improved park, full of native flora transpiring Oxygen, storing Carbon Dioxide, and expanding the habitat for birds and other fauna.

We are keen to collaborate closely with the City of Nedlands and to play a positive and transformative role in creating a very special parkland space which will be a valuable asset for the entire community.

Having just completed a circa \$4.5M transformation of land adjacent to Perth Children's Hospital on the QEII Medical Centre campus into a native garden and playground wonderland for children, families, staff and Nedlands residents, we are extremely confident we can deliver a similar outcome at the Swanbourne Bowling Club vacant land. This transformation saw the planting of 61 new trees including *Agonis flexuosa*, *Corymbia calophylla*, *Banksia attenuate*, *Banksia grandis*, *Banksia*

illicifolia, Banksia menziesi, Banksia prionotes, Eucalyptus decipiens, Eucalyptus foecunda, Eucalyptus gomphocephala, Eucalyptus marginata, Eucalyptus todtiana, providing over 1100sq.m of canopy cover at 80% maturity and total shade cover of the site of approximately 40%, and a deep infusion of Noongar cultural narratives and interpretation opportunities.

PCHF looks forward to working with the City of Nedlands to achieve an agreement.

Time is not on our side, so we would be delighted if you could move this to consideration and decision as soon as is possible.

Thank you.

Yours sincerely

WHAT A JOKE

Hon. Ian Campbell
Chairman
Perth Children's Hospital Foundation

Amendment (Standard)
Submission Form

Submission
Metropolitan Region Scheme Amendment 1415

Children's Hospice Site

Secretary
Western Australian Planning Commission
Locked Bag 2506
PERTH WA 6001

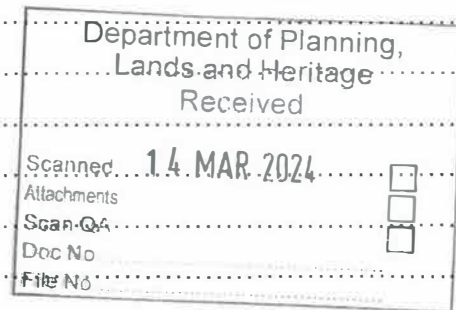
FILE
RLS/1014

Title (Mr, Mrs, Miss, Ms) MS First Name LYNNE
Surname MCGUIGAN (PLEASE PRINT CLEARLY)
Address 12 JAMES ROAD SWANBORNE Postcode 6010
Contact Number 0808005374 Email Address lynne.mcgulgan@gmail.com

Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission? ☐ Yes ☒ No

Submission

(Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)



turn over to complete your submission

This image shows a full page of a notebook or worksheet template. It consists of approximately 20 horizontal rows. Each row is defined by two short, parallel dashed lines, one above and one below the intended writing space. The lines are evenly spaced and extend across the entire width of the page. There are no margins, text, or other markings present.

- The Western Australian Planning Commission (WAPC) is subject to the *Freedom of Information Act 1992* and as such, submissions made to the WAPC may be subject to applications for access under the act.
- In the course of the WAPC assessing submissions, or making its report on these submissions, copies of your submission or the substance of that submission, may be disclosed to third parties.

Signature A. Z. Mayne Date 13/03/2024

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Late submissions will NOT be considered.**

Metropolitan Region Scheme Amendment 1415 (Standard) - Children's Hospice Site

I am a long term resident of Swanbourne and live close to Allen Park precinct. I walk almost daily through the park and pass the proposed hospice site to the beach. Having worked for many years as a social worker including in health and children's services, I support the Western Australian Government's commitment to building the state's first children's hospice. However I believe the site of the hospice is inappropriate.

The current plans of the Children's Hospice provide respite and palliative care for 7 children and their families. The small number is consistent with the recommendations of specialised child palliative care services here and other parts of the world.

Given the WA population growth in the Perth metropolitan region, the demand for child palliative care can be expected to grow and put pressure on the hospice for more services. It can be expected that to meet increased demand the hospice will seek to acquire more land.

There is some media suggestion that this is already happening. If there is already a push to expand before the hospice is even built, it suggests flaws in the planning of the hospice and reinforces the concern of many local people that the site is inappropriate given its location in the fire risk zone and next to a military base and its attendant noise arising from gun fire and explosion practice.

Odeon Crescent which would be the sole access to the proposed hospice is used by several community groups and public accessing the beach. It has been the subject of complaint from residents adjacent to the road because of amount of vehicle traffic turning into and leaving the area. An expansion of the hospice would bring greater traffic and demand for parking, which is already limited.

A public review of the planning process is required to throw light on how the site was chosen.



Lynne McGuigan

12 James Road

Swanbourne

13 March 2024

From: Belinda Williams <lindyjanew@gmail.com>
Sent: Tuesday, 12 March 2024 7:51 AM
To: Region Planning Schemes
Subject: Allen Park Children's Hospice

[You don't often get email from lindyjanew@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

I object to use of Allen Park as a Hospice as this is a fire prone area. One entry & exit. Cut off from views & people.
Not near transport for family friends & outings.

Interference with Native Bee zone & natural bush land.

Many other areas stripped & ready, far more suitable including Leighton(fabulous view of the ocean & public transport), Buckland Hill, the Cable Station, Port Beach's massive area between the railway & Port Beach Rd.

Please register my objection

Yours Sincerely

Belinda Williams

222 Marmion St Cottesloe

0432584200

lindyjanew@gmail.com

Sent from my iPhone

Submitted to Metropolitan Region Scheme Amendment 1415 (Standard) - Children's Hospice Site
Submitted on 2024-01-31 15:57:38

About you

1 What is your first name?

First name:
Barbara

2 What is your surname?

surname:
Leonard

3 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

No

4 Are you responding on behalf of an organisation?

No

If yes, please fill in the name of your company.:

5 What is your email address?

Email:
bmleonard1@gmail.com

6 What is your address?

address:

13 Hooley Street

7 Contact phone number:

Phone Number:
+0432906654

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

Wrong position for a hospital because it is a fire risk with limited access and is surrounded by volatile bush.
There is no room for expansion which will be needed and no nearby accomodation for families of the patients.
The beach often has dumpers, waves that are dangerous for weaker swimmers who are not familiar with them. Making it
A danger rather than an asset.
The place would need a dog proof fence because of the proximity of the dog exercise oval.
A much better place would be Sunset Dalkeith, the old men's home there had no impact on locals, it is safe and answers all these criticisms and is not on
land given and designated as an A class reserve

File 1:
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File 2:
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File 3:
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Submitted to Metropolitan Region Scheme Amendment 1415 (Standard) - Children's Hospice Site
Submitted on 2024-02-18 12:26:07

About you

1 What is your first name?

First name: *Name and contact details removed at the request of the submitter*

2 What is your surname?

surname:

3 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

Yes

4 Are you responding on behalf of an organisation?

No

If yes, please fill in the name of your company.:

5 What is your email address?

Email:

6 What is your address?

address:

7 Contact phone number:

Phone Number:

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

It's A class reserve and should not be built on as this can set a precedent for future A class reserves being built on.

A class reserves should be protected at all costs.

There were other more suitable places with more room for a hospice and playground.

Money should not be able to be used to persuade politicians that A class reserves can be purchased.

File 1:

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File 2:

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File 3:

No file uploaded

Submitted to Metropolitan Region Scheme Amendment 1415 (Standard) - Children's Hospice Site
Submitted on 2024-02-19 17:12:48

About you

1 What is your first name?

First name: *Name and contact details removed at the request of the submitter*

2 What is your surname?

surname:

3 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

Yes

4 Are you responding on behalf of an organisation?

No

If yes, please fill in the name of your company.:

5 What is your email address?

Email:

6 What is your address?

address:

7 Contact phone number:

Phone Number:

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

The Swanbourne site chosen for the Childrens Hospice is unfortunately inappropriate and flawed for many reasons.

1. Allen Park is a mixture of sports grounds and natural bush area. The bushland within the park has been classified by the National Trust for its high conservation value and are highly valued by the City of Nedlands and the local and broader Western Australian community. It is part of a very unique bushland corridor from the City to the Ocean utilised and enjoyed by many Western Australians.

2. The Park provides for a variety of native flora and fauna - specifically fauna, including Boobook Owls and the endangered Black Cockatoos, who will be impacted by the low-level noise & light pollution generated by the Hospice 24/7. Dugite snakes and Bobtail Goannas are abundant throughout the park and siting's of dugites are numerous in summer around the chosen site for the Childrens Hospice and beach tracks.

3. At times this site is anything but peaceful and tranquil which one would anticipate families of terminally ill children would require. With the Campbell Barracks immediately north of the Hospice site there are often Black Hawke Helicopters flying overhead. These helicopters are not just seen and heard but felt in every cell of the body as they fly overhead, they are extremely loud. It is useless to attempt to talk when a Black Hawke passes overhead. Intermittent gun fire and explosion type noises from the Campbell barracks can also happen at any time of the day. During Rugby season the noise from the ovals to the east can be very loud not just during a weekend home game but also during the weekly evening training sessions. I can often hear the whistles and yelling from my home in Lyons Street which is around 1km away.

4. The budget for this development has now blown out to around \$35 million for just 7 children with life-limiting conditions. There are over 2000 children in WA in need of hospice care. There is no room for expansion at this site other than taking more A Class reserve land away from the Western Australian public. As it is the Perth Childrens Hospital Foundation are wanting another 3,000 sqm of land to the south of the current site for a playground and want to raise a further \$4 million dollars for this playground. This land is used extensively by the Western Australian public to access Swanbourne beach and

the highly utilised Swanbourne oval. Unfortunately, there will be no public access through this land if the PCHF gains access to this further 3,000 sqm. The City of Nedlands have plans and a budget to connect the Whadjuk Trails for the Western Australian public and tourists to experience through this land south of the Hospice site. These plans would come to an abrupt ending if the PCHF acquires this land for a playground.

The original plan was a one storey building, now it is two stories and now more land is already needed due to the site being in a fire zone.

5. With only one access road shared with the WA Bridge Club from Odern Crescent, in the event of a bush fire when many people may be present at the bridge club, I fear there would be casualties if the Hospice and Bridge Club needed to evacuate at the same time. Many members of the bridge club due to age, would be unable to run to safety to either Odern Crescent or Swanbourne Oval. In the event the Hospice acquires the extra 3,000 sqm for the \$4 million playground there would actually be no access to escape to Swanbourne oval.

5. Public transport is minimal. The 102 bus which stops on North Street only runs every half hour from 6am to 9pm. There is no bus between 9pm and 6am. The nearest train station is a 25-minute walk away.

6. With the lack of public transport this site really isn't easily accessible for families and staff who may need to use public transport to get to and from the Hospice.

In summary, the location chosen for the Childrens Hospice is completely inappropriate & there are numerous more tranquil locations which would be much more suitable for this wonderful and much needed facility.

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Submitted to Metropolitan Region Scheme Amendment 1415 (Standard) - Children's Hospice Site
Submitted on 2024-03-12 14:01:46

About you

1 What is your first name?

First name:

Janet

2 What is your surname?

surname:

Roddy

3 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

No

4 Are you responding on behalf of an organisation?

No

If yes, please fill in the name of your company.:

5 What is your email address?

Email:

jroddy@iinet.net.au

6 What is your address?

address:

30 Reeve St
Swanbourne
WA 6010

7 Contact phone number:

Phone Number:

0458700151

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

The proposal to put a children's hospice in bush land with high fire rating shows poor planning or it was intentional by planners wanting to develop this protected bushland. The current proposed amendment to increase the building envelope to "reduce the fire risk" suggests the plan has always been to bulldoze this protected bushland which provides a safe sanctuary for many threatened species.

Everyone wants a peaceful, beautiful safe place for terminally ill children. Surely this should not be in bush land with hire fire risk, only one road in , next to a beach with notoriously difficult surf especially for inexperienced swimmers and relatively removed from health care facilities . There must be equally peaceful, safer, more child friendly places to build this facility which do not put the children at risk and do not entail destroying recognised habitat. For example on the old hospice site on the river which is close to the Children's hospital . There are several other metropolitan beaches or beautiful parklands which are already developed, would be safer and would not require habitat destruction .

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Submitted to Metropolitan Region Scheme Amendment 1415 (Standard) - Children's Hospice Site
Submitted on 2024-03-12 14:37:01

About you

1 What is your first name?

First name: *Name and contact details removed at the request of the submitter*

2 What is your surname?

surname:

3 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

Yes

4 Are you responding on behalf of an organisation?

No

If yes, please fill in the name of your company.:

5 What is your email address?

Email:

6 What is your address?

address:

7 Contact phone number:

Phone Number:

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

The process to put the hospital in an A Class reserve has been flawed from onset. Residents, Council and opponents have been ignored.
It should never have been planned near the SAS
The entire Park should have remained an A Class Reserve.
The Nedlands Council Master Plan should have been implemented.
The hospital is in a high risk fire area.
The hospital has been placed in an environmentally sensitive area.
The hospital is bigger and glossier than it ever first appeared.
There is no room for parking and for other activities to occur in Alan Park, with the hospital there.
The amount of people the hospital serves, does not justify the size of the building or the damage to the area in which is going to be implanted.
All public space is precious and should be protected from such vain developments.
This was a bushland recreational area designed to serve all people.
Of course, there should be a hospice for sick children, but not at the expense of existing bushland.

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Submitted to Metropolitan Region Scheme Amendment 1415 (Standard) - Children's Hospice Site
Submitted on 2024-03-12 15:28:14

About you

1 What is your first name?

First name:
Allison

2 What is your surname?

surname:
Manners

3 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

No

4 Are you responding on behalf of an organisation?

No

If yes, please fill in the name of your company.:

5 What is your email address?

Email:
amanners.cbhs@gmail.com

6 What is your address?

address:

127 North St Swanbourne WA 6010

7 Contact phone number:

Phone Number:
0417502641

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

There are a number of reasons that I oppose the proposed amendment to the MRS to authorise building a children's hospice in Allen Park Swanbourne. The concept of a children's hospice is an excellent one, and I support this development. However, the choice of location within an A-Class Reserve presents significant risks and challenges to the hospice inhabitants, the surrounding environment and the local community.

Reason 1 - Location: the hospice location within Allen Park is not consistent with the purpose of the Park, nor with the community's expectations. It's location raises considerable fire risk to the hospice's inhabitants and it's limited area means that any required increased capacity over time, will directly impact the surrounding flora and fauna in addition to directly impact the very community purpose of Allen Park as designated a century ago. A more suitable location would be one that is free of fire risk, able to expand as required over time without negative impact on surrounding environment and community, and be one that enables family members of the children in the hospice to access easily via public transport.

Reason 2 - Elitist model: the hospice will only cater to a very limited number of children at any given time. With 7 patient beds, calculations suggest that only 91 families in WA could have support for 4 weeks once a year. There are over 2000 children in need of this hospice and this figure will only increase over time. Thus a building of this size does not nearly cater for all those in need, and more to come in the future. And the impact of expanding the hospice area in this location will have significant negative impact on the surrounding natural environment and the large numbers of community members utilising it. This is simply a flawed model, totally based on poor location choice. There is already growing community concern over the developer proposing to take another 3000sqm of Allen Park to expand the footprint of the hospice. This is unacceptable and further confirms the poor location choice.

Reason 3 - Lack of Community Consultation: the process from the early concept of the hospice in this location has been driven by arrogance and ego. The local community staged a number of town hall style meetings to garner information from the developers and government entities, only to be dismissed

and to be misrepresented in the media with incorrect quotes and hearsay. It has been a very disappointing handling of a proposed development and many of the community feel let down and ignored.

In summary, the government, PCH and associated entities have together pursued a relentless mission to build this hospice in Allen Park with dogged determination and lack of due diligence. Without doubt, it is a flawed decision that will lead to countless issues and high risk incidents. The chances that this development becomes a white elephant are very high.

Sadly the cost of this flawed planning is also high. Primarily to the children and families promised a hospice that can only cater for 7 children at a time.

And then for a hospice with limited capacity for expansion without impacting the precious public open space of the A-Class Reserve that surrounds it. And finally for the regional planning implications for numerous families, in the Perth region and beyond, that will never see the benefits due to poor decision making and funding misallocation.

And for the general public, it is a loss of reserved public land that is permanent.

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Submitted to Metropolitan Region Scheme Amendment 1415 (Standard) - Children's Hospice Site
Submitted on 2024-03-12 16:06:57

About you

1 What is your first name?

First name: *Name and contact details removed at the request of the submitter*

2 What is your surname?

surname:

3 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

Yes

4 Are you responding on behalf of an organisation?

No

If yes, please fill in the name of your company.:

5 What is your email address?

Email:

6 What is your address?

address:

7 Contact phone number:

Phone Number:

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

I oppose the amendment including for the following reasons;

1 This is a designated class A reserve. It should not be possible to amend the scheme to allow for any development in such a reserve, let alone the building of a hospital, bearing in mind all the ancillary services that will also be required to sustain such a facility. Such a facility will necessarily involve a lot of additional parking, ambulance and hospital vehicle movements and, during construction, significant dislocation to the surrounding residential and parkland areas.

That is why it has been designated as such - to prevent development of an area which is considered of such importance from an environmental and societal perspective that it is designated class A. It should be preserved for, and to allow, future generations to enjoy, and for important species of flora and fauna to survive.

2 We all support a hospital for children. That goes without saying. But there are a variety of far more suitable locations, and this one is an entirely inappropriate area to locate such a facility, including for the welfare of the children, their families and the staff of the proposed facility. The reasons for this include:

A. It is located next to the SAS facility. That in itself is quite bizarre. Let me repeat that - it is quite literally right next door to a very active SAS military facility! Future generations will look back at this whole exercise, and the decision makers involved (when looking to allocate responsibility and liability),

with disbelief. It is clearly unsafe. The noise alone from the firing range, various military exercises and related equipment, including helicopters, makes the location a ridiculous choice.

B The bush fire risk clearly has not been mitigated to the extent required for the location to be designated safe.

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Submitted to Metropolitan Region Scheme Amendment 1415 (Standard) - Children's Hospice Site
Submitted on 2024-03-12 18:38:44

About you

1 What is your first name?

First name:

Roslyn

2 What is your surname?

surname:

Seale

3 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

No

4 Are you responding on behalf of an organisation?

No

If yes, please fill in the name of your company.:

5 What is your email address?

Email:

r.seale@westnet.com.au

6 What is your address?

address:

30 Narla Road
Swanbourne
West Australia 6010

7 Contact phone number:

Phone Number:

0448894515

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

The proposed amendment to the metropolitan Region Scheme for land in the City of Nedlands forp the purpose of building a children's hospice is inappropriate as his is a bushfire prone area and the loss of natural landscape and make a presedent if the Metropolitan Region Scheme is amended from parks and recreation reservation to the public a purposes- special uses.

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Submitted to Metropolitan Region Scheme Amendment 1415 (Standard) - Children's Hospice Site
Submitted on 2024-03-12 19:05:58

About you

1 What is your first name?

First name: *Name and contact details removed at the request of the submitter*

2 What is your surname?

surname:

3 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

Yes

4 Are you responding on behalf of an organisation?

No

If yes, please fill in the name of your company.:

5 What is your email address?

Email:

6 What is your address?

address:

7 Contact phone number:

Phone Number:

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

The Allen park precinct was originally set aside as a park and recreation area, and never thought of to be a public area. Significant collaboration occurred within our area to build a multilaged recreation play area so that there would be equipment for the aged to improve balance , muscle strength and exercise endurance alongside play equipment for children . The idea is to get cross generational interaction for both groups to benefit from. I think ideally the council should continue with its original plan, there is adequate left in this area. This play are could be designed to meet the needs of the hospice children. How would nderful to have the aged exercising and being of support to children in need , the situation would be mutually beneficial. By transferring the area to public use land there may be the misfortune that a play area will never be created .

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Submitted to Metropolitan Region Scheme Amendment 1415 (Standard) - Children's Hospice Site
Submitted on 2024-03-12 22:06:06

About you

1 What is your first name?

First name:

Anya

2 What is your surname?

surname:

Seabourne

3 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

No

4 Are you responding on behalf of an organisation?

No

If yes, please fill in the name of your company.:

5 What is your email address?

Email:

aseabourne@bigpond.com

6 What is your address?

address:

8 Jameson Street

Swanbourne

7 Contact phone number:

Phone Number:

0408441748

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

I am very concerned about the proposed amendment as I believe keeping Allen Park intact and protected in its entirety is of the utmost importance. Having been a resident in Swanbourne for over 25 years I have been able to personally witness the significance of this bush park as a wildlife corridor. There are so few such like areas in Perth metro that conserving A Class Reserve and Crown land is critical to the wellbeing of future generations of Perth residents and any person that wants to be able to access nature spaces. The social benefits of biodiversity, tree canopies and wildlife corridors cannot be underestimated.

I do not object to the proposed children's hospice project. I object to the footprint of that project, with its allied services and development, encroaching on the Allen Park Bushland. That land is a legacy for generations of people in Perth.

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Submitted to Metropolitan Region Scheme Amendment 1415 (Standard) - Children's Hospice Site
Submitted on 2024-03-12 22:23:32

About you

1 What is your first name?

First name: *Name and contact details removed at the request of the submitter*

2 What is your surname?

surname:

3 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

Yes

4 Are you responding on behalf of an organisation?

No

If yes, please fill in the name of your company.:

5 What is your email address?

Email:

6 What is your address?

address:

7 Contact phone number:

Phone Number:

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

1. This site was A Class reserve until 2020, when it was reclassified. The original basis for its A Class status remains - it is an important portion of remnant public open space in a "beach to bush" flora and fauna/ wildlife corridor, and rehabilitation for this purpose was imminent. This should be respected, and the proposed MRS amendment should not be made.

2. The area is a thoroughfare for recreational users of the Allen Park precinct including rugby and other sporting teams, school groups, bush walkers and the proposal will create an obstruction that will require clearing of yet more remnant bushland to allow passage. The proposed amendment will cause a cascade of further destruction of the of the precinct.

3. The area is in a very high risk bushfire area. It would be irresponsible to allow this location to be used to house some of our most vulnerable children in a known high fire risk environment. The Department of Fire and Emergency holds grave concerns about such a development at this site, and for this reason did not sign off on the proposal - this fact should be taken very seriously and in any reasonably mean that the proposed Metropolitan Regional Scheme Amendment should not be allowed.

The lack of DFES approval, in combination with the ever warming climate and increasing severity and frequency of bushfires, means that losses and trauma from a devastating fire at this location would reflect very poorly on, and could in fact implicate DPLH for facilitating an inappropriate and unsafe development.

As such this scheme amendment should not in good faith, proceed.

4. There is a huge need for a children's hospice in the populous northern corridor of Perth (as per previous Health Department advice). A Children's Hospice should be easy to access by public transport for stressed families and visitors. Tucking a very expensive, small capacity Children's Hospice in a bushfire prone area, with no public transport and in a location that is inappropriate to serve the public need., and with no room to expand to accommodate growing need, is non sensical and cannot be in the interest of WA families and taxpayers. That is to say the basis for the requested MRS amendment is flawed and not in the public's best interest. This MRS amendment is too significant to be made to facilitate public expenditure on a flawed proposition (a Children's Hospice in this location) it would be extremely unwise to approve the proposed amendment.

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Submitted to Metropolitan Region Scheme Amendment 1415 (Standard) - Children's Hospice Site
Submitted on 2024-03-13 06:32:36

About you

1 What is your first name?

First name:

Rodney

2 What is your surname?

surname:

Greedy

3 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

No

4 Are you responding on behalf of an organisation?

No

If yes, please fill in the name of your company.:

5 What is your email address?

Email:

rod@beyondbricks.com.au

6 What is your address?

address:

33 North Street Swanbourne 6010

7 Contact phone number:

Phone Number:

0431041229

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

There are three key reasons why this proposal is both immoral and unethical and prove the basis why the proposed amendment should not be allowed to go through.

1. State abuse of emergency planning powers provisioned for the purpose of the CV19 pandemic.

The planning approval mechanisms used by the State Government to place a hospice in a totally inappropriate area of the suburb was an abuse of emergency planning powers. Had the normal planning processes occurred the facility would never have been given planning approval because it is poorly sited, has consumed recreational community space, will be further degrading our limited natural coast environment, and as identified by this submission located in a hazard area and is unsafe. Bypassing due process has now created the problem for the government of retrofitting and justifying policy and process to create the conditions which are required for this poor decision to go forward. This is both an abuse of State power and fraudulent. The community, the environment and the public generally are being impacted because of extremely poor planning decisions exercised by the state government by using an emergency planning process for an illegitimate reason and purpose.

2. Changes to state and bushfire risk management practices for the wrong purpose and counter to standard controls.

I provide bushfire risk management advice and risk management services to DFES and OBRM. Amending risk control documentation designed to protect the public in order to justify a bad planning decision is something which should never be done. The hazard to the community which is being created by attempting to render safe a development placed within a hazardous zone goes against every safety principle typically put in place to stop developments of any kind being created within hazardous areas. Attempting to render safe the bushfire environment to justify the progression of a hospice where

patients are going to be highly immobile is unconscionable. Fires are inconsistent in their nature, highly volatile and irregular. Even adjusting the policy to create a paper based and somewhat fictitious justification that the Site by destroying even more of our rare coastal environments and public use areas is not going to remove the bushfire risk for the facility. It is actually going to increase the risk and likelihood of a fire event occurring because of the change of use in the area. In context had proper planning approval process for this development been used, this Site would not have been approved, numerous seas side options within existing built environments without any environmental or social impacts would have been selected requiring no changes to land use, public policy or retrofitted and ill-conceived process to justify this development.

3. We are destroying public space and the natural environment and our community is being impacted

The basis of this proposed amendment is simply irrational and an abuse of state powers. The impacts are being felt by the broad community and the natural environment. There is no requirement for a facility of any kind to be placed in that location. There is no requirement for the hospice to be sited in that location. Therefore, there is no need for any changes to the natural environment to accord with emergency management process of the state to be considered.

The only reason the community is being further impacted is because due process was not followed in the first instance. The metro region and the local communities are now at risk of losing more natural bushland in the suburb and in the area. There is very few of these areas left in our local communities, and especially in proximity to the ocean - they have all been built out and destroyed. Now as a result from what is clearly a very bad and unethical planning decision to place a hospice in Allen Park, an action which has destroyed some of this natural environment for absolutely no reason, further natural environment must be destroyed to make the bad development approval safe. This is simply unacceptable and evidences a series of clearly bad and manipulated processes, and smacks of pork barrelling.

Unethical behaviour has led to an unethical decision and an illogical set of decisions all with negative consequences. What is worse, the general public are simply unaware. Whilst this specific process of consultation which I am responding to is an attempt to evidence an aspect of due processes, the real communities which are impacted are totally unaware of what is being requested in this land use and planning change. The true impact in destroying this natural environment are the children of our communities who are not yet born. The people who do not have a voice in this matter, but whose natural resource is being removed from them. This exact process and basis for change (bad decision followed by a series of more bad decisions to justify the end) is the process by which global warming and climate change issues were created. These natural environmental locations will become more and more precious to our communities as our population grows, our land consumption increase and sprawls and the densities around our cities increase. Perth is forecasted for extremely strong population growth predicted by government, yet the government is suggesting that destroying scarce coastal bushland because of a planning decision which was incorrect and flawed in the first place is the solution. How can this be ethical? How can this possibly be considered to be reasonable? How can this kind of planning precedent ever be set?

The community cost does not justify the nature of the development in any way. It is short sighted and unnecessary. The reason that it is now occurring is because the state government has already contracted and commenced construction activities on the Site. It is now trying to ensure that their unethical and fraudulent behaviours do not come undone and be exposed within the fiscal environment, and because due planning processes were bypassed, the only option is to destroy more bushland in order to create an environment which meets the safety requirements of state policy. This must stop, the amendment must be rejected, it is simply not justifiable.

Once the bushland is gone, so are the animals. Our children enjoy the natural environment of Allen Park. They love the nature, they love the ability to play in the bushland, explore, look at and chase animals, enjoy the bird life. They are not alone. It is very common to see the local children playing games in the bush. The children are so lucky, so many other councils need to invest in nature playgrounds, and right in Allen Park is a truly natural playground filled with animal life. The man made "nature" playgrounds have no animal life. There are no surrounding developments, the natural environment is almost exclusively surrounded by recreational park land. This also supports the health animal lief that exists in the area. This environment must be protected.

In considering these changes the following items must be reviewed:

i) the nature and scale of the proposal is compatible with the use and zoning of surrounding land, the nature and purpose of the reserved land and the environmental character of the location;

No it is absolutely not. It is entirely out of character and not in alignment with anything development in that area.

(ii) there is a community need for the proposed facility in the proposed location;

There is not a single community need for the development of the hospice in that specific location. It is possibly the worst location for that facility and numerous other sites within the surrounding area of Cottesloe are far better locations which are already appropriately zoned, are of extensive size and are located in greater proximity to the ocean and public transportation for the families of the patients.

(iii) the community and local government(s) support the proposal;

No the community does not support the proposal and the community has been fighting this development from inception.

(iv) the proposal can be integrated with other planned facilities and sharing of facilities by more than one incorporated club, community group or private business;

There is nothing else there to integrate with. The nature of the sporting facilities and the land use in the area are generally incompatible with the development in it's original condition. Destroying more bushland does not change this, it exacerbates the problem.

(v) the proposal is consistent with existing and/or proposed land use and management plans.

Clearly the fact that the land use needs to be changed because the development is inconstant with land use plans evidence that the planning decision was flawed in the first place. The proposal for the hospice was not consistent with land use plans as the site destroyed designated public space and need to be specifically rezoned, and now the state government is seeking t change the land use and zoning to make the original decision safe from bushfire within what is the worst rating of hazard possibly in the bushfire setting. There is literally nothing which is consistent with existing or proposed land use and management plans.

This development is simply wrong. The suggestion that the answer to fix a bad decision is to destroy even more bushland to make it right is utterly insulting to the community and the future community whom will be deprived of this natural public resource, and plainly unethical.

I do not support any aspect of this planned amendment, nor do I support the development.

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Submitted to Metropolitan Region Scheme Amendment 1415 (Standard) - Children's Hospice Site
Submitted on 2024-03-13 07:08:15

About you

1 What is your first name?

First name: *Name and contact details removed at the request of the submitter*

2 What is your surname?

surname:

3 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

Yes

4 Are you responding on behalf of an organisation?

No

If yes, please fill in the name of your company.:

5 What is your email address?

Email:

6 What is your address?

address:

7 Contact phone number:

Phone Number:

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

I understand that as Perth gets bigger there is a need for higher density infill residential development to take place. There is a need for higher rise buildings, infill development and reduction in the size of residential blocks. There is a housing crisis and the government and councils need to facilitate more residential development. All this make sense. I also understand that for every development in Perth and change to planning schemes there is an active group of objectors as they are unhappy about higher density in their back yard. These objectors no doubt often get dismissed as unfortunate victims in meeting the needs of higher density and higher populations.

However, the hospice is not about higher density residential. The issue with the Children's Hospice in Swanbourne should not be dismissed as nimbyism. It is about loss of park land that will never ever be returned. It is about the incremental insidious creep of development into park land, loss of native vegetation and ecosystems for birds and other animals. It is about preserving our important urban amenity. Yes it might be only 3% of Allen Park. But then in 5 years time, there will be another Ian Cambell who will have another pet project and want another 3%. Where does it stop - when it is all gone?

Yes we need hospices - no one would dispute this. But we need parkland. Hospices do not need to consume and erode our precious natural habitat. Hospices can be located in many locations that are under-utilised and already developed. You are paving paradise to put up a parking lot.

The whole concept of the hospice is extremely poorly conceived. Such a large footprint for such a small number of patients. It is outrageous. Why do these patients get to overrule the community requirements, not just for this generation but for generations to come? We don't need playgrounds there, we need bird habitats, we need trees and woodland for native flowers, native bees, reptiles and paths for humans to walk through - not around.

Once it is developed, who knows what incremental development you will be facilitating – easy to say “but that is not my responsibility and it is not in my scope for approving this”. Don’t absolve yourself of those other decisions that you know will follow.

Please don’t dismiss the community concern with platitudes of “I am sorry but in this instance your objection is not successful.... blah blah blah. These are real issues and you as an individual are fulfilling an important planning role. That role should not be to rubber stamp a poorly conceived and planned development that has been politically supported just because it has momentum. I urge you to reconsider this and not facilitate this odious development on precious parkland.

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Submitted to Metropolitan Region Scheme Amendment 1415 (Standard) - Children's Hospice Site
Submitted on 2024-03-13 08:19:23

About you

1 What is your first name?

First name:
Rebecca

2 What is your surname?

surname:
Yde

3 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

No

4 Are you responding on behalf of an organisation?

No

If yes, please fill in the name of your company.:

5 What is your email address?

Email:
rebecca@beyondbricks.com.au

6 What is your address?

address:

33 North Street, Swanbourne WA 6010

7 Contact phone number:

Phone Number:
4017013339

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

There are many reasons why this proposal is both immoral and unethical and this proposed amendment should not be allowed to go through.

Bad planning from day one. It is wrong to amend risk control documentation designed to protect the public in order to justify a bad planning decision. It is wrong and immoral to plan to build a hospice in a bushfire zone in the first place and then attempting to render safe the bushfire environment to justify this bad decision. It is unjustifiable to just destroy even more of our rare coastal environments and public use areas. Especially now when we know we need to protect our natural environment and bushlands.

This proposed amendment is simply irrational and total abuse of state powers. There will be huge impacts on the broad community and the natural environment. There is no requirement for a hospice to be placed in that location of Allen Park bushland. It would be much better in a more easily accessible area and outside a natural bushfire zone.

We are now at risk of losing even more of our natural bushland in the suburb. We will not just lose bush land, but also lots of wildlife, animal and especially bird life. We need to protect our natural bushland and wildlife.
It's also good to have lots of bushland between Campbell Barracks and the residential areas, as at times there are a lot of noise and loud sounds coming from Campbell Barracks when they do training. We can't move Campbell Barracks and it is essential that our defence forces do their training.

It is just so wrong and immoral to just destroy more bushland and to rezone more A-class land in order to rectify a bad decision made by government. It

is just not right to just keep destroying our precious bushland. The development of this hospice is simply in the wrong place. The worst part is that the majority of the community is simply kept in the dark and not being informed about what is going on in the background.

Do not destroy more any of our precious bushland, please find a more suitable location for the children's hospice instead.

I do not support this planned amendment and I do also not support the development.

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Submitted to Metropolitan Region Scheme Amendment 1415 (Standard) - Children's Hospice Site
Submitted on 2024-03-13 10:38:20

About you

1 What is your first name?

First name:
Robert

2 What is your surname?

surname:
Downie

3 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

No

4 Are you responding on behalf of an organisation?

No

If yes, please fill in the name of your company.:

5 What is your email address?

Email:
rob@theme-it.com

6 What is your address?

address:

14A Knutsford St
Swanbourne 6010

7 Contact phone number:

Phone Number:
0417922980

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

Changing the zoning sets a precedent for other reserves in all councils. The building of a hospice (or any facility that has only a very small number people using it) shouldn't be permitted on the small number of reserves left in Perth.

Once this small exclusive facility is established the almost immediate call will be for permission to expand, more parking better access etc.

The facility in question would never have passed without heavy political interference and lobbying.

The location should have been in Nedlands (Sunset hospital site) - a way more appropriate location with room to expand.

File 1:
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Submitted to Metropolitan Region Scheme Amendment 1415 (Standard) - Children's Hospice Site
Submitted on 2024-03-13 11:56:07

About you

1 What is your first name?

First name:
Heidi

2 What is your surname?

surname:
Hardisty

3 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

No

4 Are you responding on behalf of an organisation?

No

If yes, please fill in the name of your company.:

I volunteer for Friends of Lake Claremont, Urban Bushland Council WA, Friends of Underwood Avenue Bushland and am a member and supporter of many other environmental groups including Birdlife Australia, WWF, EDO, WAFA, etc. I am a full-time conservation volunteer and campaigner to protect and enhance what little remains of our native vegetation in the southwest of WA - a global biodiversity hotspot.

5 What is your email address?

Email:
spideyheidi@outlook.com

6 What is your address?

address:

12a Myera Street
Swanbourne WA
6010

7 Contact phone number:

Phone Number:
0416614696

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the box below. Any supporting documents may be uploaded.

Submission:

I have been vehemently opposed to the location of this hospice from the start. It is irresponsible and distressing to see green space and a Class A Reserve being removed for a hospice.

Just because this proposal has conditional 'development approval', I maintain that this development is wrong and should not go ahead.

Hence, I am opposed to the rezoning of the land from Parks and Recreation to Public Purposes. How can you say the proposed amendment is not considered regionally significant? The loss of park space is highly significant in a local and regional sense both to the community and the wildlife. As the population and density of our suburbs increase, we need to maintain, enhance, and even increase our remaining park space – not destroy it.

There are alternative locations – on land that had previously been developed - for this project. The Sunset Hospital in Dalkeith is an ideal choice and should be repurposed for this hospice. Going forward, better planning decisions must be made. The State Government recently sold off the land of the former Princess Margaret Hospital for housing development. This was an extremely poor decision. That land should have been kept to build places like the children's hospice and other medical facilities.

I would like to reiterate the following points, as I must express my frustrations and hope decisions such as these never happen again.

DC Policy 5.3- Use of Land Reserved for Parks and Recreation and Regional Open Space

If this hospice is built, the parks and recreation land will be lost forever.

The land should not be re-zoned as the building of this hospice at this site goes against all of the policy statements in Development Control Policy 5.3:

(i) the nature and scale of the proposal is compatible with the use and zoning of surrounding land, the nature and purpose of the reserved land and the environmental character of the location; THE BUILDING IS NOT COMPATIBLE WITH THE CURRENT ZONING

(ii) there is a community need for the proposed facility in the proposed location; THE BUILDING CAN BE LOCATED ELSEWHERE – IT IS NOT FOR JUST THE LOCAL COMMUNITY

(iii) the community and local government(s) support the proposal; THE COMMUNITY IS OPPOSED

(iv) the proposal can be integrated with other planned facilities and sharing of facilities by more than one incorporated club, community group or private business; THE FACILITY IS NOT FOR LOCAL COMMUNITY USE and

(v) the proposal is consistent with existing and/or proposed land use and management plans. THE BUILDING IS NOT CONSISTENT WITH EXISTING LAND USE

DC Policy 5.3 should have been followed from the beginning and the hospice should never been proposed for this area. Open Space may be used for:

- passive recreation;
- active sporting pursuits;
- cultural and or community activities;
- activities promoting community education of the environment; and/or
- uses that are compatible with and or support the amenity of the reservation (i.e. cafe, restaurant) where specific facilities for such purposes have been approved by the WAPC.

THE SPACE SHOULD NOT BE USED FOR A HOSPICE

The space should remain as park.

Environment:

DWER has verbally said the amendment is unlikely to raise any environmental concerns. This is not good enough. Where is the evidence for this statement? The land could be rehabilitated. As density increases, any reduction in green space will have a significant impact on the environment – slowly destroying local habitat for wildlife, increasing runoff and urban heat island effects.

Servicing Demands:

It is also extremely concerning that the Water Corporation would not have initially allowed for water and wastewater demands to the proposal given the existing landuse. It appears that these critical matters have yet to be finalised. This is a gross oversight and the project should not proceed in this location.

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Submitted to Metropolitan Region Scheme Amendment 1415 (Standard) - Children's Hospice Site
Submitted on 2024-03-13 13:56:39

About you

1 What is your first name?

First name: *Name and contact details removed at the request of the submitter*

2 What is your surname?

surname:

3 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

Yes

4 Are you responding on behalf of an organisation?

No

If yes, please fill in the name of your company.:

5 What is your email address?

Email:

6 What is your address?

address:

7 Contact phone number:

Phone Number:

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

The governance for excising the land from an A Class reserve was highly questionable.

The proposed change in use impinges on important habitat and corridors for native wildlife and biodiversity in the area that Allen Park was set aside to protect.

At a time when there is increasing need for protection and enhancement of natural areas and biodiversity, it makes no sense to reduce these important pockets of protected natural areas in our suburbs.

There are multiple other locations for the hospice. In addition, the viability of the ongoing operation of the hospice is uncertain. A hospice should be more closely located to the support facilities provided by hospital and not located in a quiet residential area adjoining an extreme bush fire zone.

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Submitted to Metropolitan Region Scheme Amendment 1415 (Standard) - Children's Hospice Site
Submitted on 2024-03-13 17:00:23

About you

1 What is your first name?

First name:

Timothy

2 What is your surname?

surname:

Tucak

3 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

No

4 Are you responding on behalf of an organisation?

No

If yes, please fill in the name of your company.:

5 What is your email address?

Email:

tim.tucak@bigpond.com

6 What is your address?

address:

18A Dalkeith Road, Nedlands WA 6009

7 Contact phone number:

Phone Number:

0422313180

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

There has been a failure of the planning process with no valid site selection process for the hospital proposal.

This has resulted in the chosen site negatively impacting the hospital proposal.

The bushfire risk from the location has been addressed by making the building into a 'bunker' and substantially increasing the cost.

The proposed site is not a suitable location for our vulnerable and sickest children.

The Office of Bushfire Risk Management has designated both the building site and the single access road in and out, as a Bushfire Prone Area. Part of the building site is rated as "Flame Zone", the most dangerous bushfire risk rating.

The Department of Fire and Emergency Services does not support a vulnerable use building in this location, highlighting location, siting, design and vehicular access as areas of concern.

As a consequence of the location difficulties, the proponents are already seeking to use more of Allen Park's A Class Reserve.

Under the WAPC policy - Development Control Policy 5.3: Use of Land Reserved for Parks and Recreation and Regional Open Space (DC 5.3) the proposed hospital does not meet the circumstances under which the WAPC may approve the use and development of land reserved for Parks and Recreation for

different purposes. Therefore, the MRS should not be amended to allow for an inconsistent/incompatible use, as the intent of the reservations would be prejudiced by an inappropriate development.

1. The nature and scale of the hospital proposal are compatible with the nature, purpose, use and zoning of surrounding land and the environmental character of the location;
2. The Child and Adolescent Health Service (CAHS) did not identify a community need for the proposed hospital in Allen Park, but rather specifically identified the need in the northern suburbs of Perth.
3. The local community and the City of Nedlands do not support the proposal, with the Allen Park Masterplan clearly identifying the desire of the community and the City to not develop this area with a building, but rather nature play and an all-ages exercise area.
4. The hospital proposal is not integrated with other planned facilities nor is there any sharing of facilities with the community.
5. The hospital proposal is inconsistent with existing and/or proposed land use and management plans, being the Allen Park Precinct Master Plan Report, Final Report November 2017.

Under DC 3.5 the use and development of land reserved for Parks and Recreation under the MRS for purposes inconsistent with the purpose of the reserve will not be supported.

The hospital proposal is inconsistent with the Allen Park Precinct Master Plan and therefore the land should not be used nor developed for the hospital proposal. Similarly, the MRS should not be amended to allow for the inconsistent and incompatible hospital proposal.

The hospital proposal will not allow for Allen Park (currently land reserved for Parks and Recreation) to be used in a manner compatible with the purpose of the reserve and will prevent public access to and enjoyment of Allen Park.

Under DC 3.5 the use and development (the hospital proposal) of land reserved for Parks and Recreation (Allen Park) would result in restrictions to public access (notwithstanding the possible benefit which could be derived from the use and development to the general community) is not to be supported.

The WAPC should not be amended the MRS as the hospital proposal is inconsistent with the planning framework.

The hospital proposal is not suitably planned nor designed, as it is located in a bushfire prone area, and the hospital proposal is not of low risk nor can measures be implemented to ensure that it is classified as such.

The middle of Allen Park in Swanbourne is not an appropriate location for the proposed hospital. There will be noise and parking pressures that will adversely impact the care of very vulnerable children and their families.

Allen Park is recognised by the Heritage Council as being an important open space asset, valued by the community. In 2017 the Allen Park Precinct Master Plan for the park was finalised and adopted. It is currently being implemented.

As residential densities in the western suburbs increase, all existing parks will become more valuable and have to be protected.

Irrespective of the current land tenure, the City of Nedlands acquired the land for a park and wants it to be used for that purpose.

In order to make the proposed hospital safe, bushland outside the building site will need to be managed and the habitat that is vital to bird and wildlife, as well as people who enjoy the bushland, will be affected.

The beautiful Rainbow Bee Eaters which travel from the north of the state to Allen Park every year to breed, are currently nesting right next to the temporary fence surrounding the proposed hospital.

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Submitted to Metropolitan Region Scheme Amendment 1415 (Standard) - Children's Hospice Site
Submitted on 2024-03-13 22:13:17

About you

1 What is your first name?

First name:
Denise

2 What is your surname?

surname:
Murray

3 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

No

4 Are you responding on behalf of an organisation?

No

If yes, please fill in the name of your company.:

5 What is your email address?

Email:
denise.murray@icloud.com

6 What is your address?

address:

PO Box 6100, Swanbourne, WA 6010

7 Contact phone number:

Phone Number:
0408834929

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

I object to the proposal to amend the Metropolitan Region Scheme (MRS) as it relates to 5,945 m2 in Swanbourne from the Parks and Recreation reservation to the Public Purposes - Special Uses reservation in the MRS.

My reasons can be summarised under the following headings:

1. Preserve the integrity of the area under the MRS as it was intended.
2. Avoid damage and/or loss of more Class A Reserve
3. Respect the Allen Park Master Plan which reflects the wishes of the local and much wider community of users of Allen Park
4. Consider the far-reaching consequences of this amendment – it will contribute to the loss, forever, of green spaces, canopy, and the resultant increase in heat effect for the whole community.
5. Avoid setting a dangerous precedent which could have a snowball effect. Within 10 years Allen Park could lose most of its important western side to big development with no benefit to the wider community.
6. Previous example of a hospice in WA (Shenton Park Cottage Hospice) failed after proving too costly ; services were needed closer to where people live.

1. Preserve the integrity of the MRS as it was intended.

The MRS defines the future use of land and provides the legal basis for planning in the Perth metropolitan region, dividing it into broad zones and reservations. Current political decisions have tended to reduce the significance of this vital planning tool.

Hasty amendment for unresearched and unsubstantiated building development on land that has been thoughtfully reserved for “Parks and Recreation” will have long reaching, and possibly disastrous, consequences for the well-being of future generations.

The current awareness of growing heat effect, need for increased green spaces and canopy, increased infill resulting in little or no play and recreational spaces for many residents means the Metropolitan Region Scheme has never been more important. It is to be hoped that the experts within the Department of Planning Lands and Heritage who will be considering this amendment will base their decisions on science and research and not on political imperatives.

2. Avoid damage and/or loss of more Class A Reserve

Class A Reserve is the highest form of protection for land in our current system. King’s Park, Bold Park and Allen Park have been categorized as Class A.

Until its excision from Class A Reserve in 2021, the almost 6000 square metres of Allen Park land that is under consideration for reservation amendment had been earmarked for rehabilitation that would bring benefit to the community into perpetuity.

Alarming, the proponents of the hospital have proposed using a further 3000 square metres of Class A Reserve because the initial, hasty excision process did not reveal the bushfire classification of the site that is the subject of this proposed amendment. Areas that were designed for the hospital’s parking and play area are situated in Flame Zone so the proponents are offering \$4million to the City of Nedlands to “persuade” the city to hand over a further 3000 square metres which would be used exclusively by the hospital at times of their choosing. This would have the effect of denying the huge community of users of Allen Park 9,000 square metres of land that was intended as public parks and reserve. There is no doubt, that the extra land would eventually also be lost from Class A Reserve.

3. Allen Park Master Plan

(https://www.dropbox.com/scl/fi/fb6vfapofaobgd7pseioi/Allen_Park_Master_Plan_2017_-_Final.pdf?rlkey=xme3eflipm6pmf9l78og1gf7k&dl=0)

The Allen Park Master Plan (see link) was adopted by City of Nedlands in December 2017 after many years of consultation with the broad Allen Park community including all sporting clubs and stakeholders who use Allen Park. Extensive research and consultation with community, sporting clubs and diverse users of both the sporting precinct and the bushland area of Allen Park identified the area that has now been excised from Class A Reserve as an area for the wider community to undertake recreation – both active and passive – as well as rehabilitative and adventure play. It was an ideal, level location for recreation and the promotion of physical activity for all abilities. These cannot easily be replicated in other areas of the park. In summary, this excision of Class A Reserve has permanently removed opportunities for use of green spaces as they are currently planned in the MRS and reflected in the Allen Park Master Plan.

It should be noted that the delay by the City of Nedlands in commencing implementation of the Allen Park Master Plan was partly due to the site’s categorization as “contaminated” which required the City of Nedlands and State experts to undertake further studies. It was amazing to those of us who know the amount of asbestos and other contaminants that lie under the soil in that area, that the category of “contaminated” was lifted with little effort or investigation.

4. Consider the far-reaching consequences of this amendment.

The amendment will affect not just the 6000 square metres already excised from Class A Reserve, but the adjoining bushland and green spaces in the remaining Class A Reserves of Allen Park.

The proposed development will limit the opportunity for plans to green the area as per the Urban Greening policies. The benefits of this would increase canopy, reduce carbon emissions, combat the heat island effect, and importantly, increase biodiversity and resilience by enhancing the critical green corridor linking Melon Hill, Bush Forever Site 315, and the coastal reserves.

Nesting sites of the Rainbow Bee Eaters currently lie in the path of the development vehicles, and it should be noted that these birds return every year to nest in this area. Quenda have returned to nearby reserves, and it is a project of the Melon Hill Bushland Group to encourage their return to Allen Park via bushland corridors. If the amendment is approved, and the development proceeds, the return of quenda, and their recognised valuable contribution to soil health, is unlikely to happen. Lengthy and invasive building construction followed by intrusive activity and night light from an established hospital are not sympathetic to wildlife, especially nocturnal animals, and birds.

The Red-tailed Black Cockatoo and the Carnaby’s Cockatoo are known to fly over and rest in the area. Tuart trees that are only partly grown were part of a canopy revegetation project two decades ago and they will not be able to grow to maturity if the amendment goes ahead.

The area under consideration of amendment has been rated as high bushfire risk (for development) and the proposal to build a hospital contravenes the State’s own policy on developments for vulnerable use (State Policy 3.7 Planning for Bushfire Prone Areas).

The Department of Fire and Emergency Services has not agreed to sign off on the development for reasons of location, siting and design and vehicular access. It is acknowledged that in the event of a bushfire, there would not be enough time to evacuate the vulnerable patients, their families and the staff that support them. The patients would need to “shelter in place”.

If the development proceeds, the City of Nedlands would be obliged to reduce the natural bushland on Class A Reserves surrounding the hospital site. More green space, canopy and habitat will be lost.

We all recognise that there is an urgent need to maintain public open space for recreational use, allowing for more green corridors, growing the urban forest, and increasing biodiversity to increase the resilience of our communities.

Not only are green spaces essential to counter the heat island effect, but there is an increasing body of evidence showing the critical role of natural areas and biodiversity in ensuring resilient, healthy, liveable communities. The impact of natural areas on physical and mental health is well documented.

5. Avoid setting a dangerous precedent which could have a snowball effect.

The excuse for passing this amendment is that it is not uncommon and only affects an area of approximately 6000 square metres. However, we are already seeing that the area under consideration of amendment does not meet the needs for the proposed development, with proponents seeking the use of a further 3000 square kilometres under a \$4 million incentive proposal to the City of Nedlands. It is possible to foresee a situation in the near future where the community use of the western side of Allen Park is so affected as to be not viable as public open space. Within a decade, we could see the complete loss of the public reserves and recreation areas on the western portion of Allen Park. This is surely against the spirit of the original MRS preservation scheme which aimed to maintain the integrity of green parks and reserves as a legacy for the future.

6. Shenton Park Cottage hospice failed after proving too costly ; services needed closer to where people live.

The Cottage Hospice in Shenton Park was a purpose-built hospice for adults. It was constructed in 1984 in a bushland setting in Shenton Park. By 2005, the Shenton Park hospice was closed as a hospital and the building is now used as training rooms. The reasons for closure were cited as cost and a decision by the then Government “to ensure that palliative care services are provided closer to where people live” (Hansard [ASSEMBLY - Thursday, 18 August 2005] p 4247.

Evidence indicates that a proper clinical assessment of the cohort of patients intended for this hospital was either not undertaken or ignored. The 2020 Child and Adolescent Service submission to the 2020 Joint Select Committee Inquiry into Palliative Care concluded that the need for a children's hospice was in the northern suburbs. A hospital on the Allen Park site may not, therefore, survive for more than the “honeymoon” stage of the project.

The proposed children's hospice is based on Bear Cottage in New South Wales, but recent reports reveal that Bear Cottage is already too small for the number of patients it is intended to serve.

The MRS amendment 1415 is being proposed to facilitate a 35-million-dollar hospital in Allen Park with 7 beds for children with life limiting conditions. Data provided by the WA health Department has indicated there are 2000 children with life-limiting conditions. The proposed hospice cannot possibly meet the needs of that number. It is not located in the area that was identified as being of greatest need – the northern suburbs.

In a public/private partnership arrangement, the building is being procured by a private company . The government will use the building under a lease or licence arrangement. In the event that the project does not succeed as a hospital, the building will continue to be owned by private concerns and can be used for another purpose. No doubt the building would remain. The site is unlikely to ever be returned to green space.

The construction of the first children's hospice should therefore be on a safe site that has capacity space for expansion, in an area of greatest need. Not in the middle of a public park and reserve that is well used and valued by the wide community of Western Australia.

Allen Park and King's Park were both set aside for recreational use and classified as Class A Reserves more than 120 years ago. An amendment that removes any portion of Allen Park from Parks and Recreation should not be approved.

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Submitted to Metropolitan Region Scheme Amendment 1415 (Standard) - Children's Hospice Site
Submitted on 2024-03-13 23:32:02

About you

1 What is your first name?

First name:
Malcolm

2 What is your surname?

surname:
Murray

3 Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission?

No

4 Are you responding on behalf of an organisation?

No

If yes, please fill in the name of your company.:

5 What is your email address?

Email:
murrays@bigpond.net.au

6 What is your address?

address:

6 Sayer Street,
Swanbourne WA 6010

7 Contact phone number:

Phone Number:
0438 834 829

Submissions

8 Do you support/oppose the proposed amendment to the Metropolitan Region Scheme?

Oppose

9 Please type your submission (reasons for support/opposition) into the the box below. Any supporting documents may be uploaded.

Submission:

I oppose the proposal to amend the Metropolitan Region Scheme as it applies to Allen Park, Swanbourne from 'Parks and Reserves' to Special Purposes.

Such an amendment would have a major deleterious effect on the operation of Allen Park as a community recreational reserve.

Such a plan would be inconsistent with the Allen Park Master Plan (2017) and represent an insult to John Allen and other far-sighted individuals who set the land aside more than 120 years ago "...as a garden for the people for all time."

The legacy of such vandalism at Allen Park will be a diminished positive environmental yield from the Park's areas that remain their natural state for the all Western Australians. In addition, the proposed buildings and increased associated vehicular entries to the site will intrude into and disrupt the potential of the land as a much-valued resource for healthy recreational pursuits for thousands of people of all ages who depend upon it for good health, exercise and social activities.

In addition, the determination of the proponents to secure the site for their dream project is already creating significant public concern about the bush-fire risk implications of the chosen site and the dangerous threat it poses to the patients, their families and staff at the facility.

It will be a sad day for the profession of Planning in Western Australia if it cannot see the downside of this project in this location and recommends that

the site classification be changed to 'Special Purposes'.

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Amendment (Standard)
Submission Form

Submission

Metropolitan Region Scheme Amendment 1415

Children's Hospice Site

Secretary
Western Australian Planning Commission
Locked Bag 2506
PERTH WA 6001

FILE
RLS/1014

Title (*Mr, Mrs, Miss, Ms*) **Mr**..... First Name **Joshua**.....
Surname **Turkington** (PLEASE PRINT CLEARLY)
Address **99 Clement Street Swanbourne**..... Postcode **6010**.....
Contact Number ...**9371 5856**..... Email Address **jturkington@gmail.com**.....

Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission? ☐ Yes ☒ **No**

Submission

(Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

As a resident and regular user of the area of Allen Park, the class A reserve to be affected by the construction of the hospice and related fire breaks, I am deeply distressed at the loss of sanctuary for animals and people alike.

The colourful and sonorous Rainbow Bee Easter birds which nest in the large area the hospice would occupy are one of the many examples of native wildlife and fauna that will lose their habitat.

People from all over Perth regularly walk through Whadjuk trail for recreational purposes and to access the beach. Instead of the sanctuary of quiet open bushland they currently enjoy, they will have to divert their paths to built-up areas not in keeping with the peaceful juxtaposition with nature that Allen Park is known for.

Why when there are many other site options which are less intrusive to our scarce native habits and can accommodate a far larger hospice than the one possible on the Allen Park site (which will no doubt be attempted to be expanded upon), is so much time and public money being spent on this project which is not fit for purpose?

The City of Nedlands invested considerable time and money in community consultation to determine the 2017 Master Plan in keeping with the community's wishes, why is this being ignored?

Please don't turn the people's park and nature sanctuary into a concrete jungle and parking lot! Instead, give the sick children and their families what they deserve, a bigger hospice in an easy-to-access location.

turn over to complete your submission

This image shows a full page of white paper with horizontal dotted lines. The lines are evenly spaced and run across the entire width of the page, providing a guide for handwriting practice. There are no margins, text, or other markings on the paper.

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Signature  Date 14-Mar-2024

**Note: Submissions MUST be received by the advertised closing date on 13 March 2024.
Late submissions will NOT be considered.**

Amendment (Standard)
Submission Form

Submission

Metropolitan Region Scheme Amendment 1415

Children's Hospice Site

Secretary
Western Australian Planning Commission
Locked Bag 2506
PERTH WA 6001

FILE
RLS/1014

Title (Mr, Mrs, Miss, Ms) CAPTAIN First Name ROBERT
Surname SCOGGINS (PLEASE PRINT CLEARLY)
Address 10 ODEAN CRESCENT Postcode 6010
Contact Number 0431 337 221 Email Address ROBERTSCOGGINS@YAHOO.COM

Submissions may be published as part of the consultation process. Do you wish to have your name removed from your submission? ☐ Yes ☐ No

Submission

(Please attach additional pages if required. It is preferred that any additional information be loose rather than bound)

- THE PROPOSED SITE IS UNSUITABLE ON ACCOUNT OF THE DANGER OF FIRE IN THE CLOSE VICINITY.
- THE OLD DEAF SCHOOL SITE IN MOSMAN PARK WOULD MAKE AN ALTOGETHER ^{BETTER} SITUATION FOR ALL CONCERNED.
- THE CLOSE PROXIMITY OF THE HOSPICE WOULD HAVE A DELETERIOUS EFFECT ON THE LOCAL RESIDENTS AND VISITORS TO ALLAN PARK.

turn over to complete your submission

This image shows a full page of a document template designed for handwritten notes or essays. It features approximately 28 evenly spaced, thin grey horizontal lines extending across the entire width of the page. The margins are consistent on all sides, providing ample space for writing. There are no pre-printed questions, headings, or other markings on the page.

- The Western Australian Planning Commission (WAPC) is subject to the *Freedom of Information Act 1992* and as such, submissions made to the WAPC may be subject to applications for access under the act.
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Signature [Signature] Date 14/03/2024

**Note: Submissions MUST be received by the advertised closing date on 13 March 2024.
Late submissions will NOT be considered.**

From: Marissa Morskate <mmorskate@nedlands.wa.gov.au>
Sent: Thursday, 28 March 2024 10:56 AM
To: Anthony Muscara
Cc: Region Planning Schemes; Roy Winslow
Subject: NOTE: CORRECT RESOLUTION - City of Nedlands Comment: PROPOSED METROPOLITAN REGION SCHEME AMENDMENT 1415 (STANDARD) - CHILDREN'S HOSPICE SITE - RLS/1014
Attachments: MRS Council report.pdf
Categories: SUB

Some people who received this message don't often get email from mmorskate@nedlands.wa.gov.au. [Learn why this is important](#)

Hi Anthony,

This replaces my previous email sent this morning. **Please note this alternate proposed by Council is the correct resolution.**

Thank you for providing the City the opportunity to provide comment on MRS Amendment 1415.

At the OCM of 26 March Council resolved the following:

That Council advise the WAPC of the recommendation to:

1. **not support the reclassification of Lot 503 Odern Crescent from 'Parks and Recreation' reserve to 'Public Purposes – Special Uses' reserve as Council seeks to retain the long-term status of "Parks and Recreation" as opposed to the short-term purpose stated in the management order that it is "To be utilised for the designated purpose of 'Children's Hospice' only".**
2. **not support the reclassification of Lot 504 Odern Crescent from 'Parks and Recreation' reserve to 'Public Purposes – Special Uses' reserve as it is unnecessary and has no effect on vehicle access to Lot 503. notes that the advertising period for the amended Local Planning Policy 5.2 – Old Swanbourne Hospital will be for a minimum of 21 days and will include informing owners and occupiers of all affected and adjoining properties by posted letter, including inviting comment on the draft Policy.**

The wording of the resolution is as passed by Council. Please note the wording from the resolution relating to Local Planning Policy 5.2 – Old Swanbourne Hospital appears to have been included as an administrative error. The first sentence relating to the MRS amendment is correct.

Please find attached a copy of the Council Report presented to Council on 26 March 2024.

Should you have any queries regarding this matter please contact me via email or on 9273 3500.

Regards,

Marissa Morskate

Acting Coordinator Strategic Planning



Cottage
 71 Stirling Highway WA 6009
 PO Box 9 Nedlands WA 6909
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16. Divisional Reports - Planning & Development

16.1 PD09.03.24 Consideration of Metropolitan Region Scheme Amendment 1415 – Reclassification of Lots 503 and 504 Odern Crescent, Swanbourne

Meeting & Date	Council Meeting – 26 March 2024
Applicant	Western Australian Planning Commission
Employee Disclosure under section 5.70 Local Government Act 1995	The author, reviewers and authoriser of this report declare they have no financial or impartiality interest with this matter. There is no financial or personal relationship between City staff involved in the preparation of this report and the proponents or their consultants.
Report Author	Nathan Blumenthal – A/Manager Urban Planning
Director	Roy Winslow – A/Director Planning and Development
Attachments	1. WAPC MRS Amendment Report

Purpose

This report is being presented to Council to consider a recommendation to the Western Australian Planning Commission (WAPC) to amend the Metropolitan Region Scheme (MRS) to change the reserve classification of Lots 503 and 504 Odern Crescent, Swanbourne (the approved Children's Hospice and access leg) from 'Parks and Recreation' reserve to 'Public Purposes – Special Uses' reserve.

Recommendation

That Council advise the WAPC of the recommendation to:

1. support the reclassification of Lot 503 Odern Crescent from 'Parks and Recreation' reserve to 'Public Purposes – Special Uses' reserve.
2. not support the reclassification of Lot 504 Odern Crescent from 'Parks and Recreation' reserve to 'Public Purposes – Special Uses' reserve as it is unnecessary and has no effect on vehicle access to Lot 503.

Voting Requirement

Simple Majority.

Background

Lot 503 was formerly occupied by the Swanbourne Bowling Club and is now vacant land. It formed part of Allen Park, which is a Class A reserve vested in the City. The City manages



Allen Park in accordance with a Management Plan adopted in 2014, via a management order.

Lot 504 provides access to Lot 503, as well as the Rugby and Bridge club on Lot 501. All lots are currently reserved for 'Parks and Recreation' by the MRS.

In 2021, the Hospice site was excised from Allen Park as a standalone lot, being Lot 503 on Deposited Plan 410572. This is a Crown land title subject to a management order vested in the Child and Adolescent Health Service (CAHS). The conditions of this management order include that it is "To be utilised for the designated purpose of 'Children's Hospice' only".

In December 2021, a development application for a Children's Hospice was submitted to the State Development Assessment Unit (SDAU). The application was approved by the SDAU on 27 July 2023 and the process of clearing conditions and preparing a building permit is underway.

Although not a pre-requisite for approval of the development application, the SDAU has requested that an MRS amendment be submitted to ensure that a process for reclassifying the site is underway. The purpose is to align the reserve classification with the approved land use of Lot 503 and reserve the lot as 'Public Purposes – Special Uses'.

Lot 503 obtains frontage to Odern Crescent via a separate Crown land title, Lot 504, which is a Crown land title subject to a management order vested in the City of Nedlands. This is for the purpose of "public access" and is proposed to accommodate the main entrance to the Hospice. The WAPC proposes that Lot 504 also be reserved to 'Public Purposes – Special Uses' reserve (Attachment 1).

Discussion

The Hospice has already received development approval, and the land title has been vested for the purpose of a Children's Hospice only. Failure to amend the MRS will have no impact on the approval or function of the hospital and is more a technical matter to ensure the scheme is consistent with the proposal. The City's role in the process is to provide advice to the WAPC in making its determination.

A MRS Public Purpose reserve is defined as "Land for public facilities such as hospitals, high schools, universities, car parks, and prisons, utilities for electricity and water, commonwealth government and other special uses." The proposed classification is appropriate for the approved development on Lot 503.

Changing the reserve classification of Lot 504 to Public Purpose – Special Uses is unnecessary. The management order ensures that public access is provided to Lot 503 and all existing and future facilities adjoining the access leg. Retaining classification as 'Parks and Recreation' reserve will not restrict or otherwise impact access to existing or future facilities around the access leg.



Given the conditions of the management order specifying the use of Lot 503 and the approved development, MRS reclassification of the lot as proposed is appropriate and consistent with orderly and proper planning. Reclassification of Lot 503 is unnecessary.

Consultation

Consultation has been undertaken by the WAPC. The submission period closes on 13 March 2024.

Strategic Implications

This item is strategically aligned to the City of Nedlands Council Plan 2023-33 vision and desired outcomes as follows:

Vision Sustainable and responsible for a bright future

Pillar People

Outcome 3. A caring and supportive community for all ages and abilities.

Pillar Place

Outcome 6. Sustainable population growth with responsible urban planning.

Budget/Financial Implications

Nil.

Legislative and Policy Implications

The Western Australian Planning Commission may amend the Metropolitan Region Scheme under the [Planning and Development Act 2005](#).

Decision Implications

Council's recommendation will be sent to the WAPC, which will consider all public comments and agency comments prior to making a recommendation to the Minister for Planning, who will make the final determination on the MRS amendment.



Conclusion

It is recommended that Council support the MRS amendment reclassifying Lot 503 and Odern Crescent from 'Parks and Recreation' reserve to 'Public Purpose – Special Uses' reserve, but not support reclassification of Lot 504.

Further Information

Nil.