



The Chief Executive Officer  
City of Melville

**RE: "Submission – Major Land Transaction, Lease of Portion of Tompkins Park"**

Dear Sir

I write on behalf of the Swan Estuary Reserves Action Group Inc. (SERAG) in response to your invitation to comment on the above proposal and business case advertised in accordance with section 3.59 (4) of the Local Government Act 1995.

SERAG is a community-based group of volunteers actively engaged in the protection, conservation and rehabilitation of the natural values of the Swan River Estuary.

**This submission outlines SERAG's opposition to the proposal to construct a surf sports, recreation and leisure facility at Tompkins Park.**

**LOCATION CLASSIFICATIONS**

We submit that the facility is not in-keeping with and will negatively impact upon the natural values of the River foreshore area, being immediately adjacent to the Swan Estuary Marine Park and Alfred Cove A-Class Nature Reserve and forming part of Bush Forever Site 331. It falls within the Development Control Area (DCA) of the Swan River Trust, through the *Swan and Canning Rivers Management Act 2006*.

These classifications provide clear evidence of community recognition of the high conservation value and rich diversity of the site, and the community's desire to protect these values over many years into the future.

The Marine Park and A-Class Nature Reserve have been established for the protection of native flora and fauna. The lands adjacent to the River from Point Walter to Applecross have been classified 'Bush Forever Site 331' as part of an implementation plan and a whole of government initiative designed to identify, protect and manage regionally significant bush land in order to achieve a sustainable balance between conservation of our bush land and development in metropolitan Perth.

## **CURRENT ENVIRONMENTAL VALUES**

Alfred Cove is comprised of estuarine lands and waters within the Swan River. Together with Milyu and Pelican Point it provides important feeding habitats for trans-equatorial migratory wading birds protected by agreements Australia has with South Korea, Japan and China. Waders and water-birds move between Alfred Cove, Pelican Point and Milyu on a daily basis. The sand flats, mud flats and beaches at these three locations provide the only remaining significant feeding and resting areas in the Swan Estuary. The Park and adjacent reserves also provide habitat for a diverse assemblage of aquatic and terrestrial flora and fauna.

The conservation values of Alfred Cove are as follows:

- Important feeding habitats for internationally protected, trans-equatorial migratory wading birds.
- Rich and diverse estuarine and terrestrial communities and habitats.
- Feeding, resting and breeding habitat for fauna, such as fish species and water-birds.
- Supports threatened species/communities of flora and fauna.
- Relatively undisturbed native vegetation and geomorphology.
- Visual landscape values.
- Benthic fauna and seagrass beds that contribute to energy flows, primary production, species diversity and river floor stabilisation.

The community - including all levels of government - has both legal and ethical responsibilities to protect these internationally significant and fragile values. A collaborative effort by government, agencies and the community is needed to stop the decline in the river's health and begin improving its condition.

## **THREATS TO THESE VALUES**

SERAG contends that the construction of a surf sports, recreation and leisure facility at Tompkins Park will cause an unacceptable and critical increase in disturbance to these natural values.

- During both its construction and operational phases, the wave park will cause unacceptably high additional noise, lighting and vibration to the site, disturbing fauna.
- The increased number and proximity of people will disturb fauna.
- We have concerns about how and from where the water used in the wave park is to be sourced and to be disposed of. Water discharge is of concern both in frequency and impact on estuarine processes and water quality, including water and sediment dynamics, salinity and drainage and pollutants and nitrification.

- A potential increase in littering is also an issue. Rubbish along the foreshore not only reduces the amenity of an area but also can result in loss of bird life by attracting cats and large numbers of Australian Ravens to the area. Rubbish such as plastics, bottles, food-scrap and fishing gear can also pollute the river and entangle aquatic life.
- The wave park development will also take part of Lot 9789 currently identified in both the Swan Estuary Marine Park and Adjacent Nature Reserves Management Plan 1999-2009 (pg 8) and in the Draft *Perth and Peel Green Growth Plan for 3.5 million (Green Growth Plan)* for future incorporation into the conservation zone / nature reserve, serving as a buffer to storms and high tides, for bank stabilization and a filter for pollutants and contaminants from various current and past urban land uses.
- The narrowness of the existing bush corridor places environmental values in jeopardy through erosion of habitat already evident and increasing due to sea-level-rise and storm surges predicted from climate change. Not only will potential corridor habitat be lost but this will limit adaptive strategies to climate change.
- In the Swan Canning Riverpark, foreshores respond to seasonal variations in water level, storm surges, wave action, sediment flux, tidal currents and river flow. Tompkins Park (like many other parts of Perth) is located on reclaimed foreshore. There is a history of locating important infrastructure close to the river without adequate setback. In order to protect that infrastructure from erosion, river walls and revetments have been built along shorelines. Such structures at Alfred Cove would be extremely detrimental to the ecological values of the Marine Park. The lack of a natural 'fall-back/retreat' will require the installation of protective sea-walls and revetments to protect the new and costly infrastructure. These are extremely expensive to construct and maintain and will irreversibly alter the foreshore to the detriment of the river seagrasses and mudflats and the riparian native flora and fauna, including the habitat of migratory wading birds protected under international agreements.
- The enormous increase in size of the hard footprint (buildings, roads and parking areas) and loss of green space in Bush Forever Site 331, through the construction of the wave park facility and the extra dimensions required at Tompkins on Swan to accommodate the re-located bowling clubs, is inconsistent with Bush Forever principles which suggest the primary land use should be for conservation and restoration of environmental values.
- It will also have implications for ground-water replenishment. A combination of the predicted decreased rainfall and runoff and increased evaporation rates associated with climate change, as well as those associated with an open lagoon of water having breaking waves and constant spray, together with continuing (and indeed it would appear increasing) extraction of ground-water resources by the wave park is likely to fundamentally influence the hydrology and

ecology of the near-shore zone in the Marine Park – this at a time when the conservation of water resources is a crucial element of government policy at all levels.

## **OTHER COMMENTS**

Given the **lack of information** on how the wave-park facility - should it be built - would fit into the wider landscape and land-use plan of Tompkins Park, it is impossible to comment fully on the implications (environmental, social, cultural and economic) of this facility.

From previous vision-planning undertaken by the Council regarding the future use of Tompkins Park it was clear that there was a **major issue in catering for the various and heavy uses of the dual-use pathway** along the foreshore – especially around Atwell House where there are a number of acute bends in the pathway. This problem will be greatly exacerbated by the wave park and has not been addressed in the proposal.

We also strongly believe that, especially along the River, public land currently or, due to lease expiry, soon to become public open space should not be sold or again transferred to the exclusive control of private enterprise, accessible only on a ‘user-pays’ basis.

The **infrastructure footprint on Tompkins Park open space should be minimized** and not increased from what is currently the case – indeed it should be limited to its current extent. Existing facilities should be reviewed for multi-purpose opportunities; existing buildings should be reviewed for the possibility of constructing an additional storey, and **buildings should be environmentally sustainable**.

SERAG also urges the Council to consider Aboriginal and other heritage issues, traffic and parking issues, and the need for public open space to support the very heavy density of housing to the west of the site in its decision-making.

## **OTHER OPPORTUNITIES**

The expiry of the Bowling Club lease **provides an opportunity** to do something really visionary at the site – something to complement and support

- the superb natural values of the adjacent Marine Park and A-Class Nature Reserve,
- the creative energies of the local Arts Centre,
- Aboriginal heritage values
- cultural values associated with post-war architecture, and
- community and visitor desire for quiet, natural places for relaxation, reflection and play – as indicated by the current popularity of the area.

For example, a **nature play area**, similar to that set in Melbourne's historic Royal Park and described on the ABC's *Gardening Australia* on 27/08/2016, would bring benefit to the community as a whole, facilitating the enjoyment of many young families and other visitors. The building currently housing the Melville Bowling and Recreational Club is an unspoiled example of the elegant 1950s International-style of architecture, which is becoming increasingly rare in Perth while at the same time becoming increasingly popular, especially with young people. With its prime location and wonderful vistas to the River, it could be leased as a **coffee shop**, providing amenity to various visitors to the foreshore and users of the nature play area, the Arts Centre and sporting grounds at the western end of Tompkins Park.

Bird-watching is a major pastime in the western countries, especially Britain and the United States. Hence it is a major component of the **burgeoning eco-tourism market**. It has been estimated that 3 million international trips (worldwide) are taken each year for the main purpose of bird-watching, and many more trips combine birding with other activities. Significant numbers of in-bound tourists visiting Australia do so in part or primarily to watch birds. Hence, SERAG contends that investment in protecting and nurturing the existing natural values of Alfred Cove will prove in the long run a wiser and more economically attractive decision for our community.

#### **CONCLUSION:**

**It is important for decision-makers to be well-informed and use a big-picture and long-term perspective when making decisions relating to our much-loved but vulnerable River.**

To build such a facility in a location of outstanding natural beauty and ecological importance would be an unconscionable mistake in our history of river management. The wave park does not need to be built in one of the last remaining areas of public open space on the foreshore. **There are alternative suitable sites available for a wave park; the community does not need to miss out on the benefits associated with such a facility, and we recommend that those are explored by the proponents.**

**The Swan Estuary Reserves Action Group strongly opposes the proposal and requests the Council to reject the application.**

Yours faithfully

Margaret Matassa  
Chairperson  
25<sup>th</sup> January 2017

CC: Swan River Trust; Ministers and Department Heads of Environment, Planning, Sport and Recreation and Tourism.