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**Public submission:**

**CPS 5155/1 Wembley Sports Complex development**

**By the Urban Bushland Council WA, PO Box 326 West Perth WA 6872**

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In the Wembley Sports Complex (WSC) proposal we see the state government's involvement in dictating to the Town of Cambridge how this area and the wider area will be developed. The wider area includes the depot/nursery site, immediately to the east of the Wembley Sports Complex area, and Henderson Park, to the east and south of the depot/nursery site. Mabel Talbot Park and lake may be under consideration as well, as part of the planning.

Housing is proposed for the depot/nursery site. It has been stated that football will be removed from Henderson Park within ten years and that this is the reason that two full sized football ovals have been designed in the WSP area. The State Government and the Town of Cambridge have not explained the planning intentions of the wider area and this has naturally led to frustration and mistrust. *Trees would not have to be felled if football were kept at Henderson Park.*

If this WSC proposal proceeds, there will be an outcry from the community which has been besieged by (1) the destruction of trees (waterfront, QE11 site along Winthrop Avenue, Perry Lakes housing development, Manning Road, Charles Riley Reserve, Churchlands and more) and (2) by the destruction of bushland (Monash Avenue Bushland, A-K Reserve, Churchlands and state approval given for the development of Underwood Avenue Bushland and more).

In this proposal the state government presides over the northern half of the site and the Town of Cambridge over the southern half of the site. It is proposed that 288 trees cannot be retained. One third of the trees on site are WA native trees, one third Australian native trees and one third exotic trees.

### **Three new buildings**

Three new buildings are planned. One is the State Netball Centre which will have netball courts, change rooms and offices and is in the hands of the State government. Another is the Perth Netball Centre and the third new building will be for Athletics and the design is still not 'set in concrete.' Had the two netball facilities been designed within one new building, a saving of space could have protected some of the trees.

The Urban Bushland Council opposes the proposal as environmentally unacceptable. We are aware that young people are feeling that there is nothing they can do in the face of all the destruction and the lack of respect for trees and remaining natural areas. Older people too are expressing dismay.

In our drying climate, trees are suffering and dying, so those which are intact and healthy should be protected.

## Clearing principles

**Native vegetation should not be cleared if:**

**(b) it comprises the whole or a part of, or is necessary for the maintenance of, a significant habitat for fauna indigenous to WA**

The proposal is at variance with this principle as the site is necessary for the maintenance of a significant habitat for fauna indigenous to WA. The trees provide feeding habitat for two listed endangered species: Carnaby's Cockatoo and the Forest Red-tail Black Cockatoo. Notably the site is very close to the major roost site for up to 500 Carnaby's in the western suburbs, being ~1km from the central roost trees.

*Under DEC guidelines such tall trees shall be regarded as part of the critical roost and feeding habitat and therefore should not be cleared.*

### **Carnaby's Cockatoo**

Up to 500 Carnaby's Cockatoos roost each night, while they are on the Swan Coastal Plain, in tall trees at the corner of Underwood Avenue and Brockway Road. The flock leaves the roosting site in the mornings to forage for food over the day and for other reasons. Underwood Avenue Bushland is an important area for them and after leaving this bushland they usually fly over the area of the Wembley Sports Park and use the trees in the park. If the Underwood Ave bushland is cleared or partly cleared, the trees at the Sports Park will become even more critical feed and roost habitat

**Critical Roost habitat:** *The Wembley Sports Complex area is ~1km from the roosting site. Tall trees on the site are considered potential roosting trees.*

**Feed habitat:** Of the trees which would be lost on site, Carnaby's Cockatoos eat the flowers, nectar and seeds of jarrah, sheoak and marri and obtain grubs from WA peppermint trees and tuart trees. They also feed on the nectar of the bottlebrushes and eat some part of the flowers of the Queensland firewheel. Insects are ingested also.

Between 2010 and 2011 there was a 37% decline in Carnaby's Cockatoo numbers, from data released by DEC and BirdLife Australia, from the Great Cocky Count. When the result from the Great Cocky Count to 2012 is announced, the decline will probably be continuing. We are presiding over a tragedy, which is the extinction of both Carnaby's Cockatoo and the Forest Red Tail Black Cockatoo.

### **Forest Red Tail Black Cockatoo**

Forest Red-tail Black Cockatoos which have come onto the Swan Coastal Plain for the first time in sixty years, (other than a flock which was at Murdoch University from around 2010), also roost adjacent to Underwood Avenue, just to the west of the Carnaby's roosting site. It is estimated that up to 80 roost at this site. Forest Red Tail Black Cockatoos have been driven out of their usual habitat in the Perth Hills for a reason, and that reason may be the lack of water leading to poor seed production and thus lack of feeding habitat in the hills.

Forest Red Tail Cockatoos eat jarrah, tuart, marri, lemon scented gums, spotted gum as well as sheoak seeds. Probably they also eat the seeds of various other Eucalypts listed as being on the site.

### **Survival of black cockatoos**

In 2012 Dr Andrew Weavers, Director of Approvals, Wildlife Division of the Department of Environment, Water, Heritage and the Arts (now DSEWPAC) stated that: *The objective of the DEWHA is to support the persistence and recovery of black cockatoos. We are not confident that what we are doing will achieve that.* He also stated that it takes 15 years for foraging habitat for cockatoos to grow back.

**The clearing of these trees is therefore at serious variance with principle (b) because of loss of critical roost and feed habitat for the endangered Carnaby's Cockatoo and Red-tailed Black Cockatoo.**

**(e) it is significant as a remnant of native vegetation in an area that has been extensively cleared....**

The area has been extensively cleared as it is in an inner suburban area of the city. Clearing continues to this day and further smaller areas and bigger areas are threatened. Regionally significant ecological linkages are not protected and are being fragmented. This is unacceptable and does not justify the approval of even more habitat and native vegetation.

A tree audit has identified that at least 288 trees are to be removed which includes 65 'Cockatoo habitat/roosting' trees such as river red gum, tuart, spotted gum, marri, lemon scented gum and northern river red gum. All Eucalypts should be considered habitat or potential habitat.

**Tuart trees**

*Six very significant tuart trees in excellent condition in an east west line across the Wembley Sports Complex area will be destroyed. These trees are #170, (800mm D) #173, (950mm D) #174, (1050mm D) #177, (400mm D) #178, (800mm D) and #179 (1000mm D). The health of the six is 'excellent' and the form of five of the six is 'good'. Three of these tuarts are 17m high, one is 15metres, one is 16metres and one is 20 metres high. Tuart dominated communities have been reduced by 65% since the mid 1990s. Although these six trees stand in isolation without understorey plants, they are significant trees.*

*Furthermore, Tuart communities and individuals are degrading and are being or have been lost throughout their range by disease, clearing and groundwater decline and should now be considered for listing as a threatened ecological community. The Tuarts at WSC being in healthy condition (excellent- good) should therefore be regarded as significant and a priority for retention, and the Sports Park should be redesigned to respect this.*

**Tall trees are significant habitat**

The Arbor Centre tree list and assessment, lists the trees by their designated number, so that species are not grouped together. The intention of the list below, which the UBC has refigured, is to show the number of each species and the height of the individual trees. All these trees are proposed as 'unable to be retained.'

***What is most remarkable is that these are very large trees and they must be considered significant habitat for not only the two species of endangered black cockatoos but also the many other bird and insect and invertebrate species.***

River red gum: approximate height (m): 20,5.

Northern river red gum: approximate height (m):  
7,9,9,14,9,7,10,5,13,8,9,17,9,9,8,8,12,23,18,20,8,14,21,6,8,14,21.

Sydney red gum: approximate height (m):  
4,10,8,10,10,10,13,8,10,14,13,14,12,12,9,16,13,7,11,14,20,20,20,20,15,12,6,16,9,17,16,10,17,5,20,19,10,17,14,19,16,12,17,8,9,8,8,9,8,9,20,18,18,8,10,9.

Flooded gum: approximate height (m): 18.17,22.

Swamp mahogany: approximate height (m): 14.

Honey bracelet myrtle: approximate height (m): 3,3.  
Yellow box: approximate height (m): 17.  
Blue mallet: approximate height (m): 3,3.  
SA yellow gum: approximate height (m): 5.  
Lemon flowering gum: approximate height (m): 3,3,2.  
Illyarrie: approximate height (m): 6,3,6.  
Bottle brush: 12 individual trees.  
Bald Island marlock: approximate height (m): 6,9.  
Square fruited mallet: approximate height (m): 2,3,3,5,2.  
Swamp Mallet, approximate height (m): 7.  
Fiddlewood: H (m): 4,4,4.  
Queensland firewheel: H (m): 4,5,4.  
Queensland mock orange: H (m): 3.  
Freshwater paperbark: approximate height (m): 5  
Broadleaf paperbark: 39 individual trees, one of which is 12 m high.  
Weeping broad leafed paperbark: H (m): 4.  
Prickly paperbark: H (m): 8,7.  
Burdett's gum: H (m): 10.  
Tasmanian blue gum: H (m): 20,13,16,8.  
Queensland box: H (m): 12,6,14,8,14,10,10,6,13,10,10,10,12.  
Rough barked apple gum: H (m): 17,6,6,17,6.  
Lillypilly: H (m): 8,9.  
WA peppermint: H (m): 5.  
Chinese hackberry: H (m): 8.  
Unknown species: H (m): 12.

Ashby Banksia: H (m): 5.

Scarlet Banksia: H (m): 6.

Bangalay: H (m): 16.

Lemon scented gum: H (m): 17,14,9,19,22,16,9,14.

Spotted gum: H (m): 9,13,15,18,18,22,22,18.

Tuart: H (m): 17,17,17, 15,16,20.

River red gum: H (m): 20.

River sheoak: H (m): 19.

Jarraah: H (m): 10,10, 8.

Rose gum: H (m): 19.

Hills fig: 19 individuals.

Marri: H (m): 16.

Variegated NZ Christmas tree: H (m): 4.

**Because of the generally large size of the trees, their proposed loss would be a significant loss in an area already over cleared with less than 10% vegetation cover remaining. Thus the clearing is at variance with principle (e).**

**(h) the clearing of the vegetation is likely to have an impact on the environmental values of any adjacent or nearby conservation area**

Although the Native Vegetation Protection Branch is considering the proposal before it, the proposal is part of a bigger plan which will see the destruction of trees on the adjacent (to the east) site known as the nursery or depot site, for housing. By removing the football fields from Henderson Park, at the corner of Jersey Street and Salvado Road, there is great community concern that housing is planned for Henderson Park. Mabel Talbot Park to the south of Henderson Park may also be part of state government plans for development.

Underwood Avenue Bushland, just diagonally across the intersection of Underwood Avenue and Selby Street, is a vital bushland for the survival of black cockatoos. After flying out of Underwood Avenue Bushland, Carnaby's Cockatoo often fly through the Wembley Sports Park area. From there they may forage in Wembley and then on to areas around lake Monger and beyond or into Kings Park.

*These areas are part of the historic route of Carnaby's Cockatoos and the loss of 288 trees and shrubs must put Carnaby's Cockatoos under significant threat.*

Both Carnaby's Cockatoos and Forest Red Tail Black Cockatoos prune trees and this promotes more growth. When numbers of black cockatoos fall, there is less pruning in adjacent bushland and nearby conservation areas. (Chris Phillips, former director of Kaarakin Black Cockatoos Recovery Center: *pers*

comm.)

**Thus the proposal is at variance with principle (h).**

### **Offsets**

It is appreciated that replanting in the Wembley golf course may consolidate areas lacking some canopy cover. However there will be a time lag up to ~15 years before planted trees obtain a significant size and become suitable for foraging by black cockatoos. Immediate loss versus future gain is hardly a fair payoff. Where do the birds feed for 15 years? **Thus this offset does not actually offset the loss of habitat and the proposal remains at variance with principle (h).**

### **CONCLUSION**

**The Urban Bushland Council is opposed to the loss of 288 trees because it is at variance with principles b, e and h and according to the regulation these trees should therefore not be cleared.**

Yours faithfully

Urban Bushland Council WA Inc.  
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