13 December 2021



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Kids Free-play zone/ Bike dirt track

The Urban Bushland Council WA Inc. hereby comments on the proposal for a 'Kids Free-play zone/Bike dirt track' proposed for Empire Park, City Beach. The UBC is opposed to this proposal.

Roscommon Reserve

The Urban Bushland Council WA Inc (UBC) had been contacted by a resident adjacent to Roscommon Reserve about trail-bike riding in that bushland (9 March 2021). Due to ready communication through social media, increasing numbers of bike riders visit this Reserve, some with axes on their backs to destroy the vegetation for tracks and jumps.

In addition to this primary and unlawful destruction, subsequent rainfall has led to water pouring down the made tracks and eroding the soil and plant cover.

The damage caused by trial-bike riders there is very significant. As described by the resident 'the issue of these mountain bikers smashing up, absolutely destroying Roscommon Park has been happening for approximately two years'.

A report was sent to Pollution Watch, Department of Water and Environmental Regulation. A public meeting was held by residents on 21 March 2021.

Empire Bushland

The damage caused at Roscommon Reserve, and at other places where trail bike riders construct tracks and jumps, **will also inevitably occur at Empire Park should the proposal be allowed**. The proposal will not just be used by 'kids' constructing their jumps but will be visited by people who are older than 'kids'.

The Urban Bushland Council WA Inc is opposed to the proposition - **'Kids Free-play Zone/Bike dirt track'** - for the following reasons:

- 1.) **Damage will occur** to Empire Bushland as tracks are extended and new tracks are made.
- 2.) Empire bushland will be fragmented.
- 3.) **Birds and disturbance**: For maintenance of existing species of birds, the first guideline is that <u>disturbance must be minimised</u>. A research paper on Kings Park -'*The birds and habitat of Kings Park* ' (Cox B.W., 1998) states '*The results suggest that continued disturbance to the habitat of Kings Park will lead to an altered composition of the bird community, including a loss of further species. To conserve the existing species, careful management is required to minimise disturbance and restore degraded areas*'. Small birds

now missing from Kings Park are Black-capped Sittella, Western Thornbill, Western Yellow Robin, Scarlet Robin.

Small birds are just hanging on or becoming locally extinct in suburbia.

- Small birds seen on one 30-minute visit to Empire Bushland (22 November 2021) were Willy Wagtail, Rufous Whistler, Yellow-rumped Thornbill, Grey Fantail, Western Gerigone, New Holland Honey-eater, Striated Pardalote, Rainbow Bee-eater. It was surprising to see so many small birds and this Is explained because of the linkage of Empire Bushland to the Wembley Golf course. (Ian Abbott pers. comm.)
- Scientist and ornithologist Dr Ian Abbott has surveyed Empire Bushland at monthly visits over 2017 19 and has recorded 27 species, 11 of which are 'of interest'. These include Carnaby's Black-cockatoo (endangered), Forest Red-tailed Black-cockatoo (vulnerable to extinction), Spotted Pardalote, Weebill, Silvereye.
- **Migratory Rainbow Bee-eaters** fly to the Perth area from northern Australia and islands every November. On 22 November 2021, they were nesting within a track in Empire Bushland. These birds burrow tunnels into the ground in which they lay eggs. Cycling over the tunnels or dumping sand on the tunnels destroys them.
- 4.) Empire Park provides foraging habitat and ecological linkage value for both Carnaby's and Forest Red-tailed Black cockatoos. Both of these iconic species are listed as endangered. Their habitat must not be further reduced by this proposal.

5.) UN Sustainable Development Goals

Goals relating to sustainable development for people, planet and prosperity are noted in the WESROC updated Greening Plan. Goal 15 (page 32) is '*Protect, restore and promote sustainable use of terrestrial ecosystems,and halt and reverse land degradation and halt biodiversity loss.*' The proposal is contrary to this Goal.

6.) The State Government also has a **100-year Biodiversity Conservation Strategy** for Western Australia with 8 key strategic directions that are applicable to the proposal. (page 33 WESROC Greening plan)

Management

The UBC suggests that with assistance from the Town of Cambridge, a Friends of Empire Bushland could be formed to help care for the bushland for protection of nature.

Lack of time for reasonable consideration

Public consultation closes at noon on 20 December 2021 and the UBC is advised that a council report is to be prepared for a Development Committee meeting on 21 December 2021. How can Council staff adequately consider submissions and write a report within just one day? This is unacceptable.

Survey Results as reported Ordinary Council Meeting 27 October 2020

The three potential mountain bike facility locations offered for public consultation and opened on 22 August 2020, were Empire Park, Wembley Golf Course and The old Skyline drive-in site in Bold Park (part of Bold Park 'A'-class Reserve). Council minutes of 27 October (p167) state under 'Analysis': 'the survey identified this [Empire Park] was the least preferred site and the strong community feedback against a facility at this site suggests this is not a suitable location for a mountain bike facility.'

The 'Conclusion' was that '*The Town recommends that Council* <u>**do not**</u> progress with a mountain bike facility within the Town of Cambridge'. The reasons are then given (p167)

The Administration Recommendation was 'That Council DOES NOT SUPPORT mountain bike facilities at Empire Park or Wembley Golf course;'

Notably, this proposal, having been considered and rejected, was subsequently pursued under a different heading 'Kids Free Play zone/Bike dirt track'.

Conclusion

The proposal is strongly opposed for the reasons given in this submission. Our unique bushland has to cope with a drying climate and the proposal, if implemented, would wreck the bushland. The qualities for habitat, particularly for birds, are enhanced by the bushland being adjacent to the Wembley Golf Course.

Thank you for considering the UBC's comments.

Yours faithfully

Chairperson, Urban Bushland Council WA Inc. 13th December 2021

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