

ECU MOUNT LAWLEY- PRECINCT STRUCTURE PLAN

Submission via City of Stirling website

Introducing the Urban Bushland Council

The Urban Bushland Council WA Inc. (UBC) is the peak WA community organisation for urban bushland recognition and protection. UBC is an incorporated, not for profit organisation registered as a charity. We are a voluntary community association with an active membership of more than 90 volunteer groups (each with their own local membership from 10-165 individuals) and an additional 100+ individual 'supporter' members – all with a common interest in conservation and protection of areas of urban bushland in WA. More details at <https://www.bushlandperth.org.au/> . We recently celebrated 30 years of advocacy for the protection of urban bushland.

UBC advocates to all levels of Government for natural areas protection. We do this with limited resources through the amazing efforts of our 'Friends Groups' and their many volunteers – from all walks of life 'working' to improve and maintain the health of patches of neighbourhood nature.

UBC advocates for:

- Protection, conservation and active management of urban bushlands, wetlands and their ecological linkages
- Ending the clearing of native vegetation in urban areas
- Increasing tree canopy cover in urban areas to a minimum of 30 %
- More investment in our areas of native vegetation in urban areas
- Better detection, control, reduction and management of threatening processes in these areas
- Urban planning that results in net positive vegetation outcomes and conserves biodiversity

UBC Submission

Edith Cowan University Mount Lawley Redevelopment - Precinct Structure Plan

For public comment until 24 April 2026. The text below was submitted via the online portal on the City of Stirling website.

The Urban Bushland Council is not opposed to the development of this site. However, the Precinct Structure Plan should not be approved in its current form, but improved first. UBC identifies four key issues that need to be addressed and changed in the plan which will result in better outcomes for the community and nature.

1. Reduce the scale of tree canopy loss

UBC estimates that over 800 trees will be removed from the site if the current plan is approved. This is unacceptable for many reasons including: loss of amenity and shade, increase in urban heat island effect, negative impact on people's health and well-being, and loss of local wildlife. See UBC's previous submission below.

Instead, a minimum of at least 80-90% of these trees should be retained and new trees planted after development to achieve a net positive tree canopy result. The human population of the city is growing, but this does not have to – and should not - come at the expense of Perth’s tree canopy and biodiversity. We have taken more than our fair share and have completely lost the balance between developing and conserving our green space.

2. Retain and enhance 2.27 ha of Carnaby’s Black Cockatoo foraging habitat

The 2.27 ha of endangered Carnaby’s Black-cockatoo foraging habitat should be retained. Although this is currently rated in ‘low’ condition it can and should be retained and enhanced – as supported by the EPA. The cumulative impacts for this and so many other proposals in Perth are not being properly acknowledged, so the extent of foraging habitat continues to decline in the city due to piecemeal and irresponsible clearing. Proponents are erroneously claiming that the loss of these small patches is not important. But they are. The result is a continued decline in the population of the birds. Black cockatoos are going extinct before our eyes.

3. Determine the risk of the contamination and the cost of the remediation work

There are many unanswered questions regarding the contamination of the site. The extent of the contaminants such as heavy metals and asbestos fibres seems not to be known. Who is paying for the remediation work? Is it the government (the taxpayer footing the bill)? Prior to the approval of the Precinct Plan, a cost estimate of the remediation work should be done and included in the sale price of the land – the cost of doing business. If the cost is too great or the risk of contamination too high, then some of the site should be used for more suitable purposes such as planting a native bushland which can aid in the remediation of the contaminants and be of more benefit to society overall. The benefits could be estimated doing a triple bottom line (cost benefit) analysis.

4. Retain at least 50% of the site for government social housing

The government should seriously consider retaining at least 50% of the land to build social and affordable housing (in which the government retains ownership). This model should be used on other sites, such as the former Princess Margaret Hospital site, to help relieve the current (affordable and social) housing crisis.

Please read the following submission regarding the proposal of forward works that UBC previously submitted to the WAPC (via Have Your Say WA) in March 2026. It illustrates in more detail the concerns that UBC has with the development proposal.

Previous Submission by UBC regarding forward works:

Have Your Say – development application Edith Cowan University Mount Lawley site, 2 Bradford Street, Mount Lawley – Application under the Metropolitan Region Scheme.

Noted is that: *'This development application seeks approval only for remediation, demolition and site preparation works'*.

The Urban Bushland Council WA Inc did participate in a collective 3-day community workshop held to generate the Master Plan. The overwhelming community sense was for tree retention, retaining as many buildings as possible; creating a liveable space – with the required density. However, then a primary school was added to the site.

The Urban Bushland Council WA Inc has great concerns about this development application. Despite all the preparatory work, the UBC disagrees with how the remediation....and site preparation are proposed.

The UBC would like to be informed about the outcome of this application.

Scale of canopy loss

The 'Structures and Trees Demolition' map provided for Development WA by Colliers shows the breathtaking numbers of *'existing trees to be removed'*. The UBC believe (through counting the red dots that indicate trees to be removed) that there are around 850 trees. Some will be up to 60 years old.

Despite assurances that *'future open space has been positioned so that trees can be retained'*, and that *'Public Open Space has been 'strategically located to avoid and minimise clearing of fauna habitat, where feasible'*, the resultant clearing, if approved, is indefensible.

From that 'Structures and Trees Demolition' map it is evident that clearing will occur over the majority of the site as will earthworks fill. (as shown in the 'Bulk Earthworks' map). Should that scenario proceed, the general public will be shocked, but by then, it will be too late.

With respect, there must be a way that such blanket clearing can be avoided to obtain a far superior outcome that protects valuable and mature trees and habitat.

The advice given is that:

'Future development will result in removal of some existing vegetation – planted native and non-native species, including mature trees'. (p 48)

This gentle statement does not accord with the maps shown.

Urban Greening Strategy

The State's Urban Greening Strategy gives advice that:

'Retaining existing vegetation is the most efficient form of urban greening'

Also

'While some clearing will be needed for housing and infrastructure, priority should be given to retaining vegetation that cannot be easily replaced, such as mature trees and native bushland.' (p26 Urban Greening Strategy)

The loss of around 850 trees cannot be mitigated by landscaping with street trees (native and non-native species) and other areas on the site. The time lapse for new trees to mature is a loss. Newly planted banksia species may take from 3 – 8 years before producing their first flowers – (Australian Native Plants Society). Newly planted banksias, when finally producing flowers and seeds are limited in flowering abundance. In addition, some species of banksia need at least 12 months for the cones to fully mature (ibid).

Black cockatoos

It is appreciated that future open space has been positioned so that trees can be retained, and that *'Public Open Space has been strategically located to avoid and minimise clearing of fauna habitat, where feasible...'* However the UBC does not agree with Aurora Environmental's determination that impacts to black cockatoos foraging and potential breeding and roosting habitat are not considered significant.

Continuing clearing is significant because of the following:

Since 2023, Carnaby's Cockatoos have been picked up starving. The situation has been described as *'the unfolding mass starvation crisis facing black cockatoos'* (Emma Young Perth Now. 19 December, 2024). The major cause of population decline of Carnaby's is clearing of native vegetation. In addition, a lack of moisture has led to a lack of pollination and therefore a lack of seed development in Marri Trees. (12 February 2025: Glenn Dewhurst Kaarakin Black Cockatoo Conservation Centre – CCWA symposium: Carnaby's Cockatoo Crisis talk)

Over 2024, 12,000 ha of native vegetation were cleared (Sean Dooley Birdlife Australia at CCWA 'Carnaby's Cockatoo Crisis symposium)

At that Carnaby's Cockatoo Crisis symposium, Professor Hugh Finn stated:

'In many areas of the Swan Coastal Plain, there just isn't the native plant food in the landscape to feed even the diminished populations we have now.'

'We cannot keep removing native food plants from the Perth-Peel landscape and expect populations to recover.'

‘That points toward the need for an urban forest far thicker and far more resilient than the fragile and ever-depleting fabric of remnant woodlands and natural areas that we have now.’ (Prof. Hugh Finn reported in Emma Young’s article 19 December 2024: ‘Lifeline for Perth Zoo vets dealing with starving black cockatoo influx’)

All foraging habitat on the Swan Coastal Plain is considered critical for Carnaby’s Cockatoos according to the current Carnaby’s Recovery Plan.

The distinction between primary and secondary foraging resources is not helpful as all resources are used. Even so it is difficult for black cockatoos to feed themselves and their dependant offspring adequately.

Black cockatoo corridor

The site sits between the Mount Lawley Golf Course and Yokine Reserve, both large night roost sites (Birdlife Western Australia email 18 March 2026)

Potential nesting trees and Federal government advice

Assistant Director Elise Hardiker, Federal Department of Climate Change, Energy, the Environment and Water, has stated that:

Trees suitable to develop a nest hollow (potential nesting trees) are 300 to 500 mm (or greater) DBH. (10/9/2024)

The UBC recommends that the four Eucalypt rudis trees and one Northern River Red Gum must be retained as potential black cockatoo nesting trees. Eucalyptus rudis has been recorded as a nesting tree for pairs of Forest Red-tailed Black Cockatoo in Floreat in August 2021, December 2024, and January 2026. (Margaret Owen - personal observation). On the three occasions the fledgling was successful in having its first flight.

72 trees on site have a DBH of 450 mm or greater. None of these trees should be removed. If the assessment had been made from DBH of 300mm, as informed by the Federal government officer, more trees would be considered potential nesting trees. These are significant trees. The 29 trees that are more than 20 metres high are also significant and may be considered potential roosting trees.

A key focus for the Swan Coastal Plain *‘is the ongoing viability of foraging resources for black cockatoos, particularly Carnaby’s cockatoos’* (Federal Referral Guidelines (DAWE 2022))

Cumulative impact

The WA EPA expects proponents to acknowledge and have regard for cumulative impacts. (EPA *‘Guidelines for Cumulative Impact Assessment’*: January 2026).

Tree canopy in the City of Stirling has reduced by 3.2% between the years 2011 to 2020. The aim is to achieve 30% cover by 2040 but if loss of trees continues, this goal will obviously not be achieved.

The EPA did give advice that factors relevant to this proposal are flora and vegetation, terrestrial fauna and terrestrial environmental quality.

Man-made water bodies

The UBC appreciates that the southern basin will be retained as a water body.

Soil Contamination

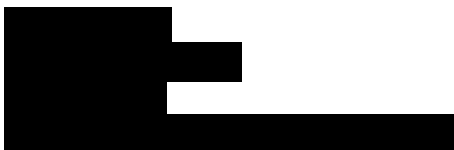
The City of Armadale has advice that:

‘Trees on contaminated sites do not always require removal: they are often kept to assist in remediation through phytoremediation, where plants absorb or stabilise contaminants. Removal is typically only necessary if the trees are dead, structurally unsound, posing a safety risk, or obstructing planned construction/rehabilitation work’.

The UBC would hope that there is no blanket clearing of trees over the site to access and deal with contamination.

Thankyou for the opportunity to comment.

Yours sincerely,

A large black rectangular redaction box covering the signature area.

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