

Closes 4pm, Tuesday 2 June 2026

Feedback goes to the City of South Perth on 'Feedback form'.

Consider also sending to Town of Victoria Park 'Your Thoughts' Victoria Park.

PREAMBLE

The owner of land is Development WA and State Government departments. The consultant is TBB Planning.

Development WA has lodged a draft Precinct Structure Plan for Bentley Technology Park with the City of South Perth and the Town of Victoria Park.

The Urban Bushland Council reads that:

'Acceptance of a precinct structure plan for advertising does not indicate that the local government supports it or that the WAPC will approve it' (Your Say South Perth).

The UBC appreciates that it has opportunity to comment. The UBC hopes that its comments on the Precinct Structure Plan are reflected in the Report from the City of South Perth to the WAPC.

DOCUMENT PRECINCT STRUCTURE PLAN BENTLEY TECHNOLOGY PARK – TBB PLANNING. MARCH 2026

The Urban Bushland Council is disappointed that the Precinct Structure Plan for Bentley Technology Park does not contain vital and necessary information about the Carnaby's Cockatoo's roost site

The UBC's main comments relate to:

- 1.) **The Carnaby's Cockatoo roost site:** the near absence from the Precinct Structure Plan of the importance of the whole site as a major roost site and possible breeding site for black cockatoos – particularly Carnaby's cockatoos.
- 2.) **The loss of roost trees and associated matters relating to tree canopy.**
- 3.) **Referral to the Federal government Department of Climate Change, Energy, the Environment and Water.**

'2.1 VISION'

The Urban Bushland Council recognise that much work has gone into developing the Vision for Technology Park. Groups and individuals involved in creating the Vision are shown on page 11 - Guiding Principle.

However, the elephant in the room is that the whole site is highly significant as a major roosting site. This knowledge should have been reflected in creating the Vision and Objectives. 'Due regard' was not given to this major fact.

1.0) CARNABY'S COCKATOO AND ROOST SITE SOUCOMR001

Birdlife has confirmed that the whole site is a roost site and the following table records numbers of Carnaby's Cockatoos roosting at the site over years from 2010 to 2025.

Site	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2021	2022	2023	2024	2025
SOUCOMR001	408	645	558	301	402	460	242	289	470	563	353	333	605	295	254

A major roost site is one where over 150 birds roost at nights. Excluding 2020, when a Great Cocky Count did not occur because of Covid, for 24 consecutive years, over 150 Carnaby's roosted at the site on that night. On the GCC night, in 2023 as you see, 605 Carnaby's were counted. Carnaby's

cockatoos have a fidelity to their roost site, and the loss of much of this site would be significant....and to a species that continues to be in decline and is in fact starving because of clearing of its habitat.

1.01 CARNABY'S COCKATOO (CALYPTORHYNCHUS LATIROSTRIS) RECOVERY PLAN

OCTOBER 2013. (The Recovery plan is being updated – advice from Murdoch University)

This document is highly relevant to the proposal.

'Habit critical to survival for Carnaby's cockatoos can be summarized as

- *In the non-breeding season the vegetation that provides food resources as well as the sites for nearby watering and night roosting that enable the cockatoos to effectively utilise the available food resources.* (p 1 Recovery Plan)

...and we read that 'More recently, night roost sites have been recognised as important components of the non-breeding habitat'. (p 12)

When making planning and environmental approval decisions, and decisions on management of areas, decision makers should ensure consistency with this Recovery Plan as well as guidance provided by the EPA and SEWPAC and seek to fully protect Carnaby's cockatoo habitat. (p 23 ibid) (UBC emphasis)

1.02 PROTECT ROOST TREES

'Black cockatoos need clusters of tall trees, to allow flock members to rest together at night. In Perth and Peel, there are few such roosts left.' (Murdoch University website).

1.03 FORAGING HABITAT QUALITY

'The quality of the foraging habitat has been identified within the survey area, was assessed and scored a 10 which is considered high quality.'

Any score over 6 is considered significant habitat. (pers comm Tony Kirkby)

The following advice from Syrinx Environmental referring to the Black Cockatoo Recovery Plan includes Syrinx's emphasis by underlining.

1.04 'PROTECT AND MANAGE IMPORTANT HABITAT '

'Complete restoration of the original extent of Carnaby's Black Cockatoo habitat is not possible. It is therefore important to identify those parts of the species' habitat most critical to survival and to protect and manage as much of this important habitat as possible to minimise the impacts of habitat loss. While planting of species that support Carnaby's Black Cockatoo is effective over the long-term and encouraged, protection and regeneration of existing habitat is significantly more efficient and effective. Therefore, efforts in this Recovery Plan are primarily directed towards protection and enhancement of existing habitat'. (p 24 Syrinx Environmental Tree Replacement Plan for Black Cockatoos habitat improvement': January 2014 Curtin University).

In the 'Frequently Asked Question' section, the writer quotes the consultant that:

'Given the existing land use and lack of connectivity to large tracts of intact native habitat, it is considered unlikely that the site would provide significant habitat for most of the fauna species identified in the database searches. However, some of the scattered trees (native and introduced) may provide potential habitat for the following species.' These species are Carnaby's, Baudin's and Forest red-tailed black cockatoos.

This writer is lacking knowledge of the extent of habitat for Carnaby's cockatoos.

In the same 'Answer' it is acknowledged that the site has 1.48ha of high-quality habitat.

2.) THE LOSS OF ROOST TREES AND ASSOCIATED MATTERS RELATING TO TREE CANOPY.

The potential loss of 188 potential breeding trees (4.1.1 Targeted Black Cockatoo Habitat Assessment by RPS) is a large potential loss. *'This represents a key environmental consideration for future subdivision and development, presenting both a constraint and an opportunity to retain mature canopy trees and enhance habitat through supplementary planting.'*

As proposals for development over the site proceed, tree loss will continue lot by lot - surely leading to a net loss overall and despite supplementary planting. Despite the cautionary advice - *'Early engagement with regulatory agencies is recommended to support future redevelopment planning and ensure compliance'*, the result will be loss of trees and canopy cover. (p122 PSP Environment Context)

2.01 FRAGMENTATION AND PUBLIC OPEN SPACE

The proposed two new roads, if constructed, would mean the loss of some roosting trees and further fragmentation. Eight hectares of local roads out of the total site size of 'Net Developable Area' of 42 hectares is not supported. How many trees would be lost in the construction of new roads.

Planned size of Public Open Space is a mere 2.5 hectares. These Public Open Spaces are described as *'a network, enhancing streetscapes and integrating ecological and recreational functions'*. The UBC does not agree that that POS is adequate. In residential developments, the historical allocation of 10% has been a norm. Where more dense development is planned, greater POS should be planned. With high rise developments a high-quality POS of 50% has been suggested. (May Carter PhD. POS Planning in WA Position Paper. March 2010)

Page 21 Figure 5, PSP

The information shown on this map is completely unacceptable. The ochre and green areas indicate 'Public Realm Priority Areas' and 'New Improved Public Open Space' respectively. This map shows the minimal amount of POS and Public Realm Priority Areas and is an indication of what would remain as development proceeds into the future.

Page 50 3.7.7.2, PSP

'Retained landmark pine trees and other significant vegetation, including potential black cockatoo foraging habitat.....will establish a climate-responsive landscape that supports the east-west green link along Dick Perry Avenue.....'

As stated already, the development site is not just black cockatoo **foraging** habitat. The whole area is a black cockatoo **roosting site**.

3.0 REFERRAL TO THE FEDERAL GOVERNMENT UNDER THE EPBC ACT

The proposed action is likely to have a significant impact on two threatened species – MNES. A Referral is therefore required to the Department of Climate Change Energy the Environment and Water.

As explained in the City of South Perth's 'Frequently Asked Questions',

The EPBC Act referral thresholds for black cockatoos states that a loss of greater than or equal to 1 ha of high-quality foraging habitat is likely to require referral to DCCEEW. The Environmental Assessment Report recorded 1.48 ha of high-quality foraging habitat within the Bentley Technology Park PSP area. Therefore, clearing equal to or greater than 1 ha of this potential foraging habitat is likely to require an EPBC Act referral.

CUMULATIVE IMPACT ASSESSMENTS

'Proponents are expected to take reasonable steps to gather relevant information for cumulative impact assessment'. (p5 Guidance CIA HIA Consultation Draft).

ERRORS

For your information there are a couple of errors in published documents.

The statement below in italics should have a 'not' in it, to indicate that the vegetation is native and hence CANNOT be removed without an approved clearing permit.

'The planted vegetation within the site does meet the definition of native vegetation under the Environmental Protection Act 1986 (EP Act), hence can be removed without an approved clearing permit (or an exemption) being provided'.

(Executive Summary of the Environmental assessment report 3 July 2024 under 'Flora and Vegetation' page 5 and in another section).

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