



Willoughby Environmental Protection Association (WEPA) Inc
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Mr Peter Conroy
Planning and Infrastructure Director
Planning and Infrastructure Department
Willoughby City Council
[Submitted online](#)

GORE HILL PARK REDEVELOPMENT PROPOSAL

I am writing on behalf of members of the Willoughby Environmental Protection Association (WEPA) Inc. WEPA has considered the Draft Plan of Management and Landscape Concept Plan Report for the proposed Gore Hill Park Redevelopment and would like to comment briefly on two aspects of those plans: the proposed planting plans for the park and cycle access within the adjacent Gore Hill cemetery.

It is clear from the proposed Concept Plan that, regrettably, a significant number of native trees will be removed from the site as it fronts onto the Pacific Highway and along the Reserve Road side of the park to make way for new buildings in the redevelopment. WEPA acknowledges that the Concept Plan attempts to balance this by retaining the overall native plant palette and limiting impacts on mature native trees. We are very supportive of the proposal to reinforce the planting of the Blue Gum High forest and Turpentine using locally indigenous plant stock to enhance the genetic biodiversity of the site. This will not only contribute to maintaining a critical wildlife habitat/corridor but also help maintain the visual integrity and amenity of the site.

Natives not Exotic Weeds

Given that the site contains one of the last remnant Blue Gum forest communities and that native plantings are considered for much of the site, it seems unnecessary and counterproductive to include exotics in these plantings. We would note that Indian Hawthorn (*Rhaphiolepis indica*), which is a declared Noxious Weed, is included in the planting lists in the draft Concept Plan. This possibly reflects its existing presence on site but if that is the case, the redevelopment should provide an opportunity to remove these weeds in an environmentally sustainable manner and replace them, over time, with native species.

Native Tree Cover

The suggestion that the native gums along the main road be replaced by Plane trees (*Platanus orientalis*) seems to contradict Council's own Urban Tree Management Policy with its emphasis on



maintaining habitat and connectivity for native wildlife. Plane trees have a very low level of attractiveness for native wildlife and provide little in the way of shelter or food, particularly when leafless in winter. WEPA is aware that Council has access to staff expert in native plantings and would suggest that they be asked to nominate alternative native trees suitable to the street frontage.

The draft Concept Plan also covers the need to manage some trees on site which are old or dead. WEPA would encourage Council to stabilise dead trees, which often have important hollows for local wildlife, and, if suitable, engage staff or consultants to look at carving new habitat hollows.

Gore Hill Cemetery links

While the native vegetation in Gore Hill Park is only one 'island' in an otherwise urbanised area, it borders the Gore Hill Cemetery site which surveying has found provides shelter and a foraging site for (breeding) White-Browed Scrub Wren, Tawny Frogmouths, Welcome Swallows and other native birds as well as Brushtail and Ringtail Possums, Flying Foxes and several species of Microbat. The Cemetery provides a little-disturbed space where these animals can feed and breed as well as a quiet, contemplative ambience which is appreciated by human visitors. Both functions will be compromised by the introduction of a cycleway through the cemetery. WEPA would strongly suggest that the paths through the cemetery remain pedestrian-only spaces and that cycles be rerouted along the existing side streets.

Together, the Gore Hill Park and Gore Hill Cemetery sites help sustain ecological function, resilience and biodiversity and provide quieter spaces in an otherwise busy urban landscape. WEPA encourages Council to use local native species which strengthen biodiversity and resilience and plan for uses for these sites which maintain their unique sense of place.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M Foley'. The signature is fluid and cursive.

*Dr Meredith Foley
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