

8 April 2013

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City of Stirling
25 Cedric St
STIRLING WA 6021

Dear Madam/Sir

PROPOSED COASTAL DUNE BOARDWALK - NORTH OF SCARBOROUGH BEACH TO SOUTH OF TRIGG BEACH

The Urban Bushland Council WA (UBC) is the peak non-profit community organisation of some 70 member groups promoting urban bushland conservation. Retention of bushland in urban areas and adequate bushland management for conservation are of utmost importance. Therefore we use this opportunity to raise our concerns over the proposal to install a boardwalk between Trigg and Scarborough beaches as presented by the City of Stirling on its website and in local press on 26 February 2013.

The Urban Bushland Council strongly opposes the proposal for construction of a boardwalk in Bush Forever site 308, which is an A class reserve. We recommend that the City of Stirling withdraws this proposal and any variation thereof, and further that it never be presented again in any form.

The proposal ignores the environmental and aesthetic values of the fragile coastal environment between Trigg and Scarborough. Regional significance of this part of the coast had been well recognised and documented by the State government as it forms part of a larger *Bush Forever* Site 308, 'Trigg Bushland and Adjacent Coastal Reserve, Trigg/Scarborough', and it is an A Class reserve. The 'A' classification is used solely to protect areas of high conservation or high community value. The UBC maintains that Bush Forever sites are set aside to be managed for conservation of nature and that disturbance and partial clearing is totally unacceptable and should not be permitted. Thus developments of any type are not acceptable. Disturbance of what little remains of the highly fragile coastal landscape and its vegetation, flora and fauna is indeed the most critical element to be avoided.

Bush Forever aims to protect only the bare minimum of at least 10% of each vegetation community of our natural heritage which is *internationally recognised* as one of 34 biodiversity hotspots for conservation priority (see articles by Myers *et al* 2000 & 2005, Hopper & Gioia 2004). We are outraged that this is being ignored and planners keep coming up with proposals that they erroneously promote as suitable for flora and fauna conservation reserves.

This A Class reserve is the only relatively intact coastal vegetation from City Beach to Hillarys that has not been reduced to a narrow strip of fragmented foredunes. It is an integral part of the larger Trigg Bushland Reserve. The presence of a boardwalk opens this area up to degradation that we can see in other intensively used parts of our coast such as loss of near coastal vegetation, increased vulnerability to erosion from storm events, increased litter, weed invasion and increased risk of fire. This is the last remaining refuge for a rich assemblage and high number of reptile species.

Even though the City argues that damage to the vegetation can be restricted, they fail to recognise a number of issues associated with the building of the boardwalk through the narrow strip of sensitive coastal vegetation:

- Building of the boardwalk, particularly 'at grade' portions, will result in fragmentation of an already narrow strip of bushland and invite unauthorised access to the dunes.
- Damage to the vegetation and the fragile dunes during the construction with machinery will be inevitable, regardless of the construction method. Boardwalk options which include 'at grade' segments – concrete pavers on the ground – will result in extensive, permanent destruction of bushland to create a corridor that is four metres wide.
- Maintenance of the boardwalk will be required and this will create an increased risk of weed invasion, new damage to vegetation and open dunes to wind and water erosion. This is a mobile and unstable dune system subject to erosion, sand build up and blow-outs. The cost of the maintenance might increase significantly with the anticipated increased severe storms along our coast, as a result of climate change.

Existing dual use path adequate

Considering that the Trigg Beach and Scarborough Beach are already connected with a dual use path as well as along the beach, we are greatly concerned that the City is willing to consider a proposal with great potential to damage regionally significant vegetation. Indeed looking at the City's aerial map showing the locations of the proposed boardwalk and the existing dual use path, it is patently obvious that the boardwalk is an un-necessary duplication of existing infrastructure which frankly beggars belief. The map shows clearly why the boardwalk is not needed.

The boardwalk will not only be a major intrusion into the last remaining sensitive coastal ecosystem in the wider area but also an aesthetic eyesore that will change the natural character of the area forever. A raised aluminium structure will be a totally unacceptable eyesore. Notably this is akin to the proposal some years ago for the construction of a chair lift up the scarp face of Kings Park; a proposal which was quickly condemned publicly for its ugly visual imposition onto the natural landscape. The proposal was quickly withdrawn.

Therefore, the Urban Bushland Council recommends that the City of Stirling abandons the proposal and focuses on refurbishment of existing facilities, such as the existing dual use path and management of the coastal reserve to maintain its natural and aesthetic values.

If you would like to discuss any of the above please contact our office on 9420 7207 (leave a message if unattended) or email to ubc@bushlandperth.org.au

Yours sincerely

President

cc Director Parks & Reserves, City of Stirling Manager Natural Areas, City of Stirling CEO, BGPA

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