



7th February 2022

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CEO, City of Melville
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Dear Mr Tieleman

Proposed Pt. Walter Mountain Bike Facility

The Urban Bushland Council WA Inc is the peak community organisation for urban bushland conservation management and protection.

The opportunity to comment on this proposal is appreciated. We submit the following comments on the proposed Pt Walter Mountain Bike Facility.

Bush Forever site 331

The site proposed for the Pt Walter Mountain Bike facility is Bush Forever site 331 '*Blackwall Reach, Point Walter, Alfred Cove and Adjacent Bushland, Bicton to Applecross*'.

Bush Forever is the whole of Government approved plan and program to protect regionally significant bushland with a target of protecting at least 10% of each of the original 26 vegetation complexes of the Swan Coastal Plain portion of the Perth Metropolitan Region.

'Bush forever is the primary mechanism for implementing the Government's commitment to conserve regionally significant bushland in Perth'. (P 1 Volume 1 Bush Forever)

More specifically, the Bush Forever document describes BF site 331 as '*protected area/bushland*' (page 427, Volume 2, Bush Forever document)

The Implementation Recommendation for Bush Forever site 331 is '*the existing care, control and management intent of Reserve 3066 and 44414 is endorsed. The existing care, control and management of the remainder of the Bush Forever site is endorsed.*' (Table 3 Bush Forever Volume 1)

Therefore the Urban Bushland Council submits that this proposal should not have even been considered in this area. The Concept Master Plan April 2021 has no mention of this being a Bush Forever site. This is a significant omission.

The proposal in this location is not supported and is an inappropriate development proposal. Some other relevant factors follow.

EPA - 'no net loss'

In its submission to the Department of Water and Environmental Regulation, on the consultation Draft Native Vegetation Policy for Western Australia, the Environmental Protection Authority (EPA) stated that its policy suites relevant to native vegetation are underpinned by the EPA's factors and objectives, in particular, the objective '**to protect flora and vegetation so that biological diversity and ecological integrity are maintained.**' The aim is to support 'no net loss' of native vegetation.

The EPA also emphasised that in the State's mitigation hierarchy, the focus is on **avoidance of impacts** and the encouragement of innovative solutions. In addition, the EPA pointed out that *'there are opportunities in the policy to recognise the value in connectivity and quality of native vegetation and the risks associated with fragmentation'*. (Letter on Native Vegetation Strategy to DWER by Matthew Tonts, EPA Chairman, 22 October 2021)

Thus the mountain bike proposal does not accord with the EPA's advice relating to the protection and management of native vegetation and the danger of further fragmentation, that would be the case if this proposal were to proceed.

Wrong place

Because there are 'informal' mountain bike tracks within the bushland, the suggested solution is to build a 'formal' facility. This justification, however, is not supported and is strongly opposed. The solution to the problem of informal track building and bush bashing must be found in other ways. Other Local Governments may have advice on how to manage this problem, for example with the presence of Rangers on the ground in the conservation reserve.

Aboriginal significance

The City of Melville website has stories of the Beeliar people of the Whadjuk group and it would appear that the whole area is of significance to these people. Uses like education about Whadjuk stories, and passive recreation, are more culturally sensitive and appropriate on this site.

Ecological linkage

Although the vegetation is modified in the proposed area, it is still part of a significant ecological linkage along the river and between areas of bushland (Bush Forever Volume 2 p 428 under 'Other Special Attributes'). (Also Map sheet 52 Bush Forever, Volume 1). Even degraded bushland areas should not be cleared. Rather these areas should be revegetated and the tree canopy and ecological connectivity enhanced.

City of Melville Tree Policy

The City has an 'Urban Forest and Green Spaces Policy'. In this Policy it states: *'It is now known that trees play an important role in building climate change resilience in our community.'* In the City's 'Tree Policy', we read *'The City is committed to protecting, maintaining and increasing its tree population'* and *'The City will actively protect existing trees...'*

Whilst the proposed Mountain Bike facility aims to protect trees on site 'where possible', some would be cleared and lost, and those trees that survive as part of the design, would likely be hit by handlebars, bike frames and pedals, and compaction of the surrounding soil would be detrimental to tree health. In addition, seepage of water and air into the ground will be restricted, also putting stress on the remaining trees. Bikes will also increase plant disease risk.

Birds

The Bush Forever document, Volume 2, reports that in a limited survey, 32 species of bird, and 8 species of reptile were documented. (page 428 Volume 2). Bushcare volunteers are already reporting the decrease in bird activity at times when mountain bike activity is high. The effect of habitat disturbance on birds has been studied by Bradley W. Cox, Edith Cowan University in his thesis 'The birds and habitat of Kings Park'. *'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'*. https://ro.ecu.edu.au/theses_hons/495. **The outcomes of this thesis is relevant to this**

proposal in that the proposed Bike trail will have significant detrimental impacts to the bushland.
This is unacceptable.

Conclusion

This is the wrong place to be considering a Mountain Bike facility. The Urban Bushland Council WA Inc. recommends that this proposal be rejected. The Pt. Walter Bush Forever site 331 is reserved for the purpose of nature conservation and passive recreation only. Bike trails are an unacceptable and degrading incursion.

It is suggested that the City of Melville seeks an alternative site which is not in a bushland conservation area.

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