

27 Aug 2025 To City of Stirling.

Submission re South Trigg proposed Board Walk

The Urban Bushland Council opposes the proposed 6.5 kilometre board walk being built over the length of dunes between South Trigg and Scarborough. UBC advice is to keep the area intact and protected for the community and for future generations, and as a reference site.

The South Trigg proposal area is:

- A virtually intact coastal vegetated natural area of 13.37 hectares
- an A class reserve (reclassified from Class C to Class A in 1998)
- reserved as Regional Open Space Under the Metropolitan Region Scheme.
- a part of Bush Forever site - number 308
- a rare coastal bushland, in marked contrast to the overdevelopment of the Scarborough area.
- an environmentally sensitive area (ESA) and
- an area that contains 0.93 hectares of a '*Critically Endangered*' Threatened Ecological Community (TEC) of Rottnest Island Pines – '*Callitris preissii/Melaleuca lanceolata forests and woodlands of the Swan Coastal Plain*' 30a.

Shoreline vegetation in Scarborough is highly fragmented through development and is in marked negative contrast to the South Trigg virtually unchanged dune system. (see photo in 'Tourism and economic development' in the Feasibility Study)(Also p 20, black and white photo 4.0 Concept design)

In reviewing the UDLA Stirling Coastal Boardwalk Study, the UBC appreciates the black and white photographs of the foredunes. It cannot be accepted that the overbearing design of the proposed board walk is 'a light touch'. Neither is the proposed boardwalk sustainable.

NATURAL LAND FORMS

'Coastal foreshores are unique in their progression from mobile and stable dunes to tuart/banksia woodlands'. (Gulliver, Robyn: *'Development or Dunes? The Long Struggle to Protect Perth's Scarborough Beach Coastal Reserve.'* Environment & Society Portal, *Arcadia* (Summer 2021), no. 20. Rachel Carson Center for Environment and Society. [doi:10.5282/rcc/9309](https://doi.org/10.5282/rcc/9309).) .

The structure of coastal processes - Foredune, First dune, Swale, Secondary dune, Secondary swale and Inland area - is very important. (17 August 2025: talk Dr Judy Fisher). The imposition of a board walk into this landform and natural heritage would be an interference to the processes that occur over the site.

The Urban Bushland Council understands the problem of extreme congestion along the pedestrian path adjacent to West Coast Highway including conflict between wheels and walkers. It is possible to seek a solution or solutions that will protect and not impact the area of almost intact coastline and dunes between South Trigg and Scarborough.

VEGETATION CONDITION

There is argument about vegetation condition - whether the coastal board walk is planned through degraded areas, or through mainly good condition vegetation. In the UBC's view, the qualities of the intact rare coastal bushland are so valuable that this argument is hardly

relevant. We wish to acknowledge the thoroughness of surveying over the area from South Trigg to Scarborough, that was conducted over nine days, by the globally-respected Dr Judy Fisher. This writer attended Dr Fisher's presentation of 17 August 2025.

COASTAL EROSION AND CHRMAP

The UBC believes that the view of the ocean from the existing path is glorious. As is stated in the CHRMAP: *The beach amenity itself is rated extremely highly by the community. Whether this is for scenic amenity, recreation, tourism or environmental reasons, many respondents noted the beauty and importance of beaches both to them and to the region's visitors.* (p43 CHRMAP guidelines)

Coastal erosion is a major long-term risk as 'soils are unstable and prone to erosion.' We read that 'Inundation is not expected before 2122.' (p16 Concept Design Report'.) Surely planning should look beyond 97 years into the future. The Galt Report notes that, due to the soil profile being 'sand, sand with organic matter and isolated bands of limestone, **the site is susceptible to erosion**'. (UBC's bold)

'Over the course of 80 years, the condition of this coastal dune systemfaced continuous encroachment from successive development proposals, like much of the global coastal-urban environment.' (Gulliver, Robyn: 'Development or Dunes? The long Struggle to Protect Perth's Scarborough Beach Coastal Reserve'. Summer 2021)

Because the community became more knowledgeable about the importance of Perth's coastal dunes, the Trigg Dune Heritage Group was formed.

Development threats to Trigg Bushland were many and developers were powerful, so various developments went ahead. However, thanks to strong community advocacy over more than 30 years, a development application was withdrawn and the dunes were incorporated into the South Trigg Class A Reserve in 2019.

CHRMAP

Coastal erosion is a major long-term risk 'particularly west of the 2070 hazard line'. (p16 Coterra Concept Design Report). By 2070 the risk of erosion is classified as 'extreme.' Mike Masiella, spokesperson for the Bush Not Boardwalk group, is quoted in an article in Perth Now as saying:

"How can you build a boardwalk that will need to be relocated in the future because of erosion issues? This seems to border on the ridiculous.

"You only have to look at the damage cyclone Alfred has caused to coastal erosion-prone areas in such a short amount of time to see why this boardwalk is a bad idea." (Liam Murphy: Perth Now -Stirling: 13 March 2025)

It is not evident how this proposal can be deemed sustainable. Even with the proposed boardwalk being sited 'to the east of the projected 2070 erosion line', the coast line will be encroaching to the east.

The UBC notes that the CHRMAP recognises coastal erosion as the prevailing coastal hazard for the City's coastline over planning time-frames up to 100 years.

'Increased coastal erosion occurring faster than modelled suggests a need to update Coastal Hazard Risk Management and Adaptation Plans (CHRMAPs) due to climate change impacts,

particularly sea level rise, making previous long-term predictions too conservative'. (Common understanding. Also CHRMAP)

BUSH FOREVER

'Trigg Bushland and adjacent Coastal Reserve, Trigg/Scarborough' is Bush Forever site 308.

As the City is aware, in 2000 the Bush Forever policy was launched by the State Liberal party, endorsed by the whole of government.

The aim of the Bush Forever policy is to protect at least 10% of each of Perth's region vegetation complexes.

There are two vegetation complexes in the Bush Forever area: 'Cottesloe Complex – Central and South' of which 9.5% of what was originally there remains in secure conservation: and 'Quindalup Complex' of which 15.4% remains in secure conservation. These are figures from the EPA published in 2015. (p 114: 'Perth and Peel @ 3.5 million - EPA Interim Strategic Advice')

In contrast to the state's 10% target, the target set by the Federal government is to protect 30% of each vegetation complex as 30% is considered the minimum necessary to maintain ecological integrity and support a healthy ecosystem within an area.

The proposed board walk will impact the length of the area through the introduction of the screw pilings causing initial damage to vegetation and subsequent damage through natural processes – wind, storm, surge, erosion and climate changes. The City notes that there should be *'minimal disruption to coastal sand dunes.'* (10 March 2025: Application to clear native vegetation on Coastal Reserve No 129992 at Trigg Beach)

The concern is that intervention across the site, if approved, will lead to high disruption.

VEGETATION

Native vegetation protects the dunes but even with a *'light-touch screw-pile construction'*, the piles would be an impediment to wind-blown sands, thus altering the form of the dunes. The environmental risks are too great to proceed.

COASTAL PROCESSES AND CLIMATE CHANGE.

Increased erosion is occurring more rapidly than modelled, driven by rising sea levels, climate patterns and more frequent, intense storm events. *'This accelerating erosion poses a significant risk to coastal infrastructure and communities...'*

The UBC draws your attention to a UWA Study, published in *Earth's Future*, *'that sea level rise and climate cycle factors unique to WA, will likely accelerate coastal flooding risks in the future.* Lead researcher Professor Ryan Lowe from the UWA Oceans Graduate School said that *'while sea levels had been rising steadily at 3 to 5 millimetres per year in recent decades, on par with global averages, sea levels along the WA coastline were also strongly affected by El Nino and La Nina conditions'.... 'during La Nina, sea levels dramatically rise north of Australia and are then carried southward along the WA coast by the Leeuwin Current'* Professor Lowe said... *'At this time, sea levels can be elevated by up to 30 centimetres, which is nearly double the total sea level rise that has occurred over the past 50 years in WA.'*

'We must develop and implement new solutions for large-scale coastal erosion, as our reliance on conventional ways of protecting the coastline such as sea walls and breakwaters may become increasingly unsustainable to address the scale of the problem.' (UWA news: *WA coastal flooding risk rising rapidly, study reveals.* 12/04/2021)

Coastal erosion continues to threaten development all along the Western Australian coastline, with Scarborough Beach one of five Perth beaches at serious risk.

This advice must be taken. It is foolhardy to build a structure along the length of a dune, where the potential for damage to the structure is high and solutions to repair damage are expensive.

REGIONAL OPEN SPACE

'The purpose of ROS under the MRS is to protect the natural environment, provide recreational and cultural opportunities, safeguard important landscapes and sites of cultural or historical significance and provide for public access'. The proposed imposition of the coastal boardwalk is not in the spirit of the purpose of the ROS. Cultural significance is already being respected through Noongar-led walks and stories and this is strongly supported.

BUFFER around Threatened Ecological Community (TEC) of Rottnest Island Pines - Callitris preissii/Melaleuca lanceolata forests and woodlands of the Swan Coastal Plain.

As stated there is no definitive buffer in place although a generally accepted buffer is 50 metres. Figure 14 page 40 of Natural Area Holdings Environmental Survey shows the 15 m and 50 m buffer around the TEC.

The City of Stirling uses a 50 m buffer in Trigg Reserve and other reserves and this is the accepted width of an effective buffer.

Populations of Callitris preissii *'have declined markedly along the Perth coast, although it is still common at Woodman Point and on Garden Island.'* (Rippey E and Rowland B. *Plants of the Perth Coast and Islands*)

Callitris preissii has a deep root system that stabilises the sandy soil at South Trigg and protects against erosion.

ECONOMIC BENEFITS OVER 30 YEARS – Urbis Feasibility Study and Economic Impact Assessment: July 2025.

It is an oversight that URBIS has factored in the value of \$92.8 million *'total visitation expenditure uplift'* and \$7.3 million *'total health and wellbeing impact'* to lead to *'\$100.1 million 'total economic benefit over 30 years'* but has failed to factor in the ecosystem services of the natural relatively intact coastal dune system

Thankyou for the opportunity to comment.