Submission to the Tennyson Dunes Coast Park Concept Plan
Tennyson Dunes Group, 8 April 2016

The Tennyson Dunes Group supports a low environmental impact discovery trail, up to 1.8m wide, including shoulders, following the existing main pathway footprint - a walking pace path that enables children and adults to learn about the Dunes. A low impact path is essential to prevent edge effects; a continuous boardwalk will not work for fauna or flora.

We oppose the path as currently proposed because it would destroy this unique and fragile ecosystem.

While the designers have taken on board some of our feedback, the current proposals will mean significant damage to this fragile environment. The path is designed for fast cycling at the expense of pedestrians and the environment. It goes through ancient, sensitive vegetation, is so wide that many of the plants will have to cleared and the subsurface is an impermeable road base that will cause irreversible damage to tree roots.

It is too fast, too wide and too hard.

By slowing the bikes down to walking pace, the path can be narrower, meander more and have a permeable surface. We want visitors to enjoy this unique environment and learn about the fragile dune ecology. If the current proposals are built, it will destroy the very thing people come to Tennyson to experience - a connection with nature.

For faster cycling, we support a bike path travelling behind the Dunes, adjacent Military Rd, which was generally accepted by the community during extensive consultation undertaken by the City of Charles Sturt in 2015.

Tennyson Dunes Conservation Reserve - hidden jewel of Adelaide's coast

Tennyson Dunes Group (TDG) volunteers have been looking after the Tennyson Dunes for 21 years. We are working hard to restore the Dunes, after years of degradation, and to promote their unique features to the public. We know the Tennyson Dunes, and its rare and threatened species very well.

We want the Tennyson Dunes conservation reserve to have a discovery trail that enables people to learn about the Dunes' unique, fragile plants and animals.

TDG wants to continue to be involved in improving the Tennyson Dunes conservation reserve discovery trail.

1. **TDG acknowledge and appreciate that the consultants have incorporated TDG's input during the development of the discovery trail, including:**

- top surface of trail blends in with sand colour
- smaller equipment and hand tools to be used during trail construction
- current path to be used for access to build the new trail
- width of trail shoulder decreased (now 0.2m - 0.5m)
- trail meanders more
- trail has fewer passing areas
- trail tread texture to allow for slow points at intersection.

2. Shortcomings/opportunities to improve the discovery trail to protect the Dunes' ecology, without compromising the project:

Overall comment: The proposed path is too fast, too wide and too hard. It will accelerate damage to the Dunes, not protect them.

Context sensitive design requires ecological sustainability to be paramount. The path in the Tennyson Dunes Conservation Reserve must be a discovery trail, not a road and not a bike way. The focus should be on what can be done with a maximum 1.8m width (including shoulders), low environmental impact path, designed for a walking pace and learning about the Dunes.

Specific elements of concern:

- path width - too wide - must be maximum 1.8m, including shoulders, except where native vegetation is already irreparably damaged
- fence set back 0.7m - 3m in straight lines will result in damage during decommissioning of old fence and building of new fence. There is a risk vegetation will become degraded up to the fenceline due to foot traffic and a risk this line will be sought as an alternative path boundary, thereby increasing damage to the Dunes
- passing places - too many, too close to one another and some in ecologically valuable areas. The placement of passing areas needs to be specifically mapped out with TDG input
- excessive clearance of indigenous plants for sight lines and in the swale, which presents some of the most valuable habitat and vegetation. At walking pace, sight lines are not an issue
- path construction impermeable - must be permeable to prevent erosion of adjoining dunes
- path subsurface construction is effectively road base, damaging to roots and will exacerbate the edge effect of the path
- inappropriate materials used for path anchor points designed to deter people from straying off the path e.g. rocks, hard edging - features foreign to a coastal dune system
- water run off management not taken into consideration
- construction methodology and expertise to oversee construction not given due consideration - inexperienced/ecologically unskilled contractors will cause unintended damage - many examples already along coast park e.g. Point Malcolm
- Phytophthora management not considered – need mandated processes for contractors to wash down vehicles and take preventative measures to ensure no weeds or soil are transported to site
- excessive widening in very sensitive vegetation where north south path through Dunes meets east west path to beach
- trail does not go to proposed interpretive centre
- overly formal design detracts from naturalness, connection with nature, bush path feel, thereby deterring current visitors who go there precisely for this experience
- offset paths (existing paths) may adversely impact vegetation by excessive clearance
- proposed construction materials - more work needed to specify sustainable, Dunes-compatible, low maintenance materials e.g. plantation or recycled timbers rather than old growth Native Pine, fencing top wire (not white plastic)

- conditions for revegetation along the path to be low lying is unacceptable. Along the swale is the only place *Leucopogon parviflorus* grows. These are not regenerating naturally and need to be replanted in the appropriate places, which happens to be along the path. Sight lines are not an issue if bikes are travelling at walking pace
- pruning of vegetation is unacceptable in some areas (e.g. swale). These are 3-500 year old plants in this area providing habitat and nesting sites for Singing Honey Eaters and other species. Pruning will destroy this habitat, and a 500 year old tree takes 500 years to "revegetate".

3. Specific path elements unacceptable to TDG:

- path is too wide
- path surface, base and construction materials are too hard
- path surface is impermeable
- too many passing points
- pruning of old trees (*Leucopogon* and *Myoporum*) will result in substantial habitat loss
- design over engineered for natural environment
- path not linked to proposed interpretive centre next to Military Rd

4. TDG preferred path alignment on map (but only if the above concerns can be adequately addressed)**:**

A, B, D, F, G, H, J, K, N, Q, R, S, U, W, X, Y, Aa, Dd, Ff, Hh, Ll

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Tennyson Dunes Conservation Reserve facts: 22 hectares of the last 3-tier dunes on Adelaide Plains coastline (less than 1% of Adelaide's original dunes), 12 km from the Adelaide CBD and home to threatened lizards, birds, butterflies and plants.

The Tennyson Dunes Group has over 50 members and has been active since 1995.