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Tennyson Dunes Stakeholder Engagement
C/- Urban and Regional Planning Solutions
12/154 Fullarton Road
Rose Park SA 5067

April 18, 2016

Re: Tennyson Dunes Coast Park Concept Report

Dear Michael,

The Nature Conservation Society of South Australian (NCSSA) welcomes the opportunity to have input to the Tennyson Dunes Coast Park Concept Report and appreciate the extra time granted to enable us to provide comment. As South Australia's primary nature conservation advocacy organisation, the NCSSA has been a long term advocate for the protection and conservation of native vegetation and biodiversity in South Australia with particular attention being paid to nationally and state listed threatened plants, animals and ecological communities, management of protected areas and remnant native vegetation.

We support the proposal for a Discovery Trail that provides opportunities for education and interpretation about the ecological significance of the area within a low speed shared-use path environment. We also support the need for stringent design principles that address the conservation and protection of the environment as the highest priority to ensure the integrity of the dunes are maintained. Although the concept plan acknowledges the ecological importance of the Tennyson Dunes we believe that further consideration of the impact of the trail on the conservation values of the area is required.

Our comments on the Concept Plan are outlined below. We look forward to ongoing involvement in this issue and if you would like to clarify or discuss any of the points raised, please contact our Conservation Ecologist Ms. Nicki de Preu on (08) 7127 4633 or via email at nicki.depreu@ncssa.asn.au

Yours sincerely,

Nicki de Preu

**Conservation Ecologist
Nature Conservation Society of South Australia**

NCSSA Comments on the Tennyson Dunes Coast Park Concept Report

General Comments

The Concept Report should acknowledge that, due to their ecological significance, the Tennyson Dunes were declared a Conservation Reserve under the Crown Lands Management Act in September 2015. Although this is stated in the summary brochure it should also be included in the Site Attributes section of the Concept Report.

We strongly support the proposal for the shared pathway to have a much narrower width than the accepted Austroads Guide to Road Design Part 6A: Pedestrian and Cyclist Paths given the environmental significance and sensitive nature of the Tennyson Dunes ecosystem. We recommend the path width is restricted to a maximum of 1.8 meters including the shoulders, except where native vegetation is severely degraded and considered beyond restoration by expert practitioners. To prevent unnecessary clearance or important remnant native vegetation we strongly recommend that the proposed trail is restricted to pedestrian access and slow (i.e. walking pace) cycling only and the development of a bike path travelling behind the Dunes, adjacent Military Rd for faster cycling. This option was generally accepted by the community during extensive consultation undertaken by the City of Charles Sturt in 2015 and will reduce the need for excessive clearance of remnant native vegetation for passing/pullover areas and sight lines as currently proposed. We strongly recommend that the location of passing/pullover areas is minimised within areas that have been identified as important remnant native vegetation particularly within the very old, remnant Coast Beard-heath *Leucopogon parviflorus* and in the swale, which presents some of the most valuable habitat and vegetation. We also recommend that the members of the Tennyson Dunes Group are directly engaged in determining the most appropriate placement of passing/pullover areas.

We have concerns regarding the decommissioning of the existing fence and impact this will have on the remnant native vegetation and habitat it provides for state rated and regionally rare flora and fauna species. Although the Concept Report acknowledges the presence of the Hawkweed *Picris scarrosa* and Painted Dragon (Regionally rare not endangered as incorrectly stated in the Concept Report) the area is also known to provide important habitat for a high diversity of reptile and bird species including the Rock Parrot *Neophema petrophila*, currently rated as Rare under the *National Parks & Wildlife Act* (Willson & Bignall, 2008) and Eastern Bearded Dragon *Pogona barbata* (regional rating of Vulnerable for the Southern Mount Lofty Ranges). The proposal to install fencing set back 0.7m - 3m from the path to "ensure it blends with the coastal dune environment" will not provide adequate protection for remnant dune vegetation both directly adjacent to the path and adjoining areas. There is a real risk that remnant vegetation will be impacted by foot traffic and unrestricted access up to 3m from the path resulting in degradation and damage to the sensitive dune environment.

We support the recommendations made in the report prepared by T & M Ecologists (Appendix 1) to minimise the impact of the trail alignment on the remnant dune vegetation and species of conservation significance that occur in the area. The need for careful bunting and protection of adjacent vegetation will be critical during trail construction to ensure that there are no adverse impacts on the conservation values of this important area.

Comments on Preferred Options for Trail Alignment

NCSSA prefer the following trail alignment as identified in the maps on Page 8-9 of the Concept Report:

Section	Justification
A	Minor impacts on remnant native vegetation.
B	Avoids important fauna habitat.
D	Trail avoids high quality dune vegetation and is aligned in an area of existing degraded vegetation.
F	Negligible impacts on dune vegetation in this area and decommissioning of a long section of existing track will enable rehabilitation/restoration of remnant vegetation.

G	Need for increased clearance to open up corners of path will be negated if bike path developed behind the Dunes, adjacent Military Rd as supported by the community consultation undertaken by the City of Charles Sturt in 2015.
H	Need for increased clearance to open up corners of path will be negated if bike path developed behind the Dunes, adjacent Military Rd as supported by the community consultation undertaken by the City of Charles Sturt in 2015.
J	Follows existing track alignment so minimal clearance required but strongly recommend node points are limited to edge of the patch of <i>Leucopogon parviflorus</i> rather than throughout as currently proposed.
K	Very minor (if any) impact on native vegetation; also decommissioning of existing North-South alignment will enable rehabilitation/restoration of remnant dune vegetation resulting in less fragmentation of habitat.
N	Very minor (if any) impact on native vegetation; also decommissioning of existing track will enable rehabilitation/restoration of remnant dune vegetation resulting in less fragmentation and improved habitat connectivity.
Q	Defragmentation of dune and negligible impact on biodiversity.
R	Alignment through existing degraded vegetation. Support the requirement for avoidance of Bushland Condition Monitoring site.
S	Follows existing track alignment with less impact on <i>Lepidosperma gladiatum</i> .
U	Less Impact on dune vegetation (esp.patch of <i>Lepidosperma gladiatum</i>).
W	Avoids important area of <i>Lepidosperma gladiatum</i> .
X	Follows existing track alignment with less impact on patch of <i>Scaevola crassifolia</i> .
Y	Follows existing track alignment with less impact on patch of <i>Scaevola crassifolia</i> .
Aa	Less impact on high quality revegetation by adjacent resident compared with Bb.
Dd	Less impact on remnant native vegetation and high quality revegetation by adjacent resident compared with the alternative proposed alignment.
Ff	Follows existing track alignment with minimal impact on remnant native vegetation.
Hh	Less fragmentation of dune habitat compared with Gg proposed alignment.
Ll	Less fragmentation of dune habitat compared with Kk proposed alignment.

Reference

Willson, A. & Bignall, J. (2008) *Draft regional recovery plan for threatened species and ecological communities of Adelaide and the Mount Lofty Ranges, South Australia*, Department for Environment and Heritage, South Australia.