



To Linear Park Project Team
Dept. of Infrastructure and Transport

Re: Submission on Linear Park Stage 2, Grange to Tennyson

Thank you for the opportunity to respond to the Government's proposal to declare a section of the dune system located between Terminus Street Grange and Bournemouth Street Tennyson a Linear Park.

Members of our Association have studied the provided location map in addition to walking the total length of the area on several occasions. We have also taken feedback from our membership over a number of years since a Shared Coastal Pathway was announced.

Our understanding is that Government is asking the community to make comment on a declaration of a Linear Park located within the green shaded area shown on the map you have provided that includes a Concept Plan for the location of a shared pathway.

WACRA wishes to register its concerns with the process of engagement seeking submissions on what seems to be a Government-preferred option without more meaningful consultation with key stake holders.

We also express our concerns that many in the community would not be aware that the proposed sand pumping pipeline has a significant relationship to the availability of the Linear Park as being proposed.

For the above reasons we consider it unfair that Government is seeking submissions from some sections of the community without the greater community knowing that connections to both projects are running simultaneously.

Given our expressed reservations as stated above, WACRA is seeking additional time for the Government (Linear Park Project Team) to provide a response to our listed concerns as follows:

1. The proposed alignment fails to pay full attention for the protection of biodiversity – flora in general, particular plant species, animals and birds inhabiting within the dunes.

Biodiversity protection is mentioned in several instances within the proposal to justify path alignment, including proceeding at times in the swales and attempting to minimise the inevitable biodiversity loss by constructing boardwalks and/or back-filling necessary for the construction of a path way closer to residential property in the section immediately north of Terminus St. The proposal merely makes assertions on this issue.

No independent evidence is quoted. This evidence should immediately be made freely available to intending respondents.

2. The proposed alignment fails to provide 'equity' for property owners/occupiers – in terms of how close to their property boundaries the pathway runs.

For example, the proposed pathway from Terminus St northwards to Hallam St runs in the swale a few metres from property boundaries. However, from Hallam St northwards to Bournemouth St the path runs close to, or next to, property boundaries.

The major reason given for this difference appears to be the stated intention of adhering to the Department Environment Water (DEW)/Coastal Protection Branch (CPB) recommendation that there be 80cu.m/lineal metre

buffer zone of dunes between the pathway and the mean highwater mark.

We are aware that surveys have been completed recording the quantity of buffer zone sand all the way from Terminus St to Bournemouth St. This evidence should immediately be made freely available to intending respondents.

3. The proposed pathway includes sections of boardwalk between Terminus St and Hallam St. The structural specifications, material and detailed means of construction of the boardwalk sections have not been provided, nor the details of the future maintenance program the boardwalk sections will need.

All these details have consequences for the dune biodiversity, the probable comfort/safety of path users, both walkers and cyclists and the longevity of a safe functional boardwalk; they should immediately be made freely available to intending respondents.

4. The proposal provides no information about the footprint/area and level of biodiversity destruction due to the construction of the path. Nor does it provide any information about the program of restoration/re-vegetation to be carried out during the path construction and over the extended period of path use after its completion.

This information should immediately be made freely available to intending respondents.

5. Concurrent with discussions about the completion of this section of the Coast Park there has been extensive consultations between government departments and the Community Reference Group about the details of siting and the construction, maintenance and biodiversity restoration strategies to be employed for the proposed sand pumping pipeline running between Semaphore Park and Henley Beach South, including any pumping stations for this scheme which will be inserted into this section of the coast.

It is widely stated that the footprint for this infrastructure will significantly exceed that of the proposed path namely, excavation between 7-10 metres width for the pipeline-and up to 7 metres for the pathway.

It has also been stated in much public discussion that there is a strong desire by government departments to construct the pipeline and path concurrently by running the pipeline wherever practically feasible underneath the path. While, on the face of it, this notion makes sense, to minimise total costs economically and ecologically, it means that anyone seeking to comment intelligently on the proposal about the pathway needs to be provided with accurate information as to the issues raised above.

This information should immediately be made freely available to intending respondents.

6. It is generally accepted that solid structures introduced to active wave-fronts inevitably cause major damage to dune systems, often to nearby properties, due to, amongst other things, the force imparted by the reflected wave as it moves back from the structure and the under-cutting of sand near the structure. This can have serious consequences for biodiversity and the ecosystem. This is especially concerning as seaside communities experience elevated sea levels and storm frequency due to climate change.

The proposal provides no information about how this matter will be dealt with. There should be provided a comprehensive climate adaptation strategy for this section of the coastline.

This information should immediately be made freely available to intending respondents.

7. One of the more problematic sections of this already difficult proposal is the diversion of the shared pathway traffic on to Seaview Rd, presumably to attend to the 80cu.m 'rule' in the very narrow section of dune between Bournemouth St and Hillview Ave. No details have been provided for the proposed configuration, construction, maintenance etc of a traffic corridor that, although relatively short, will need to cater for the vehicular access and other priorities of local residents – as well as the obvious increase in walking/cycling/shared path activities that the pathway is meant to stimulate and provide for. If the 80cubic metre rule cannot be applied between Hillview and Bournemouth streets, have you considered placing a boardwalk in this section to maintain the alignment of the pathway rather than divert the pathway onto Seaview Rd.?

This information should immediately be made freely available to intending respondents.

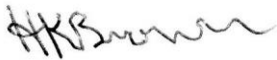
In summary,

It is our view that, while we appreciate the Government's desire to declare the proposed area as a Linear Park and seek additional comment on the concept of the location and structure of a Shared Pathway, we maintain that members of our Association, who are well informed, take a genuine interest in this section of the State's coastline and support a Linear Park Shared Pathway. We feel restricted from making a more substantial submission due to a failure by the Government to provide more supportive evidence at this stage. We are of the strong view that our concerns need to be addressed by providing a longer timeline for consultation to occur.

We thank you for acknowledging our submission and look forward to your response.

Kind regards,

Bert Brown

A handwritten signature in black ink, appearing to read 'Bert Brown', written in a cursive style.

Chair

Western Adelaide Coastal Residents' Assoc Inc