



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

9 October 2023

Office of the Appeals Convenor
Level 22 Forrest Centre
221 St Georges Terrace
PERTH WA 6000

Email: admin@appealsconvenor.wa.gov.au

Re: **CPS 9349/1 Shire of Plantagenet - Crown Reserve 15162**

The Wildflower Society of Western Australia (hereafter referred to as “The Society”) makes this submission regarding clearing application CPS9349/1 made by the Shire of Plantagenet to establish a series of trails in Crown Reserve 15162 for walking and mountain bikes and accommodation of access roads to service the trails. The Society opposes the granting of a permit to clear granted by the Department of Water and Environmental Regulation on the grounds that the Department has not considered all the direct and indirect environmental impacts that have a high risk of occurring as a result of the clearing.

The documentation provided with the clearing application indicates trails totalling 11,400 m (MDE, 2020) in length will be developed in Crown Reserve 15162 resulting in the clearing of 1.29 ha. The Society contends the area required to be cleared to construct the trails will practically result in the permanent clearing of widths of greater than 1.133 m, the width derived from the trail length and the area applied to be cleared, irrespective of the clearing methods used as this width provides only 200mm clearance either side of a standard flat handlebar on a bicycle. The example pictures highlighted in the Concept Plan (MDE, 2020) provides some visual examples of the level of disturbance for the variety of trails proposed. It is clear from them that the disturbance area is well in excess of that suggested by the areas proposed in the application. The finished trail widths indicate permanent width between 0.6 – 2.0 m dependent on the degree of difficulty.

The Blue Trails require the construction of jumps and berms to meet the expectation of blue level riders. Installation of jumps and berms requires wider corridors for their installation and operation. The Black Trails are designed to include more undulations and need a wider corridor for their installation to meet the expectations of more skilled, often younger, riders. The installation of Blue and Black Trails incorporates the installation of both built and natural technical features that requires modification of the ground surface and/or import of material for their construction (MDE, 2020). The Society contends this work will require at least temporary disturbance of a wider corridor than that proposed in the clearing permit during construction to allow for contouring of gradients and turns.

The Concept designer (MDE) has highlighted the constraints associated with having events at this facility. The Society believes the use of this facility for events poses a significant threat to the flora and vegetation that lines and lies between the trails on this site. We note that the location of threatened, and priority, flora identified on the site is often proximal to the trails and its conservation will be significantly increased should events be run at this facility.



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

The Society is concerned that much of the area has a dieback status which is uninterpretable, likely as a consequence of the area being burned immediately prior to site studies being carried out. Given the susceptibility to dieback and the movement constraints on the site, as well as the site topography, the Society contends this project has a high risk of spreading dieback throughout the site during site development and during operations as all the trails being developed go up and down gradient resulting in the easy transmission, of any infestations that occur, throughout the site. The constrained construction zone will make delineation of areas with differing dieback status difficult to manage in a practical sense. We also contend that a detailed dieback survey should be conducted immediately prior to any construction to more clearly define what areas are dieback free and those which are dieback infested.

The installation of the trails will fragment what is a single remnant of vegetation and reduce it to a series of small patches with large edge/area ratios. These patches will not be viable in the long-term and will lose their value as habitat without an intense management effort. As a result, this area will not provide the value to the "Porongorup Range Corridor" that is currently provided. The description "... the application relates to the construction of a narrow, linear bike track within a larger vegetated reserve and that mature trees will be retained to maintain canopy connectivity, it is not expected that the proposed clearing will significantly impact the functionality of the South West Macro Corridor" suggests there is only one track involved when in fact there are 12 individual tracks within the proposed area that will result in a highly fragmented remnant.

The Society is concerned that insufficient consideration has been given to the overall environmental impacts that will arise from implementation of this project. Evidence from the visual images in the concept plans highlight the width of the impact zones immediately adjacent to the trails. Visual assessment of the impact zone of trails in Albany suggests this may be up to 5 m either side of the trail, as a result of sediment created through erosion and the introduction of weeds carried on bicycle tyres. With the close proximity of some parts of the proposed trail, this is likely to result in the loss of up to 15 ha (or 25% of the area) of the natural vegetation structure in the long-term.

There needs to be an erosion control plan produced for each trail as the gradients on all the trails will result in erosion and the generation of sediment. This sediment will cover the ground level plants outside the trails when it diverts off the trails and deposit weed seeds and dieback in the vegetation as well as covering plants and local plant seeds, leading to the invasion of weeds. It will also create concentrated water flows and potentially erode areas off the trails.

The Society believes the offset offered is 'rubbish'. That area should be rehabilitate by the Shire of Plantagenet at its expense not as an offset for vegetation it is clearing. It is an old gravel pit which the Shire should be rehabilitating anyway, not waiting for it to be offset against good quality vegetation it is clearing. The Revegetation Plan that is provided is also totally inadequate. There is roadside vegetation in that area that was revegetated over 30 years ago which can be used as a guide as to what should be achieved by any rehabilitation proposed.

Attached is a copy of the Society's position paper on mountain bike trails. While the Society is not opposed to the establishment of mountain bike trails, we do not believe this is a suitable site for the proposed facility. The Shire should identify an area of cleared or plantation forest area nearby and locate the trail there.



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

We believe it will degrade a patch of very good to excellent vegetation which has a number of plant species worthy of conservation as well as break a significant ecological linkage. The offset proposed is also not suitable, and the Shire should be made to rehabilitate the proposed offset anyway as they are required under the Mining Act.

In summary, the Society requests this permit be withdrawn and the Shire be requested to locate a more suitable, degraded or altered area for their trails.



<http://www.wildflowersocietywa.org.au/>

Reference

Magic Dirt Enterprises (MDE) (2020). TOWER HILL Mountain Bike Trail Network Concept Plan. Retrieved from Tower Hill Concept Plan (plantagenet.wa.gov.au)