

**Our Ref:** DM / File PROJ.ENG.63  
**Enquiries:** Damian Schwarzbach

8 April 2025

Department of Water & Environmental Regulation

Email to: [info@dwer.wa.gov.au](mailto:info@dwer.wa.gov.au)

To Whom It May Concern



**Re: Clearing Permit Application for Reserve Number 13255**

The Turner Road Mountain Bike (MTB) Trail Network Project was identified as an alternative site for a MTB network to service the Denmark community and replace an earlier proposal for MTB trails on Mt Hallowell. Mount Hallowell (which contains an A Class Reserve core) was the subject of significant community consultation, and plans to pursue a MTB trail network in the Reserve have been halted whilst a review of the Mount Hallowell Reserve Management Plan is undertaken. It is unclear if Mount Hallowell will be suitable for MTB trail development in the future, and even if supported this would likely be limited to the lower slopes to avoid the high conservation value inner core area.

Denmark currently has no sanctioned MTB trails, and informal trails are being developed and used to the detriment of the environment. There is increasing pressure to alleviate the unsanctioned trail activity currently experienced. The development of the Turner Road MTB trails should result in the broader offset of reducing the incidence of unsanctioned trails being developed elsewhere.

The Turner Road Reserve has been heavily disturbed over the years through former use as a gravel extraction pit. The Shire has undertaken revegetation of pockets of the Reserve, however multiple disturbed areas remain. The concept design brief to develop a MTB network at Turner Road Reserve was framed so that any proposed trails be aligned to minimise clearing and utilise the existing cleared sections where feasible. Several of the proposed trail alignments subsequently take advantage of the existing tracks within the Reserve.

The first draft of the concept plan had a carpark proposed in an area at the base (north boundary). This was reconsidered when priority flora was identified, and as such the car park is now adjacent to an existing cleared area used as parking and circulation for the Scotsdale Shadforth Bushfire brigade (who also occupy the site). This carpark area also takes advantage of utilising the existing access track, thus alleviating the clearing that would be required to construct a new access driveway had the carpark been in the original location.

The project is based on the Magic Dirt Concept Plan (2024), which proposes the development of:

- 12 new MTB trails (total length 8.62km, requiring a maximum corridor of 1.2m wide = 1.03 ha).
- 2 new carparks (total area 0.30 ha).

---

[Redacted signature block]

One existing fire access track is proposed to be used as a shuttle road (0.63 km) between the carparks. No widening of this track is currently required.

Consequently, the current plan development requires a footprint of 1.33 ha.

Biological surveys were conducted by Southern Ecology during 2023 and 2024, including:

- Reconnaissance level vegetation survey of Turner Road Reserve (42 ha).
- Targeted flora survey and cockatoo assessment of trail corridors (~30m wide) and carparks (26 ha).

The outcome of the surveys has led to several minor track alterations during the design phase to mitigate impacts to DBCA Priority-listed flora. The locations of cockatoo habitat trees were also recorded to assist with planning and avoidance.

The spatial biological data provided by Southern Ecology has been interrogated to provide an initial Environmental Impact Assessment. This has determined that the 1.33 ha development envelope currently intersects the following:

- A total of 0.93 ha of remnant vegetation.
- 0.36 ha of partially revegetated quarry (combination of native and introduced flora, not considered pursuant to native vegetation clearing principles of the EP Act).
- 0.04 ha of existing cleared land (i.e. tracks and bare gravel areas).

The remnant vegetation within the development envelope includes:

- 0.86 ha of Jarrah/Marri Woodland (CcalEamarBlin) in condition classes: Degraded 0.03 ha, Good 0.13 ha, Very Good 0.69 ha and Excellent 0.01 ha.
- 0.07 ha of Karri Forest (Ediv) in condition classes: Degraded 0.05 ha, Good 0.02 ha and Very Good <0.01.
- No Threatened or Priority flora were recorded within the development envelope.

Key mitigation strategies for the project include ensuring a 1.2m maximum width for the MTB trails; avoidance of impacts to priority flora and cockatoo nesting trees; and no eucalypts over >100mm DBH to be removed. As the proposed project is still at concept design stage, further detailed design will refine the trail corridors to minimise environmental impacts. The principles of avoidance will be maintained, and the spatial data and EIA updated as part of finalising the design.

Should you wish to discuss this matter further please contact Damian Schwarzbach on

[REDACTED]

Yours faithfully

[REDACTED]

Director of Infrastructure and Assets

Enc. Proof of Ownership – Management Vesting Order  
ESRI Shapefiles – MBT Data  
Avoidance & Mitigation  
Targeted Flora & Cockatoo Assessment – Turner Road Reserve (Southern Ecology)