

## CPS 9182/1 – Responses to Public Submissions from the Revised Proposal’s Re-advertising in December 2022

On 8 December 2022, CPS 9182/1 was re-advertised on the department’s website with a 7 calendar day submission period, inviting public comment on the revised application of 3.16 hectares, due to a revision to the proposed trail alignment to divert the trail around an area of granite. Sixteen submissions were received within the specified timeframe. The 16 submissions received during the re-advertisement of CPS 9182/1 raised similar matters to the nine submissions received during the initial 21 calendar day submission period on 24 April 2021 and a response to these matters is available at <https://ftp.dwer.wa.gov.au/permit/9182/>.

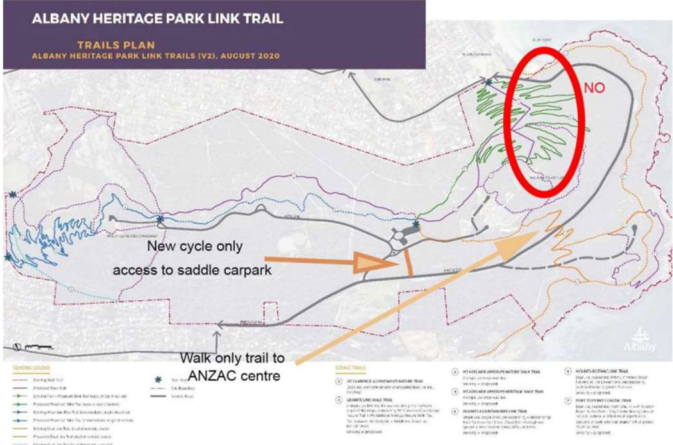
The public comment submission summary below relates only to those matters raised in the 16 submissions for which the City’s response to public submissions dated 20 June 2021 is insufficient to address.

Item	Submission	City of Albany Response	City of Albany comment
1	Submission 4 raises concern that the proposed trail alignment between Marine Drive and trails north of Forts Road will result in extensive clearing within intact and undisturbed native vegetation on Mount Clarence and Mount Adelaide (see Figure 1 below). The submission proposes two alternatives to clearing in this area that would provide access for cyclists between Marine Drive and the top of Mount Adelaide.	No modification or action required	The alignment of these trails has been informed by considerable environmental assessment, avoiding potential habitat areas for significant flora and providing buffers from potential nesting / roosting sites of significant fauna. The trails project is to provide a well-balanced, site responsive trail network system, linking major destinations, neighbourhoods and activity nodes. These mountain bike trails are aimed at beginners and are designed to be family-friendly. Forcing users to use public roads in lieu of a properly designed trail would be a major safety issue, as well as reducing the amenity of the trail network. The proposal relating to cycle and dual-use trails has already been pared back to a minimum, and these two trails (ascending and descending) are necessary to achieve the key purpose of safely linking the Mounts to the tourism precinct of Middleton Beach.



Submission 4 suggests that one alternative option would involve a track between the existing trails and Morley Place (see Figure 2 below).



	<p>Figure 2. Alternative cycle route between the existing trails and Morley Place proposed by Submission 4.</p> <p>Submission 4 proposes a second alternative option involving a new trail further west of the National ANZAC Centre, providing a cycle-only trail between Marine Drive and the existing car park (see Figure 3 below). The submission suggests that this would also allow the proposed trail north of Marine Drive to be pedestrian-only.</p>  <p>The map, titled 'ALBANY HERITAGE PARK LINK TRAIL TRAILS PLAN', shows various trail routes. A red circle highlights a specific area in the upper right quadrant. An orange arrow points to a 'New cycle only access to saddle carpark' near Marine Drive. Another orange arrow points to a 'Walk only trail to ANZAC centre'.</p>		
2	<p>Submission 9 suggests that having all trails as dual use will create significant conflict between pedestrian and mountain bike users within the Albany Heritage Park. Submissions 8, 9 and 14 also suggest that dual-use trails pose a safety risk to pedestrians and that the ongoing management, monitoring, and maintenance of the upgraded trail network proposed by the City are not adequate to address these safety concerns.</p>	<p>No modification or action required</p>	<p>The revised proposal is aimed at separating user groups (walkers/riders) to improve the visitor experience and address safety issues. This was a key consideration in the design of these dual use trails. The majority of trails in the revised proposal are single use.</p> <p>The number and length of dual-use trails in the proposal has already been reduced significantly. The remaining dual-use trails are necessary to provide a well-balanced, site responsive trail network system, linking major destinations, neighbourhoods and activity nodes. They have been designed to best-practice industry standards with safety as paramount; the alignments, switchbacks, lines of sight and surfacing are</p>

			designed to discourage fast riding, and the width of the trails will allow for safe passing. Accompanying signage and demarcation will ensure users are informed.
3	Submission 10 suggests that the proposed clearing is inconsistent with the City's Natural Reserves Strategy and Action Plan 2017-2021 particularly with respect to its strategic goals to preserve and increase the ecological values of the City's natural reserves and to provide recreational facilities that minimise impact on the natural environment.	No modification or action required	<p>The proposal - and the City's application - is consistent with the purposes of the reserves, being for the purposes of a public park and recreation.</p> <p>Potential environmental impacts of trails construction and use have been thoroughly assessed by environmental consultants and balanced with the project aim. Accordingly, the proposal has been revised and trails realigned and/or reduced to avoid entirely or mitigate these impacts.</p> <p>The predominant issue impacting the ecological values of the Mounts has been the construction of unsanctioned trails. In addition to providing a properly designed trail network to obviate the need for users to construct illegal trails, the City is offering an extensive revegetation plan to rehabilitate the unsanctioned trails. This will see over 6.6ha of weed eradication and revegetation works to accompany the closure of those trails.</p>