



Non-Confidential Submissions to Draft
Belfast Coastal Reserve Management Plan 2018

From:
Sent: Friday, 16 March 2018 11:21 AM
To: ParkPlanMailbox
Subject: beach access

To whom it may concern,

As an owner of horses trained in Warrnambool, the opportunities beach training presents as well as the relaxed country environment the district has to offer is the key reason why I will continue to support the continuation of horse training in the region.

If this training was not available, the opportunities for these horses would become limited, thus there would be the potential for them to retire from racing all together. This would have a huge effect on the local trainers, horse numbers would decrease as well as taking away the opportunity for any return to continue to find future horses to be trained in the region.

The opportunity to train horses on Levy's Beach and the dunes is critical for the ongoing success of horse training in Warrnambool of which I am fully supportive.

I also understand the need for conservation, so would strongly urge that a common solution can be worked out so that the historic and iconic Warrnambool horse industry can continue to be a major part of the region.

Regards,

From:
Sent: Friday, 16 March 2018 1:58 PM
To: ParkPlanMailbox
Subject: Belfast Coast Management Plan

To Project Team

We have had input in the various local meetings re the draft plan.

We have had input into two submissions

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* The other from the Belfast Coast Community Users Group

o

We would like to put our own personal submission to have the conservation zone changed to a conservation and recreational zone.

o We have concerns about estuary management and agreement with Glenelg CMA re the opening of the cutting when the water reaches 1.1 M level.

o Historical use of beach for horse trainers.

o Availability for use for recreational purposes. Putting people horses and dogs in the small area allotted will cause many issues in the future.

o Keeping assess tracks open for people especially the older members to visit the parts of the beach they have loved and appreciated over many years.

Sent from Mail for Windows 10

From:
Sent: Thursday, 15 March 2018 8:32 PM
To: ParkPlanMailbox
Subject: Belfast Coastal Reserve

I am writing in support of the continuation of beach training in Warrnambool and the surrounding Belfast Coastal Reserve. Beach training has been pivotal as it enhances the performance of horses, and indeed can prolog their careers.

Sent from my iPhone. I believe that managed/controlled use of all beaches within the reserve is an achievable outcome.

In particular Levy's beach, in close proximity to Warrnambool, could easily accommodate up to 100 horses on the beach and 50 horses per day 7 days a week from sunrise to midday. This would allow horses and humans to enjoy the BCR in an harmonious fashion. Yours Sincerely

From:
Sent: Thursday, 15 March 2018 6:19 PM
To: ParkPlanMailbox
Subject: Belfast Coastal Reserve

To Whom is May Concern:
RE: Belfast Coastal Reserve

I would like to confirm that I do not support the allowance for commercial racehorse training on the beaches within the Belfast Coastal Reserve

The site is critical habitat for the Eastern Hooded Plover and should remain protected for this reason.

Please let's not see the racing industry dictate to us locals what is part of a beautiful environment for wildlife and locals who enjoy the beach area

From:
Sent: Thursday, 15 March 2018 1:30 PM
To: ParkPlanMailbox
Subject: Belfast coastal Reserve

Hi

I am writing to say that I agree that this plan will help provide the protection required for the Flora and Fauna on this beautiful stretch of coast. Having fished and dived in the waters off this coast, I have seen the devastation caused by motor bikes and horses increase, with vegetation wiped out, sand dunes destroyed by horse traffic and the decline in the number of hooded plovers and dotterals. Any commercial exploitation of this part of the coast would be endangering all wild life and the beach itself.

Yours sincerely

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From:
Sent: Thursday, 15 March 2018 3:46 PM
To: ParkPlanMailbox
Subject: Belfast Coastal Reserve Plan

I wish to respond to the Belfast Coastal Reserve Plan.

My family have been enjoying the reserve's natural serenity for years.

We think the racing industry has enough resources to find places to train without impacting on the birds and other living things that need this place.

We also think-

* The site is critical habitat for the Eastern Hooded Plover, containing 12% of the Victorian population, 2.5% of the Eastern subspecies. This is a species for which many of you personally invest your time in protecting, assisting local, state and federal governments in threatened species management.

* When BirdLife reviewed the breeding success in the Reserve, they found 44% of sites had not produced fledglings in 5 breeding seasons of monitoring. Sites were under extreme pressure from horses, dogs off leash and even illegal vehicles, as well as weeds and foxes. The narrow, rocky beaches are subject to high pressure from horses and dogs which are squeezed in to this narrow zone. This area happens to contain one of the densest populations of Hooded Plovers known – for example, there are 28 Hooded Plover breeding sites within the proposed conservation zone, which comprises 43% of the onshore Reserve, not to mention 24 red-capped plover and 2 pied oystercatcher breeding sites, PLUS one of five priority locations for Orange-bellied Parrots, plus internationally significant habitat for Sanderling and Sharp-tailed Sandpiper, and nationally significant habitat for Ruddy Turnstones and Double-banded Plovers. We really want the proposed Conservation Zone to be dog and horse free to alleviate pressures on these birds and because 57% of the reserve would still be available for dog (a designated off leash beach plus bird areas as on leash) and horse access (with a permit system following strict conditions) so that we are taking a coexistence approach and aiming for the best balance in use of the Reserve.

* Bottom-up efforts have to be met by top-down support in order to achieve long-term sustainable use of the coast and to return the balance wildlife trying to persist in heavily impacted areas.

* You are highly supportive of the Draft Management's approach to set aside the highest value section of the Reserve as a Conservation Zone, with a focus on protecting the habitat values and minimising disturbance to breeding birds and roosting and foraging migratory shorebirds.

* We do not support commercial horse training in the reserve. There are extreme risks to threatened species, habitat, cultural heritage sites, and public safety. An alternative sand track and pool was built in 2017, and several trainers are using the sandy soil in their paddocks. Trainers will still achieve the results they desire for their horses but it does not have to be on the beach where there is so much to lose.

* There are many good elements in the draft coastal management plan that I wholeheartedly support: cultural heritage protection; joint management; education and interpretation; monitoring and research; rationalisation and closure of inappropriate beach access; dog control. But it remains deeply flawed because of its complicity in entrenching and expanding the use of the reserve by commercial racehorse trainers.

* Under the plan, commercial racehorse training would rapidly expand to multiple beaches and in sand dunes, with devastating effects for the nationally threatened hooded plovers—the reserve is its most important breeding area in the state according to the plan— and other coastal wildlife as well the safety and enjoyment of families, anglers, surfers and other beachgoers.

* The length of beaches available to racehorse training would, under the plan, be increased by 250% (from 2 km to 5 km) and the number of horses by 400% (from 65 to 256 each day). That represents 25% of the reserve's beaches, with nothing in the plan to stop future expansion.

* The draft plan would allow racehorses back into 750 metres of fragile dunes behind Levy's Beach and

at Hoon Hill, where in the past they have caused severe dune erosion. The plan even recommends racehorse training within the Conservation Zone at Rutledge's Cutting. As the most significant area for Hooded Plover nesting, that is inexcusable.

* Many times, the draft plan refers to damage caused by racehorses but fails to explain how increasing the area available to them by 250% will mitigate these impacts. Worse still, the plan's risk assessment reveals that management won't make any difference. Before management, the risk to coastal dune vegetation, cultural heritage, resident and migratory shorebirds from racehorse training is rated 'Extreme'. After management is introduced? The rating remains—Extreme!

* Ever since the uninvited invasion by racehorses in 2015, their training has been mismanaged, with numerous breaches of licensing conditions, public safety put at risk and taxpayers footing the bill for costly Parks Victoria surveillance and infrastructure upgrades. Expanding the number of training beaches will simply make that worse.

* By entrenching and expanding commercial horse training the plan is a relic of past coastal mismanagement and inappropriate use.

Yours sincerely,

From:
Sent: Thursday, 15 March 2018 12:20 PM
To: ParkPlanMailbox
Subject: Belfast Coastal reserve management plan.

To whom it may concern,
I enjoy the wilderness feel, remoteness and beauty of this area, however I would not have been aware of this without the need to walk my dogs. They are friendly and well behaved but I feel that it is important for them to be able to be off leash to exercise fully to be able to stay relaxed happy and well behaved, this also goes for me! The dogs have improved my health and well being immensely.

It is good to have an area where I can do this without meeting lots of people and other dogs, this area is so, rarely are there many people, often no one, therefore I feel that the impact to the wildlife and environment is as minimal as it can be and I do not have to worry that other people may feel intimidated by the dogs, they don't need to be but that is not often the first impression.

I understand that there is an impact, but this is an area between two towns and it is fantastic to be able to use it as it is now. To have space, freedom, lack of people. It is a rarity in this world and precious it makes this area a desirable place to live especially when able to enjoy it fully.

I feel that the training of horses will have a much greater impact on the environment. However people are nature too, we come from this planet, this Earth I am happy to share. If there are a couple of hours to either avoid or be prepared to walk another way so be it. But if they are allowed to use it then we should definitely too as it is, dogs off leash on the beach. If horses cannot train there we should still be able to use it as it is with private use of horses also.

To restrict peoples use of the area to maintain a heritage and improve wildlife I find upsetting. There are too many restrictions already, decreasing peoples ability to behave responsibly and most people are responsible, it is only a minority who are not and further restrictions will make no difference to them. A heritage is not a heritage if it can't be appreciated. I do not see an increase in visitors if there are restrictions in place only a decrease in numbers by locals. Which is good for wildlife to a point (Non indigenous wildlife also have a big negative impact, like rabbits and foxes), but not good for people and we do matter. It is used mostly by locals.

I am there often at least three times a week and the number of people I usually meet is none to a few on holidays or hot days therefore the area is not over used, but it is greatly appreciated by the ones who do use it. Please do not increase restrictions, please let us continue walking our dogs here on the beach off leash.

Yours sincerely

From:
Sent: Friday, 16 March 2018 7:01 PM
To: ParkPlanMailbox
Subject: Belfast Plan - science groups informed

Dear Government Staff

- o It is highly significant that no Independent Environmental Impact Study has underpinned this plan.
- o Complaints about the plan and the process have been made to the State Ombudsman and to IBAC.
- o Of great concern is the lack of attention to the alternatives that innovation affords and the complete lack of imagination to solve problems such as enclosed dog parks where dogs can be off leads away from the beach.
- o Science organisations have been made aware of this issue as has the Federal Minister for the environment and the Federal Minister for Health, relevant because research is showing the importance of natural environments to peoples' health in the fast-paced 21stC.
- o Science organisations contacted so far are listed far below.

PROCESS

1. (Preferential access) Government Reference Group - only the Racing Industry (and Indigenous)
2. (Corrupt practice) Fox in charge of chickens; Racing Victoria - a 'delivery partner' (P 57 Word Doc – <https://engage.vic.gov.au/belfast>).
3. ('Push Polling" results) Submission guidelines - 'Very Supportive' listed as 1st and last option in all six sections
4. (Inconsistent due date for submission) Submission due date different in two key places
5. (Misleading) Attempt to imply racing industry would financially suffer if beach training not available
6. (Missing information) No mention of synthetic training surfaces which mimic the beach <https://country.racing.com/news/2017-06-19/warrnambool-rc-opens-new-synthetic-fibre-sand-training-track>
7. (Misleading) Conservation and Recreation Zone is actually a Business, Workplace, Conservation and high-impact Recreation Zone
8. (Missing information) No scientific information about effects of the plan - now, 1 year, 3 years through to 15 years
9. (Missing information) No research partners named in the plan
10. (Covered up) Maps with place names such as Golfies, Baldy, Hoons - not available; can't see where the activity is going to happen
11. (Covered up) Maps with kms for racehorses and other high-impact activities - not available. Out of the 18-20 kms can't see how much of the coast is for high impact.
12. (Covered up) No kms for historical access. Only a star on a map
13. (Missing) No map overlaying vulnerable species location with proposed high impact activities – horses, dogs, equipment such as jetskis

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1. (Science & Research) No scientific or environmental impact study to underpin the plan – research promises are vague and futuristic
2. (Innovation & 21stC) No attempt to promote synthetic facilities <http://www.darrenweiracing.com/facilities> and <https://country.racing.com/news/2017-06-19/warrnambool-rc-opens-new-synthetic-fibre-sand-training-track>
3. (Legal) No consideration of dedicated on-land fenced dog parks to protect people and wildlife
4. (Legal) No consideration legal implications of the beach being a workplace. Weir says beach rider at work

<http://www.standard.net.au/story/5173072/government-proposal-would-allow-horses-back-on-beaches-have-your-say/>

5. (Mental health & natural environments) No recognition of natural landscape significant for wellbeing - fast-paced 21stC : <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3734455/>
<https://www.sciencedirect.com/science/article/pii/S2212962615000371>
6. (Demography & Business) No recognition horse businesses / leisure riders are growing in vast numbers https://www.rdv.vic.gov.au/__data/assets/powerpoint
7. (Demography & Business) No consideration to shift expanding beach-horse businesses and leisure riders to dedicated paddocks overlooking the beach; Port Fairy golf course overlooks the beach
8. (Demography) No recognition pressure of 21st C population SW coast -local and national travellers
9. (Demography) No information - escalation of peoples from emerging economies gaining passports, travelling down under
10. (Science) No scientific or impact study relating to noise pollution - high impact activities such as jetski, speedboat affecting the unique coastal environment and visitors

Innovation already here

<http://www.darrenweirracetrack.com/facilities>

<https://country.racing.com/news/2017-06-19/warnnambool-rc-opens-new-synthetic-fibre-sand-training-track>

UNDUE INFLUENCE – Moyne lets horses back on beach

<http://www.thecourier.com.au/story/4858245/state-government-quietly-allows-horse-training-on-beaches/?cs=2452>

UNDUE INFLUENCE - Paukla defends Weir

<https://www.smh.com.au/sport/racing/horse-trainer-darren-weir-in-dispute-with-warnnambool-locals-over-use-of-beaches-20161025-gs9tqf.html>

BEACHES ARE WORKPLACES – Weir – young rider at the beach was at work

<http://www.standard.net.au/story/5173072/government-proposal-would-allow-horses-back-on-beaches-have-your-say/>

SCIENCE ORGANISATIONS

- * CSIRO – smarter coastal development and management:
<https://www.csiro.au/en/Research/OandA/Areas/Coastal-management>
- * CSIRO – coastal research <https://coastalresearch.csiro.au/>
- * Department of Industry, Innovation and Science The Department provides a number of science and research reports and studies.
- * Office of the Chief Scientist The Office of the Chief Scientist releases an Occasional paper series on current scientific topics.
- * Australian Institute of Marine Science (AIMS) AIMS provides research on tropical marine ecosystems including data on climate change, biodiversity and sustainability.
- * Geoscience Australia Geoscience Australia provides a range of spatial information including maps, data and publications on topics such as energy, groundwater, marine and coastal areas, minerals and hazards.
- * Sustainability Victoria - www.sustainability.vic.gov.au
- * Birdlife Australia

From:
Sent: Thursday, 15 March 2018 11:01 AM
To: Parks Victoria Mailbox
Subject: Belfast Coastal Reserve

I wish to object to Parks Victoria allowing race horses to train on the beach at Belfast Coastal Reserve, surely if it is a reserve it should be treated as a protected area. Dogs off leash should also be banned, small native birds have little chance of survival against both horses hooves and dogs that naturally hunt.

From:
Sent: Thursday, 15 March 2018 6:16 PM
To: ParkPlanMailbox
Subject: Horse Training at Levy's Beach

To the Manager of Parks Planning Victoria,

I am the owner of a horse and have owned a couple of others in the past who have utilised Levy's Beach as a regular part of their training programs. I feel it's my duty to also attempt to speak on behalf of the animal I have known and loved all my life.

I'm unsure if you have ever been or are at all involved with horses in particular racehorses, however I would still like to explain the need to retain the beach for use by horses. The horse I currently own the saltwater and dunes have seen such a dramatic increase in his soundness, happiness Just like humans they are fickle creatures who require constant stimulation to prevent boredom and to increase enrichment. The facilities at Levy's Beach have for many years increased the longevity of horses careers and lives.

In addition, there are the livelihoods of hundreds of staff employed either directly or indirectly inside the racing industry that will likely be affected if trainers are unable to use the beach as a draw. Please consider the repercussions of any decision made.

Regards,

From:
Sent: Thursday, 15 March 2018 4:52 PM
To: ParkPlanMailbox
Subject: Horse training on beaches in south west Victoria.

I am sending this email as I object to these beautiful areas being destroyed by horse training. I cannot understand how anyone can think that a commercial enterprise such as horse racing can take precedence over the preservation of an area that has been in existence for a very long time and that supports rare and precious native species. I also don't understand the need for this racing training to be done on a natural habitat when a similar environment of sand track could be established on other land that does not support a natural environment. Please keep these rare and precious beaches.

Sent from my iPad

From:
Sent: Friday, 16 March 2018 1:08 PM
To: ParkPlanMailbox
Subject: RE: Training horses on local beaches

To whom it may concern,

we have been involved in horse's in the Warrnambool area

horse's because of the
way he trained using the beach and dunes he choose to get involved, as he thought it was a
great way to getting the horses really fit.

We love the idea of using the beach we also believe that it has played a big part in our horse's
not only getting to the track but to perform. If this was to change I believe it will have a major
affect on the area, not just the horse people who train and use the beach but also on the local
economy, who rely on us

putting money back into local businesses.

Also we believe that the horse trainers who use these beaches have the greatest respect for the
beach and surrounding environment; so I am supporting those people who need to maintain
the businesses for them and there families.

Kind regards,

From:
Sent: Friday, 16 March 2018 4:20 PM
To: ParkPlanMailbox
Subject: Reg warnambool beach training support submission

To whom it may concern,

As an owner of horses trained in warnambool, The opportunities beach training presents as well as the Relaxed country environment the district has to offer is the key Reason why I will continue to support the continuation of horse Training in the Region, If this opportunity was not available the horse's would be limited in their Opportunity's and potentially have to retire from racing altogether, This would have a huge effect on the local horse trainers, horse numbers Would decrease as well as taking away the opportunity for any return To continue to fund future horses to be trained in the region.

The opportunity to train horses on levy's beach and the dunes is critical For the on going success of horse training in warnambool which I am supportive of.

Kind regards

Sent from my iPad

From:
Sent: Thursday, 15 March 2018 10:31 PM
To: ParkPlanMailbox
Subject: Submission for continuing Thoroughbred Beach Training

Friday 16 March 2018

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

As an owner of horse/s trained in Warrnambool, the opportunities beach training presents as well as the relaxed country environment the district has to offer is the key reason why I will continue to support the continuation of horse training in the region.

If this opportunity was not available, the opportunities for these horses would become limited, thus there would be potential for them to retire from racing all together. This would have huge effect on the local horse trainers, horse numbers would decrease as well as taking away the opportunity for any return to continue to fund future horses to be trained in the region.

The opportunity to train horses on Levy's Beach and the dunes is critical for the ongoing success of horse training in Warrnambool which I am fully supportive of.

Regards,

From:
Sent: Friday, 16 March 2018 2:26 PM
To:
Subject: VIC LABOUR-on the nose- COASTAL RESERVE TRASHED

To: respected government ministers and staff and local government staff and local Councillors,
Re: State Government of Victoria AU <https://engage.vic.gov.au/belfast/> / Moyne Shire land managers for important strip of fragile coast

PROCESS

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Racing Victoria a delivery partner (see page 57 Word Doc – Belfast Coastal Reserve Draft Management Plan).

KILLARNEY BEACH WILL BE A PERMANENT RACE HORSE TRAINING LOCATION.



Photo – Killarney beach before / after training

From:
Sent: Thursday, 15 March 2018 4:24 PM
To: ParkPlanMailbox
Subject: Warrnambool Beach Training Support Submission

Thursday 15th March

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke Street
Melbourne VIC 3000

To Whom it may concern,

Re: Warrnambool Beach Training Support Submission

As an owner of a horse trained in Warrnambool, the opportunities beach training presents as well as the relaxed country environment the district has to offer is the key reason why I will continue to support the continuation of horse training in the region, As I have a horse currently being trained in Warrnambool, I honestly believe if beach training is stopped this would make me reconsider my horse being trained in Warrnambool and unfortunately stop the support of local trainers in the western districts. Beach work is also known to benefit all kinds of horses, so please for the sake of the region and the horses allow beach training to continue or it will be a huge loss to the district.

If this opportunity was not available for these horses it would then become limited for them, thus there would be potential for them to retire from racing or owners will relocate their horses. This would have a huge effect on ALL local horse trainers, horse numbers will decrease as well taking away the opportunity for any to return and continue to fund future horses to be trained in the region. The opportunity to train horses on Levy's beach and the dunes is critical for the ongoing success of horse training in Warrnambool which I am fully supportive of.

Regards

15 March 2018.

The Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke Street
MELBOURNE VIC 3000

EMAIL – ParkPlan@parks.vic.gov.au

Dear Sir/Madam,

**BELFAST COASTAL RESERVE
DRAFT COASTAL MANAGEMENT PLAN JANUARY 2018**

I enclose my Submission for your consideration.

Yours truly,

SUBMISSION IN RESPECT OF THE BELFAST COASTAL RESERVE DRAFT COASTAL MANAGEMENT PLAN JANUARY 2018

Submission by

15 March 2018

I accept and approve the Vision as stated in clause 2.1 of the draft, page 7, on the understanding that the reference to *Horse Riding* in the 4th paragraph is to *Recreational Horse Riding*. For many years, the Reserve has been a place to escape to an unspoiled natural environment. This is the key attribute and attraction of the Reserve to local residents and tourists alike.

Once this Vision is adopted, I cannot see how the re-introduction and maintenance of commercial training of racehorses can be countenanced, or found a place.

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My Submission focuses on two aspects:

- A. The use of the Reserve for the commercial training of racehorses.
- B. The restriction of dogs "off-leash" in the Eastern Coastal and Recreation Zone.
- C. Attachments.

A. The Use of the Reserve for Commercial Training of Racehorses

1. I oppose in principle the commercial use of public land for private and commercial purposes in respect of coastal land. The principles established by the Coastal Management and Coordination Committee (under the Crown Land (Reserves) Act 1978) were that a use sought to be established on reserved coastal land, first should be consistent with the terms of the reservation, and secondly, was a use which would be complementary to the purpose of the Reservation, and of necessity could not be performed other than on the coastal land.

These principles have broadly been followed under later legislation, and the general present Reservation of coastal land for the protection of the coastline.

2. The land east of Rutledge's Cutting was preserved permanently in 1873 "... for the purpose of being sown and planted in order to prevent irruptions of sand thereon." See the attached copy of a section of the Parish Plan.

The Gazettal and the Shire of Warrnambool, on 5 January 1910 made Regulations for the care and management of such of the Reserve within the Shire as follows:

- "1. The Reserve shall be open to the public from sunrise to sunset.
2. No person shall enter or remain in the Reserve who may offend against decency as regards dress, language or conduct.
3. No person shall damage in any way the trees, shrubs, flowers or grasses in the Reserve nor shall fires be lighted therein.
4. No person shall put in the Reserve, or turn loose or allow to wander therein, any horses, cattle, goats or pigs" (Gazette 2 March 1910 page 1624 attached)"
3. Horse racing and commercial horse training are private industries. The Warrnambool Racing Club and the commercial trainers are not "the public".
By its very nature, it is a private club and not a public body.
4. The intense training of racehorses in the Reserve is the antithetic to the purposes of the Reservation.
5. Commercial training of horses is not a permitted use under the planning scheme. Public Conservation and Resource Zone, clause 36.03.
6. Much as Warrnambool Racing Club might argue to the contrary, commercial horse training is not a recreation.

7. In recent years, the new intensity of training horses in the Reserve has shown itself to be an undesirable use. The crowding of access areas for unloading horses, their excrement, the damage inflicted by deep tracks in the dunes, and access tracks over the fore dunes to the beaches are but examples of the problems. The conduct of the operators towards co-users reputedly has been aggressive.
8. I do not believe that any licensing scheme will ameliorate these disadvantageous outcomes.
9. Substantial infrastructure will be needed. For instance, at the Levy's Point carpark, a larger hard surfaced area will be required. Manure collection and disposal points established. Toilet facilities provided. The facility must be manned to monitor the licensed daily-users. At the other proposed licensed areas, similar facilities would be required.
10. If it is resolved that horse training is to be permitted, then the Golfies and Rutledge Cutting proposals seem appropriate.
11. In the Eastern Conservation and Recreation Zone, training should be restricted to the beach between Big Baldy and Spooky's. The beach east of Spooky's should be excluded from training.

This would enable unloading facilities to be constructed off and north of the dune around what is marked as "Proposed Gate" on the Plan, adjacent to the track into Spooky's.

12. If training of horses is to be permitted from Big Baldy to Spooky's, then specific conditions should be included in the Strategy on page 64.
13. This would ensure that the wild and natural environment of the beach would be preserved in the area from Spooky's toward Thunder Point, which in my experience, is the beach most frequented by local pedestrian traffic.

If training is to be permitted, it should be at an appropriate fee which should be per horse per day. A fee of \$20 would cost the "owners" of the horses one day a week, \$1,040 a year. This would go some way to recover the start-up cost of the facilities and annual cost of supervision of the trainers. Nevertheless it would not give any compensatory benefit to the public.

14. My submission is that there be no commercial training on any of the beaches. The Warrnambool Racing Club should provide its own facilities.

**B. Eastern Conservation and Recreation Zone
Dogs Off-Leash**

1. I have walked dogs mainly in the afternoons. Until the more recent increase in intensity of horse use of the beach, I have always marvelled that on many days, mine are the only footprints on the beach. I have watched the ebb and flow of the fore dune, the opening up of pedestrian tracks to the beach and their closure by overgrowth or wind blown sand.
2. On most occasions there have been no more than 4 or 5 fishermen or walkers on the beach. Only about half have dogs.
3. I am surprised therefore that there is perceived to be a problem with dogs off-leash in this area. I have never experienced any other persons or dogs being frightened by my dogs.

I have not noted the presence of any hooded plover nestings. There are generally few small birds in this area, which is mostly populated by seagulls.
4. Therefore apart from the hooded plover season, I see no case to treat the Eastern Coastal and Recreation Zone differently to the Killarney Zone, with off-leash permitted from 1 March to 30 November.
5. I also believe the presence of hooded plover in this area should be monitored, and the restriction released if hooded plover are found not to be nesting in this area.
6. I submit that the Mornington case study is not apposite. Mornington population would be much more concentrated in its visit to the Mornington Beach, than Warrnambool residents visit Levy's Beach.
7. Certainly the restriction of dogs being on-leash is not consistent with allowing 20 or more horses to thunder along the beach in the Eastern Coastal and Recreation Zone.
8. The Strategy in clause 6.4 on page 62 should be amended to delete the reference to licensing horse training at Levy's Beach, and by introducing an off-leash season for dogs to be walked. The Goal and Strategy on page 61 also needs to be amended in respect of dogs on-leash 365 days.

C. Attachments

1. Gazette, 1873 page 318
2. Section of the Parish Plan
3. Gazette, 2 March 1910 page 1624

1873 17 318

PROPOSED REVOCATION OF THE TEMPORARY RESERVATION OF LANDS.

IN pursuance of the provisions of The Land Act 1869 (33 Vict. No. 399, § 6 and 8): Notice is hereby given that it is the intention of the Governor, with the advice of the Executive Council, to revoke the temporary reservation of the lands hereinafter referred to after the expiration of four weeks from the first publication of notice in each instance, viz.:-

The following Notices were Gazetted 1st on 24 January 1873, pursuant to Order of 20 January 1873.

PARTYBATH.—The temporary reservation, by Order of the 20th of July 1871, of two acres of land in the parish of Panny-ybur for Common school purposes is about to be revoked.—(72.L.21143.)

The following Notices were Gazetted 1st on 31 January 1873, pursuant to Order of 27 January 1873.

BEMALLA.—The temporary reservation, by Order of the 4th June 1866, of twenty-six acres two rods, more or less, of land in the town of Bemalla for a Public Park, is about to be revoked.—(70.L.16743.)

BERKELEY'S TOWN RESERVE.—The area in the Shire of Berkeley, temporarily reserved, by Order of the 24th October 1870, for the purpose of affording a supply of Firewood, and diminished by Order of the 6th December 1872, is about to be further diminished by revoking the temporary reservation of the portion thereof comprised within the boundaries described as follows, viz.:- Commencing at a point on the north boundary of the parish of English distant about sixty-eight chains from the south-west angle thereof; thence by that boundary bearing east forty chains; thence by lines bearing respectively north eighty chains, west forty chains, and south eighty chains to the point of commencement.—(72.G.22015.)

The following Notices were Gazetted 1st on 11 February 1873, pursuant to Order of 11 February 1873.

CARRONGH.—The site in the parish of Carrongh temporarily reserved for Watering purposes, by Order of the 16th December 1864, is about to be diminished by revoking the temporary reservation of the portions thereof comprised within the boundaries hereinafter described, viz.:- Twenty-two acres one rod thirty-seven perches, county of Grenville, parish of Carrongh. Commencing at the north-east angle of allotment 1 of section 4; thence by lines bearing respectively north seven chains sixty-five links, west twelve chains, north six chains sixty-seven links, and east twenty-two chains eleven links; thence by a road bearing south fourteen chains thirty-two links; and thence by allotment 4: bearing west ten chains eleven links to the point of commencement.—(72.H.2624.)

MOSHWARRE.—The temporary reservation, by Order of the 23rd September 1861, of two rods of land in the parish of Moshwarre, being part of allotment 14 of section 5, for Temperance Hall, is about to be revoked.—(61.D.516.)

J. J. CASEY,
Minister of Lands and Agriculture, and
President of the Board of Land and Works.

Lands and Survey Office,
Melbourne.

LANDS PROPOSED TO BE PERMANENTLY RESERVED FROM SALE.

IN pursuance of the provisions of The Land Act 1869 (33 Vict. No. 399, § 6 and 8): Notice is hereby given that it is the intention of the Governor, with the advice of the Executive Council, to reserve from sale permanently the lands hereinafter described, for the purpose stated, after the expiration of four weeks from the first publication of the description, viz.:-

The following notices were Gazetted 1st on 24 January 1873, pursuant to Order of 20 January 1873.

VENNERA.—Site for Town Hall purposes, about to be permanently reserved.—One rod sixteen perches and a half, county of Rodney, town of Echuca, being part of allotment 4 of section 1; Commencing at the intersection of the eastern side of High street by the northern side of Hoyparth street; bounded thence by the first-named street bearing N. 11° W. fifty-six feet three inches; thence by lines bearing respectively N. 75° E. twenty-six feet six inches, S. 11° E. seven feet nine inches, N. 75° E. ninety-six feet six inches, N. 11° W. forty-seven feet, and S. 75° W. one hundred and twenty-three feet to High street aforesaid; thence again by that street bearing N. 11° W. thirty-six feet six inches; thence by allotment 3 bearing S. 75° E. one hundred and sixty-five feet; thence by allotments 6 and 7 bearing S. 11° E. one hundred and thirty-two feet to Hoyparth street aforesaid; and thence by that street bearing S. 75° W. one hundred and sixty-five feet to the point of commencement.—(72.E.4453.)

VENNERA.—Site for Court House purposes, about to be permanently reserved.—Twenty perches and a half, county of Rodney, town of Echuca, being part of allotment 4 of section 1; Commencing on the eastern side of High street, at a point distant N. 11° W. fifty-six feet three inches from the intersection of the said side of that street by the northern side of Hoyparth street; bounded thence by lines bearing respectively N. 75° E. twenty-six feet six inches, S. 11° E. seven feet nine inches, N. 75° E. ninety-six feet six inches, N. 11° W. forty-seven feet, S. 75° W. one hundred and twenty-three feet to High street aforesaid; and thence by that street bearing S. 11° E. thirty-nine feet three inches to the point of commencement.—(72.E.4455.)

GEORONG.—The unappropriated Crown lands on that portion of the shore of Port Phillip Bay lying within the boundaries of the town of Geelong, as shown on the plans deposited at the Crown Lands Office, Melbourne, are about to be permanently reserved for Public purposes.—(72.H.21787.)

QUONACILLU.—The unappropriated Crown lands on that portion of the shore of Port Phillip Bay lying within the boundaries of the borough of Quonacillu, as shown on the plans deposited at the Crown Lands Office, Melbourne, are about to be permanently reserved for Public purposes.—(72.H.21787.)

The following Notices were Gazetted 1st on 14 February 1873, pursuant to Order of 11 February 1873.

TARALIA.—Site for Watering purposes about to be permanently reserved.—One acre three rods twenty-three perches, county of Normanby, parish of Tabara, being part of allotment 10 of section 11; Commencing on the right bank of McLeod's creek, at the point where the south-western boundary of allotment 6 abuts thereon; bounded thence by that allotment bearing N. 44° 34' W. seven chains fifty links to the road from Geelong to Morino; thence by that road bearing S. 45° 30' W. one chain; thence by the line licensed to Thomas Leckie bearing S. 41° 24' E. five chains, S. 75° E. three chains twenty-six links, S. 65° W. eight chains ninety links, and S. 21° 40' E. ninety-two links, to the aforesaid creek; and thence up that creek to the point of commencement.—(72.H.26262.)

WARRAMBOOL (KAROSBY).—The Crown land within the boundaries hereinafter described is about to be permanently reserved for the purpose of being sown and planted in order to prevent irruptions of sand thereon, viz.:-County of Villiers, parish of Yaugery, near Warrambool; Commencing on the right bank of the Murrumbidgee at its mouth; thence by that river and by the southern margin of a swamp north-westerly to George's land; thence by that lane and a line southerly to the sea coast; and thence by the sea coast to the point of commencement; as shown on the plan deposited at the Crown Lands Office, Melbourne.—(72.H.25337.)

J. J. CASEY,
Minister of Lands and Agriculture, and
President of the Board of Land and Works.
Lands and Survey Office,
Melbourne.

LANDS PERMANENTLY RESERVED FROM SALE.

IN pursuance of the provisions of The Land Act 1869 (33 Vict. No. 399, § 6 and 8), and in fulfillment of intention duly notified, the Governor, with the advice of the Executive Council, has reserved from sale permanently the lands hereinafter referred to pursuant to notices given in the issue of the Government Gazette mentioned in each instance and in subsequent issues thereof, viz.:-

Received by Order of 20 December 1872.
DANLEYSFORD.—Site for Borough Offices. See Gazette of 28th January 1864.

Received by Order of 13 January 1873.
CARLTON.—Site for Medical School. See Gazette of 15th November 1871.

ESPLANADE HILL.—Site for Public Gardens. See Gazette of 15th November 1872.

MALDEN.—Site for Church of England Place of Public Worship. See Gazette of 16th November 1872.

WARRAMBOOL.—Site for Church of England Place of Public Worship and Minister's Dwelling. See Gazette of 15th November 1872.

WILLIAMSTOWN.—Site for Temperance Hall. See Gazette of 29th November 1872.

D. GILLIES,
Vice-President of the Board of Land and Works.
Lands and Survey Office,
Melbourne.

TEMPORARY RESERVATION OF CERTAIN LANDS REVOKED.

IN pursuance of the provisions of The Land Act 1869 (33 Vict. No. 399, § 6, 7, and 8), and in fulfillment of intention duly notified, the Governor, with the advice of the Executive Council, has revoked the temporary reservation of the lands hereinafter referred to, pursuant to notice given in the issue of the Government Gazette mentioned, and in subsequent issues thereof, viz.:-

Revoked by Order of 16 December 1872.
SANDHURST (GRASSY FLATS).—Reservation for Survey Pad-dock, by Order of 3rd August 1863, revoked. See Gazette of 15 November 1872.

D. GILLIES,
Vice-President of the Board of Land and Works.
Lands and Survey Office,
Melbourne.

SALE (No. 3563) OF CROWN LANDS BY TENDER AT CHILTERN, ON 18th FEBRUARY 1873.

WITH reference to the notification contained in the Government Gazette of the 17th ultimo, relative to a sale of certain Crown lands to be held at Chiltern on the 18th instant: Notice is hereby given that lots 11, 14, and 16 have been withdrawn from sale.

J. J. CASEY,
Minister of Lands and Agriculture, and
President of the Board of Land and Works.
Lands and Survey Office,
Melbourne, 17th February 1873.

March 2, 1910

1624

Victoria Gazette

to time be made by the Board of Land and Works, and the Mayor, Councillors, and Citizens of the said City of Collingwood: And whereas by section 200 of the *Land Act 1901* it is provided that where any such land has been vested in trustees or jointly with the Board of Land and Works and trustees, it shall be lawful for the trustees of any such land, with the approval of the Governor in Council, from time to time to make rules and regulations for all or any of the purposes mentioned in clause 1 of the said section: Now therefore the Board of Land and Works, and the Council of the City of Collingwood, do hereby make the Regulation following in respect of the said Darling Gardens:—

REGULATION.

The undermentioned gentleman shall be a member of the Committee of Management to exercise control over the said Darling Gardens:—

WILLIAM RAIN,

in the room of Edgar Wilkins, resigned.

Provided nevertheless that the said William Rain shall hold office as a member of the Committee of Management of the said Darling Gardens for so long only as he may continue to be a Councillor of the said City of Collingwood.

The common seal of the Board of Land and Works was herewith affixed this 22nd day of October, 1909, in the presence of—

(SEAL) H. MCKENZIE, President.
J. W. SKENE, Member.

The common seal of the Mayor, Councillors, and Citizens of the City of Collingwood was herewith affixed in the presence of—

(SEAL) H. EVANS, Councillor.
E. J. BROWN, Councillor.
W. R. BUTCHER, Town Clerk.

Approved by the Governor in Council,
24th February, 1910.

F. W. MARRIOTT,
Clerk of the Executive Council.

REGULATIONS FOR THE CARE, PROTECTION, AND MANAGEMENT OF SUCH PORTION OF THE LAND IN THE PARISH OF YANGERY, NEAR WARRAMBOOL, RESERVED FOR THE PURPOSE OF BEING SOWN AND PLANTED TO PREVENT THE IRRUPTION OF SAND, AS SITUATE WITHIN THE SHIRE OF WARRAMBOOL.

THE Council of the Shire of Warrambool, being the duly appointed Committee of Management of such portion of the land in the Parish of Yangery, near Warrambool, permanently reserved by Order in Council of 28th April, 1873, for the purpose of being sown and planted to prevent the irruption of sand, as is situate within the said Shire of Warrambool, having framed

the following Regulations for the care, protection, and management thereof, and for the preservation of good order and decency therein, submit the said Regulations to the Board of Land and Works, to be made by such Board, in pursuance of the powers conferred by section 199 of the *Land Act 1901*.

REGULATIONS.

1. The Reserve shall be open to the public from sunrise to sunset.
 2. No person shall enter or remain in the Reserve who may offend against decency, as regards dress, language, or conduct.
 3. No person shall damage in any way the trees, shrubs, flowers, or grasses in the Reserve, nor shall fires be lighted therein.
 4. No person shall put in the Reserve, or turn loose or allow to wander therein, any horses, cattle, goats, or pigs.
 5. No person shall erect any dwelling in the Reserve, or any other structure, without the consent, in writing, of the Committee of Management being first obtained.
 6. No person except labourers and workmen employed in the Reserve shall enter any plots therein which may be enclosed for plantation of young trees and shrubs.
- Every person offending against these Regulations shall, in accordance with section 199 of the *Land Act 1901*, on conviction before any justice, forfeit and pay a penalty not exceeding Five pounds for each offence; and every person who knowingly and wilfully offends against any such Regulations, and who, after he has been warned by any bailiff of Crown lands or any constable, does not desist from so offending, may be forthwith apprehended by such bailiff or constable and taken before such justice of the peace, and shall, on conviction, forfeit and pay a penalty not exceeding Ten pounds.

Dated at Warrambool this 5th day of January, 1910.

(SEAL) DANIEL O'KEEFE,
JOHN GOODEN,
W. O'BRIEN,
JOS. ROWAN,
T. C. BLAIN,
WM. BEVERIDGE,
WILLIAM LINDSAY,
ERNEST R. DE LITTLE,
L. CRAWLEY, Secretary.

Members of the Council of the Shire of Warrambool.

The Board of Land and Works, in pursuance of the powers conferred by the *Land Act 1901*, section 199, do hereby make the foregoing Regulations in respect of such portion of the land in the Parish of Yangery, near Warrambool, permanently reserved by Order in Council of 28th April, 1873, for the purpose of being sown and planted to prevent the irruption of sand, as is situate in the said Shire of Warrambool.

The common seal of the Board of Land and Works was herewith affixed this 2nd day of February, 1910, in the presence of—

(SEAL) H. MCKENZIE, President.
J. M. REED, Member.
(10/C.47318.)

Land Acts.

VILLAGE SETTLEMENT LAND AVAILABLE UNDER SECTION 318 OF THE LAND ACT 1901 AS AMENDED BY THE LAND ACT 1904.*

THE undermentioned allotment is available for application at the Office of Lands and Survey. All applications lodged on or before Wednesday, 30th March, 1910, will be deemed to have been simultaneously made.

NOTE.—Incoming tenant to pay value of improvements (if any) on this allotment.

H. MCKENZIE,
Commissioner of Crown Lands and Survey.

Department of Lands and Survey,
Melbourne, 24th February, 1910.

County.	Parish.	Area.	No. of Allotments.	Section.	Value of Improvements.	Remarks.	Corr. No.
		A. R. P.			£ s. d.		
Talbot	Bellarke	9 2 37	4	1	10 0 0	Formerly held by A. Woodhous.	571/318

* Settlers already holding Village Settlement Allotments have the option of applying for a Conditional Purchase Lease (section 316, *Land Act 1901*) for any of these allotments, provided that original holding, together with additional land applied for, does not exceed 1250 in value.

Monday, 19 March 2018

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

As an owner of horse/s trained in Warrnambool, the opportunities beach training presents as well as the relaxed country environment the district has to offer is the key reason why I will continue to support the continuation of horse training in the region.

I have specifically targeted a Warrnambool Trainer to train my horses due to them having access to the Beach because of the many benefits to the Horses soundness short and long term. Plus it enables me and the other Owners to go there for a weekend to watch the Horses work or race and spend some extra time taking in what Warrnambool has to offer.

If this opportunity was not available, the opportunities for these horses would become limited, thus there would be potential for them to retire from racing all together. This would have huge effect on the local horse trainers, horse numbers would decrease as well as taking away the opportunity for any return to continue to fund future horses to be trained in the region.

The opportunity to train horses on Levy's Beach and the dunes is critical for the ongoing success of horse training in Warrnambool which I am fully supportive of.

Regards

Submission template for Draft Belfast Coastal Reserve Management Plan

About you:

Your name:

Your Organisation (if relevant): _____

Postcode:3280

Email or Postal address:

THIS SUBMISSION IS: **CONFIDENTIAL** **NOT CONFIDENTIAL** Date:15/3/2018

Your Comments:

Please Note – The following information will be made publically available.

Main reason for interest: *(such as local resident, visitor to parks, tourism operator, environmental interest, business operator, education interest, scientific interest)*

Local resident, beach user , bird watcher and supporter of cultural heritage

How often do you or your organisation use the reserve?

Daily Weekly Monthly A couple of times a year Rarely Never

How do you or your organisation mainly use the reserve?

Walking or running Dog walking Using the beach (swimming and surfing)

Horse riding Horse training Volunteering

Camping Hunting Fishing/boating

Picnicking Birdwatching Socialising

Other (please specify): _____

Which part(s) of the reserve do you or your organisation most frequently use?

West of Killarney (Port Fairy side) Between Killarney and Big Baldy

East of Big Baldy (Warrnambool side) Not sure

Key management theme #2: Healthy Country

How supportive are you of the strategies for ‘Healthy Country’ included in the draft management plan?

- Very supportive Supportive Not sure/Don’t know
- X Unsupportive Very supportive

Comments: *(Your submission can be as short or long as you wish. Put comments under relevant headings corresponding to plan sections or strategies, noting page and paragraph numbers. Attach more pages if required).*

☒ “Large areas of the Reserve will be managed for the primary objective of conservation as reflected in the zoning.

☒ The protection of vulnerable fauna such as Hooded Plover will require reducing threats to these species through controls on the key impacting activities of dogs, horses and people.” (p.41)

Zoning by itself will do nothing to protect threatened species , why not zone the entire area as a conservation zone, which would reduce the amount of policing with periods of entitlement being non existent.

I do not believe the strategies of allowing commercial horse training and off lead dogs into area will be adequately supervised or controlled. Already horse training activities on these areas have had many breaches of the guidelines and also has a history of operarating under the cover of darkness. The remoteness of these activities will make checking compliance very difficult.

Considering the commercial aspects of allowing horses to be trained on public spaces, I believe the Warrnambool Racing Club received financial assistance to construct a sand track at the racecourse. It is my opinion that horses should be trained there, the saying “horses for courses” obviously came from somewhere.

As well as the beaches and intertidal zones the entire area is significant for many “ over wintering “ species of birds which would p[robably apreciate not having to deal with dogs and horses.

Wilson and Seeny (2009) determined that horses caused the greater degree of trail erosion as they loosen soils to a greater degree than hikers and motorcyclists, due to their relative weight and high exerted ground pressure. Sand dunes sensitivity to disturbance, can lead to loss of habitat, reduced seed sources and increased risk of dune erosion by storms. (p.44)

Submission template for Draft Belfast Coastal Reserve Management Plan

About you:

Your name:

Your Organisation (if relevant): _____

Postcode:

_____3280_____

Email or Postal address:

THIS SUBMISSION IS: **CONFIDENTIAL** **NOT CONFIDENTIAL** Date: 15Mar18_____

Your Comments:

Please Note – The following information will be made publically available.

Main reason for interest: *(such as local resident, visitor to parks, tourism operator, environmental interest, business operator, education interest, scientific interest)*

Visitor and scientific interest

How often do you or your organisation use the reserve?

- Daily Weekly Monthly A couple of times a year Rarely Never

How do you or your organisation mainly use the reserve?

- | | | |
|--|--|---|
| <input checked="" type="checkbox"/> Walking or running | <input type="checkbox"/> Dog walking | <input type="checkbox"/> Using the beach (swimming and surfing) |
| <input type="checkbox"/> Horse riding | <input type="checkbox"/> Horse training | <input type="checkbox"/> Volunteering |
| <input type="checkbox"/> Camping | <input type="checkbox"/> Hunting | <input type="checkbox"/> Fishing/boating |
| <input type="checkbox"/> Picnicking | <input checked="" type="checkbox"/> Birdwatching | <input type="checkbox"/> Socialising |
| <input type="checkbox"/> Other (please specify): _____ | | |

Which part(s) of the reserve do you or your organisation most frequently use?

- West of Killarney (Port Fairy side) Between Killarney and Big Baldy
 East of Big Baldy (Warrnambool side) Not sure

15th Mar 2018

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

I am writing this letter in support of the continuation of beach training in Warrnambool and the surrounding Belfast Coast.

that is also very therapeutic and utilising the beach has given many horses the opportunity to prolong their racing careers.

to provide and maintain employment opportunities and further investment in the local community.

Due to the proximity of Levy's Beach, I firmly believe that horses on the beach and in the dunes is a realistic and very manageable. Additionally, a key element of gaining access to the Levy's Beach is having access to the area from sunrise to midday, 7 days a week, to ensure it is able to be utilised by all trainers large and small.

have always held the view that people are always interested and given the opportunity will ask you your horses name this add to the atmosphere of a beach holiday for many people with some attending just to look at the horses.

I fully support the Warrnambool Racing Club, Racing Victoria and Country Racing Victoria to enable beach training to continue.

Regards,

Friday, 16 March 2018

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

I am writing to support this submission from licensed people for the continuation of Horse Training on the local beaches on the Warrnambool and Belfast coasts.

The beach and dune training is an important for the rehabilitation of horses, which are not suitable to the everyday rigours of track work, so they can continue to race well, and provide financial benefits to their owners, and those who treat them, (eg; feed merchants, farriers, Vets, masseuse and Saddleries), which has a flow on effect into the community.

I fully support the effects of the bodies who have contributed submissions to enable the beach training to continue.

Regards

Tuesday, 13 March 2018

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

As an owner of horse/s trained in Warrnambool, the opportunities beach training presents as well as the relaxed country environment the district has to offer is the key reason why I will continue to support the continuation of horse training in the region.

Horses thrive on variety and the fact that so many very successful horses have been trained at Warrnambool with beach access is testament to the enormous benefit the sea water and sandhills can bestow!

If this opportunity was not available, the opportunities for these horses would become limited, thus there would be potential for them to retire from racing all together. This would have huge effect on the local horse trainers, horse numbers would decrease as well as taking away the opportunity for any return to continue to fund future horses to be trained in the region.

The opportunity to train horses on Levy's Beach and the dunes is critical for the ongoing success of horse training in Warrnambool not only for the welfare of the horses but also for health of the local economy. Many jobs and businesses would be impacted if the beach access was restricted or banned.

Thursday, 15 March 2018

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

I would like to register my support for the continuation of training access to the beach. As an owner of horses that have been trained in Warrnambool, I totally believe that beach training presents the opportunity to add wonderful variety to the training of our horses as well as a beautiful experience for the people who work, love and care for the racehorses.

I chose to have my horses trained in Warrnambool specifically because of the beach and dune access. It is very beneficial for the well being of the horse to experience different modes of training and the beach and dunes provides much needed variety and enjoyment. If a horse is happy then they are more likely to perform at their optimum.

The racing industry is a massive industry with thousands of people earning an income from training, farriers, transport, veterinary services, groundspeople and administration. It is key to the health and vitality of the economic community to keep the industry functioning in the best possible way. To take away the access to the dunes and beach would have a negative impact on the financial health of many people because if it were not for the beach training the Warrnambool training facilities would be just like all the other training place!

Warrnambool is a choice because of the beach training if it is needed to assist the horse to perform to the best of his/her ability.

Horses who have had injuries particularly benefit from the special training at the beach. It is quite likely that without beach training many injured horses would need to be retired. This would have huge effect on the local horse trainers, horse numbers would decrease as well as taking away the opportunity for any return to continue to fund future horses to be trained in the region.

I am in total support of the opportunity to train horses on Levy's Beach and the dunes as it is critical for the ongoing success of horse training in Warrnambool.

Regards,

Friday, 16 March 2018

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

Access to the beach and salt water is essential to the training and maintenance of race horses. You would think with the large expanse of coastline it should be possible for all groups to come to a fair and balanced outcome.

I don't accept that horses on the sand disrupt plovers in the dunes when you consider foxes, wild cats, dogs, hawks, crows etc. roam at will and are constantly looking for food.

If the powers to be were to start with a blank page the first industry they would be trying to attract to the district would be the racing-training industry. Council's and Government's cannot ignore vacant shops and the demise of Murray Goulburn, but don't turn your back on the racing industry because it is already established here. Its economic value is difficult to predict, but along with the May Carnival supplies many millions and employment for the district and local economy.

The positive publicity generated by Prince Of Penzance and Michelle Payne could not be valued, and with the training "edge" of the dunes and salt water and beach access this history making event will be repeated, and we all hope a statue is erected.

Warrnambool Racing Club

Thursday, 9 August 2018

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

I chose to have them trained at Warrnambool purely based on having access to the local beaches
I believe that the horses have a longer career with far less or nil
injuries.

If access to the beaches would be taken away from the trainers I would consider moving
as Warrnambool would no longer have any significant benefit for me in my view.

I believe any decision to stop the beach access would have a significant impact on not only the horse
trainers but also the local businesses.

Regards

Tuesday, 13 March 2018

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

As an owner of horse/s trained in Warrnambool, the opportunities beach training presents as well as the relaxed country environment the district has to offer is the key reason why I will continue to support the continuation of horse training in the region.

If this opportunity was not available, the opportunities for these horses would become limited, thus there would be potential for them to retire from racing all together. This would have huge effect on the local horse trainers, horse numbers would decrease as well as taking away the opportunity for any return to continue to fund future horses to be trained in the region.

The opportunity to train horses on Levy's Beach and the dunes is critical for the ongoing success of horse training in Warrnambool which I am fully supportive of.

Regards,

Wednesday, 14 March 2018

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

As an owner of horse/s trained in Warrnambool, the opportunities beach training presents as well as the relaxed country environment the district has to offer is the key reason why I will continue to support the continuation of horse training in the region.

Without access to beach training I have no doubt horse numbers would be lost to local trainers resulting in a negative flow on effect to the local economy.

If this opportunity was not available, the opportunities for these horses would become limited, thus there would be potential for them to retire from racing all together. This would have huge effect on the local horse trainers, horse numbers would decrease as well as taking away the opportunity for any return to continue to fund future horses to be trained in the region.

The opportunity to train horses on Levy's Beach and the dunes is critical for the ongoing success of horse training in Warrnambool which I am fully supportive of.

Regards,

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Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
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Re: Warrnambool Beach Training Support Submission

As an owner of horse/s trained in Warrnambool, the opportunities beach training presents as well as the relaxed country environment the district has to offer is the key reason why I will continue to support the continuation of horse training in the region.

Without access to beach training I have no doubt horse numbers would be lost to local trainers resulting in a negative flow on effect to the local economy.

If this opportunity was not available, the opportunities for these horses would become limited, thus there would be potential for them to retire from racing all together. This would have huge effect on the local horse trainers, horse numbers would decrease as well as taking away the opportunity for any return to continue to fund future horses to be trained in the region.

The opportunity to train horses on Levy's Beach and the dunes is critical for the ongoing success of horse training in Warrnambool which I am fully supportive of.

Regards

Thursday, 9 August 2018

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

As a long term owner of horses (with now most trained in Warrnambool) I have found the opportunities beach training has provided has been most beneficial to my horses. The relaxed environment where the horses can fully benefit from swimming and working on the sand has enhanced and prolonged their racing career.

If Beach training was not available, the opportunities for these horses would become restricted and in some cases I believe there would be potential for them to retire from racing all together. It goes without saying this would have huge effect on the local horse trainers, horse numbers would decrease as well as taking away the opportunity for any return to continue to fund future horses to be trained in the region.

I firmly believe the opportunity to train horses on Levy's Beach and the dunes is critical for the ongoing success of horse training in Warrnambool.

Regards,

Thursday, 15 March 2018

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

As an owner of horse/s trained in Warrnambool, the opportunities beach training presents as well as the relaxed country environment the district has to offer is the key reason why I will continue to support the continuation of horse training in the region.

Though not a veterinarian, I truly believe that the horses having the ability to train on the beach, gives them a much better physique and makes them stronger as a result.

If this opportunity was not available, the opportunities for these horses would become limited, thus there would be potential for them to retire from racing all together. This would have huge effect on the local horse trainers, horse numbers would decrease as well as taking away the opportunity for any return to continue to fund future horses to be trained in the region.

The opportunity to train horses on Levy's Beach and the dunes is critical for the ongoing success of horse training in Warrnambool which I am fully supportive of.

Regards.

Belfast Coastal Reserve - Draft Management Plan Submission by

This submission is not confidential. My main interest in the subject area is that I make regular visits and I have a strong interest aboriginal cultural heritage, in birds and in the environment, indeed, these are the major reasons I visit the area.

I can say that your plans to protect cultural heritage are important to us.

In some areas you have made assumptions of things that cannot be changed and must be accepted. By doing this, it is then harder to fix some of the problems identified. If something cannot be fixed, then you must explain this and say why it is not worth the effort to fix and commence the debate on whether that is something the community agrees with.

I am interested in the Hooded Plovers and other birds that nest on the foreshore and would welcome beach closures and anything else that is needed to support the effectiveness of their breeding. That your plan to increase the area available to racehorse training in sensitive areas is not welcomed by me. I would want them removed entirely during times when birds are raising young as a minimum level of protection. This will not help with erosion, but may protect some birds..

Alienating a public area for private use, where other users are prevented from full enjoyment of their uses is never a good idea. You refer to racehorse training as an “authorised use”, but do not convince me that authorising it is a public benefit.

You do not explain how you will mitigate the harm done by horses on the beaches and dunes. Management plans should show how things will get better into the future.

Executive Summary

Management Plans need to be consistent with all the other plans and strategies that relate to the lands under consideration. I do not think that this draft Plan has had a close enough look at the other relevant plans. I thought the Reserve was intended to focus on passive recreation, cultural heritage, wildlife conservation, and dune protection. There needs to be stronger linking of this. I see that your plans are also inconsistent with Warrnambool’s planning scheme, which has the area in a Public Conservation and Resource Zone. Commercial racehorse training is not a listed as a permitted activity here.

The Vision for the Belfast Coastal Reserve

I am partly supportive of the strategic vision. However, the use of the term “horse riding” is not what is really meant. The big issue is with “commercial racehorse training” in this Reserve. These are the horses being ridden and that are doing all the damage and any reference to horse riding should be removed from the Plan.

Key Management Theme #1 Cultural Landscape and Living Heritage

I am somewhat supportive of the plans to maintain the geological features and cultural heritage of the area. Aboriginal people (the Gunditjmarra) have been in this area for tens of thousands of years. It has been changed much since their displacement, but much of the care they did on this country could be reinstated. It is right that you recognise their connection to it and I would think that establishing relationships with them might be a good way of rehabilitating the land. If community are to protect the land, then the government should not make their job harder with new destruction from horses.

Key Management Theme #2 Healthy Country

I support reinstating and maintaining healthy country, but I am not sure how well the Plan addresses the conflicts between the different uses and users. I like the idea of better reducing fire risks, managing the many and varied plant, animal, and fish habitats, reducing pest species, and managing the impact of visitors. Climate change is lurking and the addressing of this will be a huge challenge. How do we build resilience into the environment? It is well that you have identified these issues.

Key Management Theme #3: Recreation and Use

It is not just “recreational use” as stated in the heading when you add in commercial interests. They should not set the agenda for the Plan to support their needs and the Plan’s focus on this then limits to what can be achieved with the Reserve. I like the idea of better management and enforcement of all of the user impacts and better education of users (signage and brochures) to encourage them to act to support the environment objectives.

You seek to control and limit future recreational uses of the Reserve, while giving racehorses an exemption and even a right to expand their impact as a right. This is not a good thing.

I am somewhat concerned about the use of jet skis. Given how fast they can go and how quickly they can turn, they can be a big risk to water birds. I do not think they should be permitted in confined or inland waters.

Dogs should be removed from beaches altogether or be kept on leads when birds are breeding. This would need enforcement.

Key Management Theme #4 Managing in Partnership

It is important that when the Plan is set then all parties involved in carrying it out sign off on it and support its objectives and actions. Perhaps the best way to achieve this is by making the Reserve a national park. The National Parks Act might be the best way of ensuring that activities of the various parties are consistent.

I have seen elsewhere where Parks Victoria has undertaken partnerships with local indigenous groups for land care in National Parks. I believe that this has been successful. I know the local Koorie people do have a strong interest in the condition of this land and I would be very interested to see them involved in this.

Key Management Theme #5 Research and Monitoring

I think that any plan must have actions identified and these must be monitored to ensure that progress is being made. It is all just talk if you do not commit to results and take remedial action along the way when results do not match plans and objectives. To get this part right at the outset, you need to explain how the various problems identified will actually be solved by the planned actions.



PO Box 368
Warrnambool, Vic 3280

admin@djbowmanracing.com
www.djbowmanracing.com
ABN: 64 535 149 875

16th March, 2018

Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne
Vic 3000

To Whom It May Concern,

Re: Warrnambool Beach Training Support Submission

I am writing this letter in support of the continuation of beach training in Warrnambool and the surrounding Belfast Coast.

As a horse trainer, the beaches in the Belfast Coastal area have been a vital part of training each of my horses as an individual and has been a key aspect to my success over the recent years. Horses that have transferred to my stable from metropolitan trainers, have thrived on the relaxed environment of the beaches. The beaches are also very therapeutic and utilising the beaches has given many of my horses the opportunity to pro long their racing careers.

Due to the proximity of Levy's Beach, I strongly believe that 120 horses on the beach and 40 horses in the dunes is a realistic and very manageable number for all trainers in the area. A key elemnet of gaining access to Levy's Beach is having access to the area from sunrise to midday, 7 days a week, to ensure it is able to be utilised by all trainers large and small.

We are very aware of preservation within the Belfast Coastal Reserve and believe horses and wildlife can co-exist in this area with the right management.

The Belfast Coast is a unique aspect of my training and I believe my training career will be severely affected if the beaches were to close.

I fully support the Warrnambool Racing Club, Racing Victoria and Country Racing Victoria to enable beach training to continue.

Regards

Wednesday, 14 March 2018

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

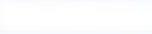
Re: Warrnambool Beach Training Support Submission

As an owner of horse/s trained in Warrnambool, the opportunities beach training presents as well as the relaxed country environment the district has to offer is the key reason why I will continue to support the continuation of horse training in the region.

If this opportunity was not available, the opportunities for these horses would become limited, thus there would be potential for them to retire from racing all together. This would have huge effect on the local horse trainers, horse numbers would decrease as well as taking away the opportunity for any return to continue to fund future horses to be trained in the region.

The opportunity to train horses on Levy's Beach and the dunes is critical for the ongoing success of horse training in Warrnambool which I am fully supportive of.

Regards.



Belfast Coastal Reserve Management Plan

I am writing in support of horses being able to train on the beach as per the agreement reached with Industry.

The habitat has been used by horses for many years with little, if any, deterioration attributable to that use.

The area should also be available to all recreational users as it has been for many years. The idea that the area should be restricted or reserved for particular parties is offensive and not something that should be condoned by a government department that should be supporting the needs of the community while protecting the environment

I am happy to answer any questions you may have

Regards

Friday, 16 March 2018

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

As an owner of [redacted] trained in Warrnambool, the opportunities beach training presents as well as the relaxed country environment the district has to offer is the key reason why I will continue to support the continuation of horse training in the region.

[redacted] this is just one example of what the beach life can offer these magnificent creatures, not to mention the employment opportunities that are provided by trainers who can boost their numbers because of the access to our beaches and dunes, the alternative is not one we like to talk about, however the fact is that these horses would have a shortened life and get to do what they love, run.

If this opportunity was not available, the opportunities for these horses would become limited, thus there would be potential for them to retire from racing all together. This would have huge effect on the local horse trainers, horse numbers would decrease as well as taking away the opportunity for any return to continue to fund future horses to be trained in the region.

The opportunity to train horses on Levy's Beach and the dunes is critical for the ongoing success of horse training in Warrnambool which I am fully supportive of.

Regards,

To the Manager

Parks Victoria Planning

Level 10, 535 Bourke Street

Melbourne VIC 3000

Dear Sir/Madam,

I wish to respond to the Belfast Coastal Reserve Draft Management Plan.

The draft management plan does consider Racehorse trainers, but is short on detail, and has a number of ambiguities.

I don't believe there is any need to have the dark green conservation only zone, but instead believe that the entire Belfast Coast should be a conservation and recreation zone.

The negative debate around horses working on beaches, was a result of a sharp increase of racehorses using Belfast beaches. That combined with the heavy sand use, and an arrogance and selfishness towards other beach users by a couple of stables, set the local community against all Racehorse trainers. Completely understandable,

The resulting monitoring by Parks officers (who were only doing their job) was a massive waste of human resources.

My suggestions are as follows,

- All of the Belfast Coast should be conservation and recreation zone
- The area in the draft set aside for Licensed Racehorse Trainers is good, but should be extended to Big Baldy. Then a large number of horses could be accommodated, allowing smaller numbers back to use Belfast beaches.
- That the Minister acknowledge the different Licence that a 'hobby' trainer holds, compared to a Commercial Trainer. Whilst insurances are mandatory, the number of horses are restricted. The mindset of hobby trainers is similar to recreational riders.
- There would be no need for the Licence system currently granted to Warrnambool Racing Club. Hobby trainers have once again been unfairly treated, and the costs are prohibitive.
- At all Belfast Coast beaches, the maximum 2 horse per trainer per day rule should apply, as per the rules set out in agreement between Moyne Shire and SWOTRA. The logbook method of accountability should suffice as a record and is as simple as it is effective. There could also be a user pay-system
- Moyne Shire should be recognized in a greater management role for the Belfast Coast. It is their backyard. They have also worked hard to establish a rapport with SWOTRA.
- The hobby trainers have co-existed with other beach users and should be able to continue doing so. There are many past examples where reported injured and dead ocean animals to DELWP and parks officers.

- Just because there have been problems, it is not a solution to just close areas off. Good management should involve the whole community, not alienate sections of it. Respect for environment, cultural heritage, other users and flora and fauna can only be learned if it is experienced, not just read about.
- I met with _____ who was asked to find a solution to the beach problems some time ago. _____ constantly used the term 'social conscience'. I believe that the Hobby trainers in particular, not only understand this term but live it daily.

Hoping you consider my input favourably,

Yours sincerely,

Belfast Coastal Reserve Submission

About me:

Our Associations and clubs :

Postcode: 3280

Email or Postal address:

THIS SUBMISSION IS: CONFIDENTIAL **NOT CONFIDENTIAL**

Date: 15 March, 2018

Your Comments:

Please Note – The following information will be made publically available.

Main reason for interest: *(such as local resident, visitor to parks, tourism operator, environmental interest, business operator, education interest, scientific interest)*

Recreation.

How often do you or your organisation use the reserve?

Daily Weekly Monthly **A couple of times a year** Rarely Never

How do you or your organisation mainly use the reserve?

Walking or running Dog walking **Using the beach (swimming and surfing)**
 Horse riding Horse training Volunteering
 Camping Hunting Fishing/boating
 Picnicking Birdwatching Socialising

Other (please specify): Hang Gliding and Paragliding.

Which part(s) of the reserve do you or your organisation most frequently use?

West of Killarney (Port Fairy side) Between Killarney and Big Baldy
 East of Big Baldy (Warrnambool side) Not sure

About the vision- Belfast Coastal Reserve, 15 years from now...:

How supportive are we of the vision for the Belfast Coastal Reserve?

- Very Supportive** Supportive Not sure/don't know
 Unsupportive Very unsupportive

I believe the current cooperation between locals and visitors plus all the relevant parties/agencies, Traditional Owner groups, land owners, volunteers and community groups has been working reasonably well.

The Belfast Coastal Reserve has users with quite a few different viewpoints. I feel it is very important that everyone has a right to put forward their views. I believe and hope that this cooperation will continue to exist and improve.

It's very hard to see 15 years into the future, however with a solid, constructive management plan I believe that the varied users of this reserve will still be able to enjoy and appreciate all it has to offer.

Key management theme #1: Cultural landscape and living heritage

How supportive are we of the strategies for 'Cultural landscape and living heritage' included in the draft management plan?

- Very supportive** Supportive Not sure/don't know
 Unsupportive Very unsupportive

I (we) value the cultural heritage of this area. I feel that it is very important that this heritage is recognized and that improved information resources are easily accessible to those wishing to learn more.

Our activities (Hang gliding and Paragliding) are purely recreational and would have no foreseeable effect on the cultural landscape and living heritage.

Key management theme #2: Healthy Country

How supportive are we of the strategies for 'Healthy Country' included in the draft management plan?

- Very supportive Supportive Not sure/don't know
 Unsupportive Very unsupportive

I (we) have a great respect for the environment as a whole, but in particular the flora and fauna. It is important that we all show awareness of the local (Belfast Coastal Reserve) ecosystem and the perils it faces. We, as HG and PG pilots have strict guidelines set down so that we have basically no impact on the flora and fauna in any area. For example:

Hooded Plovers

Help protect our Hoodies

When flying at low dune sites keep your eyes out for Hooded Plover nests. They will typically be obviously marked with signs and enclosures. Give them plenty of space as they are very sensitive to disturbances when breeding (September to April) and are endangered in Victoria.



Operational agreement developed in conjunction with Bird Life Vic, Barwon Coastal Committee, GORCC and Moggs Creek Hooded Plover Group.

1. 100 ft vertical clearance from nest.
2. Avoid glider shadows on the nest.
3. Avoid landing within 100 meters horizontally from the nest.
4. Avoid walking past nest with an assembled glider.

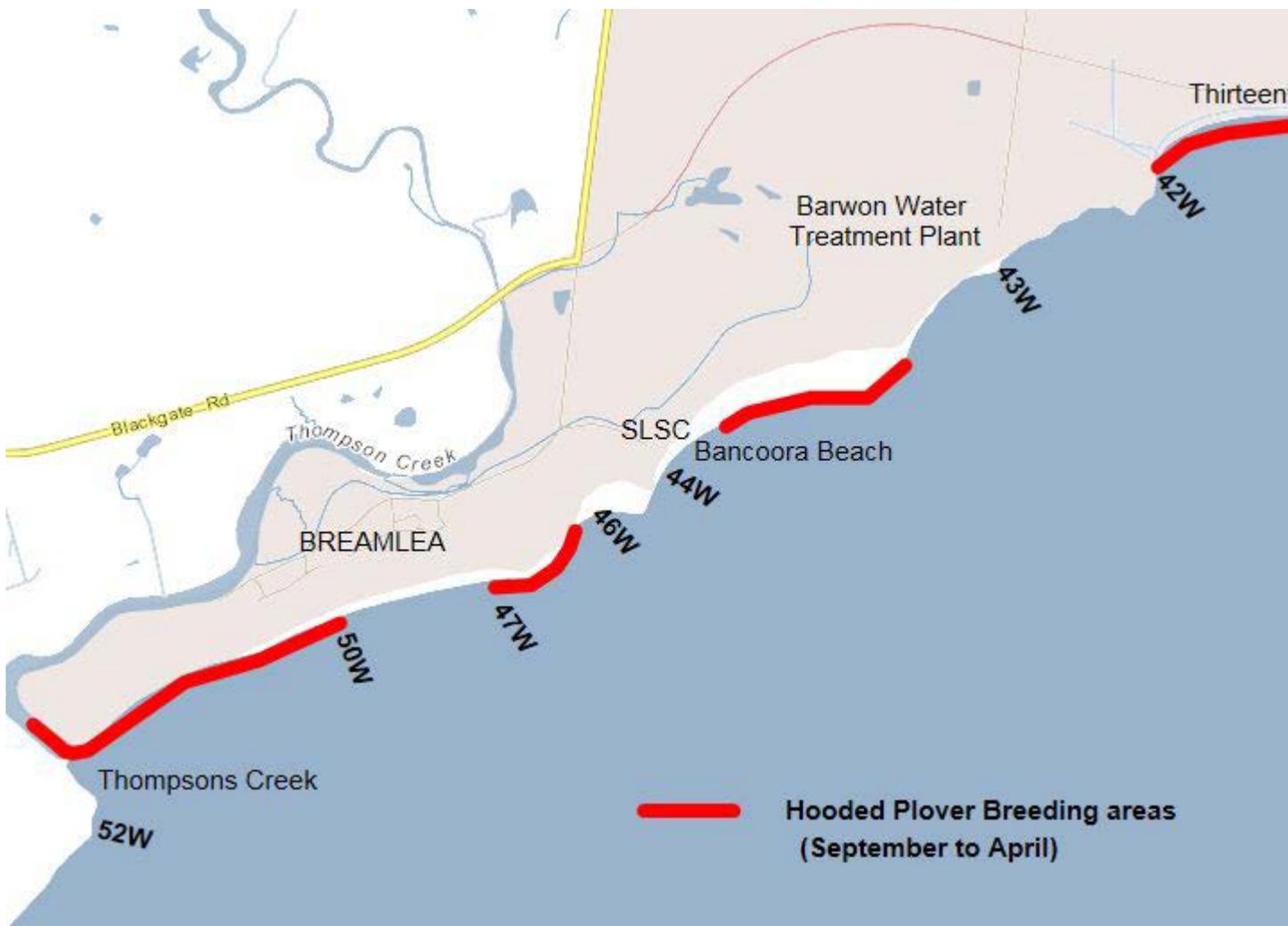
The following is the sort of information we are able to provide to pilots. Albeit, this is for other coastal flying sites but similar information can be provided for the Belfast Coastal Reserve.

Known nesting locations

Moggs Creek.

100m east of Moggs Creek estuary.

Breamlea and Blackrock.



13th Beach

Update as of Nov 24th 2017:

Staff here have made observations regarding Hooded Plover nest scrapes along 13TH Beach, 3 nest sites with eggs at this time.

Please find below a map of the locations with reference to the nearest beach access points.

At each of the nest sites there will be identifiable facilities on the beach signage and rope cordon.



General dog access controls: 42W - No dogs at any time.

36W to 35W - Dogs supervised control.

31W to 30W - Dogs supervised control.

At 40W, thoroughbred horse access permitted for 1km toward 35W

At 40W, hang gliders launch, flight usually eastward

No vehicles allowed on beach.

Collendina to Pt Lonsdale.



Kilcunda.



Flinders Golf Club

TBA - see signs at site.

More information

Please visit the following links:

- [Barwon Coast Hooded Plover info](#)
- [GORCC Hooded Plover info](#)
- [Birdlife Australia beach-nesting birds](#)
- [MyHoodie](#)

We have various other measures in place to ensure that no damages or disturbances are neither intentionally nor accidentally caused by us.

Key management theme #3: Recreation and use

How supportive are we of the strategies for 'Recreation and use' included in the draft management plan?

- Very supportive** Supportive Not sure/don't know
 Unsupportive Very unsupportive

To provide my views on this area I will have to refer to the Belfast Coastal Reserve - Draft Coastal Manage Plan.

I realize there a many different forms of recreation occurring in the reserve and different guidelines and rules need to be in place to enable a successful and sustainable use of this area.

Refer to Section 6.2, 6.3, 6.4. Pages 47 – 62. As Hang Gliding and Paragliding is concerned our impact would be no more than Walking/Using the beach, less than swimming and surfing, any camping would be done in Killarney Camping Reserve. While most of the other uses pose minimal impact, I am a bit concerned about the horse riding issue.

Referring to Table 6.1, Page 54: I notice that Hang Gliding has proposed "No's" for both the Conservational & Recreational Zone and the Conservation Zone. Our only beach access requirement within the reserve would be at Killarney Beach and possibly (unlikely) at the Killarney boat ramp. Launching would be done from the beach access tracks, so no vegetation damage would occur. As such I (we) urge you re-assess and change the Hang gliding permission to a "Yes" for the Conservational and Recreational Zone. This would be greatly appreciated.

Key management theme #4: Managing in partnership

How supportive are we of the strategies for 'Managing in partnership' included in the draft management plan?

- Very supportive** Supportive Not sure/don't know
 Unsupportive Very unsupportive

I (we) fully agree that coordinated management is essential. Any liaising would be primarily through the Victorian Hang Gliding and Paragliding Association - <http://www.vhpa.org.au/>
Or The Dynosaurs Hang Gliding Club - <http://dynasoarers.vhpa.org.au/>

I (we) have respect for all the other agencies and groups involved in coordinating the management.

Key management theme #5: Research and monitoring

How supportive are we of the strategies for 'Research and monitoring' included in the draft management plan?

- Very supportive Supportive Not sure/don't know
 Unsupportive Very unsupportive

Maintaining the Management Plan is obviously going to rely heavily on information and feedback provided by all the various agencies and user groups. Without this knowledge sensible, constructive and effective decisions cannot be made. The main problem with providing any information is who does one forward it to.

Other Relevant Information and external references and links.

All hang gliding and paragliding pilots MUST be members of Hang Gliding Federation of Australia (HGFA) (federal aviation law (Civil Aviation & Safety Authority)).

ALL HGFA members have 20 million dollar public liability insurance.

ALL clubs (incorporated) are affiliated with their state association (incorporated) and the HGFA

ALL state associations are affiliated with the HGFA.

The Victorian Hang Gliding and Paragliding Association (VHPA) have licences with Parks Victoria and several councils.

Victoria has about \$300,000 of infrastructure (at members cost) on Parks Victoria land (National Parks) in the form of ramps and astro-turfed launch areas.

Help protect our Hoodies

<http://siteguide.org.au/hoodies.html>

When flying at low dune sites keep your eyes out for Hooded Plover nests. They will typically be obviously marked with signs and enclosures. Give them plenty of space as they are very sensitive to disturbances when breeding (September to April) and are endangered in Victoria.



Operational agreement developed in conjunction with Bird Life Vic, Barwon Coastal Committee, GORCC and Moggs Creek Hooded Plover Group

1. 100 ft. vertical clearance from nest.
2. Avoid glider shadows on the nest.
3. Avoid landing within 100 meters horizontally from the nest.
4. Avoid walking past nest(s) with an assembled glider.

<http://www.vhpa.org.au/>**torian Hang Gliding and Paragliding Association**



The Victorian Hang Gliding and Paragliding Association

The VHPA is the Victorian branch of the HGFA (Hang Gliding Federation of Australia), and is responsible for fostering the sports of Hang Gliding, Paragliding, Weight Shift Microlighting (trikes) and Parascending in Victoria.



Once a month a group of pilots (the VHPA committee, which includes representatives from every Victorian club) get together to go over projects that are helping to make Victoria a better, safer place to fly and get 'best bang for buck' from the state development levy for pilots.

This might be administering funds to a club who need financial help in maintaining a flying site, or improving operational safety. It might be helping create a state government licence or agreement with a landowner, planning attendance at sports expos or air shows, gaining additional airspace access or it could be looking at ways to further improve pilot knowledge & training.

Our activities include:

- Supporting clubs to grow the sport across all disciplines, improve safety and pilot education
- Funding flying site maintenance or improvements
- Funding new flying site developments
- Funding specialist sports development events
- Developing flying/ landing right of use agreements
- Lodging and acquiring VIC state government access licences
- Assessing and funding appropriate flying safety programs for VIC pilots
- Assessing and funding competitions specialist clinics for VIC pilots
- Assisting Victorian clubs become affiliated with the VHPA/HGFA
- Assisting Victorian clubs govern and administer themselves and their sites
- Organising working bees
- Gaining access to additional airspace
- Supporting clubs to encourage community awareness and participation in the sports
- Representing Victoria at a state level to state and federal government entities
- Seeking to ensure all pilots operate responsibly and safely
- Representing Victoria at a state level to HGFA (and hence through ASAC, FAI, CASA, and other National Aero Clubs, etc.)

<http://siteguide.org.au/>

Management of flying sites is everyone's responsibility - Pilots need to 'fly neighbourly'.

- Treat land owners well, without their goodwill we can't fly; if they give assistance, pay for it; Be their friends and they will be yours, don't take them for granted. Provide landowners with signed waivers where required.
- Close gates immediately behind you, the rule is if you open it you close it; if there is more than one car you close it behind all of them, at the next gate somebody else does it all for you.
- Do not be the cause of any grass or bush fire.
- *No smoking* on launch sites or in landing areas.
- Report fire outbreaks to CFA via UHF radio, VHF radio or telephone.
- Red streamers *must* be displayed by 'Supervised' rated pilots.
- Do not take vehicles into paddocks, walk in.
- Keep vehicle speeds reasonable and remember to minimise dust.
- Do not land where permission has been denied by the owner or in other prohibited areas.
- Do not climb over fences - use the gates.
- Take your litter home.
- Do not overfly prohibited areas.
- Do not land in stocked or cropped paddocks.

- Be aware of transmission of stock or fauna disease, especially if landing on farms.
- Minimise any environmental damage, be particularly careful with inadvertent transplant of seeds.
- Beware power lines - they may be strung between tree lines; they are located near most buildings.
- Limit the number of vehicles using access roads where possible.

Remember public relations, treat all the public well, inform them of your sport and encourage their interest.



country racing **It's a Great Day Out**

Country Racing Victoria Ltd.
400 Epsom Road Flemington Victoria 3031
www.countryracing.com.au
ABN 93 112 777 714

16th March 2018

Manager, Park Planning
Parks Victoria, Level 10, 535 Bourke Street
Melbourne, Vic, 3000

Via email: parkplan@parks.vic.gov.au

Dear

RE: BELFAST COASTAL RESERVE MANAGEMENT PLAN

Thankyou for allowing Country Racing Victoria (CRV) to lodge this submission on behalf of many country racing participants and supporters. I take this opportunity to congratulate the Government and all involved in the process of developing the Belfast Coastal Reserve Management Plan Draft.

Beach training in the region of Warrnambool including the Belfast Coastal Reserve is an iconic part of the local community, as well as the racing industry and has been used with considerable success for many decades.

CRV in conjunction with the Warrnambool Racing Club (WRC) are respectful of the current situation and are committed to work with all stakeholders to ensure a sustainable resolution for all involved parties. We believe this plan creates a balanced approach and are supportive of the majority of recommendations in the plan. However, should there be significant changes to the current draft then the balance may then be lost.

It is our view that implementation of the plan is well overdue.

CRV strongly believes that a proposal focussed on utilising Levy's Beach and its dunes offers significant opportunity for all users of the Belfast Coastal Reserve as well as being a key driver of economic growth in the region.

Please find attached our submission to support the continuation of horse training in the Belfast Coastal Reserve.

Yours sincerely,

BELFAST COASTAL RESERVE MANAGEMENT PLAN - FEEDBACK SUBMISSION



Levy's Beach

COUNTRY RACING VICTORIA



country racing **It's a Great Day Out**

EXECUTIVE SUMMARY

CRV is thankful for the opportunity to lodge this submission. We congratulate the Government and all involved in the process of developing the Belfast Coastal Reserve Management Plan Draft.

We believe this plan creates a balanced approach and are supportive of the majority of recommendations in the plan.



Levy's Beach in 2009 – a picture tells a thousand words. 3 horses working abreast isn't possible in the same location in 2018 as vegetation growth has prevented such activity from occurring. It has been suggested that thoroughbred horses have caused damage to this area. Today, this is a single path that only allows horses to work in single file.

It is our view that there is significant support for the use of Levy's Beach to train horses. It is also our view that this is a key aspect to the sustained and balanced approach for the future. The advantages as we see them are noted below:

- Improved safety
- Reduces the interaction between conflicting beach users
- Important environmental and cultural heritage controls will be in place
- Provides marketing and promotional opportunities
- Secures the future of the racing industry in South West Victoria

In addition to this, other beaches in the Belfast Coast and surrounds play important roles also and these will be discussed further in the submission.

Horse access numbers as outlined in **the Cultural Heritage Management Plan (CHMP) for Levy's Beach** represent a viable and sustainable solution. The numbers outlined in the Draft Management Plan for other beaches is also supported by CRV.

Access times is also critical to this sustained **solution. Using Levy's Beach as the main beach, we believe** that access should be permitted until 12 noon to allow realistic access from sunrise onwards so that horse numbers can be divided per hour. Other beaches in the Belfast Coastal Reserve do not require the additional time given lower horse numbers proposed on these beaches.

The CHMP developed for the activity area at Levy's Beach, recognises concerns and proposed protocols for horse access. CRV is very committed to work conjunction with Traditional Owner Groups and believe this is a sustainable approach.

Lastly, the racing industry in general is committed to compliance and strongly believe that a final Management Plan with clear guidance will greatly assist all involved. Signage is important, as is a collaborative approach between the racing industry and the Government authorities.

BACKGROUND

In recent times the challenges associated with beach training and the associated media and community attention both positive and negative has highlighted the need to ensure the sustainability of horse training in the region albeit with changes to suit as many beach users as possible.

The thoroughbred racing industry generates upwards of \$100 million of value added impact and engages approximately 5000 people as an employee, volunteer or participant in the Western District. This includes providing full time employment for approximately 1000 people.

There are currently 476 horses trained in Warrnambool with 65 registered trainers operating. Warrnambool trained horses represent a significant portion of the industry in the south-west of the state and many other smaller race clubs and racing venues would be significantly impacted if the number of horses trained in Warrnambool was to decline. The local industry would significantly decline if access to beaches was severely

restricted and it is worth noting that one prominent trainer has already relocated to Ballarat as a result of the issues with beaches. Other trainers have advised CRV that they too would be forced to relocate to other parts of the state if beach access was impacted significantly.

A by-product to the added impact the racing industry creates, the WRC have for the previous 5 years averaged capital expenditure upwards of \$400,000 per annum. The capital investment the Club makes is spread across multiple streams however the investment in training and training infrastructure is significant, year on year. Throughout this period of capital investment, the Club has averaged 2034 starters nationally. This is a significant contribution to the entire racing industry and one that CRV are committed to retaining.

There are many benefits associated with the Levy's Beach area and these are discussed further later in this submission.

The racing industry has worked with various groups to develop a Cultural Heritage Management Plan for **the Levy's Beach area. This is a critical document aimed at appropriate management cultural heritage and** will be a key component of proposed plans for the use of the area. This is discussed further later in this submission.

The racing industry, at multiple levels has been engaged in processes related to these beaches for many **years. The industry has received considerable support from Government departments, Government MP's,** local Councils and other groups in working through all associated issues and we appreciate this support. Unfortunately, an optimum solution has not been possible to this date however we are cautiously optimistic that a Final Coastal Management Plan will deliver a sustainable solution for many years to come.

We have been and are closely engaged with the Warrnambool City Council (WCC) on this issue and we acknowledge their support during this process. Any plan for the Belfast Coastal Reserve does rely on ongoing access to Lady Bay, especially for swimming and wading, which the WCC is keen to actively support.

There have been many suggestions directed towards the racing industry during this process. A number of these are considered in more detail later in this **submission. Items such as; why doesn't racing only train at the racetrack?, the horses do too much damage?, the Club cannot be trusted to manage compliance with regulations for beach use? And so on** will be discussed.

This submission will also consider access times and **horse numbers preferred for the Levy's Beach area.**

The submission will also consider compliance arrangements and have provided some comments in relation to regulation of the activity.

This submission will also provide a summary of issues / views for all current or historical horse beaches in the Belfast Coastal Reserve.

In summary, the racing industry is keen to work with all parties on a sustainable solution which involves horses accessing beaches and the dunes in the Belfast Coastal Reserve area.

BEACHES IDENTIFIED FOR HORSE ACCESS

A number of beaches have been identified in the Draft Management Plan for horse access. The most **critical of these to the plan is Levy's Beach** which is considered an exceptional option to develop as a horse access beach with its many advantages.

Each beach for horse access is considered below:

Levy's Beach (including Hoon Hill)

A key component of this submission is that Levy's Beach (including dunes) provides the best overall option for the development of a beach for a sustainable level of horse training.



Levy's Beach

Safety

Provides a much safer environment for horses to work away from the more populated locations in the Belfast Coastal Reserve and alleviates the need to work horses on some other beaches such as Killarney.

Reduces the risks of incidents by creating improved access points to the beach.

Reduces the incidence of conflict between beach users as the area has significantly less activity.

Creates greater safety for the infrequent beach users with clear signage installed to alert them to the horses.

In addition, CRV and WRC are willing to consider some appropriate fencing to horse access paths that will fundamentally reduce the incidence of horses getting onto other areas of the dunes access paths.

Environmental

As above, the industry is willing to consider appropriate fencing for horse access paths in the dunes. This will limit any activity to specific areas.

The access paths from the main car park to the beach will be able to be managed via fill and other cleaning to ensure reduced subsidisation, contamination.

Management of horse numbers (considered further later in submission) will ensure sustainable levels of activity for the beaches, dunes, and car park areas.

Arrangements will be agreed via the Final Management Plan, regulations and instruction from Parks Victoria (PV) and Department of Environment, Land, Water and Planning (DELWP) will assist in management of environmental items including any hooded plover activity and other related wildlife / birdlife.

Local Business and Sustainable Employment

Continued access to the beaches provides support to sustain the current \$100 million economic contribution per annum that the racing industry provides the region.

Ensures sustainability for local horse racing related businesses e.g. stock feed companies, vets, farriers, construction industry etc.

Enables further investment in on course facilities at the race course due to the amount of horses in the region e.g. sand fibre track, Brierly Paddock upgrade, equine veterinary hospital, swimming pools, stables and other training tracks etc.

Provides growth and surety for the local tourism industry with people that view horses training on the beach.

Maintains employment opportunities and career pathways for the people of Warrnambool and district.

Marketing and Promotional Opportunities

Opportunities to leverage horse racing engagement throughout the May Racing Carnival and when leading local horses are entered in the major Spring Racing Carnival races.

It secures the future of an iconic training precinct for Warrnambool that provides the local community and visitors to the region opportunities to view star horses up close.

Economic and Financial Support

The racing industry is committed to financial support of the development of a horse access beach and will work with the State and Federal and Local Government to fund infrastructure and development opportunities **at Levy's Beach**.

Non-Racing Opportunities

Potentially provides additional car parking opportunities for public use at non-horse training times.

Causes limited disruption, safety issues to other community groups / sporting Clubs that currently use other beaches.

The racing industry is supportive of the non-racing opportunities that could present at **Levy's Beach** and believe that these can be developed compatibly. The racing industry would be keen to work in conjunction with the Moyne Shire and the Warrnambool City Council to explore all avenues to enable further development of **Levy's Beach** to ensure compatibility with the proposed horse training solutions.

CHMP

This item is considered later in the submission but it is clear that an appropriate CHMP, as approved by **Aboriginal Victoria (AV) is a terrific advantage for Levy's beach and the identified "activity area"**

Access Times / Horse Numbers for Levy's Beach

A key ingredient to any sustainable beach access solution is access times for horses and confirmation of horse numbers.

It is **CRV's view** that the numbers as provided in the CHMP are suitable. They do represent a reduction in historical levels of overall access however CRV acknowledge that this reduction is a contribution towards sustainability.

For the sake of clarity, these numbers are as follows:

- 120 horses per day to access the beach
- 40 horses per day to access Hoon Hill (the dunes)

This suggests that 160 horses could access the beach on any one day.

As suggested earlier, these numbers are already reduced and any further reduction is likely to lead to significant issues for the future of the region as a strong racing region.

The key to sustainable management of the proposed horse numbers is access times. The longer the access times the better the management of the use. This relates to car parking and the number of horses on the



country racing **It's a Great Day Out**

beach at any one time. Given it is not proposed to access beaches in the pre-dawn hours it is proposed that access times need to be until at least 12 noon. This is explained simply by dividing the number of hours available by the number of horses. With an average of 5 hours (7am to 12 noon) this would mean potentially that horses numbers can be managed at approximately 30 – 35 per hour which is significantly better for car parking and the number of horses on beaches. If 10am was utilised this would be more like 55 – 65 horses per hour which is significantly more difficult to manage for all parties involved.

The time involved in following the activity area (as outlined in the CHMP) will result in working horses appropriately taking approximately 30 minutes for the beach and approximately 40 for the dunes so it is virtually impossible to work the proposed number of horses in 3 hours and maintain appropriate numbers at any point in time on the dunes / beach.

It is also proposed, as per the CHMP, that horses can access Levy's Beach all year round.



Levy's Beach in 2009 – horses working in the dunes.

In 2018 this path is restricted to horses working in single file due to significant vegetation growth

Golfies / Mills Reef

It is proposed in the draft management plan that horse access numbers would continue along the lines of the current interim license arrangement. This is a maximum of 20 horses in winter and 50 horses in the summer period.

CRV is supportive of these numbers and believe that Golfies provides an alternative option for horse access. Golfies has provided part of a solution throughout the year but particularly in the summer months, albeit with small horse numbers.

Given the smaller horse numbers involved the access times can be restricted to the current interim license times of sunrise to 10.00am.

Rutledge's Cutting

Restricted access is proposed for residents of the local cutting area (4 identified trainers) within currently available times and with daily self-management and random PV / DELWP review.

CRV is supportive of this proposal and understands that access to these beaches will cease when these 4 trainers do not continue to hold a Racing Victoria trainers license.

Given the smaller horse numbers involved, access times can likely be restricted to sunrise to 10am.

Gorman's Lane

CRV believes that the 4 trainers **identified in the Rutledge's Cutting section also utilise the Gorman's Lane beach**. If this is the case then it is preferred if the trainers are able to continue their historical use as per the **arrangements outlined for Rutledge's Cutting**.

Killarney Beach

It is proposed in the draft management plan that access to Killarney is proposed for the same 4 trainers as is **identified in Rutledge's Cutting**.

CRV is not convinced that these 4 trainers utilise Killarney and believe that further investigation is required to **determine usage**. **It may be possible that this beach can be included in those that don't have horse access for permitted use.**

Lady Bay

Although not related to the Belfast Coastal Reserve Management Plan it is worth mentioning that Lady Bay access is a critically important element of a sustainable access for horses in this region. We understand that WCC is a supporter of the development of **Levy's Beach and of the ongoing use of Lady Bay**. **Lady Bay is critical given the lack of a swimming and wading options at Levy's Beach**. **Normally a horse will be trained at a location where it can access the beach and the water however this is not considered possible at Levy's**



Beach due to the dangerous surf conditions. This will result in the trainers making considerable compromise to their activities however as stated earlier the racing industry is seeking a sustainable solution and understand that there will be compromise. Horses will access Levy's Beach for beach work and then proceed to Lady Bay for swimming and wading.

The numbers for swimming and wading need to be maintained at Lady Bay all year round with at least 96 horses able to swim and wade per day from March 1 to November 30 and 30 horses to swim and wade per day from December 1 to February 28 each year. Without Lady Bay the whole proposal for the region does not work.

The racing industry understands that a previous proposal for a Worm Bay development is not to be pursued. Whilst this proposal would have provided the best overall option we are disappointed that the WCC and others did not support this proposal.



Lady Bay

CULTURAL HERITAGE MANAGEMENT PLAN

The WRC sponsored the development of a CHMP at Levy's Beach. This was undertaken to provide management and protection of Aboriginal cultural heritage during the proposed activity, in our case, horse training. In addition, this CHMP provided contingency arrangements for managing the discovery of any further Aboriginal cultural heritage places identified during the course of the proposed activity. This CHMP has been approved and can be implemented when a Coastal Management Plan is finalised. Implementation is predicated by user induction and other relocation and / or restoration works. The CHMP provides limits on horse numbers (120 beach, 40 dunes) and full management plans, including appropriate reviews.

KEY RISKS IF HORSE ACCESS TO BEACHES IS RESTRICTED

The reduction in or removal of beach access will see a flow on effect across the board, trainers will look to relocate their stables, and horse numbers will decrease.

trainers that are likely to depart should a sustainable beach access solution be unable to be reached.

A significant decline in the horse population in the region will result in less regional economic benefit overall. A decrease in industry capital expenditure and funding will also occur. The funding provided by the racing industry for investment in training and training infrastructure will ultimately be prioritised to locations with greater trainer and horse numbers.

The reduction in horse numbers will result in less race meetings for Warrnambool and the south-west region which currently rely on the strong Warrnambool training base.

Full time and part time employment opportunities that are currently available will unfortunately be relocated or discontinued.

None of these outcomes are desirable and CRV are keen to ensure they do not occur.

COMPLIANCE / REGULATIONS

CRV believe that compliance and regulation through a specific licence is critical to the ongoing management of beach training in the Belfast Coastal Reserve.

Since the inception of the licence 2023041 there had been a small number of noted non-compliance breaches against the license holders. The majority of non-compliances took place within the first 4-6 weeks post allocation. This was at a time when education of this license was low, the understanding and more specifically the interpretation of the license conditions were unclear and after Warrnambool Racing Club (WRC) staff and Parks Victoria staff were able to converse, and gauge greater understanding of these interpretations of these conditions the number and frequency of the reports of non-compliance has reduced dramatically.

CRV are committed to work with the WRC and all other relevant parties on the introduction of such licence and to ensure all users remain compliant. The licence however will need some time to enable all parties to

be aware of the conditions. The WRC will include an induction process to assist trainers and staff in their education.

The WRC has been very proactive in the management of compliance and continues to do so. With the support of Racing Victoria stewards, any breaches to compliance are treated like any other breach of the rules of racing which under the licence conditions of the trainer they are required to comply with.

The introduction of individual licences has been a great positive for the WRC's ability to administer and manage the conditions of the license in the proper manner.

Warrnambool Racing Club's policy for handling non-compliance with licence conditions is as follows.

The WRC have divided breaches of rules into different severities and punishments accordingly.

Minor Breach:

2 written warnings & then suspensions of beach permit

Moderate Breach:

1 written warning & then suspension of beach permit

Major Breach:

Instant suspension of permit & then disqualification of permit

The above has been well supported by the racing industry and specifically the Racing Victoria Stewards.

Below is an excerpt from a letter sent to the WRC from _____ to all licensed trainers with local beach permits/licenses.

"A Licensed Trainer's ability to use a beach to train their horses is a privilege, not a right. Accordingly, if the Warrnambool Racing Club or Council considers that the safety and welfare of the beach is prejudiced by Trainers failing to obey the Club or Council Beach Rules, it may revoke or amend the permissions previously granted.

Please note that if you do breach the Warrnambool Racing Club or Council Beach Rules, the Stewards may charge you under AR 175 (or other relevant rules), as your actions could be characterised as conduct **prejudicial to the interests of racing.**"

SUGGESTIONS TO THE RACING INDUSTRY

There have been many suggestions directed towards the racing industry during this process.

Why **can't the horses only train at the racetrack?**

The beach acts as an ideal, relaxed environment to train thoroughbred horses, providing therapeutic and rehabilitative benefits, prolonging a horse's racing career.

Racehorse trainers in the southwest have accessed the beaches in and around Warrnambool and the **Belfast Coastal Reserve for more than 70 years. Access to the 'beach' is regarded as a 'competitive advantage' and its benefits include:**

- Aiding rehabilitation and recovery for joint and soft tissue problems
- Resistance training without the need for speed
- Utilising a variety of working surfaces
- Therapeutic effects of water

[The horses do too much damage to the beaches / dunes?](#)

It is acknowledged through the development of the CHMP that erosional activity may result, however the degree of degradation owing to this is very much indeterminable given the variable nature of the location.

Given the area is within the Belfast Coastal Reserve and is open to the public, impacts may also occur due to activities falling outside of the scope of horse training (i.e. hiking, illegal motor vehicle activity, motor bike riding).

[The Club cannot be trusted to manage compliance with regulations for beach use?](#)

The WRC has been very proactive in the management of compliance and continues to do so. With the support of Racing Victoria stewards, any breaches to compliance are treated like any other breach of the rules of racing which under the licence conditions of the trainer they are required to comply with.

The introduction of individual licences has been a great positive for the WRC's ability to administer and manage the conditions of the license in the proper manner.

SUMMARY

The racing industry is an integral part of the local community and brings enormous benefit to the local economy. As previously stated, the racing industry generates upwards of \$100 million of value added impact and engages approximately 5000 people as an employee, volunteer or participant in the Western District region. This includes providing full time employment for approximately 1000 people.

Further, the racing industry is a heavily regulated industry that can heavily sanction individuals who disobey instructions or bring racing into disrepute. Therefore, we believe we can manage a sustainable plan for the horse access to beaches, as well as managing cultural heritage in accordance with the CHMP.

In our view the Levy's Beach area is a terrific primary option for beach access for the reasons outlined in this submission and should be supported and developed for this purpose.

It is also our view that a significant reduction in racings value to the local community and economy will occur if a balanced plan is not agreed soon. The industry cannot grow in Warrnambool and surrounds if beach access is off limits.

We look forward to the opportunities to work closely with Governments of all levels to support a sustainable beach solution involving horses.

We are available to discuss this issue further at any time by contacting
or email [@countryracing.com.au](mailto:countryracing.com.au)

on 03

Submission for Draft Belfast Coastal Reserve Management Plan

About you:

Your name:

Your Organisation (if relevant): N/A

Postcode:

Email or Postal address:

THIS SUBMISSION IS: CONFIDENTIAL NOT CONFIDENTIAL Date: 16/3/2018

Your Comments:

Please Note – The following information will be made publically available.

Main reason for interest: *(such as local resident, visitor to parks, tourism operator, environmental interest, business operator, education interest, scientific interest)*

Visitor to parks

How often do you or your organisation use the reserve?

Daily Weekly Monthly A couple of times a year Rarely Never

How do you or your organisation mainly use the reserve?

Walking or running Dog walking Using the beach (swimming and surfing)
 Horse riding Horse training Volunteering
 Camping Hunting Fishing/boating
 Picnicking Birdwatching Socialising
 Other (please specify): _____

Which part(s) of the reserve do you or your organisation most frequently use?

West of Killarney (Port Fairy side) Between Killarney and Big Baldy
 East of Big Baldy (Warrnambool side) Not sure

Key management theme #3: Recreation and use

How supportive are you of the strategies for 'Recreation and use' included in the draft management plan?

Very supportive Supportive Not sure/Don't know
 Unsupportive Very supportive

Comments: *(Your submission can be as short or long as you wish. Put comments under relevant headings corresponding to plan sections or strategies, noting page and paragraph numbers. Attach more pages if required).*

Rundells is the **only** trail riding operator in Victoria that I whole-heartedly recommend to friends and acquaintances – not just because of the exemplary way that it looks after its horses and the high standards that it strives to maintain, but also because of the beauty of the natural environment in which it operates, and the opportunities for spectacular scenic riding experiences that it presents.

I have been extremely concerned to read this plan, as it proposes dramatically decreasing the area of the beach where recreational horse riding is allowed (**Map 5, “Recreational Horse Access”**).

The appeal of trail rides on the beach relies on the natural beauty of the coastal area, and the ability to ride for a reasonable distance down the beach. Rundells operates in an area where there are almost no feasible inland tracks for trail riding nearby, so it therefore relies entirely on beach rides for all of its trail riding activities. Restricting riders to a small area will dramatically decrease the appeal of beach riding, and is therefore highly likely to significantly damage or completely destroy Rundells Mahogany Trail Rides.

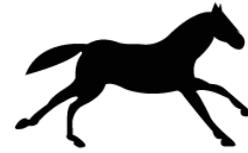
if I knew that my riding at Rundells would be restricted to only a small area. I am sure most other Rundells customers would feel the same way.

Rundells employs many young women from the local Warrnambool area, and is owned and operated entirely by women. It is a fantastic example of a thriving independent small business, and it would be a tragedy if it was forced to close due to the excessive restrictions proposed by Parks Victoria.

The draft plan emphasises the need to bear in mind the economic contributions of the horse racing industry and the needs of horse racing trainers to use the beach (**6.5, “Beach training of racehorses, page 63**). I would like to make a clear distinction

between the needs of recreational horse riding, and horse racing training. Racehorse training can be done away from the beach in dedicated training facilities like the synthetic sand track at Warrnambool racecourse that is mentioned in this document. Recreational horse riding, on the other hand, is largely enjoyable due the beauty of the surrounding natural area and therefore relies on being able to be pursued at the beach itself. It seems misguided and extremely unjust to promote the needs of the racing industry while neglecting the requirements of a small Warrnambool business with a more fundamental need to use the beach.

I implore Parks Victoria to reconsider the proposed restrictions on recreational horse riding as they would apply to Rundells Mahogany Trail Rides.



AJ Chambers Racing

To whom it may concern,

I've been disappointed how the local small trainers have been treated over the past couple of years. Most of these trainers have been training at Rutledges cutting for generations without incident. They have always respected the environment and all other user groups within the reserve. Local land owners have been severely effected by these changes without any consultation from governing bodies.

- I personally, cannot see how racehorses can impact the hooded plover and there nesting sites, if the horses are worked on the waters edge. Vermon such as foxes, eagles, stray dogs and feral cats all pose bigger threats than horses.
- Parks Victoria should look to extend horse trainers usage of rutledges cutting from 4 months to 6 months. The months of April and September aren't allowing thoroughbreds, yet the plover breeding season only goes from October until the end of March.
- During the winter months, there is no issue with public safety around racehorses. I ride most mornings during the colder months, and rarely see a human.

I strongly believe small trainers should continue training in the Belfast coastal reserve, as long as the numbers are capped. Local land owners (rate payers in the moyne shire) should have preference over large scale trainers who aren't even locals.

I have always had the utmost respect for other beach users whilst riding horses. Given this I believe both horses and humans can co exist on the Belfast coastal reserve. Overall I believe the beach is here for all of us to use and enjoy. That includes surfers, bird watchers, fisherman, walkers, and of course us- horse riders!

parkplan@parks.vic.gov.au

Belfast Coastal Reserve Draft Management Plan Submission guide

prepared by the
Victorian National Parks Association



Draft Belfast Coastal Reserve Management Plan

About you:

Your name:

Your Organisation:

Postcode:

Email or Postal address:

THIS SUBMISSION IS: NOT CONFIDENTIAL

Date: 16/03/2018

Your Comments:

Please Note – The following information will be made publically available.

Main reason for interest: Family has owned a holiday house and I have a strong environmental interest.

Member:

GENERAL COMMENTS

- There are many good elements in the draft coastal management plan that I wholeheartedly support: cultural heritage protection; joint management; education and interpretation; monitoring and research; rationalisation and closure of inappropriate beach access; dog control. But it remains deeply flawed because of its complicity in entrenching and expanding the use of the reserve by commercial racehorse trainers.
- Under the plan, commercial racehorse training would rapidly expand to multiple beaches and in sand dunes, with devastating effects for the nationally threatened hooded plovers—the reserve is its most important breeding area in the state according to the plan—other coastal wildlife and the safety and enjoyment of mum, dad and the kids, anglers, surfers and other beachgoers.
- The length of beaches available to racehorse training would, under the plan, be increased by 250% (from 2 km to 5 km) and the number of horses by 400% (from 65 to 256 each day). That represents 25% of the reserve's beaches, with nothing in the plan to stop future expansion.
- The draft plan would allow racehorses back into 750 metres of fragile dunes behind Levy's Beach and at Hoon Hill, where in the past they have caused severe dune erosion. The plan even

recommends racehorse training within the Conservation Zone at Rutledge's Cutting. That is inexcusable.

- Many times, the draft plan refers to damage caused by racehorses but fails to explain how increasing the area available to them by 250% will mitigate these impacts. Worse still, the plan's risk assessment reveals that management won't make any difference. Before management, the risk to coastal dune vegetation, cultural heritage, resident and migratory shorebirds from racehorse training is rated 'Extreme'. After management is introduced? The rating remains—Extreme!
- Ever since the uninvited invasion by racehorses in 2015, their training has been mismanaged, with numerous breaches of licensing conditions, public safety put at risk and taxpayers footing the bill for costly Parks Victoria surveillance and infrastructure upgrades. Expanding the number of training beaches will simply make that worse.
- By entrenching and expanding commercial horse training the plan is a relic of past coastal mismanagement and inappropriate use.

Executive summary (pages v-viii)

- The draft plan claims on page vi of the executive summary that it is consistent with the 'existing strategies and guidelines of relevant governing bodies'. This is simply not true. It is inconsistent with the:
 - original and ongoing purpose of the reserve which aims to conserve coastal wildlife and cultural heritage, and support passive recreation and public education
 - Victorian Coastal Strategy, which urges that coastal dune and beach systems be protected from damage and that any uses should be coastal dependent, which means they can only be carried out along the coast. Commercial racehorse training is clearly not one of those
 - City of Warrnambool's planning scheme: the Levy's Beach to Hoon Hill area is covered by a Public Conservation and Resource Zone, which lists the uses that are allowed with or without a permit. Any uses not listed are prohibited. Commercial racehorse training is not listed so should be prohibited.

About the vision- Belfast Coastal Reserve, 15 years from now...: (page 7)

How supportive are you of the vision for the Belfast Coastal Reserve?

Very supportive

Comments:

- The vision encapsulates much of what I wish to see in the future for the Belfast Coastal Reserve except for the reference to 'horse riding': "The location, timing and intensity of activities such as horse riding has been managed to avoid conflicts between uses, and to reduce the risk of damage to the environment and cultural sites". The softer term of 'horse riding' deflects from the extreme risk and existing damage to wildlife, culture and passive recreation from commercial racehorse training in the reserve. The term 'horse riding' should be removed from this statement and commercial racehorse training removed from the Belfast Coastal Reserve. Throughout the rest of the plan there are 24 references to the impacts that horses have on the reserve's natural, cultural and recreational values. More on this under Key Management Theme #2 Healthy Country.

Key management theme #1: Cultural landscape and living heritage (pages 13-24)

How supportive are you of the strategies for 'Cultural landscape and living heritage' included in the draft management plan?

Very supportive

Comments:

- I strongly support the goals and strategies within this chapter of the draft plan including maintenance of geological features, recognising Traditional Owner and community connections to it, ensuring cultural landscape values are protected in heritage management, and establishing partnerships with Traditional Owners to protect and conserve heritage features. However, one of the strategies—'Work with users and community groups to reduce impacts from both authorised and illegal access on the fragile coastal dune systems'—is expecting too much from community groups to act as delivery partners when those groups will witness daily the extreme damage to sand dunes and beach habitats from commercial racehorse training which, under the plan, will have 'authorised access'. The goals and strategies also ignore the extreme risk to cultural heritage from commercial racehorse training.

Key management theme #2: Healthy Country (pages 28-42)

How supportive are you of the strategies for 'Healthy Country' included in the draft management plan?

Supportive

Comments:

- This chapter reveals the draft plan's underlying contradictions regarding commercial racehorse training. On page 29, the draft plan admits that the extreme risk to coastal habitats, cultural heritage and resident and migratory wildlife from commercial racehorse training will remain so even following management action. This fundamental contradiction in the draft plan will undermine the achievement of the very good goals and strategies in this chapter. The goals to which I give strong support include maintaining and enhancing habitats, reducing the impact of pest species and visitors, better management of marine, lake and swamp habitats, minimising the fire risk and building resilience to climate change.
- It is very pleasing to see one of the strategies under this goal including water management of the Belfast Lough, which until now was not considered as part of the Belfast Coastal Reserve. But the strategy is vague, only referring to maintaining its aquatic values. This needs to be more articulate and refer to water quality, water levels and habitat protection, especially the strong management of motor boats and jet skis, which in the shallow waters can significantly impact on shallow-water habitats and birdlife. Jet skis should be banned from the lough and broader reserve.
- Reducing threats and impacts are a commonly used measure to build resilience to climate change within natural systems. Horses have the most impact in the reserve, especially with regard to dune vegetation and stability. Sea-level rise may reduce the width of beaches and intensify the impacts of racehorses on that habitat. The best way to build resilience is to get the racehorses out.

Key management theme #3: Recreation and use (pages 45-69)

How supportive are you of the strategies for 'Recreation and use' included in the draft management plan?

Very supportive

Comments:

- I strongly support many of the goals and strategies that relate to the recreational use of the Belfast Coastal Reserve in this chapter including increased enforcement, better management of vehicular use, dog walking and recreational horse riding, bans on dune boarding, hunting and off-road vehicles, reducing risks and improving safety, improving information, interpretation and education, and developing tourism partnerships, marketing and promotion. But without the removal of commercial racehorse training, these goals will not be achieved.
- A far more honest heading for this chapter would be 'Recreational and commercial use'. Too often the plan seeks to confuse recreational riding and commercial racehorse training or to downplay the intensity and impacts of the commercial activity, continually referring to the training as a 'licensed' or 'authorised' use to convey that it is not negotiable, it cannot be restricted or removed. By including it within a chapter mainly on 'recreation', it again tries to downplay the highly commercial and intensive nature of racehorse training.
- The draft plan recommends strict controls on where and how recreational uses are to be managed in the future, whereas commercial racehorse training will be expanded. That doesn't make sense.
- In the introduction to this chapter, the draft plan states, with my underlining: Riding of horses for recreational or commercial purposes was viewed as a threat to dune health, cultural heritage, shorebirds and public safety, especially if riders did not comply with regulations, codes of conduct or licence conditions. This suggests that the community is mainly concerned about impacts that occur when commercial racehorse training doesn't follow the rules. But as the risk assessment table reveals on page 29, even with rules, management will not mitigate the extreme risk from commercial racehorse training.
- Jet skis should not be allowed in reserve waters, including Belfast Lough, because of their disturbance to wildlife and other recreational users, and damage to shallow water habitats.
- Dogs should not be allowed off-leash from 1 August to 30 November at Killarney Beach, coinciding with the first part of the hooded plover breeding season.
- It is ludicrous to consider renaming Hoon Hill to 'improve expectations on visitor behaviour' when those same visitors will witness racehorses and their riders 'hooning' up and down the dunes of the hill.
- Section 6.5 of this chapter is titled 'Authorised uses', code for commercial racehorse training. Much of the emphasis in this section is the regional economic importance of the racing industry as justification for the damage that it is causing and will continue to cause if it remains in the Belfast Coastal Reserve. But in a September 2013 report prepared for the Victorian racing industry by consultants IER, it was revealed that the racing industry generates \$75 million gross value added in the Western District, which includes Warrnambool but also a number of other racing clubs at Casterton, Coleraine, Hamilton, Terang, Camperdown Mortlake, Peshurst and Dunkeld. The report also reveals that 40% of statewide gross value added for horse racing is from gambling, which takes money out of the community. If applied to the Western District, \$30million of the gross value added would be from gambling, which leaves \$45million shared across all of the region's clubs.
- This is tiny relative to other sectors in the regional economy. Most jobs are provided by the healthcare and social assistance, retail and accommodation and food services sectors. Tourism generates more than half of Warrnambool's total economic output of \$3.3billion. Except for the May Racing Carnival being mentioned in a dot point in an event strategy, the racing industry in Warrnambool is ignored in the Warrnambool Economic Development and Investment Strategy 2015-2020 prepared by the City of Warrnambool.
- It appears that the main reason for justifying a huge expansion in commercial racehorse training is 'due to community interest' and so the 'plan sets out an approach for horse training that balances support for the racing industry, equity of access for all trainers and ensuring adequate protection for cultural and natural values'. The consultation carried out by Parks Victoria confirmed the serious concerns the community had about commercial racehorse training, but that is now being referred to as 'community interest' that justifies the racing industry's use of the reserve. It sounds ludicrous and it is.
- I strongly condemn the goal under this section of the chapter—Authorised uses of the Reserve are managed to minimise the effect on values and visitors—with regards to commercial racehorse training as it is incompatible with the goals of the plan and the purposes of the reserve.

Key management theme #4: Managing in partnership (pages 71-75)

How supportive are you of the strategies for 'Managing in partnership' included in the draft management plan?

Very supportive

Comments:

- I strongly support the first goal in this chapter: Coordinated management of the Reserve enables efficiencies in program delivery and is supported by consistent land status and regulations. But I cannot support the strategies that aim to achieve it. The plan recommends retaining the fragmented management across the City of Warrnambool, Moyne Shire Council and Parks Victoria and leaving the reserve under the Crown Lands (Reserves) Act. The reserve should become a park under the National Parks Act.
- I also strongly support goals to ensure that Traditional Owners caring for their Country is an integral part of the reserve's management and that community skills, knowledge and assistance provide stewardship and help in that management. However, if commercial racehorse training is retained inside the reserve, all of their efforts would be to nought.

Key management theme #5: Research and monitoring (page 77-79)

How supportive are you of the strategies for 'Research and monitoring' included in the draft management plan?

Very supportive

Comments:

- I strongly support this chapter's goal and strategies and the indicators to be used to evaluate the effectiveness of the management plan. However, the plan fails to explain how it will lower the extreme risk presented by commercial racehorse training revealed in the table on page 29. That table proves that it cannot and so commercial racehorse training should be removed from the reserve.



16 March 2018

File No: CA/15/3187

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke Street
MELBOURNE VIC 3000

Dear Manager,

BELFAST COASTAL RESERVE - DRAFT COASTAL MANAGEMENT PLAN

I write in response to the release of the draft coastal management plan for Belfast Coastal Reserve for public comment. The Victorian Coastal Council (VCC) welcomes the opportunity to comment on the draft Coastal Management plan and has taken a statewide perspective in this review.

In summary, the Victorian Coastal Council submits that the current draft plan can be improved in a number of crucial ways. Fundamentally, it does not adequately apply the framework and principles of the Victorian Coastal Strategy (VCS).

While the Council commends a satisfactory risk assessment and very comprehensive consultation process, the Council considers that the draft plan could be improved in important areas before being finalised. Those areas are detailed in the following submission and can be summarized as:

- A better use and application of the Hierarchy of Principles in the Victorian Coastal Strategy, especially in the absence of a statewide policy for managing the use of dunes and beaches by domesticated animals.
- Stronger consideration of known environmental and cultural values in decision-making.
- A reconsideration of the application of current relevant statewide policies on leasing and licensing in coastal and marine areas.
- More clarity on the compliance requirements for authorised uses within the coastal reserve, and the relevant enforcement activities and resources of relevant land managers to ensure that any activities that pose residual unmitigated risks are managed as an immediate priority.
- Greater clarity could be introduced regarding the objectives, outputs and subsequent management actions of both the monitoring and research programs.

The Council offers a more detailed discussion of the rationale and feedback on the draft plan below, as well as steps that can be taken to improve it for the final version.

Background

The VCC is established under the *Coastal Management Act 1995*. The Council has a strategic planning and advisory role to government in relation to the Victorian coast. A key responsibility is to develop and report on the implementation of the VCS. The VCC is also required to provide advice to the Minister on proposed coastal management plans for coastal Crown land.

The 4th iteration of the VCS (VCS 2014) was released in September 2014 following an extensive research and stakeholder consultation process. The VCS provides the framework for planning and management of Victoria's coast and is underpinned by the concept of Integrated Coastal Zone Management (ICZM). The VCS applies to both public and private land and is integrated into the Victorian planning system through the State Planning Policy Framework (SPPF).

The VCS sets a long-term vision and framework for how we plan and manage the coast, guided by a Hierarchy of Principles, policies and actions. The Hierarchy of Principles gives effect to the directions in the *Coastal Management Act 1995* and is included in the State Planning Policy Framework. Planning and decision making on the coast needs to be guided by and consistent with the Hierarchy of Principles. The principles are:

- | | |
|----------------------------|---|
| VALUE & PROTECT | 1 Ensure the protection of significant environmental and cultural values |
| PLAN & ACT | 2 Undertake integrated planning and provide clear direction for the future |
| USE & ENJOY | 3 Ensure the sustainable use of natural coastal resources
<i>Only when the above principles have been considered and addressed:</i> |
| | 4 Ensure development on the coast is located within existing, modified and resilient environments where demand for development is evident and any impacts can be managed sustainably |

The VCS also notes the importance of evidence-based decision making. To assist with this the VCC established a Science Panel comprising around 40 scientists from diverse disciplines to provide independent, technical scientific advice. The VCC has sought the advice of a suitably qualified subgroup of its Science Panel to inform this submission. Sections 3, 4 and 6 below draw heavily on the advice of

. The VCC would like to thank these scientists for their contributions.

VCC feedback on the Belfast Coastal Reserve – Draft Coastal Management Plan

1. Community consultation

It is pleasing to see that Parks Victoria has undertaken a range of engagement activities to involve the public in coastal planning and management decisions relating to the Belfast Coastal Reserve. Such activities are consistent with objective s.4(e) of the *Coastal Management Act 1995*. Council has benefitted from receiving two briefings on the draft management plan from Parks Victoria in December 2017 and February 2018. The long term aspirational vision for the reserve and details of the proposed management zones were discussed at these meetings.

2. Competing uses and the need for a state-wide approach

The VCC notes that there is significant community interest in this draft management plan with many different user groups expressing alternative views on appropriate uses within the reserve reflecting the range of environmental, social and cultural and economic values associated with the reserve. Such challenges associated with competing uses are only likely to increase in the future due to population growth and climate change impacts rendering some areas of the coast inaccessible. To ensure a sustainable, healthy coastal and marine environment both now and in the future, these competing uses must be appropriately managed taking a statewide perspective that balances the interests of all Victorians.

The VCC believes there is a need for a clear state-wide policy relating to the use by domesticated animals of dunes and beaches and the protection of natural and cultural assets on those dunes and beaches. This policy needs to be developed for unreserved areas of Crown land and reserved areas that are yet to develop coastal management plans. Such a policy would reduce uncertainty for users and provide clear future guidance for delegated land managers. Until such a policy exists, the VCC suggest drawing on the Hierarchy of Principles, policies and actions within the current VCS.

3. Inconsistent application of the VCS and the Principles for decision making

Whilst the VCS does not specifically refer to the scenario currently facing Belfast Coastal Reserve relevant principles can be drawn from the strategy to guide consideration of this issue. The VCC is concerned that the VCS 'Hierarchy of Principles' have not been appropriately applied in the development of this draft coastal management plan, and where the principles have been considered, incorrect interpretation has been given to the weighting and prioritisation of these principles.

The following observations are made:

- The first order principle of 'Value and Protect' requires that a balance be achieved between coastal access, management of recreation users and conserving natural and cultural values to ensure co-existence. Access and recreational use in onshore environments needs to be well managed with appropriate enforcement of tools such as disturbance buffers to *ensure* protection of threatened plants and animals to protect the ecological integrity of onshore coastal environments.
- The principle of 'Plan and Act' notes the role activity and recreation nodes can play. It states that coastal dependent activities may be sited in recreation nodes. It is however, questionable whether commercial horse training can be classified as a coastal dependent activity. Sand and saltwater training of racehorses can and does occur inland at purpose-built facilities.
- The Principle of 'Use and Enjoy' suggests actions be taken to reduce risks associated with access. The VCC understands a risk management assessment has been prepared by Parks Victoria to inform the preparation of the draft management plan as per the requirements of the VCS, however the environmental risk associated with horse training remains 'high risk' with limited risk mitigation actions proposed.
- The VCC notes that the draft plan refers to the economic value that the racing industry contributes to the local economy. However, the plan does not outline the *added* economic value to the racing industry or local economy of training racehorses on the beaches in question. Nor does it highlight the potential economic loss of endangered bird species, or other natural assets, to local tourism revenue. Whilst economic values are a relevant consideration, in this case the VCC contends that they are not of a higher priority consideration to the protection of significant environmental and cultural values.

Further commentary is provided below regarding the significant environmental and cultural values associated with the Belfast Coastal Reserve.

i. Recognition of significant environmental value

The VCS recognises the need to value the intrinsic characteristics of coastal and marine environments, habitats, ecosystems and biodiversity. The following commentary is provided based on inputs by _____ from the VCC Science Panel. It highlights current knowledge relating to known significant environmental values associated with the Belfast Coastal Reserve.

Vulnerable bird species

The VCC notes the importance of the Belfast Coastal Reserve to nationally threatened birds (e.g. Orange-bellied Parrot and Hooded Plover), and important populations of bird species listed under the Environment *Protection and Biodiversity Conservation Act 1999* (EPBC) (i.e., migratory

shorebirds). Conservation of these species is important in the context of increasing pressures to the coast and its biodiversity. Of note is the occurrence of an important breeding population of the EPBC-listed Hooded Plover within the reserve. In relation to this species the VCC notes:

- BirdLife Australia has conducted Hooded Plover conservation and monitoring in Victoria since 1980 (Weston 1993), and possesses the most accurate and relevant data on this species on south-eastern Australia, and within the reserve.
- Recent counts by BirdLife Australia suggest that this stretch of coast is especially important for Hooded Plover, having increased in importance over past years. Substantial numbers of breeding pairs occur in this region (BirdLife Australia unpublished data).
- To breed, Hooded Plovers require areas with specific geomorphology and harbouring certain prey resources (Cuttriss et al. 2015; Ehmke et al. 2016). Territories are usually temporally stable, and host breeding year after year (Weston et al. 2009). Protection of breeding territories has long been recognised as a key conservation measure (Dowling and Weston 1999).
- While increasing numbers in the area are encouraging, they are not necessarily linked to population viability. Ecological traps may exist, and population viability cannot be automatically assumed.
- Hooded Plovers in Victoria are almost exclusively tied to sandy high-energy beaches, unlike some populations in South Australia and Western Australia (Barrett et al. 2003). They are thus considered sandy-shore obligate species in Victoria where, with very few exceptions, their entire life cycle occurs on high energy ocean beaches (Marchant and Higgins 1993). This means that they cannot and do not use other habitats than sandy-shores.
- The VCC notes the long-term conservation efforts related to this species, and that where effective management is implemented, conservation and coexistence with human uses is possible (Maguire et al. 2011). Measures include zoned restrictions on dogs, especially in areas where breeding occurs, and addressing other threats (Dowling and Weston 1999; Maguire 2008).
- Hooded Plovers are threatened by a variety of processes, including dogs, especially off leash dogs, invasive predators, flooding, and egg- and chick- crushing agents, such as horses (Maguire 2008). Dogs and horses directly threaten Hooded Plovers by crushing their eggs and young, and dogs have been shown to crush eggs and prey on young in Victoria (Lees et al. *in Review*). Dogs (and by deduction, horses) also indirectly and detrimentally affect Hooded Plovers by causing physiological and behavioural disruption (“disturbance”), potentially affecting bird condition and compromising parental care (Weston and Elgar 2005, 2007). Hooded Plovers are especially prone to disturbance, and for their size appear to be among the most sensitive species to human approaches in Australia (Weston et al. 2012).

ii. **Recognition of cultural landscape and living heritage**

The VCS acknowledges that healthy coastal and marine ecosystems provide significant social and cultural values for all Victorians. It is pleasing to see that the draft plan recognises the cultural significance of the area to the Eastern Maar and the Gunditjmarra Traditional owners and the cultural value of the landscape to residents and other visitors to the area. The plan notes the requirements under the *Aboriginal Heritage Act 2006* to protect Aboriginal cultural heritage but also refers to several authorized and unauthorized activities within the Belfast Coastal Reserve that are disturbing Aboriginal cultural heritage. The primary area of concern appears to relate to pedestrian, horse and motor vehicle access to sensitive dune areas.

The VCC is concerned that the plan may not adequately address the values of the Gunditjmarra Traditional Owners who have indicated that they do not support racehorse training within the reserve due to the threat it poses to their cultural heritage. The Council suggests that further

investigation is required as a matter of priority to ensure that adequate actions are in place to protect significant cultural heritage areas within the reserve and to avoid non-compliance with the 'Value and Protect' higher order VCS principle.

4. Consideration of the scientific evidence base to determine appropriate uses at individual sites

The VCS contends that timely and good decision making on the coast requires authoritative information based on science and evidence. Such information is essential to inform site specific assessments to determine appropriate uses at individual locations. For some critical decisions within the plan, Council considers that evidence is lacking. Below we offer a summary of the known state of knowledge about impacts of both horses, and dogs, and beach biodiversity, to support decision-making at individual sites.

Horses, and beach biodiversity

VCC notes that licences for commercial horse training on public beaches do not exist elsewhere in Victoria. It also notes that the environmental impacts of horses are poorly documented in Australia, but impacts may manifest themselves at low levels of usage (Phillips and Newsome 2001; Newsome et al. 2002, 2008).

No specific studies of the impact of horses on beaches in Australia exist, and this constitutes a key information gap and research need. However:

- In terrestrial contexts, horses appear more impactful than walkers (Pickering et al. 2010).
- Horses are likely to cause avian disturbance (see Weston et al. 2012), and shorebirds are known to initiate escape responses to horses; in at least some contexts these responses appear more frequent than those elicited by other stimuli (Lafferty 2001).
- Horses also create indentations in the beach which may trap or impeded the movement of flightless young of birds.
- Horses trample ground nests (Mandema *et al.* 2013) including those of shorebird nests on beaches (e.g., Sabine et al. 2006). The VCC is aware of observations of horses crushing beach nests from western Victoria (G. Maguire *pers. comm.*). Thus, on beaches horses represent a crushing risk for eggs and flightless young, especially in the upper beach and lower dune (Maguire 2008). Such crushing results in partial or complete failure of a given reproductive attempt.
- Horses trample beach infauna such as shellfish (Taylor et al. 2012). Only one study exists regarding this, from New Zealand, and which investigated horses and Surf Clams. On average, horse riding resulted in 36.9% mortality within a single hoof print. Extrapolative modelling predicted that the long-term presence of horse riders (and vehicles) would be highly detrimental to shellfish. Shellfish, and other beach infauna, form important parts of food webs on beaches so processes which disrupt these constitute stressors to beach ecologies (Defeo et al. 2008; Schlacher et al. 2008).
- Beach-visitors perceive horse-riding as among the most damaging recreational activities on beaches (Priskin 2003).
- Horse faeces deposited directly on the beach are little studied, but are known to occur, and are a possible source of contamination of water and sand (Kitts et al. 2014).

Dogs and beach biodiversity

Dogs on beaches represent a controversial topic, however a growing body of literature has been established:

- Dogs cause disturbance to vertebrate wildlife such as birds, apparently at greater distances and intensities than walkers (Lafferty 2001; Weston and Stankowich 2013).
- Dogs can crush bird eggs on beaches in Victoria (Weston et al. 2017).
- Dogs prey upon flightless young of birds on Victorian beaches (Lees *et al.* In Review).

- Compliance with leashing laws on Victorian beaches is low, and apparently intractable (Dowling and Weston 1999; Williams *et al.* 2009; Miller *et al.* 2013). Dog exclusion zones are associated with the highest compliance in Victoria, compared with other types of restrictions (Maguire *et al. In Press*).
- Dogs can dominate small coastal reserves, displacing or replacing natural scavengers (Schlacher *et al.* 2015).
- Dog faeces potentially contributes to bacterial loads in marine waters and beach sands (Halliday and Gast 2010; Zhu *et al.* 2011). In some surf beaches, it can represent the primary source of microbial pollution (Ervin *et al.* 2014).

Given these factors, the VCC supports the exclusion of dogs from the Conservation Zone as proposed in the draft management plan.

5. Apparent failure to apply state-wide policy on leasing and licensing

The plan identifies a significant increase in the area for licensed racehorse training over the current known use. The plan provides no information or justification on the coastal dependency of racehorse training or the net community benefit of licensing the activity.

The criteria for use and development on Coastal Crown land (including reuse and redevelopment) is outlined on page 66 of the VCS. Given that racehorse training is considered a use under license it would need to meet the criteria for use and development. The criteria include (but is not limited to) the relevant points:

- Demonstrates need to be sited on the coast, based on support for, and direct linkage to coastal activities.
- Demonstrates that the use and development cannot be feasibly located elsewhere.
- Recognises nature conservation and biodiversity as primary values for use and management of coastal Crown land.

The policy for decision making (on page 67 of VCS) states:

(5) Leasing and licensing arrangements on coastal Crown land (including renewals) must consider how they can contribute to achieving the outcomes and policies of the Victorian Coastal Strategy.

(6) Clear leasing and licensing agreements are established for commercial uses of coastal Crown land. Associated rentals, fees, rates and taxes should be competitively neutral to discourage the use of coastal Crown land as a cheap alternative to private land. The revenue raised should be directed towards protecting, developing and maintaining the environment and infrastructure in accordance with approved management plans.

It is noted in the plan that there is a synthetic sand fibre track at the Warrnambool Racecourse and that the demand for beach training of racehorses has increased significantly in recent years. It is unclear how the racing industry contribution to the local economy is connected to race horse training on the beach. The equity of licences between smaller and larger trainers is acknowledged as an issue but not addressed.

Gunditj Mirring Traditional Owners Aboriginal Corporation have expressed that they do not currently support commercial racehorse training occurring within the reserve. The increase in the area for racehorse training seems at odds with managing the area and working in partnership with Traditional Owners.

In table 5.1 of the plan, key threats to conservation assets of the reserve are noted. Habitat degradation from disturbance from horses (including recreational riding and training activities), the risk is noted as extreme for the following impacts, including after management action:

- Coastal dune scrub morphology/% vegetation cover (also important to the integrity of Aboriginal cultural values in dune areas including middens and burial sites)
- Resident shorebirds, nesting, fledging, feeding (Hooded Plover, Oyster Catchers)
- Migratory Shorebirds, feeding, resting (Fairy Prion, Grey-headed Albatross, Rudy Turnstone)

VCC contends that it is not consistent with statewide leasing and licensing policies to retain such significant risks unmitigated.

In the absence of risk mitigation, licence compliance will be even more crucial. There is anecdotal evidence that compliance to the current rules by some trainers has been low in some areas in recent history. There is little point introducing a licensing regime that is not honoured by all trainers. In the VCC's view, taking the step to formally licence the non-coastal dependent activity of training race horses on the foreshore requires a strong and commensurate commitment from all trainers to abide by licence requirements. Any failure, real or perceived, to do so should result in a strong enforcement response. With use of public assets for private activities comes a responsibility to live by the rules. VCC notes that this may require a step up in compliance monitoring activities by the relevant land management agencies. The VCC notes that it is currently unclear in the draft plan if adequate resources and accountabilities have been identified to monitor compliance with licence requirements, reserve conditions and regulations.

6. Research and monitoring

Research and monitoring activities in the draft plan are vague, especially relating to beach and coastal erosion monitoring. The plan could be enhanced by specifying the methods to be employed (e.g. beach profiles and ideally the measurement technique), locations to be monitored (e.g. location and number of beach profiles) and frequency and timing of measurements along with the parameters to be reported. In the absence of such detail being available, the plan could be improved by adding a framework and/or pathway to achieve clarity.

The physical state of the beach underpins the activities in the study area. The beach area between the water's edge and the toe of the dune system is the area at most risk. If this area gets narrower, or disappears, due to sea-level rise or storm activity, many of the other activities cease to have any meaning. Proper monitoring of this area is thus fundamental to any monitoring or investigation of other systems, physical, ecological or social.

It appears that many of the research and monitoring items lack specifics relating to inputs or outputs. This section of the plan could be clearer that monitoring and research are two separate topics. Monitoring is a specified process at a site occurring at specified times and the outputs are a given set of parameters which can be assessed over time and used to provide triggers for action. Research is an investigative activity with goals and aims, but without specified inputs and outputs as the outcome is not known in advance. It is important that this difference is recognised and VCC believes the final plan could be improved by being clearer in this section as a first step. Subsequent, greater clarity could be introduced into this section regarding the objectives, outputs and management actions of both the monitoring and research programs.

7. Conclusion

In summary, the Victorian Coastal Council submits that the current draft plan can be improved in a

number of crucial ways. Fundamentally, it does not adequately apply the framework and principles of the Victorian Coastal Strategy (VCS).

While the Council commends a satisfactory risk assessment and very comprehensive consultation process, the Council considers that the draft plan could be improved in important areas before being finalised.

Those areas were detailed above and can be summarized as:

- A better use and application of the Hierarchy of Principles in the Victorian Coastal Strategy, especially in the absence of a statewide policy for managing the use of dunes and beaches by domesticated animals.
- Stronger consideration of known environmental and cultural values in decision-making.
- A reconsideration of the application of existing relevant statewide policies on leasing and licensing in coastal areas.
- More clarity on the compliance requirements for authorised uses within the coastal reserve , and the relevant enforcement activities and resources of relevant land managers to ensure that any activities that pose residual unmitigated risks are managed as an immediate priority.
- Greater clarity could be introduced regarding the objectives, outputs and subsequent management actions of both the monitoring and research programs.

The Victorian Coastal Council welcomed the opportunity to comment on the Belfast Coastal Reserve Draft Coastal Management plan. Should you wish, I, or representatives of the Council, would be pleased to meet with you to discuss any issues or feedback raised in this submission.

Yours sincerely

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Submission from _____ to Draft BCR management plan

The long narrow beaches with few people, and almost no dogs and the only horses seen were those being swum for therapeutic purposes were a feature of Belfast Coastal Reserve (BCR). Upon enquiry, I was told that a Management Plan for BCR would be developed in the near future.

Over the years, I have noticed the increasing pressure on the coast between Warrnambool and Port Fairy from humans and their free running dogs and increasing numbers of horses, both race horses and recreational riders/horses of all types.

I object vehemently to ANY horses or unleashed dogs being in BCR for the following reasons: Horse riders have openly flouted the current rules about how they are to behave on the beach, including where they are to ride in relation to the waters edge, how many in a group, how fast they are allowed to ride, and even allowing other beach users safe access in the car parks and on the beach.

The trial horse access has been disastrous in that the riders leave the horse excrement behind (and dog owners are expected to pick up dog excreta, which often does not happen). This excrement is full of seeds of plants that easily become weedy in the dunes, as they ride through the dunes regularly, even though they are not supposed to.

Horse riders have been quite aggressive towards bird observers and other beach users, including swimmers and surfers.

There are no tidal limits, only time limits for the horses, which presents great problems when high tide coincides with the times that horses are to be on the beach. At these times, they have no option other than to ride next to or through the fenced nest areas for endangered Hooded plovers and other nesting shorebirds which are under increasing threats from humans, dogs and horses. Endemic and migratory shorebirds feed in the intertidal zone, and this is where most horse riding takes place. They are under constant disruption from horses and dogs. Horses running across the hard sand further compacts it, making feeding even more difficult and placing these birds under danger of being trampled or not gaining enough weight to safely make their annual migration. When horses are exercised at high tide, they often run along the base of the dune, causing erosion that does not repair. As a result, much dune has collapsed. The dune separating the ocean and the wetland that runs from Port Fairy to Warrnambool is quite narrow and should it be breached, the wetland and the farmland behind it are in grave danger.

Tyre tracks from all sorts of vehicles, both people-powered and motorised, have become a feature of the beach in recent years.

Kite surfers have also become something of an issue, especially with inexperienced users who can end up in trouble on beaches and potentially entangled with other people, etc.

We need to look after the dunes and the beaches for generations to come. The only way to do this is to keep all dogs on leads at all times; allow no horses in BCR at any time for any reason; keep ALL wheeled vehicles on made roads; and keep all watercraft access restricted to the main beach at Killarney. This will preserve BCR and keep it safe for all who seek to enjoy its natural assets.

Friday, 16 March 2018

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

We are part owners of horses currently trained in Warrnambool, and the opportunities beach training presents as well as the relaxed country environment the district has to offer is the key reason why we will continue to support the continuation of horse training in the region.

The beach training is a critical part of our horses' training routine, and we believe gives the horses an advantage in their general health and conditioning.

If this opportunity was not available, then the opportunities for our horses would be limited, and they would possibly need to retire from racing all together. The racing industry in the region supports a large number of people, and there would be a negative effect on the local horse trainers, their staff and livelihoods. Horse numbers would decrease, and a subsequent decline in the future of horses to be trained in the region.

The opportunity to train horses on Levy's Beach and the dunes is critical for the ongoing success of horse training in Warrnambool.

Regards,

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

As a current member of the Warrnambool Racing Club, this letter is written to provide my support to the continuation of Beach training in Warrnambool.

I am very proud of the fact we have the beaches to offer this unique horse training opportunity, this for certain provides significant positive economic benefits to our local community, and employs many passionate people.

and something we always make an effort to do together is to go down to the beach and watch the horses train. It's always a majestic sight, and when I bring other tourists from interstate to visit the region, it is always a highlight.

I know just how great the financial benefits are to the town and region, and the strategic benefit for trainers from training on the beach is indisputable. Trainers will leave the local community and seek these strategic advantage training opportunities elsewhere, should their beach access be denied.

The investment provided through the horse racing and training industry in Warrnambool has flow-on effects to a multitude of other businesses and families.

As communities all over the western district shrivel up in economic decline, with no answer provided by governments locally, state or federally for new, additional industries to support our communities, it beggars belief that a government would rule to remove one of the few strategic industry advantages Warrnambool has.

If the government rules to shut down beach access for horses, disadvantaging this core financial industry contributor to the western Victorian region, I would be most interested in hearing how it proposes to replace the almost \$100 million investment into the region as a result.

What we have is unique and something our community is proud of, as a result I am fully supportive of the continuation of horse training on our local beaches.

Regards,

Response to Belfast Coastal Reserve Plan .

Please accept this late and very brief set of comments.

Time has been at a premium. I need to register my concern at the possible destruction of a fragile dune system that is important to world wildlife preservation and the protection of Port Fairy.

The report is basically very good but it seems to be in 2 parts, 1 conservation and environment and 2 commercial exploitation. They are poles apart. Unfortunately there are many similar reports and plans gathering dust in offices around Victoria. In fact I have contributed to many of them

No action, no money and definitely an extreme lack of qualified staff. Without volunteer groups nothing would happen

Habitat protection has excellent ideals but at the moment no hope of ever being implemented or policed. You only have to look at Parks like Tower Hill, Little Desert, Arapiles, and parts of the Grampians to see how little ever happens.

Healthy Country, again great ideals but there is little evidence of active work. Signage unless well designed and placed has little or no impact, eg dogs and Hooded Plover sites. Again no enforcement .

The proposed zoning looks good in colour on a Plan but will be very difficult to implement. The whole area deserves to be Conservation with limited protected access to significant features

Once the comprehensive detailing of a conservation/protection policy is well developed out of nowhere comes a case to introduce large numbers of racehorses. This is in contradiction to an otherwise good study I feel that the numbers widely quoted for the horse case are very "rubbery" and based on a Racing Club report, used as a reference, but not publically available. I have frequently used figures that are "legitimate" but grossly inflate the flow on effect. Eg numbers employed , \$value to the District, etc. Surely these figures need to be publically tested.

The ideal solution would be to have beaches and dunes free of commercial horse training

Submission template for Draft Belfast Coastal Reserve Management Plan

About you:

Your name:

Your Organisation (if relevant): N/A

Postcode: 3284

Email or Postal address:

THIS SUBMISSION IS: **CONFIDENTIAL** **NOT CONFIDENTIAL** Date: 16/3/18

Your Comments:

Please Note – The following information will be made publically available.

Main reason for interest: *(such as local resident, visitor to parks, tourism operator, environmental interest, business operator, education interest, scientific interest)*

Local resident, environmental interest

How often do you or your organisation use the reserve?

Daily Weekly Monthly A couple of times a year Rarely Never

How do you or your organisation mainly use the reserve?

<input checked="" type="checkbox"/> Walking or running	<input type="checkbox"/> Dog walking	<input type="checkbox"/> Using the beach (swimming and surfing)
<input type="checkbox"/> Horse riding	<input type="checkbox"/> Horse training	<input checked="" type="checkbox"/> Volunteering
<input type="checkbox"/> Camping	<input type="checkbox"/> Hunting	<input type="checkbox"/> Fishing/boating
<input type="checkbox"/> Picnicking	<input checked="" type="checkbox"/> Birdwatching	<input type="checkbox"/> Socialising
<input type="checkbox"/> Other (please specify): _____		

Which part(s) of the reserve do you or your organisation most frequently use?

<input checked="" type="checkbox"/> West of Killarney (Port Fairy side)	<input checked="" type="checkbox"/> Between Killarney and Big Baldy
<input type="checkbox"/> East of Big Baldy (Warrnambool side)	<input type="checkbox"/> Not sure

The key element of my submission is that commercial race horse training in the Belfast Coastal Reserve should be banned for the reasons of:

- Safe public access
- Protection of the wildlife and environment
- Recognition of the publicly stated purpose of the Belfast Coastal Reserve

The plan entrenches racehorse training in large numbers in sections of the reserve that are critical shorebird habitat. Despite the plan acknowledging that racehorse training is an 'extreme risk' to shorebirds, it actually increases the area allowed for racehorse training over historical use and leaves the door open for expansion of numbers of horses allowed. The State Government funded a sand fibre training track and swimming pool at Warrnambool Racing Club and some trainers inland are replicating sandy dune-like beach conditions on their private properties. This is as it should be. The commercial racehorse industry should use its own properties, not public land that is critical for shorebird survival and loved for its passive recreational opportunities.

About the vision- Belfast Coastal Reserve, 15 years from now...:

How supportive are you of the vision for the Belfast Coastal Reserve?

- Very supportive Supportive Not sure/Don't know
 Unsupportive Very supportive

Comments: *(Your submission can be as short or long as you wish. Put comments under relevant headings corresponding to plan sections or strategies, noting page and paragraph numbers. Attach more pages if required).*

The vision encapsulates much of what I wish to see in the future for the Belfast Coastal Reserve except for the reference to 'horse riding': *"The location, timing and intensity of activities such as horse riding has been managed to avoid conflicts between uses, and to reduce the risk of damage to the environment and cultural sites"*.

The softer term of 'horse riding' deflects from the extreme risk and existing damage to wildlife, culture and passive recreation from commercial racehorse training in the reserve. The term 'horse riding' should be removed from the vision statement and replaced with 'recreational horse riding' and 'commercial race horse training' as appropriate.

Commercial race horse training should be banned from the Reserve.

Key management theme #1: Cultural landscape and living heritage

How supportive are you of the strategies for 'Cultural landscape and living heritage' included in the draft management plan?

- Very supportive Supportive Not sure/Don't know
 Unsupportive Very supportive

Comments: *(Your submission can be as short or long as you wish. Put comments under relevant headings corresponding to plan sections or strategies, noting page and paragraph numbers. Attach more pages if required).*

I strongly support the goals and strategies within this chapter of the draft plan including maintenance of geological features, recognising Traditional Owner and community connections to it, ensuring cultural landscape values are protected in heritage management, and establishing partnerships with Traditional Owners to protect and conserve heritage features.

All strategies are endorsed, noting that community groups will only agree to be delivery partners when they support the plan. Removal of commercial race horse training will assist with this support.

Key management theme #2: Healthy Country

How supportive are you of the strategies for 'Healthy Country' included in the draft management plan?

- Very supportive Supportive Not sure/Don't know
 Unsupportive Very supportive

Comments: *(Your submission can be as short or long as you wish. Put comments under relevant headings corresponding to plan sections or strategies, noting page and paragraph numbers. Attach more pages if required).*

Generally, I support the strategies for Healthy Country.

However, the risk assessment chart shows the extreme risk posed to coastal habitats, cultural heritage and resident and migratory wildlife by both recreational horse riding and commercial racehorse training. The management plan will not mitigate this risk and is therefore inadequate and cannot be supported.

The goals to which I give strong support include maintaining and enhancing habitats, reducing the impact of pest species and visitors, better management of marine, lake and swamp habitats, minimising the fire risk and building resilience to climate change.

It is very pleasing to see one of the strategies under this goal including water management of the Belfast Lough, which until now was not considered as part of the Belfast Coastal Reserve. But the strategy is vague, only referring to maintaining its aquatic values.

Jet skis should be banned from the lough and broader reserve.

Dogs should be permitted only in specific areas of the reserve where no birds are threatened, and only on-leash. Enforcement is critical and if non-compliance is observed, dogs should be banned from the reserve.

Key management theme #3: Recreation and use

How supportive are you of the strategies for 'Recreation and use' included in the draft management plan?

- Very supportive Supportive Not sure/Don't know
 Unsupportive Very supportive

Comments: *(Your submission can be as short or long as you wish. Put comments under relevant headings corresponding to plan sections or strategies, noting page and paragraph numbers. Attach more pages if required).*

I strongly support many of the goals and strategies that relate to the recreational use of the Belfast Coastal Reserve in this chapter including increased enforcement, better management of vehicular use, dog walking and recreational horse riding, bans on dune boarding, hunting and off-road vehicles, reducing risks and improving safety, improving information, interpretation and education, and developing tourism partnerships, marketing and promotion.

Commercial racehorse training is not compatible with the ecological, cultural and recreational values of the reserve. Recreational horse riding can have a place in the reserve as long as it is regulated and conducted in a manner that respects Aboriginal Cultural Heritage, the environment and wildlife and the safety and enjoyment of the public.

Jet skis should not be allowed in reserve waters, including Belfast Lough, because of their disturbance to wildlife and other recreational users, and damage to shallow water habitats.

Dogs should not be allowed off-leash anywhere in the reserve and if non-compliance is observed, dogs should be banned from the reserve.

Key management theme #4: Managing in partnership

How supportive are you of the strategies for 'Managing in partnership' included in the draft management plan?

- Very supportive Supportive Not sure/Don't know
 Unsupportive Very supportive

Comments: *(Your submission can be as short or long as you wish. Put comments under relevant headings corresponding to plan sections or strategies, noting page and paragraph numbers. Attach more pages if required).*

I strongly support the first goal in this chapter: Coordinated management of the Reserve enables efficiencies in program delivery and is supported by consistent land status and regulations. I note that fragmented management is never the best outcome – it is preferable for the reserve to be managed by one suitable entity – perhaps under the National Parks Act.

I also strongly support goals to ensure that Traditional Owners caring for their Country is an integral part of the reserve’s management and that community skills, knowledge and assistance provide stewardship and help in that management.

Key management theme #5: Research and monitoring

How supportive are you of the strategies for ‘Research and monitoring’ included in the draft management plan?

- Very supportive Supportive Not sure/Don’t know
- Unsupportive Very supportive

Comments: (Your submission can be as short or long as you wish. Put comments under relevant headings corresponding to plan sections or strategies, noting page and paragraph numbers. Attach more pages if required).

I strongly support this chapter’s goal and strategies and the indicators to be used to evaluate the effectiveness of the management plan.

Submission template for Draft Belfast Coastal Reserve Management Plan

About you:

Your name:

Your Organisation (if relevant): _____

Postcode: _____

Email or Postal address:

THIS SUBMISSION IS: **CONFIDENTIAL** **NOT CONFIDENTIAL** Date: 15/3/18

Your Comments:

Please Note – The following information will be made publically available.

Main reason for interest: *(such as local resident, visitor to parks, tourism operator, environmental interest, business operator, education interest, scientific interest)*

*I'm a local resident
recreational horse riding*

use of the reserve for safe and close

How often do you or your organisation use the reserve?

Daily Weekly Monthly A couple of times a year Rarely Never

How do you or your organisation mainly use the reserve?

<input checked="" type="checkbox"/> Walking or running	<input checked="" type="checkbox"/> Dog walking	<input checked="" type="checkbox"/> Using the beach (swimming and surfing)
<input checked="" type="checkbox"/> Horse riding	<input type="checkbox"/> Horse training	<input type="checkbox"/> Volunteering
<input type="checkbox"/> Camping	<input type="checkbox"/> Hunting	<input type="checkbox"/> Fishing/boating
<input checked="" type="checkbox"/> Picnicking	<input type="checkbox"/> Birdwatching	<input checked="" type="checkbox"/> Socialising

Other (please specify): _____

Which part(s) of the reserve do you or your organisation most frequently use?

West of Killarney (Port Fairy side) Between Killarney and Big Baldy
 East of Big Baldy (Warrnambool side) Not sure

Key management theme #1: Cultural landscape and living heritage/

How supportive are you of the strategies for 'Cultural landscape and living heritage' included in the draft management plan?

- Very supportive Supportive Not sure/Don't know
 Unsupportive Very supportive

Comments: *(Your submission can be as short or long as you wish. Put comments under relevant headings corresponding to plan sections or strategies, noting page and paragraph numbers. Attach more pages if required).*

My understanding is that local indigenous people have no problem with others enjoying their traditional space as long as it is looked after. I believe this has been the case, with exception of the increase in commercial horse training in the area, which lead to short-term negative impacts on the environment. Additional "Racehorses" and the planned management activities of Moyne Shire and Parks Victoria would be the only changes and I would be confident that both the Shire and Parks Victoria consulted with the local indigenous people on their activities.

My interactions with local indigenous people (seemingly unlike whoever put this plan together) is that they do not make broad sweeping decisions, but instead look at the detail and are very sensible with their feedback. I.e. I don't believe any indigenous people are opposed to recreational horse riding and I also don't believe they would be opposed to commercial horse riding training if well managed. My experience with local indigenous people leads me to believe that indigenous people would not be opposed to people walking their dog on the beach off a leash where there is no risk to birds and on a leash where the designated nest areas are known to be.

I agree in theory in working with users and community groups to reduce impacts from both authorised and illegal access on the fragile coastal dune systems. However, I am wary as I think at present that this plan seems to unfairly target certain groups.

I feel that this needs to be done with careful consideration. I feel that at present certain groups such as bird groups and environmentally focused groups feel that they are to protect the reserve from other users who also love the reserve and want to enjoy it.

I believe the plan unfairly targets recreational horse riders and also unfairly assumes that recreational horse riders and local residents don't responsibly use the reserve when horse riding or walk their dogs on the beach.

I agree in theory in recognising, respecting and interpreting the significance of the Reserve's cultural landscape and the dynamic nature of the scenic coastline and dune system. I do find it hard to visualise what this would look like in reality? Would it mean creating some educational signage (such as at Koonongwootong Reservoir) and perhaps a place to sit and reflect on these beautiful places of significance (maybe Bamstone could create some "especially designed furniture" in consultation with the local indigenous community for an area within the reserve that has significance to them? Maybe they want it to remain as it is? I'm not sure. Creation of any of these things does come with the risk of vandalism.

I agree with ensuring the impacts from large scale events such as storm surge, flood and bushfire are appropriately mitigated – however I would have thought that is business as usual rather than a new strategy.

I'm not sure what I think of the first two strategies on page 16:

Encourage a collaborative approach between Land Managers, Traditional Owners, Heritage Victoria and Aboriginal Victoria (with other partners as appropriate) to research and understand the outstanding cultural landscape of the Reserve;
Seek to recognise Belfast Coastal Reserve as a cultural landscape on the Victorian Aboriginal Heritage Register and increase appreciation of the extent, diversity and richness of the tangible and intangible Aboriginal cultural heritage associated with the Reserve

as I am unsure if it would negatively impact what I am opposed to, namely creation of a Conservation Zone which will result in not being able to ride my horse recreationally on the 3km stretch of beach. I now walk my dog on Port Fairy's East Beach instead of the exclusion zone as I really enjoy the flat, wide beach for dog walking and it's not much further and easy to access with a dog. However, I would be opposed to local resident not being able to walk their dog on a leash on the beach if they wanted to. I have been down to the beach within the proposed Conservation zone at least once week for the past 4 weeks to enjoy it and observe it in "peak summer/autumn period" and I have only seen one dog not on a leash in that area in that time and it was patiently watching its owner surf and did not move. Each time I have spent at least two hours in the area on my horse.

I am in support of: In partnership with Eastern Maar, Gunditjmarra and local communities, investigate renaming Belfast Coastal Reserve, key features and locations to reflect Traditional Owners' connections in accordance with the guidelines for Geographic Names standard process.

I am in support of the strategies on page 19 if that is what the local indigenous people want.

My feeling on the proposals on page 23 and 24 is one of caution. I am very cautious of the proposed targeted assessment of the informal track network to identify impacts to Aboriginal sites and prioritise management interventions for protection and conservation works.
The reason is that I believe at times, cultural significance is used as a reason for some people to oppose of some things that they don't agree with to allow their activities/lives to not have to share with. If the local indigenous people told me that they opposed me riding my horse recreationally in a responsible manner on the reserve, because it negatively impacted them due to known sites of significance, their cultural beliefs and/or their connection to the land then I would respect that and ride somewhere else.

However, unfortunately I have come across people who just don't want any horse riders using the beach (which includes limited use of dunes for access) as a general rule because they are surfing there and they think that the car park and tracks should be just for them – i.e. they don't want to share. I find this rude.

At this point in time I don't know what the result would be if a small finding was made, so I am concerned. I am unsure of what tracks are proposed to be closed but I am opposed to any closing of:

- Access track to beach at Gormans Lane – this is the most significant spot for me as the parking there is great, the track to the beach itself is consistent (and free of scary things) and the landing on the beach is protected by rock with good hard sand from entry all the way to the water line
- Any closing of access to the roller coaster as although I don't use it and haven't been on it for years it is a fantastic horse ride through there
- I'm not sure exactly which tracks are which past the roller coaster eastward but I am opposed to any closure of existing tracks that are used for trail rides by Rundells Mahogany Trail Rides. I am also guessing there would be recreational horse riders who live in the Dennington area that utilise tracks up the east end where I don't go.
- There is no need to comment on the area that is proposed for commercial horses.
- Access track on the west side of Killarney Beach
- Access by horses (commercial in small numbers or recreational) to Killarney Beach via the boat ramp
- Access by horses to the basin, I don't personally use that entry anymore but it has a pretty good car park and I have used it in the past.

Comments on other areas for access to beach for horses

Key management theme #2: Healthy Country

How supportive are you of the strategies for 'Healthy Country' included in the draft management plan?

- Very supportive Supportive Not sure/Don't know
 Unsupportive Very supportive

Comments: (Your submission can be as short or long as you wish. Put comments under relevant headings corresponding to plan sections or strategies, noting page and paragraph numbers. Attach more pages if required).

I am supportive of some of the strategies and am supportive of others in consultation with regular users of the reserve. I believe some strategies could have a negative impact on use of the reserve.

I support:

Facilitate the active rehabilitation of eroded dunes and wetland fringes via supplementary planting of site-indigenous species in areas where further disturbance could affect natural or cultural values.

Undertake invasive weed management through: Prioritising treatment of new and emerging weed species infestations e.g. Sicilian Sea-lavender; Staged control of priority woody invasive weeds e.g. reduce Coast Wattle; Containing the expansion of Marram Grass.

I feel concerned relating:

Reduce the impacts of fragmentation in dunes, foredunes and wetlands and prevent erosion by:
Closing illegal vehicle access points; Closing and rehabilitating informal tracks;

Relating to above, I'm not sure which informal tracks you are looking to close but please see comments in previous section regarding this. I think further consultation is required on tracks before any are closed. I would hope that there might be an invitation for all recreational riders to get together to discuss which tracks are the best options to maintain and which ones we are prepared to lose for revegetation/protection.

I have commented on the tracks I don't want to lose for my own personal recreational riding, however I think the major stakeholders to talk with are workers from Rundells who would be very familiar with that part of the reserve not only for the designated rides (they would be sending their patrons on the safest but also enjoyable paths) they do with patrons but also for the rides they do for pleasure.

I support:

- Ensuring the management of existing assets and planning for asset and access upgrades considers potential fragmentation and erosion impacts;
 - Promoting and educating visitors on the benefits of using designated pathways and the impacts of forming undefined tracks, trampling vegetation.
 - Monitor and reduce the impact of browsing animals (e.g. rabbits and hares) on priority habitat areas including Orange-bellied Parrot habitat.
-

I feel concerned relating:

Facilitate natural regeneration by protecting remnant vegetation from access through the installation of fencing.

It depends where the fencing is intended to go as there are no maps indicating this.

I support: Identify opportunities to connect the Reserve to other high-quality habitat in the area, enabling native animals to move through the landscape.

This "could" also be an opportunity create alternate walks/ horse rides for other users to safely enjoy. However, this is outside of the scope of this plan.

I support: all of the strategies on page 34, 39, 40 and 42

Key management theme #3: Recreation and use

How supportive are you of the strategies for 'Recreation and use' included in the draft management plan?

- Very supportive Supportive Not sure/Don't know
 Unsupportive Very supportive

Comments: (Your submission can be as short or long as you wish. Put comments under relevant headings corresponding to plan sections or strategies, noting page and paragraph numbers. Attach more pages if required).

I support:

Provide vehicle and walking access to visitor sites and beaches as shown on Map 3 and close and revegetate unauthorised tracks.

Provide signage and speed limits on shared-use roads to encourage appropriate driving behaviour.

Control illegal vehicle access to dunes and wetlands using bollards, gates and barrier fencing with clear signage at illegal vehicle access points.

I strongly oppose: any creation of a Conservation Zone which would not allow dogs (or horses) in the zone. I believe that this decision has been made with little thought of its implications of local residents wanting to take their dog for a walk in a responsible manner.

I support the off-leash dog access at Killarney beach all year except for 9am to 6pm from December 1 to Easter Monday when dogs are not allowed on the beach.

I advocate in addition to this that Killarney beach be re-instated as a canter/gallop zone for recreational horses all year round except for 9am to 6pm from December 1 to Easter Monday, when at which time a horse must slow to a trot when within 70 metres of a person and slow to a walk within 5 metres of a person. For years I had this stretch of beach all to myself outside the and even during the peak period. It only takes a minute or two at most to smoothly ride this stretch of beach. It is a fantastic stretch of beach which has safe hard sand, no wildlife and only a few potentially "scary" things (at the ramp end). Entry via the boat ramp is not steep, the sand is good and the horse has good vision coming onto the beach.

* I don't have an opinion of whether commercial racehorses should be allowed back on Killarney beach. Overuse by race horses created large ruts, so if the industry wanted to go back there, it needs to be better managed (they pay to have it graded regularly/ less horses) but it is a good strip for horses for the above-mentioned reasons.

I strongly oppose:

Provide recreational horse riding access only in the Conservation and Recreation Zone on defined tracks and restricted to the water's edge when riding on the beach.

Implement a permit system for group recreational horse riders, providing detailed conditions of use.

This aspect of the plan show how little investigation was carried out to understand the current use by recreational riders.

The reasons why I love recreational horse riding in the Belfast Coastal Reserve, particularly in the proposed Conservation Zone.

-

unfortunately cars do not slow down enough for horse riders. I am not able to ride safely on the public roads, even in residential streets (non-main roads) people in cars don't think about how quickly and easily a horse can get from the nature strip to the other side of the road. My horse can clear a double road if frightened in two steps. There is the ability to ride a section of the rail trail from Murray Goulburn in towards Warrnambool, but unfortunately push bikes don't seem to slow down either so I have avoided that ride in recent years.

-

the next nearest safe location to ride (Orford)

(I consider "a ride" as where you can ride safely for 30 minutes or more, as a rule horse won't get back on the float without at least that amount of exercise)

- After that the options are:
 - Sawpit at Narrawong
 - Timboon forest
 - Lake Bolac
 - Cobbooboonee Forest – two locations both drive away
- The sand is hard from the west of Killarney beach eastward to Rutledge's Cutting. Tidally there will be some softer patches however this section does not have any "deep sinking sand"
- I usually prefer riding from Gormans to Killarney or from Gormans to anywhere up to Levy's depending on time of day/tide/sand. The ride from Gormans to Killarney is interesting, there's generally some good sections of seaweed which is pretty and there are generally birds amongst it to look at, then there are some clear stretches of hard sand to canter along. I like watching the plovers feeding on the waterline. I used to think they were stupid to keep flying ahead of me until someone told me that was a strategy to get you further from their nests. I think that is cool. The coast is varied and that makes it interesting for me and my horse. We both enjoy it.
- Care needs to be taken when riding from Rutledge's Cutting eastward, sometimes the sand can be incredibly sinking. However if you are lucky enough to ride in the middle of the day or early afternoon it can be pretty good. If a horse needs a good muscle work out and is well controlled and able this sinking sand can be a really good work out if you are very careful, I know plenty of people who have had horses trip in this area. Hence, I do find it interesting that the proposed areas for recreational riding are some of the least safe for most horses.
- The area east of the Killarney Boat Ramp is a fabulous spot for getting a horse familiar with swimming. It is really safe as there are no waves past the shoreline and there is a natural drop off that has a horse go from mid-thigh to completely swimming, which is really lovely.
- The area just east of Gormans Lane is also fabulous for a horse to have its first few splashes in water.
- I can ride my horse here for 2-4 hours easily only covering the same ground upon my return. When I ride I usually ride from 2-3 hours and I think this is what was perhaps overlooked when the Conservation Zone was proposed. People usually ride their horse for at least 30 minutes. If you take the time to put your horse in the float you generally want to be riding for at least 2 hours if light allows and at least half an hour in the winter months. I don't know that it was realised when the Conservation Zone was proposed that 2 out of 3 of rides that I do (and a lot of other people do too as they are the best ones) would not be able to be done.

My concerns are:

- I don't particularly like the thought that if I want to ride with over 6 people that we would need to get a permit to ride in the Conservation and Recreation Zone either. In the daylight savings period there is a group of riders who ride there weekly and there are generally 5-8 riders and it would be a pain to have to get a permit every time. If you want to go down the road of permits, I think that I would like an option to be able to apply for a licence to ride there all year round. I would hope there would be no charge attached.
 - I find it kind of insulting that the plan is proposing that riders provide detailed conditions of use. I also wonder how it intends on being managed. I imagine no one who works in the Warrnambool area of Parks Victoria was in agreement with that idea. I think that also shows that very little investigation/contact was made with recreational riders. Warrnambool Trail Horse Riders Club and I don't believe that the club has been contacted. Every single rider at the club knows what is termed "detailed conditions of use". I call it being responsible and even if I wasn't responsible the following would still apply because I want my horse to be safe:
 - I would stay out of the fenced nesting areas/ I laugh that anyone might think that anyone would want to take their horse in there, not only would I stay out but I would naturally
-

keep my horse as far as safely possible away from the fenced off area as it is a riding hazard.

- I would ride as close to the water line as safe as this is where the best surface for riding can be found (contrary to whoever thinks otherwise people don't ride their horses near the dunes as a rule) most of us only venture anywhere near there to leave the beach or if there are unavoidable (fisherman/people/dogs/wildlife who don't want to move for whatever reason) or if the horse was out of control (doesn't happen much) and the person needed to slow their horse quickly but wasn't agile enough to turn their horse in a circle (which is the preferred approach).

I support: all strategies on page 56

I support: the strategies on page 57.

In addition, I believe that the reposition of the Golfies carpark needs to be prioritised to be designed immediately and include major resurfacing of the track as it is pretty unsafe. If the new carpark for the horse area was moved, with a good track to drive in on and the track to the beach was designed with horses in mind, I would consider riding there outside commercial riding hours and if it was I would be pretty delighted to have another riding option.

I support: all strategies on page 58 and as previously mentioned I would suggest that as per the last strategy, that recreational horse riding is also permitted again on Killarney Beach at a canter/gallop with conditions.

I oppose: prohibiting dogs and horses from The Basin, Pelicans and Towilla Way beaches. I have ridden there for years and I am responsible and I am a horse rider and an animal lover so I don't want to hurt the birds and I know I have safely ridden around them for years. I do believe that dogs must be on a leash in the areas where these birds nest.

I support:

Maintain signage (e.g. permissible uses and warnings) and increase compliance patrolling.
Upgrade boat access to Armstrong Bay, using low impact design.

I support:

Rationalise beach access e.g. close secondary beach access tracks, revegetate and treat weeds.

I support closing beach access at Pelicans.

I am not sure where Towilla Way beach is but I think closing beach access would be ok

I do not support closing any beach access at the Basin.

Although I support:

Reinstating bluestone rock barriers to limit illegal beach access by vehicles. Page 59

It would be good if the design could consider that horses can be spooked by these if they are too big.

I oppose page 60 in its general bias against recreational horse riders and dog walkers. It is really disappointing to read this page.

- I am not opposed to closing Rutledges Cutting carpark as previously mentioned, but it would be good if there was enough access that if needed a horse could pass.
 - I support dogs being on a leash (AT RUTLEDGES AND KELLYS SWAMP) but I am opposed to dogs being prohibited. I see a lot of responsible dog owners walking their placid dogs on a lead (and one dog who was not on a lead but was not leaving the shoreline until his surfing human came back from the waves, I would be said if this human was fined).
 - I am not opposed to rationalising beach access but I believe you need to consult with the local about what ones are removed.
 - I support establishing a low viewing platform for surfers and other beach users to check beach conditions to reduce off-track impacts
 - I support permitting small numbers of horse training under licence at Rutledges Cutting to provide for local trainers that have historically used the reserve. In addition to this it would be nice if the wording would add recreational riders also (no number restrictions).
-

-
- I am opposed to horses being prohibited at Kelly’s Swamp Track without having a public meeting of interested recreational horse riders to come to an agreement on some trails to be ridden in the area.
 - I support formalising key trails and the loop network for walkers
 - I support a program of track closure, rationalisation and revegetation IN CONSULTATION WITH KEY STAKEHOLDERS AFFECTED, namely dog walkers, recreational horse riders and bird lovers.

I support all strategies on page 61, 62 and 64

I support all strategies on page 65 EXCEPT:

Close the beach to **horse riding groups** (I agree with closing it to racehorses as the idea is that they go fast) when Hooded Plover nests extend onto narrow sections of beach. Horse riding groups will use common sense and only walk and won’t access if the tidal conditions are suitable.

I support all strategies on page 66, 67, 68 and 69

Key management theme #4: Managing in partnership

How supportive are you of the strategies for ‘Managing in partnership’ included in the draft management plan?

- Very supportive Supportive Not sure/Don’t know
 Unsupportive Very supportive

Comments: *(Your submission can be as short or long as you wish. Put comments under relevant headings corresponding to plan sections or strategies, noting page and paragraph numbers. Attach more pages if required).*

I support the strategies.

Friday, 16 March 2018

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Belfast Coastal Management Plan

As horse/s trained in Warrnambool, the opportunities beach training presents as well as the relaxed country environment the district has to offer is the key reason why I will continue to support the continuation of horse training in the region.

If this opportunity was not available, the opportunities for these horses would become limited, thus there would be potential for them to retire from racing all together. This would have huge effect on the local horse trainers, horse numbers would decrease as well as taking away the opportunity for any return to continue to fund future horses to be trained in the region.

We believe that training horses on the beach is indeed a privilege, and there are many things that trainers can do to minimise the impact of exercising horses on the beach, and not degrade other users experience or the conservation values of the area.

To this end we support many of the recommendations contained in the draft management plan, Specifically not working horse west of Rutledge Cutting, limiting horse numbers per trainer in this location, working near the waters edge, limiting disturbance around car parks and beach access, and avoiding environmentally sensitive areas. We have no interest in working horses in the dunes although I acknowledge that other trainers feel that this is an important element.

Kind Regards

Draft Belfast Coastal Reserve Management Plan

About you:

Your name:

Your Organisation (if relevant):

Postcode: 3280

Email or Postal address:

THIS SUBMISSION IS: CONFIDENTIAL NOT CONFIDENTIAL Date: 15/3/18

Your Comments:

Please Note – The following information will be made publically available.

Main reason for interest: *(such as local resident, visitor to parks, tourism operator, environmental interest, business operator, education interest, scientific interest)*

- **this is the most backward Plan I have ever seen. Instead of phasing out Commercial Horse Training which it says over 20 times is a threat to the reserves values, it increases its extent? In the 21st century why would you make this decision? Its not valuing the reserve its accommodating the Racing (Gambling Industry) in a Nature Reserve. This is absurd and screams of vested interests particularly by the MP's supporting this who have known links to the racing industry, Tehan, Purcell and Britnell and Napthine. One has to ask has their been coluded behaviour in the creation of a document that when it left Warrnambool was vastly different to how it looks now. Dodgy!**
- **The taxpayer has already helped fund 700K of sandtrack at the 120acre racecourse, why is this not good enough? If you need one on a hill there are hills there and sand dredged from the lady bay could be used. There is no need to put Cultural Heritage, Endangered species and Public safety at risk. None at all.**
- **Latest tourism reports show that visitors to the area want a two night stay and a Nature or Cultural based tourism experience, why would you choose the gambling industry over this sustainable source of future jobs. It is a wild stretch of beach with endangered species, fishing, heritage. It makes no sense, its backward thinking. Why not let the gambling industry fund solutions to its problems like any other business? Why impose it on public conservation land when they have 120acres of Public Land? Absurd**
- **I do not want to see the area trashed by racehorses, I don't want the Aboriginal Cultural Heritage destroyed that will**

further be exposed, I don't want the weeds the horseshit will bring. I want to see the area valued for its conservation and heritage importance.

- **Is it even legal to have been conducting this activity in the first place at Levy's? The area is zoned PCRZ the highest conservation planning zone, it does not permit this activity.**

- There are many good elements in the draft coastal management plan that I wholeheartedly support: cultural heritage protection; joint management; education and interpretation; monitoring and research; rationalisation and closure of inappropriate beach access; dog control. But it remains deeply flawed because of its complicity in entrenching and expanding the use of the reserve by commercial racehorse trainers.

- Under the plan, commercial racehorse training would rapidly expand to multiple beaches and in sand dunes, with devastating effects for the nationally threatened hooded plovers—the reserve is its most important breeding area in the state according to the plan—other coastal wildlife and the safety and enjoyment of mum, dad and the kids, anglers, surfers and other beachgoers.

- The length of beaches available to racehorse training would, under the plan, be increased by 250% (from 2 km to 5 km) and the number of horses by 400% (from 65 to 256 each day). That represents 25% of the reserve's beaches, with nothing in the plan to stop future expansion.

- The draft plan would allow racehorses back into 750 metres of fragile dunes behind Levy's Beach and at Hoon Hill, where in the past they have caused severe dune erosion. The plan even recommends racehorse training within the Conservation Zone at Rutledge's Cutting. That is inexcusable.

- Many times, the draft plan refers to damage caused by racehorses but fails to explain how increasing the area available to them by 250% will mitigate these impacts. Worse still, the plan's risk assessment reveals that management won't make any difference. Before management, the risk to coastal dune vegetation, cultural heritage, resident and migratory shorebirds from racehorse training is rated 'Extreme'. After management is introduced? The rating remains—Extreme!

- Ever since the uninvited invasion by racehorses in 2015, their training has been mismanaged, with numerous breaches of licensing conditions, public safety put at risk and taxpayers footing the bill for costly Parks Victoria surveillance and infrastructure upgrades. Expanding the number of training beaches will simply make that worse.

- By entrenching and expanding commercial horse training the plan is a relic of past coastal mismanagement and inappropriate use.

Executive summary (pages v-viii)

- The draft plan claims on page vi of the executive summary that it is consistent with the 'existing strategies and guidelines of relevant governing bodies'. This is simply not true. It is inconsistent with the:

- o original and ongoing purpose of the reserve which aims to conserve coastal wildlife and cultural heritage, and support passive recreation and public education
- o Victorian Coastal Strategy, which urges that coastal dune and beach systems be protected from damage and that any uses should be coastal dependent, which means they can only be carried out along the coast. Commercial racehorse training is clearly not one of those
- o City of Warrnambool's planning scheme: the Levy's Beach to Hoon Hill area is covered by a Public Conservation and Resource Zone, which lists the uses that are allowed with or without a permit. Any uses not listed are prohibited. Commercial racehorse training is not listed so should be prohibited.

About the vision- Belfast Coastal Reserve, 15 years from now...: (page 7)

How supportive are you of the vision for the Belfast Coastal Reserve?

- Very supportive Supportive Not sure/Don't know
 Unsupportive Very supportive

- The vision encapsulates much of what I wish to see in the future for the Belfast Coastal Reserve except for the reference to 'horse riding': "The location, timing and intensity of activities such as horse riding has been managed to avoid conflicts between uses, and to reduce the risk of damage to the environment and cultural sites". The softer term of 'horse riding' deflects from the extreme risk and existing damage to wildlife, culture and passive recreation from commercial racehorse training in the reserve. The term 'horse riding' should be removed from this statement and commercial racehorse training removed from the Belfast Coastal Reserve. Throughout the rest of the plan there are 24 references to the impacts that horses have on the reserve's natural, cultural and recreational values. More on this under Key Management Theme #2 Healthy Country.

Key management theme #1: Cultural landscape and living heritage (pages 13-24)

How supportive are you of the strategies for 'Cultural landscape and living heritage' included in the draft management plan?

- Very supportive Supportive Not sure/Don't know
 Unsupportive Very Unsupportive

Comments:

- I strongly support the goals and strategies within this chapter of the draft plan including maintenance of geological features, recognising Traditional Owner and community connections to it, ensuring cultural landscape values are protected in heritage management, and establishing partnerships with Traditional Owners to protect and conserve heritage features. However, one of the strategies—"Work with users and community groups to reduce impacts from both authorised and illegal access on the fragile coastal dune systems"—is expecting too much from community groups to act as delivery partners when those groups will witness daily the extreme damage to sand dunes and beach habitats from commercial racehorse training which, under the plan, will have 'authorised access'. The goals and strategies also ignore the extreme risk to cultural heritage from commercial racehorse training.

Key management theme #2: Healthy Country (pages 28-42)

How supportive are you of the strategies for 'Healthy Country' included in the draft management plan?

- Very supportive Supportive Not sure/Don't know
 Unsupportive Very Unsupportive

Comments:

- This chapter reveals the draft plan's underlying contradictions regarding commercial racehorse training. On page 29, the draft plan admits that the extreme risk to coastal habitats, cultural heritage and resident and migratory wildlife from commercial racehorse training will remain so even following management action. This fundamental contradiction in the draft plan will undermine the achievement of the very good goals and strategies in this chapter. The goals to which I give strong support include maintaining and enhancing habitats, reducing the impact of pest species and visitors, better management of marine, lake and swamp habitats, minimising the fire risk and building resilience to climate change.
- It is very pleasing to see one of the strategies under this goal including water management of the Belfast Lough, which until now was not considered as part of the Belfast Coastal Reserve. But the strategy is vague, only referring to maintaining its aquatic values. This needs to be more articulate and refer to water quality, water levels and habitat protection, especially the strong management of motor boats and jet skis, which in the shallow waters can significantly impact on shallow-water habitats and birdlife. Jet skis should be banned from the lough and broader reserve.
- Reducing threats and impacts are a commonly used measure to build resilience to climate change within natural systems. Horses have the most impact in the reserve, especially with regard to dune vegetation and stability. Sea-level rise may reduce the width of beaches and intensify the impacts of racehorses on that habitat. The best way to build resilience is to get the racehorses out.

Key management theme #3: Recreation and use (pages 45-69)

How supportive are you of the strategies for 'Recreation and use' included in the draft management plan?

- Very supportive Supportive Not sure/Don't know
 Unsupportive Very Unsupportive

Comments:

- I strongly support many of the goals and strategies that relate to the recreational use of the Belfast Coastal Reserve in this chapter including increased enforcement, better management of vehicular use, dog walking and recreational horse riding, bans on dune boarding, hunting and off-road vehicles, reducing risks and improving safety, improving information, interpretation and education, and developing tourism partnerships, marketing and promotion. But without the removal of commercial racehorse training, these goals will not be achieved.
- A far more honest heading for this chapter would be 'Recreational and commercial use'. Too often the plan seeks to confuse recreational riding and commercial racehorse training or to downplay the intensity and impacts of the commercial activity, continually referring to the training as a 'licensed' or 'authorised' use to convey that it is not negotiable, it cannot be restricted or removed. By including it within a chapter mainly on 'recreation', it again tries to downplay the highly commercial and intensive nature of racehorse training.
- The draft plan recommends strict controls on where and how recreational uses are to be managed in the future, whereas commercial racehorse training will be expanded. That doesn't make sense.
- In the introduction to this chapter, the draft plan states, with my underlining: Riding of horses for recreational or commercial purposes was viewed as a threat to dune health, cultural heritage, shorebirds and public safety, especially if riders did not comply with regulations, codes of conduct or licence conditions. This suggests that the community is mainly concerned about impacts that occur when commercial racehorse training doesn't follow the rules. But as the risk assessment table reveals on page

29, even with rules, management will not mitigate the extreme risk from commercial racehorse training.

- Jet skis should not be allowed in reserve waters, including Belfast Lough, because of their disturbance to wildlife and other recreational users, and damage to shallow water habitats.
- Dogs should not be allowed off-leash from 1 August to 30 November at Killarney Beach, coinciding with the first part of the hooded plover breeding season.
- It is ludicrous to consider renaming Hoon Hill to 'improve expectations on visitor behaviour' when those same visitors will witness racehorses and their riders 'hooning' up and down the dunes of the hill.
- Section 6.5 of this chapter is titled 'Authorised uses', code for commercial racehorse training. Much of the emphasis in this section is the regional economic importance of the racing industry as justification for the damage that it is causing and will continue to cause if it remains in the Belfast Coastal Reserve. But in a September 2013 report prepared for the Victorian racing industry by consultants IER, it was revealed that the racing industry generates \$75 million gross value added in the Western District, which includes Warrnambool but also a number of other racing clubs at Casterton, Coleraine, Hamilton, Terang, Camperdown Mortlake, Peshurst and Dunkeld. The report also reveals that 40% of statewide gross value added for horse racing is from gambling, which takes money out of the community. If applied to the Western District, \$30million of the gross value added would be from gambling, which leaves \$45million shared across all of the region's clubs.
- This is tiny relative to other sectors in the regional economy. Most jobs are provided by the healthcare and social assistance, retail and accommodation and food services sectors. Tourism generates more than half of Warrnambool's total economic output of \$3.3billion. Except for the May Racing Carnival being mentioned in a dot point in an event strategy, the racing industry in Warrnambool is ignored in the Warrnambool Economic Development and Investment Strategy 2015-2020 prepared by the Coty of Warrnambool.
- It appears that the main reason for justifying a huge expansion in commercial racehorse training is 'due to community interest' and so the 'plan sets out an approach for horse training that balances support for the racing industry, equity of access for all trainers and ensuring adequate protection for cultural and natural values'. The consultation carried out by Parks Victoria confirmed the serious concerns the community had about commercial racehorse training, but that is now being referred to as 'community interest' that justifies the racing industry's use of the reserve. It sounds ludicrous and it is.
- I strongly condemn the goal under this section of the chapter—Authorised uses of the Reserve are managed to minimise the effect on values and visitors—with regards to commercial racehorse training as it is incompatible with the goals of the plan and the purposes of the reserve.

Key management theme #4: Managing in partnership (pages 71-75)

How supportive are you of the strategies for 'Managing in partnership' included in the draft management plan?

- Very supportive Supportive Not sure/Don't know
 Unsupportive Very Unsupportive

Comments:

- I strongly support the first goal in this chapter: Coordinated management of the Reserve enables efficiencies in program delivery and is supported by consistent land status and regulations. But I cannot support the strategies that aim to achieve it. The plan recommends retaining the fragmented management across the City of Warrnambool, Moyne Shire Council and Parks Victoria and leaving the reserve under the Crown Lands (Reserves) Act. The reserve should become a park under the National Parks Act.
- I also strongly support goals to ensure that Traditional Owners caring for their Country is an integral part of the reserve's management and that community skills, knowledge and assistance provide stewardship and help in that management. However, if commercial racehorse training is retained inside the reserve, all of their efforts would be to nought.

Key management theme #5: Research and monitoring (page 77-79)

How supportive are you of the strategies for 'Research and monitoring' included in the draft management plan?

- Very supportive Supportive Not sure/Don't know
 Unsupportive Very Unsupportive

Comments:

- I strongly support this chapter's goal and strategies and the indicators to be used to evaluate the effectiveness of the management plan. However, the plan fails to explain how it will lower the extreme risk presented by commercial racehorse training revealed in the table on page 29. That table proves that it cannot and so commercial racehorse training should be removed from the reserve.

13th March 2018

Submission in response to the Belfast Coastal Reserve Management Plan

writing to express my deep concerns about the current Belfast Coastal Reserve Management Plan Proposal put forward by Parks Victoria.

This town has a great community and has very quickly become a really enjoyable place to live for so many reasons.

We are both deeply committed to the local area and the lifestyle this region offers us both professionally and personally.

I am a frequent user of the Belfast Coastal Reserve and have been for many years.

I currently use the same area almost daily during the warmer months and then depending on the weather I also go down during the cooler months to walk my dogs as I no longer have a horse to ride. As locals, the beaches within the reserve are just beautiful and I am sure since this proposal has come out people are now aware how important they are to so many locals for so many different reasons within the local community and also the wider community of the South West Region.

Since learning about the current proposal, I simply can't believe the extreme exclusion so many in the local community will be subjected to should the powers that be allow this plan to go ahead. As Dr Grainne Maguire from BirdLife Australia stated in her research 'A practical guide for managing beach-nesting birds in Australia from May 2014 pg. 5 (<http://www.birdlife.org.au/documents/BNB-Manualpart1bsm.pdf>)

*'Total beach closures to protect these sensitive birds would **deprive Australians of access to one of their most favoured environments and so would never be a feasible approach to their conservation**' she added that **'striking a balance between the protection of beach-nesting birds and the needs of beach recreationists (people that use the beach for recreational purposes, including walking, dog walking, swimming, surfing, fishing etc.) could be done through 'increasing awareness, understanding and involvement by communities in conservation of beach-nesters, particularly as many of the threats faced by these birds can quite easily be abated through public education, such as encouraging dog leashing on beaches during breeding season.'***

If this is the belief of the manager of BirdLife Australia then why has this not been taken into account for this proposal? The current proposal pushes dog walkers to either end of the proposed conservation reserve in areas with very little access to the beach to the east and to the west of Killarney Beach that has restrictions during the warmer months and still has nesting shore birds. There have even been suggestions that dog walking tracks be created through the dunes. These dunes are infested with snakes and also 1080 baits used to manage introduced predators in the reserve in particular foxes. How could anyone believe dog walkers would put their animals at such risk by walking in these areas let alone their own risk with the number of snakes.

Maguire also stated in a letter to the Editor published in The Standard on the 16/2/2018 (<http://www.standard.net.au/story/5230215/letters-to-the-editor-february-16/>) saying that;

*'**Hooded plovers have not declined within the reserve. Instead, their breeding success has plummeted in the face of increasing, high intensity threats and the lack of management to address these.** She adds that **'the balance for these birds has been greatly upset by the increased use of coasts over time by people, dogs, horses and vehicles, plus increases in predators and changes to habitat like infestation with Marram Grass.'***

However, as the I have outlined below one of the reasons for the growth in this area would surely be because of the lifestyle we are so privileged to enjoy through the access people have to these beaches. The Moyne Shire Council (<http://www.communityprofile.com.au/moyne/>) states that;

‘Moyne has a total population of around 17,000 residents, with much of the growth within the Shire having occurred to the south in the coastal areas. With a steadily increasing population, the State Government anticipates continued population growth up to 0.5% through to 2031.’

The following information is gathered from the current Draft Domestic Animal Plan 2017 by the Moyne Shire Council with statistics of dog ownership within the Shire shows 0.15% of the population own dogs (that are registered) which is a small number. (www.moyne.vic.gov.au/files/assets/public/.../draft-domestic-animal-plan-2017.pdf).

Attribute	Value
Population	16,856
Area	5,478km ²
N ^o of EFT Authorised Officers (Animal Control)	3
Hours training per officer annually	30
N ^o of registered Dogs	2673
% of registered Dogs that are de-sexed	58.88%
N ^o of registered restricted breed dogs	0
N ^o of declared menacing dogs	3
N ^o of declared dangerous dogs	0
N ^o of dogs collected by Moyne and returned directly to owner	191
N ^o of impoundments by Moyne Shire (dogs)	103
N ^o impoundments by Public (dogs)	26
N ^o of impounded dogs re-claimed by owner	63
N ^o of impounded dogs rehoused	52
N ^o of impounded dogs euthanized	9
N ^o of Registered Cats	728
% of registered Cats that are de-sexed	84.48%
N ^o of impoundments by Moyne Shire (cats)	48
N ^o of impoundments by Public (cats)	92
N ^o of impounded cats re-claimed by owner	10
N ^o of cats rehoused (includes cats impounded by Warrnambool City Council and rehoused into Moyne Shire)	82
N ^o of impounded cats euthanized	25
N ^o of Boarding establishments	6

The Council also stated in the Plan that;

Dangerous, Menacing and Restricted Breed Dogs

Current Situation

Moyne Shire currently has no restricted breed dogs, three menacing dogs and no dangerous dogs on the register.

Very few dogs are declared in Moyne Shire as most owners of dogs that are involved in serious attacks involve livestock and the owner is fearful their dog may attack again and have their dog euthanized.

There are no statistics of current dog user rates within the Belfast Coastal Reserve proposal, therefore how is Parks Victoria declaring on pg. 45 under Chapter 6 Recreation and Use that;

‘Dogs were considered to be one of the biggest threats to shorebird breeding sites, particularly when off-leash, as well as a safety issue following instances of people being bitten by dogs’.

I also emailed the Moyne Shire Council and had a response from to my query via a phone call stating with his permission;

A search of Council records dating back to 2013 has found no records of any dog attacks occurring within the Belfast Coastal Reserve during this time.

Regards



MOYNE SHIRE COUNCIL PO Box 51 | PORT FAIRY | VIC | 3284

For more information about Moyne Shire visit www.moyne.vic.gov.au Please consider the environment before printing this email

During the past couple of months dog walkers have been intimidated, harassed and subjected to being followed by photographers making them feel like criminals for continuing to enjoy the simple pleasure of walking a dog along these beaches. I would like to dispel the myth that all dog walkers have little to no respect for the nesting and resident shore birds along these beaches and that we feel we are 'entitled' to use the beaches no matter the cost to flora and fauna. This is very untrue as I have nothing but respect for the environment but believe very strongly we can co-exist and create a balance for all to continue to enjoy these beaches.

According to the Victorian Population Health Survey from 2008

Moyne Shire (<https://www2.health.vic.gov.au/Api/downloadmedia/%7B0D2747FC-C672-4243-B891-74CD9C276E10%7D>)

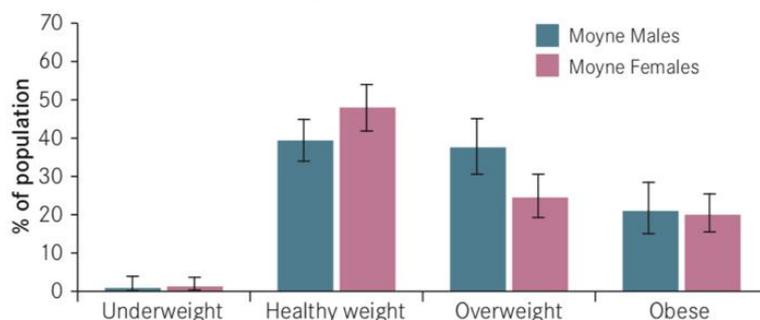
These were the rates of obesity in our area back in 2008;

Overweight and obesity

Being overweight or obese is an important risk factor for developing type 2 diabetes, cardiovascular disease, hypertension, certain cancers, sleep apnoea and osteoarthritis. It is typically measured by calculating a person's Body Mass Index (BMI), which is their weight in relation to their height⁹.

In 2008, 37.6% of males and 24.5% of females in the Moyne Shire were overweight, similar to Victorian males and females (39.9% and 24.2% respectively). More than one in five males (21.0%) and 20.0% of females in the Shire were obese, also similar to Victorian males and females (17.3% and 16.1% respectively).

Percentage of overweight and obesity in adults, 2008



Dogs get people out and about, walking, accessing the environment and involving themselves within the community. There are lots of familiar faces along the reserve which creates unity and community. Why discourage this by locking dog walkers out of the reserve as this proposal is suggesting?

I feel the proposal has numerous flaws the two greatest being that as Parks Victoria stated at the in-depth conversations with the community in Warrnambool, Port Fairy and Koroit the statistics used for this proposal come from areas other than the beaches in the proposal including the Mornington Peninsula to name one and other parts of the Victorian coastline. The incidence of dog walkers along our beaches would be significantly fewer as shown in the Current Domestic Animal Management Plan for the Mornington

Peninsula Council (<https://www.mornpen.vic.gov.au/Your-Property/Animals-Pets/Domestic-Animal-Management-Plan>) stating there are 28,871 registered dogs compared to 2673 in the Moyne Shire Council.

Domestic Animals Snapshot

Domestic Animal Snapshot – Mornington Peninsula Shire Council	
	2016-2017
Population	160,862 (ABS ERP)
Number of households	57,789
Geographic area of municipality	723km ²
EFT Authorised Shire Rangers (including Seniors)	6.3 (ie. 60% workload of 10.5 Shire Rangers)
EFT Authorised Shire Rangers per 1000 households	0.11
Hours of animal management training per Shire Ranger	12
Number of dog complaints, requests, infringements	4,500
Number of cat complaints, requests, infringements	1,417
Number of dog or cat complaints or requests per Shire Ranger (excluding impoundments)	945
Number of registered dogs	28,871
Number of registered declared dogs (dangerous, menacing or restricted breed)	26
Number of dog attacks	363
Number of registered cats	6,866
Keeping of animals / excess animals permits issued	89
Number of registered Domestic Animal Businesses	20
Number of Domestic Animal Business inspections	20
Number of successful prosecutions	47 (plus 2 pending)
Dogs - impounded	1019
Dogs - direct adoptions	27
Dogs - rescue group adoptions	94
Dogs - returned to owner / agent	870
Dogs - euthanased	17
Cats - impounded	638
Cats - direct adoptions	74
Cats - rescue group adoptions	291
Cats - returned to owner / agent	101
Cats - euthanased	129
Number of cat cages issued	467

Secondly the level of community consultation to engage, educate and inform the local people who use the beaches of their intention to close them to dog walkers and recreational riders was something the community believed was about the Race Horse industry and not these more passive activities. The local media reporting during 2017 only appeared to focus on the racing industry not the recreational users. During this current stage of the proposal I have spoken to business owners in the main street of Koroit and fellow dog walkers whilst being at the reserve and far too many people simply had no idea this is what the plan entailed if they had even heard about the plan at all.

If the mantra for Parks Victoria is ‘*Healthy Parks, Healthy People*’ why have so many in the community felt left out of the consultation process? Under Chapter 5 Healthy Country Parks states at the top of the threat list;

‘People: Individuals and groups can trample Hooded Plover eggs if they move above the high tide mark of through dunes. When people are in close proximity birds can also leave their nest. If Hooded Plovers are off the nest for more than 30 minutes on hot days the embryo can be destroyed from heat stress (Weston 2000). Hooded Plovers often nest near informal dune tracks, presumably due to the openness of the area, and thus are vulnerable to crushing (Dowling & Weston 1999). Disturbance can also be lethal to chicks, where lengthy periods in hiding can lead to dehydration and starvation (Weston & Elgar 2005).’

Dr Grainne Maguire (A site by site assessment of threats and prioritisation of management investment on Parks Victoria managed land May 2014 <http://www.birdlife.org.au/documents/BNB-Manualpart2sm.pdf>) also states static activities on pg. 40;

‘Sunbaking, picnicking, sandcastle building, fishing and pipi collecting (Weston in prep.) recorded the presence of static activity during 74.4% of 82 days of observations of Hooded Plovers breeding territories. Static activities predominantly occurred on the upper beach. This suggests that these activities carry a greater risk of crushing nests located above the high-tide mark’

- Would this not then lead us to conclude that Maguire’s suggestion to improve nesting rates as she explained in The Standard Letter to the Editor that static activities are more detrimental than dog walking to the success of breeding numbers?
- Does the above statement mean people will soon be banned from sunbathing, picnicking, making sandcastles and other more static passive beach activities?

To this day there is still no information on the community notice board at the Killarney Beach caravan park. Fellow beach walkers I have spoken with have a mutual feeling that we all feel like custodians of the beach and want to continue to appreciate the reserve the way we currently do in particular for me walking my dogs as well as continuing to collect rubbish, report injured wildlife to relative authorities (which I have done numerous times) and encouraging people to do the right thing including respecting all that go to this special place. The coastline here has changed over the decades due to

introduced species especially Marram Grass. The dunes have changed from exceptionally large tides the proposal should aim to work with the community because we all have a vested interest.

I would like to see education for users to self-regulate rather than authoritarian regulation. Working with the Moyne Shire Council to see more dog dispensing excrement bags and disposal bins is a simple way of encouraging people to do the right thing. More signage and education about the breeding season of the more vulnerable birds would also be beneficial. Locking the community out will only create animosity and non-compliance due to long running historical use of dog walking along the reserves beaches. Most users from the wider community from the north of the Shire and beyond are rural people who have a deep underlying respect for the environment which is why they live in these rural regions.

I would like to thank James Purcell MLC Vote 1 Local Jobs member for his public declaration that he will support a light green conservation/recreation zone allowing dog walkers and recreational riders to continue enjoying the entire Belfast Coastal Reserve. I would like to also thank Roma Britnell, the Liberal Party member for the South-West, for visiting the area and speaking with the local community about their concerns and for then involving and organising Nick Wakeling, the Shadow Minister for Environment for also taking the time to hear our stories and listen to our concerns. It was exceptionally disappointing the current Labor Environment Minister, Lily D'Ambrosio was unable to speak with locals about the proposal when she visited Portland 14/2/2018 to discuss the significant recycling issues also facing our region. Ms D'Ambrosio stated (<https://www.premier.vic.gov.au/wp-content/uploads/2018/01/180117-Draft-Management-Plan-For-Belfast-Coastal-Reserve.pdf>)

*'This draft plan is about getting the balance right – recognising the strong connection local Traditional Owner groups, neighbours, community groups, local businesses and all Victorians have to the area' adding 'We want to ensure the Belfast Coastal Reserve is maintained for future generations – **but also allow recreational use** so that Victorians get the most out of this incredible reserve'*

Ms D'Ambrosio are you going to lock out dog walkers and recreational horse riders by allowing this proposal to go ahead? Your above statement states recreational use is a must so please don't ban the two of the main recreational user groups.

I want to see the dark green conservation zone changed to a light green recreation conservation zone which continues to allow dog walking and recreational horse riding.

Please bring some balance to this proposal as the proposed loss to the majority of the community is immeasurable in my opinion.

Thank you for taking the time to read my submission.

Kind regards,

Belfast Coastal Reserve Management Plan 2018 Submission

All information put forward in this submission is not confidential.

I have taken recent concern with the above-mentioned management plan.
I utilise our local beach for; fishing, swimming, paddle
boarding and dog walking.

My main concern is the proposed closure of access to the majority of the beach within the Belfast Coastal Reserve for dog walkers for the following reasons:

1. Lack of consultation with dog walkers within the community.
 2. Statistical data used to argue for the closure of the beach is not from this area.
 3. Bias reporting within the management plan with too much focus given to the hooded plover. With very little focus on people.
- In 2014 Warrnambool to Yambuk had the highest density of hooded plovers in Australia (Birdlife Australia 2014) 2.44 birds per kilometre of the 50.1km stretch.
 - Victoria count total in 2014, 585 hooded plovers.
 - Victoria counts, 334-538 birds 2003 (Weston), 550 birds 2011 (Ewers), 565 birds 2012 (Ewers). This is an increase in species numbers and not a decrease.
 - (Birdlife Australia 2014) Hooded plover numbers have increased between Yambuk and Warrnambool.
 - (Birdlife Australia 2014) Study of 81 nests across Victoria found that the main causes of nest failure through predation were from; foxes, ravens and magpies. The plan has no management focus for magpies or ravens.
 - (Birdlife Australia 2014) reported a high chick survival rate within the Yambuk to Warrnambool region.
 - A review of all previous data in 2003 (Weston) revealed that Yambuk to Warrnambool had a ranking of 9th in the state for importance to the hooded plover. In 2014 (Birdlife Australia) ranked our region as 2nd. Further proof that our local coastline is prospering with the hooded plover.

- The hooded plover does not only use the coastal zone for its nesting habitat, with large flocks recorded nesting and breeding hundreds of kilometres inland. (BJ Newbey 1994-1996).

Statistical data used in the draft management plan was state based and not focused on our protected and well managed region. Furthermore, I would like to see more data from within the Belfast Coastal Reserve due to the extent of prohibition to the local community and not state based statistics that have been used for this proposal.

Count zone 13 takes in the 50.1 km stretch between Yambuk and Warrnambool. There are another 21 sections within this zone that can be further scrutinised to give a true reflection of the state of the reserve. Looking at all data, one could assume that the Hooded Plover is very stable within our region and is not under threat.

Domestic dogs are widely used to prevent the predation of wildlife from foxes. The most glaring example would have to be Middle island in Warrnambool. Dogs were introduced to minimise the impact of foxes on migrating birds. With great success this program has been running for many years. There is currently a study being undertaken at Deakin University

This paper will determine if domestic dogs provide bird populations with protection from fox predation.

Concerning that Parks Victoria (healthy parks healthy people) is being led by Birdlife Australia in the mitigation of human activity on our beaches. Through continued government grants, both federal and state. We have seen a professional campaign waged to mitigate human recreational activity on the states beaches. Any further state-based grants directed to Birdlife Australia should take this into consideration.

I applaud the actions of those who are introducing study programmes into the classroom. Further education following the lead of this example should take priority. In Koroit and Port Fairy during February we have our annual sheep dog trials with many visitors to the region. State based grants should be directed at educating those who visit our region. VWSDA (Victorian working sheep dog association) are the current organisers. An informational education campaign with brochures and loud speaker advertising would have great awareness impact, without affecting the economy of the region. This is only one example.

Thank you for considering my submission



MILDURA RACING CLUB
PO BOX 10128
MILDURA VIC 3502
Web: milduraracingclub.com.au

Office: (03) 5023 1759

Friday, 16 March 2018

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

Country Racing Club and also of an owner of horses trained in Warrnambool, the opportunities beach training presents as well as the relaxed country environment the district has to offer is the key reason why I will continue to support the continuation of horse training in the region.

Country Racing is a pivotal part of communities such as Warrnambool and if this training option was not available, the opportunities for these horses would become limited, thus there would be potential for them to retire from racing all together. This would have huge effect on the local horse trainers, horse numbers would decrease as well as taking away the opportunity for any return to continue to fund future horses to be trained in the region.

The opportunity to train horses on Levy's Beach and the dunes is critical for the ongoing success of horse training in Warrnambool which I am fully supportive of.

Regards,

Mildura Racing Club

**Submission to: Parks Victoria
Comments on the Draft Belfast Coastal Reserve Plan
From:**

The aims and objectives of Parks Victoria state that the organisation was established in 1996 to protect and enhance Victoria's parks and waterways. The Parks Victoria statement "A time of great opportunity", states that Parks Victoria will '*identify key trends and challenges*' and will "*continue to care for the environmental heritage so that park visitors can enjoy their experiences*" and so that the parks can remain a "*stronghold of conservation that nurtures healthy ecosystems*". So far, Parks Victoria staff have done their best to preserve the environment and the bird life that so many people appreciate.

It is particularly important in the case of the Draft Belfast Coastal Reserve that we bear in mind that around the world sea birds and wildlife are rapidly dwindling in numbers as shorelines disappear under concrete marinas and tourist accommodation. The Belfast Coastal Reserve is the natural home of various vulnerable and endangered bird species, as well as being a popular place of recreation for swimmers, surfers and families using the beach. Information from BirdLife Australia lists the site as critical for the Eastern Hooded Plover, Red-Capped Plover, Orange-bellied Parrots, Sanderling, Sharp-tailed Sandpiper, Ruddy Turnstones, Double-banded Plovers, and the Pied Oystercatcher. This site is of both national and international significance for these birds.

The major new challenge to conservation of endangered and vulnerable birds that rely on the Belfast Coastal Reserve for their continued existence is the demand from the racing industry that it should be allowed to use the coastal reserve for training purposes. The cumulative effect of the use of the area (in batches) from a total of around 200 horses is much different from when the area was used occasionally by a few locally owned horses. As will be explained below, damage has already been done to the dunes; also successful breeding cycles of Hooded Plovers and other birds over consecutive years has been stopped. The birds are running out of time to replace themselves. Once the birds are gone because of pressure from dogs and horses, nothing will bring them back from extinction.

We should also bear in mind that dog owners will always have somewhere to exercise their pets. Previous regulations regarding leashing and not using the beach at certain times of the year have not caused problems to dog owners. The public should be made aware of this and of how we can all contribute to preserving bird life for future generations.

If the bird life is to be preserved, the proposed conservation area will have to be a horse and dog-free zone. Important factors are:

According to BirdLife Australia's observations at monitoring sites from 667 individual threat assessments, the threat from horses was observed to occur in 66% of all assessments, with vehicle use (illegal access) in 20%. The threat from dog off-leash was reported to occur in 32% of observations, while dog on-leash was 11%. Evidence of threat from foxes was 11.5, raven 8%, and magpie 3% (BirdLife Australia (2014)).

The key questions that should be asked are:

Is there an alternative to the beach and dunes for horse training?

- **Answer: Yes. Facilities are available that are not on the beach. A pool and sand track were built in 2017, and some trainers use sandy soil areas on their properties to exercise their horses. Dogs and horses do have *other places, including parks and walking tracks*, where they can exercise. Also present regulations have worked well in the past, with dog walkers accepting the need for leashing and for not visiting certain areas at some times year due to nesting birds.**

Is there an alternative nesting site for the birds that have nested on the beach for thousands of years?

- **Answer: No. The birds come back to the place where they were hatched.**

What are the dangers of horses being exercised on the beach?

Answers:

- **There is the real possibility of injuries to members of the public who use the beach. (I have spoken to someone about a horse out of control on the beach, and there were children on the sand at the time.)**
- **Blocking of the road and entry to the area with turning and the manoeuvre of horse floats has the potential to cause traffic accidents. To my knowledge this has already caused some problems with other vehicle traffic.**
- **In the past, horses hooves have caused erosion of the dunes. Horse manure is also becoming a problem.**
- ***Legal cases* against those responsible for making decisions for horses to be allowed to exercise on the beach and dunes and thus being culpable for any negative consequences or accidents.**
- **Contribution to extinction of bird species already vulnerable, due to disturbance at nesting times or crushing of eggs.**
- **Horse hooves make holes and channels in the sand that can trap fledglings and/or prevent them finding their way.**
- **Horses and dogs can scare parent birds away, and cause death of fledglings from dehydration or heat, and death of chicks in the eggs if the parent birds leave the nest for too long because of horse or dog activity.**
- **Dogs and horses, as well as people, can accidentally crush eggs or fledglings.**

- **NOTE: When BirdLife reviewed the breeding success in the Reserve, they found 44% of sites had not produced fledglings in five breeding seasons of monitoring. Sites were under extreme pressure from horses, dogs off leash and even illegal vehicles, as well as weeds and foxes.**
- **The irony is that whilst the Belfast Reserve area contains one of the densest populations of the remaining small number of Hooded Plovers, yet horses, dogs, vehicles and human disturbance are interfering with the breeding of these endangered birds and other vulnerable bird species.**

If shore birds become locally or nationally extinct because this generation of environmental decision makers give in to pressure from the racing industry, who will be to blame?

- **Answer: Parks Victoria, Victorian and local government representatives, those members of the public who put their demands for unfettered access before preserving the wildlife for posterity, as well as politicians responsible for decisions would be culpable if all steps are not taken to preserve the bird populations that rely on the Belfast Coastal Reserve for their continued existence.**

Important facts to bear in mind:

According to the advisory lists maintained by DELWP (Appendix B): *“The Reserve is home to over 50 species listed as threatened. In addition, fauna records identify nearly 200 different native species of birds, mammals, fish, reptiles and amphibians sighted within the planning area. Migratory shore birds are protected under international agreements including the Japan-Australia and China-Australia Migratory Birds Agreements. Key feeding and roosting areas exist in the Reserve for migratory species between Killarney boat ramp and the Basin, Rutledges Cutting and the wetland system that extends inland from the estuary and includes Kellys Swamp.”*

The last time I looked, dogs and horses were NOT endangered species.

The Big Question From Now On (which is already being faced by forward-thinking nations): With rising human populations placing more and more pressure on the natural environment, we have to face the fact that if we are to preserve our fauna and flora and abide by the Flora and Fauna Guarantee Act, then some areas will have to be off limits for cumulatively damaging activities. Preservation of the species will enable our grandchildren to enjoy watching birds and wildlife into the future.

Yours truly,

Thursday, 15 March 2018

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

As an owner of horse/s trained in Warrnambool, the opportunities beach training presents as well as the relaxed country environment the district has to offer is the key reason why I will continue to support the continuation of horse training in the region.

If this opportunity was not available, the opportunities for these horses would become limited, thus there would be potential for them to retire from racing all together. This would have huge effect on the local horse trainers, horse numbers would decrease as well as taking away the opportunity for any return to continue to fund future horses to be trained in the region.

The opportunity to train horses on Levy's Beach and the dunes is critical for the ongoing success of horse training in Warrnambool which I am fully supportive of.

Regards,

Thursday 15/3/18

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

As an owner of several horses trained in Warrnambool, the opportunities beach training presents as well as the relaxed country environment the district has to offer is the key reason why I will continue to support the continuation of horse training in the region.

If this opportunity was not available, the opportunities for these horses would become limited, thus there would be potential for them to retire from racing all together. This would have huge effect on the local horse trainers, horse numbers would decrease as well as taking away the opportunity for any return to continue to fund future horses to be trained in the region.

It must be taken into consideration that the horse racing industry is the 3rd largest in Australia and employs in the vicinity of a quarter of a million people Australia wide. Many people from the W/Bool area are directly or indirectly involved. Many of these are young people who would rather remain in the area than travel to larger cities to gain employment. For example there are in excess of 50 'strappers' provided with full or part-time employment by the local trainers. [The majority of these are young females].

The opportunity to train horses on Levy's Beach and the dunes is critical for the ongoing success of horse training in Warrnambool which I am fully supportive of.

I hope the submissions made will be considered by the decion makers.

Yours Truly

Regards,

<<Owners Full Name>>

15th October 2017

via email: parksplan@parks.vic.gov.au

Manager, Park Planning
Parks Victoria,
Level 190, 535 Bourke Street,
Melbourne VIC 3000

Dear Sir/Madam,

Re: BELFAST COASTAL RESERVE - DRAFT COASTAL MANAGEMENT PLAN

I write in response to the release of the draft Belfast Coastal Reserve Coastal Management Plan (BCR CMP) for public comment.

In summary I do not believe that the draft BCR CMP adequately protects this important section of Victoria's coastline. It requires significant strengthening to:

1. ensure protection of all, current natural values and habitats across the reserve
2. adequately facilitate the need for an improved ecological condition in future
qv Victorian Coastal Strategy 2014

I have knowledge of this sector of the Victorian coast over many years beginning in the

I am aware of:

- the lack of a cohesive, single agency management plan for the reserve (i.e. current responsibilities of Parks Victoria, Moyne Shire, Warrnambool City Council and DELWP)
- Parks Victoria's note that Belfast Coastal Reserve is/has been appropriate for trail riding and birdwatching ("The area is home to many native coastal and wetland birds including Hooded Plover, Lathams Snipe and Orange-bellied Parrot.")
- I also note that the status of one of species noted is vulnerable (Threatened) and the other is critically endangered - "on the brink of extinction")
- recent concerns of local communities regarding the training of racehorses on various beaches and dune systems in or near the Belfast Coastal Reserve
- responses from the Thoroughbred racehorse industry that suggest that beaches are the province of horses and that coastal dune complexes are equally valuable racehorse training areas provided there are not indigenous issues to be considered.
- a collective response from the Minister for Aboriginal Affairs, the Minister for Environment and the Minister for Racing.
- the matter of amendments to racehorse training licences and concerns over the protection of the Hooded Plover nesting areas is to be resolved when Parliament returns this month.

It seems that Department of Environment, Land, Water and Planning's *Science Statement* (May 2017) which states, "Science underpins all our work, hold us to account and enables us to connect, involve and inform the community in evidence-based decision making to deliver improved outcomes for all Victorians" has been severely compromised in this Draft Coastal Management Plan.

It is essential that the BCR CMP facilitate a capability to achieve the high level of objectives of the *Victorian Coastal Strategy* (2014) and the recently released *Protecting Victoria's Environment – Biodiversity 2037* (2017) in the probability of changed morphological conditions in the Belfast Coastal reserve in a warming world. How has coastal climate change adaptation knowledge been employed in the BCR CMP?



Killarney Beach, April 2015. photo:

Critical elements of the status quo requiring reconsideration and re-evaluation in the BCR CMP are:

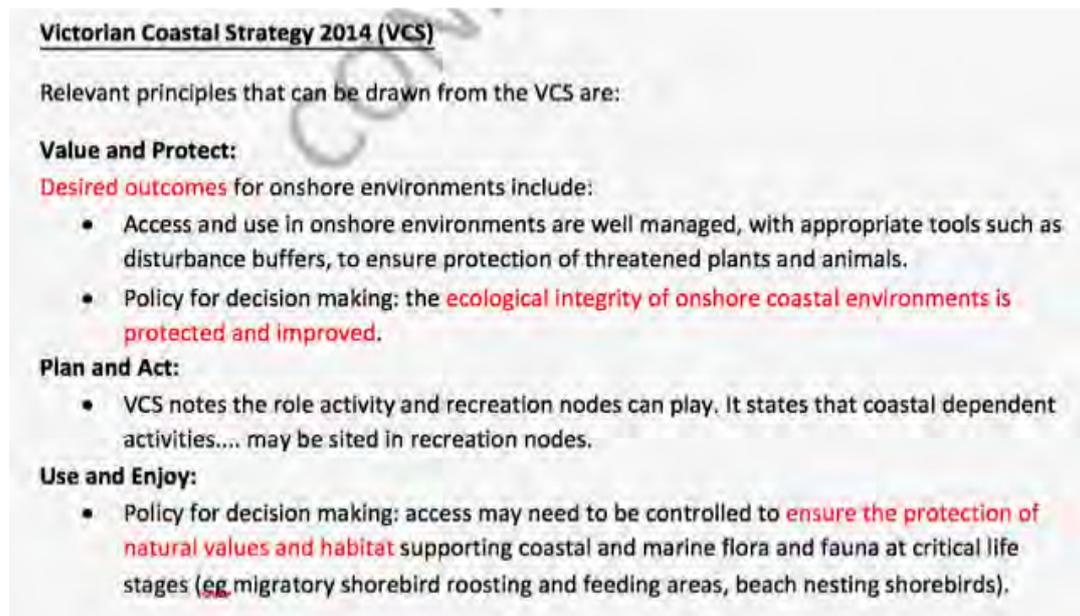
- significant habitat values are not being protected and none of the values and uses described for the BCR by the Land Conservation Council (LCC) are being facilitated or supported.
- the incapacity of Parks Victoria to regulate current breaches of regulations (horseriding behaviour, both professional and recreational and off-leash dog walking in important wading bird habitats).

In late 2016 the Minister for Energy, Environment and Climate Change, Hon. Lily D'Ambrosio was briefed on "options to regulate" the training of commercial racehorses on beaches. This position assumes that training of racehorses on BCR beaches is *fait accompli*. It should not be. One might argue that the Minister for Environment's key responsibility would be to identify "options to protect" shorebirds rather than options to regulate horses. "Options to regulate" implies a pre-determined position and does not "ensure the protection"; i.e deliver the best outcome for shorebirds and other species at risk e.g. Orange-bellied Parrot

Segmentation of the BCR into some beaches/dunes for horse training; some for dog walking; some for Hooded Plovers etc. is absolute nonsense. It is impossible to argue that racehorse training and recreational horse riding are coastal dependent uses. They are not. It is arguable, when the need to protect and enhance our state biodiversity is properly considered, that dog walking in critical beach habitats is a “coastal dependent” use. It is a convenient luxury we can no longer afford.

I would be interested in an ornithologist’s view and I note that Birds Australia is bringing forward a petition, but I would not have thought that the identification of individual beaches, i.e. some for birds and some for horses is realistic. It’s a bit like painting an “H” on designated habitat trees in a clearfelled forest coup. I hope Hooded Plovers know which beaches are for them and which are for horses and that they don’t change their minds on the ones they like best.

The key words in the following extract from the Victorian Coastal Strategy 2014 are “protected and improved” and “ensure the protection of natural values”.



Victorian Coastal Strategy 2014 (VCS)

Relevant principles that can be drawn from the VCS are:

Value and Protect:

Desired outcomes for onshore environments include:

- Access and use in onshore environments are well managed, with appropriate tools such as disturbance buffers, to ensure protection of threatened plants and animals.
- Policy for decision making: the **ecological integrity of onshore coastal environments is protected and improved.**

Plan and Act:

- VCS notes the role activity and recreation nodes can play. It states that coastal dependent activities.... may be sited in recreation nodes.

Use and Enjoy:

- Policy for decision making: access may need to be controlled to **ensure the protection of natural values and habitat** supporting coastal and marine flora and fauna at critical life stages (eg migratory shorebird roosting and feeding areas, beach nesting shorebirds).

I raised the following questions during the period of consultation with the community before the preparation of the draft BCR CMP.

These questions are more important now given the state Department of Environment, Land, Water and Planning’s Science Statement:

1. How many racehorses per day does it take to ensure that a pair of Hooded Plovers will not return to a beach where they may have been nesting for 50 years? Do we know?
2. If horses were banned from Victorian beaches is there a chance that Hooded Plovers might begin to nest on other adjacent beaches currently frequent by racehorses and that their populations might therefore be less at risk (better protected) and improved?

3. What if the geomorphology of one of the beaches with higher current numbers of birds changes in a storm (see picture above) so that an existing population may need to find another beach/beaches to nest on?
4. In a world of climate change is it possible that the breeding season for Hooded Plovers might be changing, starting earlier, and that it might not bookend the dates for the Spring Racing Carnival in future?

I am aware that with our current state of knowledge these questions leaves them unanswerable. Our most recent national *State of the Environment Report* again states, "The lack of data and information from long-term monitoring of biodiversity is universally acknowledged as a major impediment to biodiversity conservation." This was the main point identified of our first SoE in 1996.

If we invoke the Precautionary Principle, as we should in this case, the need to ensure the protection of Hooded Plovers and other shorebird species that nest in this area is paramount. All recreational dog-walking should be on e.g. East Beach Port Fairy not in the tiny BCR (750 Ha), one of the last strongholds of Hooded Plovers and other shorebird species that are required by government(s) to be protected. The BCR should be off-limits to horses and dogs until such time that our science tells us we can be confident that such potentially impactful activities have no impact.

Recent comments have been made by the Victorian Premier, Daniel Andrews and the Attorney General and Minister for Racing Martin Pakula to the effect that the local (horse racing) economy should not be compromised by the BCR CMP.

This proposition would be legitimate if there was any evidence at all that the training of racehorses on BCR beaches and dunes had any positive impact on the local economy.

The following questions arise:

- how has the economic "value" of racehorse training on BCR beaches been assessed or is this an untried assumption; a coincidence?
- what is the evidence that the physical nature of western coast beaches such as BCR beaches (grain size, slope, material, beach width, tidal range etc.) makes them more valuable for racehorse training than other beaches in the state?
- what is the knowledge of the nature of BCR beaches that Warrnambool racehorse trainers have that scientists do not understand about the value of these particular beaches for racehorse training? Where has this knowledge been peer-reviewed?

The question that must be asked and verified is:

- "what is the added economic value to the racing industry of training racehorses on beaches?"

In parallel these questions should be asked and answered:

- "what is the positive value of the ecosystem and economic services provided by the BCR as a barrier to sea level rise and as a habitat for endangered species?"
- "what is the potential economic impact of the loss of endangered bird species to local tourism?"

Arguments that *“thoroughbred racing and training contribute to the Western District and Wimmera communities; country racing is part of the social fabric of regional Victorian communities. Thoroughbred racing in the Western District and Wimmera communities delivers an annual economic benefit of over \$97 million and generates more than 950 full-time equivalent jobs and over 4,500 part-time and volunteer positions”* etc, are totally irrelevant. The economic value of thoroughbred racing is not in question, however, the use of this argument to maintain a non-coastal dependent use for a minority group which may be putting critical coastal habitat at risk certainly is.

In Victoria we still languish in support of legacy management positions. Informed management programs are often subverted by the poor argument presented regarding historical use. e.g. *“We’ve always allowed racehorses on this beach; we’ve always been able to walk our dogs off-lead on this beach.”* and *“Horse trainers have used the beaches and sand dunes between Warrnambool and Port Fairy (Belfast Coastal Reserve) for many years for resistance training and rehabilitation.”*

Acceptance of this argument in the face of good science and the need to strongly reinvest in biodiversity and critical habitat assumes that we are incapable of learning; that conditions are not changing; that status of critical species is not changing and that we are therefore bound not to make improved decisions in the face of better information; more knowledge; better science. If we accepted *“legacy arguments”* we wouldn’t have seat belts in our cars and we’d still have lead in paint!

I appreciate the opportunity to comment on the draft Belfast Coastal Reserve Coastal Management Plan and hope that my comments and questions are viewed as being *“constructively critical”* and assist Parks Victoria to challenge compromising political expectations currently in the BCR CMP in order to achieve longer term, higher level objectives in biodiversity protection and improved ecological condition for the benefit of future generations of Victorians.

Yours sincerely,

The Manager

Parks Victoria

Dear Sir

Re Invitation for comment on Parks Plans and South West Vic Beaches and other.

I refer to the very detailed report on beach use and parks under proposals at present.

Even tho the Plover birds don't reside it appears at Killarney, I don't use that beach at all for riding as from my experience it's a medium density used beach by people and dogs.

have used all other local beaches for horse riding, pleasure and commercial , beaches being Port Fairy, from the Golf club to the residential homes on main beach, Tower Hill, and main beach at Warrnambool, subject and in line with the latter rules.

attended the Port Fairy beach on 18 occasions with two horses. Was at the beach and in the car park beside the Golf Course (now not allowed) for between one hour and one hour 30minutes on each occasion, all daylight hours from say 6-30 am to the latest time 11.00 am finishing.

In the 18 visits, apart from seeing the golf club staff, we counted we saw three people in total on or near the beach and certainly in our sight, yes 3 people in total over that 18 day visits, not per day but in total.

On the 1st December 2016 the day of the new rules, we went to Port Fairy and inspected the area and found over 13 people that morning. Where were they in the previous month, or years in fact, I can tell you they were not at that beach near those times.

The use of horses at Port Fairy and Tower Hill beach has gone on with minimal fuss for over well over half a century in our experience.

The present rules at Port Fairy don't allow the horse or rider to go far enough, ie now stopping at Golfies at the car park and not allowed to ride past the rock wall has no issue with plovers as the plovers never and won't lay any eggs in front of the rock wall.

The horses do not interfere as far as I can see with the plovers and think that recent studies will prove that in past year. Tides do, horses don't.

The community, fairly so, have had some issues with the large number of horses at Killarney beach.

This has I believe, since been corrected, and in fact I don't think horses should be allowed at Killarney at all, full stop.

Port Fairy to a longer section of the beach known as Golfies, should be allowed, even to use the West side car park also that is at present rarely used and is out of the way and simple small path leads to the beach and no erosion or interference with the environment occurs to an adverse effect that I can see, and ive been using the beaches

On that I do make comment it seems Port Fairy, well Moyne Shire, is it seems one of the few Shires or Councils in Australia that has made some real impact on beach erosion with the current rock wall and works done on the dunes near old tip site and other areas along the main beach. Well done, action speaks louder than words. Their excellent work goes back decades in fact when they built those timber flanks near the surf club and residential area on East beach.

Tower Hill , likewise, no adverse impact from horse use.

The main beach at Warrnambool has been well used and is under present rules which seems to work well in current environment and any changes it appears subject to Warrnambool City Council matters.

The area known as Dunes I have only ridden at

Horses I firmly believe have no adverse impact on that area where we currently, (well used to until present restrictions) ride.

There is only room for one horse, not two abreast on the current walking track. I have walked it in past month and seen no material change other than the repeated and larger use of four wheel drive vehicles, that has had a greater impact since the horse use stopped, well race horse not pleasure horse. I think that has occurred as when the race horses used it the four wheel drive people were more aware of our possible visits etca the cars never deviated form the current paths they used. That has not been the case since horses left the area on the new restricted basis.

I overstate it but 300 horses could use that Dunes area and the next day you would not know a horse had been on site.

Those numbers were never achievable anyway and only 50 a day ever used to use it at max anyway.

I have seen large beach fronts be washed away overnight tho by king tides in 2015 and 2016, some I guess 20m meter cliffs appear overnight it seemed on the beach tidal front.

But no damage by horse and minimal usage other than a few surf board riders and fisherman none of which we seemed to interfere with, well none at all.

I support the information and report provided by the local South West Owners and Trainers association also known as SWOTRA in their submission (m apart from my comments re Killarney as stated above, plus I believe that the numbers should not be on a per trainer but on an overall usage basis.

I support the current race thoroughbred horse use, with full 7 day a week access with rules in place, also that they need to be licenced by Racing Victoria, member of SWOTRA and the licence basis be overseen by Warrnambool Race Club.

Plus use of pleasure horses as long as they are individually a financial member of a current Horse Riding body, be it Equestrian Victoria, Pleasure Riders , Pony Club etc, and accompanied by an Adult of over the age of 18.

Also I support the current use of people as is.

No cars allowed on beaches, Dunes yes in current paths but not off current tracks.

Regards

To: ParkPlan@parks.vic.gov.au

Submission to Draft Belfast Coastal Reserve Management Plan

About you:

Your name:

Your Organisation (if relevant): _____

Postcode:

Email or Postal address:

THIS SUBMISSION IS: **NOT CONFIDENTIAL** Date: 16 March 2018

Your Comments:

Please Note – The following information will be made publically available.

Main reason for interest: *(such as local resident, visitor to parks, tourism operator, environmental interest, business operator, education interest, scientific interest)*

Visitor to parks,
environmental interest

How often do you or your organisation use the reserve?

Rarely

How do you or your organisation mainly use the reserve?

Walking

Other: Looking for Hooded Plovers and marine life

Which part(s) of the reserve do you or your organisation most frequently use?

Any part

About the vision- Belfast Coastal Reserve, 15 years from now...:

How supportive are you of the vision for the Belfast Coastal Reserve?

- Unsupportive

Coastal Reserves should not be used for horse training because, as explicitly pointed out in numerous ParksVic documents, hard-hoofed animals are very damaging to these areas. Such activity mitigates against the natural values of the area, and excludes others from enjoying the area. It is also a very poor precedent as it will encourage other destructive activities in beach areas. It is a wonder to me that ParksVic could even consider such a proposal. Government agencies are the biggest threat to what is left of our natural environment, either by their direct actions, or by complicity in the actions of others. The horse racing industry is wealthy and already gets enormous funding and other support from governments. It has many options including building sand tracks on its own land as well as salt water swimming tanks.

Key management theme #1: Cultural landscape and living heritage

How supportive are you of the strategies for 'Cultural landscape and living heritage' included in the draft management plan?

- Supportive

Apart from horse training, I support many of the other draft proposals.

There is confusion of purpose in the plan – is this coast to be managed as a natural reserve, or all kinds of purposes? Is the purpose to generate cash?

“There are several areas of the Belfast Coastal Reserve where Aboriginal cultural heritage is being negatively impacted by visitors, particularly related to dune access. This impact ranges from relatively low (foot traffic) through to extremely high (four-wheel drive traffic and repeated horse traffic).”

Belfast Coastal Reserve Draft Coastal Management Plan p.22

It seems clear that horse and vehicle access to Belfast Beach reserve should be banned. Restoration of native vegetation should be carried out

Key management theme #2: Healthy Country

How supportive are you of the strategies for 'Healthy Country' included in the draft management plan?

- Supportive

Australia has the highest rate of recent mammal extinctions in the world. The rate of invertebrate extinctions is likely a lot higher since all mammals have specific parasites, and little was recorded of vertebrate fauna before large habitats were obliterated.

Belfast reserve is a tiny strip soon to be overcome by rising seas, but there is no plan for coastal retreat here or anywhere else. The reserve could be expanded landwards in anticipation.

The suggestion that community groups do the revegetation work is a copout. Governments cannot be trusted to value community work. If people are paid to cut trees down or remove native vegetation, why shouldn't they be paid to do the more valuable work of planting and restoring?

Colonial knowledge of native flora and fauna is extraordinarily slight so the precautionary principle should be applied in all planning.

Aboriginal people should have more say in management.

Key management theme #3: Recreation and use

How supportive are you of the strategies for 'Recreation and use' included in the draft management plan?

Supportive

Reserves for nature are miniscule across much of western Victoria. And yet these tiny remnants are still expected to cope with ever higher levels of visitation by governments promoting rapid population growth. These reserves are leftover bits of land that farmers degraded and couldn't find further use for. This area could be significantly expanded to make it more useful for migratory birds and other wildlife (now rapidly disappearing across this country and the planet), and could also expand recreational use without destroying the natural values, if carefully managed. Always bearing in mind the primary purpose is environmental protection and the precautionary principle.

The failure so far to record visitor numbers and activities is a severe oversight. (point 6.2 p. 47) and should be remedied ASAP.

Keep vehicles out of the reserve. Government is constantly telling us that citizens are unhealthy due to lack of exercise, but promotes car use in every possible way. I support the closure of roads in this reserve.

Dogs should be kept out as well.

It is no good writing rules if they are not enforced or cannot be enforced.

It is disturbing that only the most critical shorebird habitat is proposed for protection – see bottom line of **Belfast Coastal Reserve Draft Coastal Management Plan p.51**. This is 'business as usual' approach is a sure way to exterminate native species. A dollar in the hand apparently is worth more than any number of birds.

Key management theme #4: Managing in partnership

How supportive are you of the strategies for 'Managing in partnership' included in the draft management plan?

Unsupportive

I can't support local government or any other government agency as the land manager. ParksVictoria might be the best manager if they were not so obstructed by clumsy bureaucracy and government interference, as well as lack of funds. There are good managers in ParksVic but the upper levels of the bureaucracy are just overpaid stooges generally.

Aboriginal management might also be better, but given we are such a profoundly racist country it is not an idea that would appeal to them I suspect.

Local and State governments just take whatever money is on offer and do as they are told.

Community group involvement is good so long as it is consultative and their work isn't sabotaged by 'decision makers'.

Key management theme #5: Research and monitoring

How supportive are you of the strategies for 'Research and monitoring' included in the draft management plan?

Very supportive

Citizen science is fashionable at the moment, I guess because it saves governments money. For Australian governments environment is always the last consideration, with the possible exception of Aborigines and homeless people.

The monitoring of threatened species lags astronomically behind the needs. Some 2000 native species are now officially recognised as threatened, while the reality is the numbers are actually about 10 times as high. Few of these species get realistic protection, have resourced action plans, or any action plans at all.

Regular periodic drone photography is becoming a useful tool, as is remote camera monitoring. Much of the expertise now rests in private and volunteer hands, as government becomes more redundant and dysfunctional in every sphere, despite the ever-increasing size of government bureaucracies. There should certainly be more Aboriginal input and control, as after all they created the landscapes colonials purport to manage.

Submission

Draft Belfast Coastal Reserve Management Plan

About you:

Your name:

Your Organisation (if relevant):

Postcode:

Email or Postal address:

THIS SUBMISSION IS: X NOT CONFIDENTIAL Date: 16 March 2018

Your Comments:

Please Note – The following information will be made publically available.

Main reason for interest: *(such as local resident, visitor to parks, tourism operator, environmental interest, business operator, education interest, scientific interest)*

Birdwatching, Regular Visitor

How often do you or your organisation use the reserve?

- Daily Weekly **Monthly** A couple of times a year Rarely Never

How do you or your organisation mainly use the reserve?

- | | | |
|---|---|---|
| <input checked="" type="checkbox"/> Walking or running | <input type="checkbox"/> Dog walking | <input type="checkbox"/> Using the beach (swimming and surfing) |
| <input type="checkbox"/> Horse riding | <input type="checkbox"/> Horse training | <input type="checkbox"/> Volunteering |
| <input type="checkbox"/> Camping | <input type="checkbox"/> Hunting | <input type="checkbox"/> Fishing/boating |
| <input checked="" type="checkbox"/> Picnicking | <input checked="" type="checkbox"/> Birdwatching | <input checked="" type="checkbox"/> Socialising |
| <input type="checkbox"/> Other (please specify): _____ | | |

Which part(s) of the reserve do you or your organisation most frequently use?

- | | |
|---|--|
| <input checked="" type="checkbox"/> West of Killarney (Port Fairy side) | <input checked="" type="checkbox"/> Between Killarney and Big Baldy |
| <input checked="" type="checkbox"/> East of Big Baldy (Warrnambool side) | <input type="checkbox"/> Not sure |

About the vision- Belfast Coastal Reserve, 15 years from now...:

How supportive are you of the vision for the Belfast Coastal Reserve?

- Very supportive Supportive Not sure/Don't know
 Unsupportive Very supportive

Comments: (Your submission can be as short or long as you wish. Put comments under relevant headings corresponding to plan sections or strategies, noting page and paragraph numbers. Attach more pages if required).

While I largely support the Vision statement, I note that the paragraph relating to the recovery of significant rare and threatened species, “The area continues to provide important habitat and refuge for native species, particularly threatened migratory birds that breed and feed here”, is inaccurate as migratory shorebirds do not breed in Australia, however the Reserve is indeed critical habitat for those species of resident shorebirds which do nest within Australia.

Also I cannot reconcile or support the statement “The location, timing and intensity of activities such as horse riding has been managed to avoid conflicts between uses, and to reduce the risk of damage to the environment and cultural sites”, given that under the Draft Management Plan the length of beaches available to racehorse training would be increased from 2 km to 5 km (a 250% increase) and the number of horses from 65 to 256 each day (a 400% increase) and racehorses would be allowed into fragile dunes behind Levy’s Beach and at Hoon Hill, where in the past they have caused severe dune erosion.

Furthermore, there nothing in the plan to stop future expansion of commercial racehorse training or to review industry compliance and impacts on the Reserve’s natural and visitor values. The Draft Management Plan even recommends racehorse training within the proposed Conservation Zone at Rutledge’s Cutting which is incongruent with the recommendations of the Conservation Zone.

Throughout the plan there is repeated reference to the severe impacts that horses have on the Reserve’s natural, cultural and recreational values so given the sensitivity of this Coastal Reserve and its value to birds which are highly prone to disturbance, it would be more appropriate to delete any reference to and to avoid specifying horse riding in the vision for the Reserve’s future. Commercial racehorse training and in fact any commercial activities are at odds with and will threaten all passive recreation users. All activities of a commercial nature should not be included in the Vision Statement.

Key management theme #1: Cultural landscape and living heritage

How supportive are you of the strategies for ‘Cultural landscape and living heritage’ included in the draft management plan?

- Very supportive Supportive Not sure/Don't know
 Unsupportive Very supportive

Comments: (Your submission can be as short or long as you wish. Put comments under relevant headings corresponding to plan sections or strategies, noting page and paragraph numbers. Attach more pages if required).

I strongly support the goals and strategies within this chapter of the draft plan including maintenance of geological features, recognising Traditional Owner and community connections to it, ensuring cultural landscape values are protected in heritage management, and establishing partnerships with Traditional Owners to protect and conserve heritage features.

Page 22 states “there are several areas of the Belfast Coastal Reserve where Aboriginal cultural heritage is being negatively impacted by visitors, particularly related to dune access. This impact ranges from relatively low (foot traffic) to extremely high (four-wheel drive traffic and repeated horse traffic).” The proposed Conservation Zone would benefit these cultural heritage sites, with the exception of permitting racehorse training which conflicts with these values.

The statement “There are currently risks and impacts to Aboriginal cultural heritage from existing authorised activities including recreational horse riding, licensed horse riding tours and licensed commercial racehorse training....Due to this, Gundijmarra Traditional Owners are not supportive of racehorse training” clearly demonstrates the stance of local Traditional Owners on racehorse training in the Reserve.

I strongly support the right for Traditional Owners to protect their cultural heritage and to be directly involved in guiding the management of this Reserve.

Key management theme #2: Healthy Country

How supportive are you of the strategies for ‘Healthy Country’ included in the draft management plan?

- Very supportive Supportive Not sure/Don’t know
 Unsupportive Very supportive

Comments: (Your submission can be as short or long as you wish. Put comments under relevant headings corresponding to plan sections or strategies, noting page and paragraph numbers. Attach more pages if required).

“The Reserve is home to over 50 species listed as threatened in the advisory lists maintained by DELWP”, “The Australian Government’s Threatened Species Strategy identifies 20 priority EPBC-listed bird species for conservation, four of which have been recorded in the Reserve: Orange-bellied Parrot, Hooded Plover, Australasian Bittern and Eastern Curlew” and “The area between Port Fairy and Warrnambool has been identified as a Key Biodiversity Area ... as defined by global scientific criteria”. These statements highlight the significance of the Reserve and is why I believe the proposed CONSERVATION ZONE is required.

The Hooded Plover and Eastern Curlew are both species for which disturbance from recreation has been identified as a key threat and a high priority for mitigation.

Objective 3 of the Wildlife Conservation Plan for Migratory Shorebirds 2014 is “Anthropogenic threats to migratory shorebirds in Australia are minimised or, where possible, eliminated.” Note the Eastern Curlew is particularly sensitive to disturbance, being

a large shorebird and having one of the longest average Flight Initiation Distances (FID) of all the shorebirds (Glover et al. 2011).

The Australian Government's Conservation Advice for the Hooded Plover specifies "Manage the use of (and access to) key beaches for recreation when plovers are breeding – e.g. **discourage or prohibit vehicle access, horse riding and dogs from beaches**; implement temporary beach closures; erect fencing to prevent people entering" as a key management action required.

This is further support for the CONSERVATION ZONE to reduce the impact of dogs and horses on the Hooded Plover and key migratory shorebird sites. It is also further support for the prohibition of commercial racehorse training in the Reserve which conflicts with threatened species management advice from the Australian Government.

The plan states on page 27 for key management outcomes as "the protection of vulnerable fauna such as Hooded Plover will require reducing threats to these species through controls on the key impacting activities of dogs, horses and people". The plan later contradicts this outcome in Table 6.1 by allowing commercial horse training within a CONSERVATION ZONE that has been identified as a priority section of coast for breeding Hooded Plovers.

This chapter reveals the draft plan's underlying contradictions regarding commercial racehorse training. On page 29, the draft plan admits that the EXTREME risk to coastal habitats, cultural heritage and resident and migratory wildlife from commercial racehorse training will remain so even following management action. This fundamental contradiction in the draft plan will undermine the achievement of the goals and strategies in this chapter.

The strategy "reduce the impacts of fragmentation in dunes, foredunes and wetlands and prevent erosion" needs to include removing horses from the dunes and wetlands. These heavy, hard-hoofed animals are associated with increased rates of erosion (page 30).

The plan fails to mention horse training in the 'Habitat Protection Strategies' table on page 32 although the plan labels the threat as EXTREME.

I strongly support the goal "The impact of visitors at key locations is reduced to allow for an increase in the extent and richness of vulnerable fauna, and the occupation of most of their potential habitat' on page 34. In particular, "to reduce disturbance to vulnerable fauna including migratory birds, shorebirds and Orange-bellied Parrot, and their habitat by implementing park zoning and access regulations". The plan should explicitly state here that access regulations will include prohibiting dogs and all horses from CONSERVATION ZONES. Furthermore, Hooded Plover should be specifically named in this particular strategy, as it is a primary indicator species for disturbance impacts.

I strongly support the strategy to "protect Hooded Plover nests and chicks from trampling through erection of temporary fencing and signage around individual breeding sites across the Reserve (following best practice protocols)" and to "undertake targeted Hooded Plover nest monitoring...use monitoring results to inform/adapt management of visitor activity".

As mentioned on page 13 "the dune systems of the Reserve have good capacity for dune retreat and redistribution of sand given there is limited infrastructure built directly in the primary dune". This again highlights the value of this system in the long-term for species of beach-nesting birds as well as migratory shorebirds. It is predicted that areas of shorebird habitat are likely to be lost in the future due to rising sea levels associated with climate

change. Thus the areas of coastline that have capacity for resilience and retreat would become of even higher significance to these species. Protection of this critical habitat is a priority at a local, statewide and national level. This lends further support for bolstering protection of the population of shorebirds using this Reserve, in particular the area within the CONSERVATION ZONE.

I strongly support the goals and strategies to maintain and enhance habitats, reduce the impact of pest species and visitors, better manage marine, lake and swamp habitats, and to build resilience to climate change.

The Reserve contains 30% of the EVC 'Swamp Scrub/Aquatic Herbland Mosaic', which is considered an Endangered EVC. This EVC is sensitive to trampling and disturbance. Note "remnant native vegetation can be readily degraded by human, animal and vehicle disturbance...research has shown that low levels of horse trampling can cause a significant reduction in vegetation height with fewer plant species found on trampled sites" (page 30). This is further support for removing horses from the CONSERVATION ZONE where this EVC occurs around Rutledges Cutting, Saltwater Swamp and Kellys Swamp.

The 'Coastal Dune Scrub' EVC accounts for 55% of the Reserve and is noted as being degraded by historical land use, rabbit grazing, trampling and Marram Grass invasion. However, the area between Rutledge's Cutting and Warrnambool is highlighted as having "large and important populations of Spinifex on primary dunes". It is this section of coastline where commercial racehorse training is being permitted and recreational horse riding. This is contradictory and conflicts with protecting the highest value remnants of this native Coastal Dune Scrub vegetation.

Page 32 strategy to 'undertake invasive weed management through: ...containing the expansion of Marram Grass' is not an accurate statement nor adequate. Marram Grass and Sea Spurge have been identified as a major threat to the Hooded Plover and other beach-nesting bird habitat. These weeds need to be better addressed by the draft management plan. In fact, the plan states "it is forecast that on current trends almost nothing of the indigenous flora will survive on these dunes unless invasive species are actively controlled, eliminated or contained" (page 30). Following the recommendations of Cousens et al. (2013), "targeting hooded plover territories for marram grass removal at a smaller scale with the aim of improving habitat would have outcomes that could be directly measured, and if effective, would relate weed control directly to improving biodiversity values of that investment".

Reducing threats and impacts are a commonly used measure to build resilience to climate change within natural systems. Horses have the most impact in the Reserve, especially with regard to dune vegetation and stability. Sea-level rise may reduce the width of beaches and intensify the impacts of racehorses on that habitat. The best way to build resilience is to remove racehorses from this sensitive system as it can be achieved elsewhere without destruction of this unique habitat.

Key management theme #3: Recreation and use

How supportive are you of the strategies for 'Recreation and use' included in the draft management plan?

- Very supportive Supportive Not sure/Don't know
 Unsupportive Very supportive

Comments: (Your submission can be as short or long as you wish. Put comments under relevant headings corresponding to plan sections or strategies, noting page and paragraph numbers. Attach more pages if required).

The proposed zoning offers the best co-existence approach to balancing threats to threatened birds within the Reserve.

I strongly support the proposed location for the CONSERVATION ZONE. This encompasses the core area used by the Orange-bellied Parrot, 28 Hooded Plover breeding sites (of 44 sites in total within the Reserve), the largest known winter flocking site for Hooded Plovers, at least 24 red-capped plover breeding sites, 2 pied oystercatcher breeding sites, and major roost and foraging sites for migratory shorebirds including internationally significant sites for Sanderling and Sharp-tailed Sandpiper, nationally significant sites for Ruddy Turnstone and Double-banded Plovers (New Zealand migrant, visits in our autumn/winter months).

I strongly support the goal “Opportunities for a range of recreational visitor activities are provided with minimal impacts on natural values, cultural values and other users”. However, this relies on the proposed CONSERVATION ZONE being implemented, education and enforcement of dog leashing in the CONSERVATION AND RECREATION ZONES, and a permit system for recreational riders with strict conditions (see below).

I strongly support the prohibition of hunting within the Reserve.

I do not support access for commercial racehorse training. I strongly condemn the authorisation of beach use by horse trainers at Golfies, Rutledges Cutting and Hoon Hill/Levys beach.

The draft plan recommends strict controls on where and how recreational uses are to be managed in the future, whereas commercial racehorse training will be expanded. This does not make sense. Table 6.1 Summary of activities proposes that commercial horse training will be allowed within the CONSERVATION ZONE at Rutledges Cutting. This is inexcusable and contradicts the vision for the Reserve and the EXTREME assessment of risk that this activity poses to key values of the Reserve.

A \$1.2 million synthetic sand track was opened in 2017 for horse trainers and therefore they will not lose the capacity to train their horses on sand if this activity is removed from the Reserve. Instead, the EXTREME risks to the cultural, environmental and public safety assets could be mitigated by removal of this activity.

The statement “Riding of horses for recreational or commercial purposes was viewed as a threat to dune health, cultural heritage, shorebirds and public safety, especially if riders did not comply with regulations, codes of conduct or licence conditions”. This does not match the risk assessment table (page 29) that indicates, even with regulations in place, commercial racehorse training poses EXTREME risks to each of these key values of the Reserve. Even if horses, ridden recreationally or otherwise, are at the water's edge at low tide, there are still risks to the flightless chicks of the Hooded Plover, which need to feed on the exposed intertidal reefs and along the water's edge. In the first few weeks after hatching, these chicks will crouch on the spot when approached by threats and this can be

anywhere from the rocky platforms, water's edge to the upper beach or foreshore. Riders will not be able to see these highly camouflaged chicks to avoid crushing them. Furthermore, the deep craters made in the sand by hooves are a hazard to chicks trying to run away from threats toward cover. Disturbance by large numbers of permitted riders would have chicks in hiding for long periods, unable to access the waterline to feed. The high density of breeding sites (28 sites) within the CONSERVATION ZONE warrants prohibition of dogs and horses to this extremely sensitive stretch of coast and would maximise their chance of successfully producing chicks. This stretch of coast triggers EPBC criteria as critical habitat.

I strongly support the goal of the draft management plan to restrict dogs in locations that are of high value to beach nesting birds and other wildlife. The plan should ensure that the appropriate zoning for high conservation areas for beach nesting birds, such as Hooded Plovers, are dog and horse free. The area between Killarney boat ramp and Big Baldy at Levys beach contains 28 Hooded Plover breeding sites. This density of breeding sites is unprecedented and highly significant. There are alternative areas within the Reserve that are available and suitable for dog walking with less impact on beach nesting and migratory birds. For example, the CONSERVATION AND RECREATION ZONE between Big Baldy to the eastern end of Shelly beach Warrnambool contains 8 breeding sites.

I strongly support prohibition of dogs in the proposed CONSERVATION ZONE as this will also allow for greater fox control to occur within this area, as currently baiting cannot occur adjacent to any walking tracks where dogs may be walked on-leash.

I strongly support the plan's identification of a designated 'off-leash dog beach' on page 49. Providing locals and visitors with a designated beach to enjoy with their dogs provides an alternative to the high value CONSERVATION ZONE where dogs will directly negatively impact the breeding of multiple species of beach-nesting birds and disturb large flocks of roosting and foraging migratory shorebirds.

I also strongly advocate for the creation of a more inviting dog walker experience and facilities for dog walkers through the old vehicle track that runs between the Golf course access and the Killarney campground. If a circuit walk for dog walkers was created here, with a walk that included on-leash time on the beach and then a walk that returned via the old track on the dune, it would take pressure off the CONSERVATION ZONE, and would provide dog walkers with a more attractive alternative.

Currently, the proposed CONSERVATION AND RECREATION ZONES allow on-leash dog access and this is compatible with the conservation values of the zones, promoting a co-existence approach to balanced recreational use. These zones have lower densities of beach-nesting birds. However, compliance with dog leashing will still be critical to reducing lethal impacts to the 16 breeding sites of the Hooded Plover within the CONSERVATION AND RECREATION ZONES. Sixteen breeding sites still constitutes critical habitat for a nationally threatened species and under EPBC and Wildlife Act legislation, disturbance to these breeding birds is illegal. I strongly advocate for sufficient resources to be allocated to enforcement of the regulations in the Reserve.

I strongly support the statement "while horse riders may be required to ride below the tide-line on beaches to avoid nesting habitat, or stay a distance away from marked nest sites, compliance with this guideline may be poor during a high tide...when the area of available space on the beach can be limited and riders may advance higher on the beach into nesting habitat. It is therefore critical that the most significant areas for shorebird breeding

are protected from disturbances including those from horses.” This is further support for no horses permitted in the proposed CONSERVATION ZONE.

There are no restrictions in place to protect the highly mobile, flightless chicks of resident shorebirds that need to feed at the water’s edge and on the rock platforms. If recreational riders are permitted in the CONSERVATION AND RECREATION ZONES, I strongly support a horse riding permit system (free of charge) that includes a strict set of conditions, an agreement to abide by these including a shorebird induction, and tracking of compliance with these conditions. BirdLife Australia have a set of recommended conditions that could be utilised.

I strongly support many of the goals and strategies that relate to the recreational use of the Belfast Coastal Reserve in this chapter including increased enforcement, better management of vehicular use, dog walking and recreational horse riding, bans on dune boarding, hunting and off-road vehicles, reducing risks and improving safety, improving information, interpretation and education, and developing tourism partnerships, marketing and promotion.

Jet skis should not be allowed in reserve waters, including Belfast Lough, because of their disturbance to wildlife and other recreational users, and damage to shallow water habitats.

The statement “there are however mixed opinions in the community about the ongoing impact of dogs and horses on the Reserve” sends a confusing message to readers. Evidence-based statements and published references about the threats posed by dogs and horses are not opinion and should not be categorised in the same way as uninformed opinions. The CONSERVATION ZONE is one of the most critical areas of habitat for a number of highly threatened and nationally significant species. Conservation advice from the Australian Government supports the removal of high impact threats, namely dogs and horses, from critical habitat.

Much of the emphasis in Section 6.5 is on the regional economic importance of the racing industry as justification for the damage that it is causing and will continue to cause if it remains in the Belfast Coastal Reserve. But in a September 2013 report prepared for the Victorian racing industry by consultants IER, it was revealed that the racing industry generates \$75 million gross value added in the Western District, which includes Warrnambool but also a number of other racing clubs at Casterton, Coleraine, Hamilton, Terang, Camperdown Mortlake, Penshurst and Dunkeld. The report also reveals that 40% of statewide gross value added for horse racing is from gambling, which takes money out of the community. If applied to the Western District, \$30million of the gross value added would be from gambling, which leaves \$45million shared across all of the region’s clubs.

The geomorphology of the coast within the CONSERVATION ZONE consists of many rocky embayments, small headlands and a narrow beach that then opens out in to the estuary at Rutledges Cutting. Horses on the upper beach along these narrow beaches and the cutting across each headland at the multiple ‘pinch’ points has been well documented through the Hooded Plover monitoring program. Avoiding critical breeding habitat cannot be successfully achieved in this particular beach morphology.

I support the statement “close the beach to horse training and riding groups when Hooded Plover nests extend onto narrow sections of beach...or when climatic conditions or tidal conditions make access unsuitable”.

Section 6.6 discusses Risks and Safety. I would like to advocate for Emergency Beach Number signs (yellow triangles mounted on posts) at access points for the safety of beach users and volunteers in the Reserve.

Section 6.7 explores Information, interpretation and education. I strongly support better signage and interpretation, and a more consistent approach by land managers. I believe BirdLife Australia should be named as a Delivery Partner given their expertise in education and community engagement around shorebirds and beach-nesting birds. I think this section also needs to include ranger patrols and the opportunity for rangers to provide educational information to beach users. In recent years, a seasonal ranger has been employed to educate beach users about beach-nesting birds, and I advocate that this continues as it is critical for assisting beach users to understand the need for the CONSERVATION ZONE and the coexistence approach in the CONSERVATION AND RECREATION ZONES.

Section 6.8 on Tourism should include more reference to highlighting the tourism value of the Reserve in terms of its unique avifauna. Similar to the penguin and shearwater colonies in adjacent parts of the coast, the Reserve offers high nature-based tourism value to the area.

Key management theme #4: Managing in partnership

How supportive are you of the strategies for 'Managing in partnership' included in the draft management plan?

- Very supportive Supportive Not sure/Don't know
 Unsupportive Very supportive

Comments: *(Your submission can be as short or long as you wish. Put comments under relevant headings corresponding to plan sections or strategies, noting page and paragraph numbers. Attach more pages if required).*

I strongly support the first goal in this chapter: "Coordinated management of the Reserve enables efficiencies in program delivery and is supported by consistent land status and regulations". I however think that the strategies that aim to achieve this are flawed. The plan recommends retaining the fragmented management across the City of Warrnambool, Moyne Shire Council and Parks Victoria and leaving the Reserve under the Crown Lands (Reserves) Act. The Reserve should become a park under the National Parks Act due to its significant environmental, threatened species and cultural heritage values. This is a recommendation of the Victorian National Parks Association.

I do not support the current 5 and 10 year reviews of implementation of the plan. These are too long a time frame for threatened species likely to be impacted by the plan. A one to two yearly review cycle is required.

I strongly support goals to ensure that "Traditional Owners caring for their Country is an integral part of the Reserve's management" and that "Community skills, knowledge and assistance provide stewardship and help in that management". However, if commercial

racehorse training is retained inside the Reserve, their efforts would continue to offer a band-aid solution instead of tackling the source of threats. It is likely that community groups who have been rehabilitating the coastal environment within the Reserve, partaking in citizen science projects including bird monitoring, and who actively erect fences and signs around vulnerable Hooded Plover breeding sites, will be demoralised if this management plan does not adequately address EXTREME threats to the assets they invest heavily in protecting.

Key management theme #5: Research and monitoring

How supportive are you of the strategies for 'Research and monitoring' included in the draft management plan?

- Very supportive Supportive Not sure/Don't know
 Unsupportive Very supportive

Comments: (Your submission can be as short or long as you wish. Put comments under relevant headings corresponding to plan sections or strategies, noting page and paragraph numbers. Attach more pages if required).

I strongly support this chapter's goal and strategies and the indicators to be used to evaluate the effectiveness of the management plan. However, the plan fails to explain how it will lower the EXTREME risk presented by commercial racehorse training revealed in the table on page 29.

This section needs to also reflect the indicator species and monitoring that has been outlined in Chapter 5 (page 34) including biannual shorebird counts, biennial beach-nesting bird population counts, Hooded Plover breeding success monitoring coupled with site-based threat assessments. It should also be stated that all monitoring data needs to be adequately evaluated and management actions adapted to improve outcomes in target populations.



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Forest Lodge Racing Pty Ltd

ABN 51 106 775 884

ACN 106 775 884

Friday, 16 March 2018

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke Street
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

Thank you for the opportunity to confirm our support for the use of beach training facilities in Warrnambool and on the Belfast Coast.

We attribute a very large part of our training results to use of these resources. For instance in 2016, all our group one winners, including our Melbourne Cup winner, were trained at Warrnambool. In 2017 all but one of our group winners were trained using the facilities available at Warrnambool.

In summary, access to beach conditions is vital to the successful training of racehorses for Darren Weir Racing:

- Working the horses in sand decreases impact force on limbs while propulsive effort increases - horses work harder in sand which increases fitness while decreasing risk of injury.
- Swimming/walking in the sea aids in the recovery after exercise. Cold water recovery reduces muscles soreness and inflammation, which as a consequence reduces muscle damage.

In addition, the opportunity to vary the horses environment (between Ballarat and Warrnambool) and to have access to a less stressful, relaxed facility is invaluable.

We are very pleased to have ongoing access to Levy's Beach but we must have enough time to exercise the horses due to the restricted numbers to work on the beach at any one time. Ideally, access from dawn to 1pm, 7 days a week, would be the preferred option and would enable all trainers to be catered for.

I fully support the Warrnambool Racing Club, Racing Victoria and Country Racing Victoria to enable beach training to continue.

Regards,

Additional comments

Submission re Draft Plan for the Belfast Coastal Reserve

Following observations based on;

* submissions and emails sent by individuals and organisations to Parks Victoria, local and state government political representatives regarding the proposed conservation zone

*discussions with residents, recreational horse riders and dog owners.

It's acknowledged that PV's community engagement process and release of the draft plan has done a great deal to increase horse riders' and dog owners' awareness of what it means as well as the the need to act responsibly.

1 Evidence (observational, anecdotal and logical)contradicts statements in the draft plan that responsible horse riding threatens Hooded Plover nesting sites, other beach goers or causes damage to native vegetation or sand dunes. Nor does walking dogs on lease or off lease during the nesting season.

2 Few members of Bird Life Australia or National Parks Association signing petitions supporting the conservation zone are local residents, have any specific knowledge of the BCR and seem unaware or choose to disregard available evidence.

3 Statements such as horses trampling HP nesting sites made in letters and articles in the Standard have undoubtedly contributed to increased abuse of horse riders and acts of vigilantism by individuals opposed to all horse riding in the BCR

4 Since the release of the draft plan it's evident that BCRA doesn't represent the views of the great majority of the local community with most residents opposed to establishment of the conservation zone.

5 The legality a conservation zone which prohibits walking dogs and recreational riding on this section of crown land reserve is open to question. See Terra Publicus article previously provided to Parks Victoria.

6 The issue of horses on BCR beaches has escalated out of control and could and should have simply been resolved by PV restricting the number and training methods of commercial racehorses. Instead the PVs draft plan seeks to punish recreational riders, hobby trainers and dog walkers by unjustly excluding them from a large section of the BCR.

7 A workable alternative would be for the final management plan to designate the steel cable and concrete fenced off area running beside Kelly Swamp as the conservation zone with the rest of the BCR a recreation/conservation zone which allows responsible regulated horse riding governed by a self-regulated code of conduct and dogs on lease in designated areas during the Hooded Plover season.

8 A conservation zone which excludes recreational horse riding and walking dogs on/off lease is unworkable and worse likely to lead to unnecessary confrontations between PV rangers BCRA members otherwise law abiding visitors and residents.

Dog owners and recreational riders have indicated they will ignore signs * prohibiting walking dogs or riding horses in the proposed conservation zone because regarding this prohibition as totally unfair and unjustified.

Visitors to Warrnambool either on holidays here or on a day trip are likely to be unaware of the bans until after parking at the end of Gorman's Lane intending to walk their dog or ride their horse(s). Most will simply proceed with their planned ride or beach walk rather than simply turning round to return home back .

Enforcement of bans will inevitably lead to confrontations involving beach users with both/either PV officers and BCRAAG volunteers taking photos or abusive exchanges even physical confrontation with odd hard core zealot .Possibility of more criminal vigilante activity such as laying poison baits for dogs on beach or slashing tyres on parked horse floats .

*Some individuals intend simply removing signs banning horses and dogs in proposed conservation zone assuming this would prevent any successful prosecution '

Submission from _____ to the Draft Belfast Coastal Reserve (BCR) management plan

I have some understanding of the coast. The Management Plan for BCR was promised in the mid 1980s, and I am delighted that something has finally been put on paper. The contents of the draft management plan are rather contradictory, and it seem to have been hastily put together – rather amazing given that it has been in the offing for three decades!

BCR used to be a haven for rare and endangered species. I have observed both Hooded plovers and Orange-bellied parrots in BCR over the years, amongst others. (Pied and sooty oystercatchers, Sanderlings, Red-capped dotterels, etc)

These and many other rare species of birds are under increasing pressure from the activities of humans, especially those who ride horses, let their dogs exercise off leash (and NOT under any sort of control), operate various wheeled vehicles (bicycles with wide tyres, motorbikes, cars, etc), on the beaches and through the dunes.

Piles of horse poo on the beach and in the dunes, along with dog poo, are disgraceful. Horse poo contains seeds of plants that are weeds within BCR, and as such the poo is a vector for weeds. Horse riders are not required to pick up the poo. Dog owners have followed their lead in not picking up the poo, where they used to be very diligent.

Horses are regularly ridden through the dunes, even though the current temporary rules do not give them that permission. They ride through the fenced off nest areas for Hooded plovers, and I often see human and dog prints and wheel tracks through these fenced areas, as well as hoof prints up to the fences.

Horse riders have been quite aggressive towards bird observers _____ and other beach users, including swimmers and surfers. They make it clear that I am in their inalienable space when I park in the public car park. They are quite intimidating, and a number of people tell me that they used to go to beaches within BCR, but stopped when the “horse people” bullied them.

There are no tidal limits, only time limits for the horses. This sounds good, but when high tide coincides with the times that horses are to be on the beach, they have no option other than to ride next to or through the areas fenced off for endangered Hooded plovers. They run through areas that other shorebirds, which are under increasing threats from humans and dogs, are nesting in.

Endemic and migratory shorebirds feed in the intertidal zone, and this is where most horse riding takes place. They are under constant disruption from horses and dogs. Horses running across the hard sand makes feeding difficult and places these birds under danger of being trampled or not gaining enough weight to safely make their annual migration.

When horses are exercised at high tide, they often run along the base of the dune, causing erosion that does not repair as it is subjected to daily pounding at successive low tides. The dune separating the ocean and the wetland that runs from Port Fairy to Warrnambool is quite narrow. It is all that protects the wetland and the farmland behind it. **If we lose the dune, we lose the lot.**

Tyre tracks from all sorts of vehicles, both people-powered and motorised, have become an unwelcome feature of the beach in recent years. Dodging vehicles whilst on the beach is not much fun. Kite surfers and jetskis have also become popular in recent times. There is no mention in the draft about them.

We need to look after the dunes, beaches, wetlands and farmland for generations to come. The only way to do this is to keep all dogs on leads at all times; allow no horses in BCR at any time for any reason; keep ALL wheeled vehicles on made roads; and keep all watercraft access restricted to the main beach at Killarney. This will preserve BCR and keep it safe for all who seek to enjoy its natural assets.

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne, VIC 3000

To whom it may concern

Re: Warrnambool Beach Training Support Submission

Most of the horses enjoy this environment, and should they suffer an injury improve more quickly than others of mine with Melbourne based trainers.

The racing industry is very important to Warrnambool and generates well over \$100 million to the local economy, and I would hate to see that decline should horses not be allowed adequate access to the beaches and dunes for training and rehab purposes.

The Warrnambool Racing Carnival is something to behold with visitors coming from around Australia and overseas – and the racing eyes of the country focus on it. It is also a very competitive 3 day event that local trainers' horses usually do well at, and should the horse training industry decline in Warrnambool the \$30 million revenue from the Carnival will fall considerably.

But it is not only the Warrnambool Carnival that is important to the town, but also the regular race meetings that are held there throughout the year. They bring owners and friends to the town, and this all adds to the tourist dollar as many stay overnight. Local horses often do well, and should there not be a strong local horse training industry the number of races meetings held in Warrnambool will fall.

I urge Parks Victoria to continue to allow local horse trainers adequate access to the beaches and dunes around Warrnambool to train their horses as their businesses, and the local economy depends on it. And this access is something unique to Warrnambool.

Thanking you for your consideration.

The Manager
Parks Planning
Parks Victoria

RE: BELFAST COAST RESERVE DRAFT COASTAL MANAGEMENT PLAN 2018

Thank you for giving me and other members of the local community this opportunity to make our submissions regarding the Belfast Coastal Reserve Draft Coastal Management Plan 2018.

I appreciate the care and expertise that has gone into preparation of the draft plan, and support many of the proposed actions.

I am very pleased that the plan recognises the significance of this reserve as habitat for a wide variety of bird species. The reserve is recognised, not just locally but also nationally and internationally, as an important feeding and breeding area for a number of threatened or endangered species, including the orange-bellied parrot and hooded plover, as well as a variety of migratory shorebirds, and is in dire need of protection and regeneration.

I therefore support the proposal to set aside 43% of the onshore area for high-level protection in a Conservation Zone, and to restrict activities within this zone in order to preserve and enhance the bird habitat. Proposals to carefully manage human and animal impacts in the remainder of the reserve are also supported.

I DO NOT SUPPORT the proposal to greatly extend the area of beach available for horse training, and to allow this activity within the Conservation Zone. The Draft Plan itself recognises that the damage caused to this vulnerable environment by horse training is EXTREME, and that the proposed actions will not mitigate this damage.

Horse training is a commercial activity and as such has no place in a reserve that the plan states is to be “managed for conservation, education and compatible recreation”. That horse training is not “compatible recreation” is clear from the proposal to erect warning signs to alert visitors to the potential risks of encountering horses galloping along the beach. Alternative facilities are already available for this purpose, making it unnecessary to train horses on public beaches.

The argument that horse training is of major economic value to the local area does not hold up. The figures supplied by local racing interests do not explain that the gross figure includes revenue across several racing clubs, not just Warrnambool. In addition, the figures omit the fact that almost half of this gross income is gained from gambling, which is a loss rather than a gain for the local economy. When compared to the much greater economic value offered by tourism, it does not make sense to perpetuate this damage to such a fragile ecosystem.

Another of the arguments put forward to support the continuation of horse training– that it has traditionally been done in this area – is also tenuous. There is no logic in continuing a harmful activity just because it has always been done. The argument of traditional usage could also be applied to off-leash dog walking and, to a lesser extent, to recreational horse-riding and offroad vehicle activities. Since these are – quite rightly – to be prohibited within the Conservation Zone and restricted in the Conservation and Recreation Zone, the same conditions should be applied to horse training.

If traditional usage is a criterion, a much higher priority should be given to the needs and wishes of the traditional owners of this land. They have expressed the view that horse training should not continue in the Reserve because it is already damaging sites of cultural and historical significance. The suggestion that the solution is to remove endangered cultural artefacts so that they can be preserved elsewhere completely fails to recognise the importance of Indigenous connection to Country.

I support proposals to enhance visitor experience by providing signage and/or other material (printed, audio or online, for example) that explains the historical and cultural significance of the Reserve. As specified in the Draft Plan, this material should be prepared in close consultation with traditional owner groups, and be presented in a way that enhances rather than detracts from the amenity of the area.

As mentioned above, I support proposals to restrict dog access to the reserve, and provide an accessible and clearly signposted off-lead beach where owners can exercise their dogs without impinging on the life cycle of resident and visiting birdlife.

I also support restrictions, as outlined in the Draft Plan, being placed on other activities within the Reserve, such as recreational horse-riding and offroad vehicle use. Infrastructure should be put in place as soon as possible to curtail parking and close unauthorised tracks to prevent further damage to this valuable natural environment. If the area is to be promoted as a tourist destination, every effort should be made to protect this local asset.

I look forward to implementation of the revised plan and integrated management of the Belfast Coastal Reserve for the benefit of the local community as well as visitors. I hope that adequate provision has been made for financing and resourcing longterm management of the Reserve, so that the efforts of all who have contributed to the final plan will be rewarded with a vibrant flourishing ecosystem and bird habitat.

I note that frequent reference is made in the Draft Plan to contribution by community groups and volunteers in ongoing management and monitoring within the Reserve. I am pleased that these significant contributions are recognised, but also concerned that these groups are adequately resourced and supported to ensure that they do not burn out from the pressures of work and expectations placed upon them.

Effective implementation of the management plan will also require considerable input from regulatory authorities (both local and state or national) to ensure compliance with the restrictions to usage of the Reserve. Erecting signage is only the start of the process; sufficient personnel must be deployed to ensure ongoing compliance with the new regime.

Thank you again for the opportunity to have a say in this very important process.

13 March 2018

Parks Planning,
Parks Victoria
Level 10, 535 Bourke St
MELBOURNE VIC 3000
e-mail: ParkPlan@parks.vic.gov.au

To whom it may concern
Dear Sir or Madam,

Re: Submission on Draft Management Plan for Belfast Coastal Reserve, Victoria

Thank you for the opportunity to comment on the draft Management Plan for this important reserve. I am writing as a citizen with a keen interest in Australia's birds, and a strong belief that no species should be allowed to decline to a point where they are threatened with extinction in the wild.

Background

The Belfast Coastal Reserve on the south-western coast of Victoria contains critical habitat for several threatened bird species, notably the Critically Endangered Orange-bellied Parrot, the Endangered Australasian Bittern, and the Vulnerable Hooded Plover. The population of the Hooded Plover in Victoria is under 600, and this Reserve is one of its important strongholds. The Orange-bellied Parrot has declined more severely and is classified as Critically Endangered nationally; this Reserve is one of only 5 priority sites for the species in Victoria. The reserve also has critical habitat for significant populations of Federal EPBC-listed migratory shorebirds, including Sanderling, Sharp-tailed Sandpiper, Double-banded Plover, and Ruddy Turnstone. A further ten nationally threatened bird species and an additional 32 species listed on the Victorian Advisory List of Threatened Fauna use the Reserve.

Because of this richness in declining fauna species, the major part of the Reserve is included in the Port Fairy to Warrnambool Key Biodiversity Area (KBA), as recognised by BirdLife International.

Management plan proposals and effects on birds

The various proposals in the plan will have beneficial or harmful effects on birds in this Reserve, which I consider should be managed as a whole with the conservation of threatened birds clearly as the highest priority. Some of the more significant proposals are discussed below, under "Key Management Themes" suggested by the draft plan.

Key Management Theme 2: Healthy Country

I strongly support the proposal to designate a Conservation Zone. It would be logical for this zone to correspond with the Key Biodiversity Area (KBA) - see above. (Not being familiar with these features, I do not know how closely the envisaged Conservation Zone matches the KBA.)

Within this proposed Zone there are several positive actions and policies mooted to protect and manage biodiversity, that should certainly be carried out. These include:

- Protecting Hooded Plover nests and chicks from trampling by erecting temporary fencing, and signage to educate visitors. To this should be added building small shelters to protect chicks from intense sunlight and predatory birds.
- Goals and actions to maintain and restore natural habitats, reduce impacts of pest species (e.g. foxes and cats), and better manage aquatic/swamp habitats. These actions would benefit many species of water and bush birds.

However, many of the above good intentions could be severely undermined by a proposal to allow commercial racehorse training in parts of the Conservation Zone (Rutledges Cutting), as well as in other areas of the Reserve outside that zone (Golfies, Hoon Hill/Levys Beach). **The Plan actually states that horse training would pose an "extreme threat" to Hooded Plovers and their habitat (think intense levels of disturbance and trampling), yet amazingly, it still sanctions this totally incompatible activity!**

How and why this is the case is a mystery. If it is an attempt to try accommodating a "traditional use" it appears greatly out of step with modern standards of managing areas with high biodiversity values. It is apparent that the Belfast Reserve should be recognised as a very important area of habitat for declining shorebird species and primarily managed for this value. It must be possible for horses to be trained in other areas in that region, outside the Reserve, where their impacts would be much less severe. Certainly, no areas of the Belfast Coastal Reserve should be subjected to galloping horses.

Key Management Theme 3: Recreation and use

I strongly agree with most of the goals and strategies relating to recreational use of the Reserve, including:

- better management of vehicular use (restricted to designated roads/tracks);
- better management of dog-walking, with enforced prohibition of dogs in the Conservation zone. Dogs can be very disruptive to ground-nesting birds. This exclusion of dogs will also allow an expansion of fox-baiting.
- more controls on recreational horse-riding, including keeping it remote from nests of shorebirds (including, but not solely, the Hooded Plover).
- overall bans on dune-boarding, off-road vehicles, and any form of shooting.

As mentioned earlier, **I totally oppose commercial racehorse training occurring anywhere in the Reserve.** If this were permitted as a use, many of the positive goals listed above would not be achievable, and people would become cynical when they saw that a small sectional interest group was allowed essentially "free rein" while the public use of the Reserve was (rightly) well-regulated.

I hope the comments and suggestions above will help in formulating a plan for this reserve that recognises and carefully protects its enormous wildlife values, while allowing well-managed public access for low-impact passive recreation.

Yours sincerely,

Thursday, 15 March 2018

Manager, Park Planning,
Parks Victoria
parkplan@parks.vic.gov.au
Melbourne, VIC 3000

Dear Manager,

Re: Warrnambool Beach Training Support Submission

As a current member of the Warrnambool Racing Club, this letter is written to provide my support to the continuation of Beach training in Warrnambool.

I am very proud of the fact we have the beaches to offer this unique horse training opportunity, this for certain provides significant positive economic benefits to our local community, and employs many passionate people.

I strongly support this position using the **positive economic impact** the racing industry has to the wider Western Victoria region as my main argument. While I do not have the actual numbers at my fingertips I am sure these numbers have been presented in your feedback.

As well **the number of people engaged to work in the industry** can only be appreciated if a visit is made to the training tracks and beaches between 5 and 8 am on every morning of the year. I believe not many of the people negative to the proposed plan have bothered to understand the amount of employment created by this industry.

I believe the proper use of the beaches around Warrnambool has seen **a major expansion of the racing industry** around our region. The industry appears to have embraced all the measures proposed too ensure best environmental practise. **The Levy's beach proposal** seems to me to tick all the boxes to meet the needs of all beach users.

What we have is unique and something our community is proud of, as a result I am fully supportive of the continuation of horse training on our local beaches.

Regards,

Friday, 16 March 2018

Manager
Parks Planning, Parks Victoria
Level 10,
535 Bourke St
Melbourne
VIC 3000

Dear

RE: WARRNAMBOOL BEACH TRAINING SUPPORT SUBMISSION

As a participant in the racing industry this letter is written to provide my support to the continuation of Beach training for thoroughbred horses in the Warrnambool region.

I am very proud of the fact we have the beaches to offer training opportunities for our horses and participants. Such training and racing facilities provide significant positive economic benefits to the local community and employ many people that without racing may not be employed.

What we have is unique and something our community should be very proud of. Our industry helps the sustainability of the greater Warrnambool community which I believe will certainly deteriorate should the training of thoroughbred horses on beached be banned or heavily restricted.

I am very supportive of the continuation of horse training on our beaches.

Regards,

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

As a current member of the Warrnambool Racing Club, this letter is written to provide my support to the continuation of Beach training in Warrnambool.

I am very proud of the fact we have the beaches to offer this unique horse training opportunity, this for certain provides significant positive economic benefits to our local community, and employs many passionate people

What we have is unique and something our community is proud of, as a result I am fully supportive of the continuation of horse training on our local beaches.

Regards,

Member
Warrnambool Racing Club

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

As an owner of horse/s trained in Warrnambool, the opportunities beach training presents as well as the relaxed country environment the district has to offer is the key reason why I will continue to support the continuation of horse training in the region.

They all have benefited considerably from the beach therapy and beach training.

If this opportunity was not available, the opportunities for these horses would become limited. This would have huge effect on the local horse trainers, horse numbers would decrease as well as taking away the opportunity for any return to continue to fund future horses to be trained in the region.

The opportunity to train horses on Levy's Beach and the dunes is critical for the ongoing success of horse training in Warrnambool which I am fully supportive of.

Kind regards,

Submission for Draft Belfast Coastal Reserve Management Plan

Postcode: 3280

Email address:

THIS SUBMISSION IS NOT CONFIDENTIAL Date: 14.3.18

Main reasons for interest: I am a local resident, visitor to parks, and have an environmental interest in the reserve. I visit the reserve weekly mostly East of Big Baldy (Warrnambool side)

Walking,

Socialising,

Dog walking (On lead)

Birdwatching,

About the vision- Belfast Coastal Reserve, 15 years from now...:

How supportive are you of the vision for the Belfast Coastal Reserve? - Unsupportive

The vision encapsulates much of what I wish to see in the future for the Belfast Coastal Reserve EXCEPT for the reference to 'horse riding':

Key management theme #1: Cultural landscape and living heritage

How supportive are you of the strategies for 'Cultural landscape and living heritage' included in the draft management plan? Very supportive

I strongly support the goals and strategies within this chapter of the draft plan including maintenance of geological features, recognising Traditional Owner and community connections to it, ensuring cultural landscape values are protected in heritage management, and establishing partnerships with Traditional Owners to protect and conserve heritage features.

However, one of the strategies—"Work with users and community groups to reduce impacts from both authorised and illegal access on the fragile coastal dune systems"—is expecting too much from community groups to act as delivery partners when those groups will witness daily the extreme damage to sand dunes and beach habitats from commercial racehorse training which, under the plan, will have 'authorised access'. The goals and strategies also ignore the extreme risk to cultural heritage from commercial racehorse training.

Key management theme #2: Healthy Country

How supportive are you of the strategies for 'Healthy Country' included in the draft management plan? - Unsupportive

This chapter reveals the draft plan's underlying contradictions regarding commercial racehorse training. On page 29, the draft plan admits that the extreme risk to coastal habitats, cultural heritage and resident and migratory wildlife from commercial racehorse training will remain so even following management action. This fundamental contradiction in the draft plan will undermine the achievement of the very good goals and strategies in this chapter.

The goals to which I give strong support include maintaining and enhancing habitats, reducing the impact of pest species and visitors, better management of marine, lake and swamp habitats, minimising the fire risk and building resilience to climate change.

Reducing threats and impacts are a commonly used measure to build resilience to climate change within natural systems. Horses have the most impact in the reserve, especially with regard to dune vegetation and stability. Sea-level rise may reduce the width of beaches and intensify the impacts of racehorses on that habitat. The best way to build resilience is to get the racehorses out.

Key management theme #3: Recreation and use

How supportive are you of the strategies for 'Recreation and use' included in the draft management plan? Unsupportive

I strongly support many of the goals and strategies that relate to the recreational use of the Belfast Coastal Reserve in this chapter including increased enforcement, better management of vehicular use, dog walking and recreational horse riding, bans on dune boarding, hunting and off-road vehicles, reducing risks and improving safety, improving information, interpretation and education, and developing tourism partnerships, marketing and promotion. But without the removal of commercial racehorse training, these goals will not be achieved.

A far more honest heading for this chapter would be 'Recreational and commercial use'. Too often the plan seeks to confuse recreational riding and commercial racehorse training or to downplay the intensity and impacts of the commercial activity, continually referring to the training as a 'licensed' or 'authorised' use to convey that it is not negotiable, it cannot be restricted or removed. By including it within a chapter mainly on 'recreation', it again tries to downplay the highly commercial and intensive nature of racehorse training.

The draft plan recommends strict controls on where and how recreational uses are to be managed in the future, whereas commercial racehorse training will be expanded. That doesn't make sense.

In the introduction to this chapter, the draft plan states, with my underlining:

Riding of horses for recreational or commercial purposes was viewed as a threat to dune health, cultural heritage, shorebirds and public safety, especially if riders did not comply with regulations, codes of conduct or licence conditions. This suggests that the community is mainly concerned about impacts that occur when commercial racehorse training doesn't follow the rules. But as the risk assessment table reveals on page 29, even with rules, management will not mitigate the extreme risk from commercial racehorse training.

Dogs should not be allowed off-leash from 1 August to 30 November at Killarney Beach, coinciding with the first part of the hooded plover breeding season.

It is ludicrous to consider renaming Hoon Hill to 'improve expectations on visitor behaviour' when those same visitors will witness racehorses and their riders 'hooning' up and down the dunes of the hill.

Section 6.5 of this chapter is titled 'Authorised uses', code for commercial racehorse training. Much of the emphasis in this section is the regional economic importance of the racing industry as justification for the damage that it is causing and will continue to cause if it remains in the Belfast Coastal Reserve.

Key management theme #3: Recreation and use - cont

But in a September 2013 report prepared for the Victorian racing industry by consultants IER, it was revealed

that the racing industry generates \$75 million gross value added in the Western District, which includes Warrnambool but also a number of other racing clubs at Casterton, Coleraine, Hamilton, Terang, Camperdown Mortlake, Peshurst and Dunkeld.

The report also reveals that 40% of statewide gross value added for horse racing is from gambling, which takes money out of the community.

If applied to the Western District, \$30million of the gross value added would be from gambling, which leaves \$45million shared across all of the region's clubs.

This is tiny relative to other sectors in the regional economy. Most jobs are provided by the healthcare and social assistance, retail and accommodation and food services sectors. Tourism generates more than half of Warrnambool's total economic output of \$3.3billion. Except for the May Racing Carnival being mentioned in a dot point in an event strategy, the racing industry in Warrnambool is ignored in the Warrnambool Economic Development and Investment Strategy 2015-2020 prepared by the City of Warrnambool.

It appears that the main reason for justifying a huge expansion in commercial racehorse training is 'due to community interest' and so the 'plan sets out an approach for horse training that balances support for the racing industry, equity of access for all trainers and ensuring adequate protection for cultural and natural values'. The consultation carried out by Parks Victoria confirmed the serious concerns the community had about commercial racehorse training, but that is now being referred to as 'community interest' that justifies the racing industry's use of the reserve. It sounds ludicrous and it is.

I strongly condemn the goal under this section of the chapter—Authorised uses of the Reserve are managed to minimise the effect on values and visitors—with regards to commercial racehorse training as it is incompatible with the goals of the plan and the purposes of the reserve.

Key management theme #4: Managing in partnership

How supportive are you of the strategies for 'Managing in partnership' included in the draft management plan?

Not sure

I strongly support the first goal in this chapter: Coordinated management of the Reserve enables efficiencies in program delivery and is supported by consistent land status and regulations. But I cannot support the strategies that aim to achieve it. The plan recommends retaining the fragmented management across the City of Warrnambool, Moyne Shire Council and Parks Victoria and leaving the reserve under the Crown Lands (Reserves) Act. The reserve should become a park under the National Parks Act.

I also strongly support goals to ensure that Traditional Owners caring for their Country is an integral part of the reserve's management and that community skills, knowledge and assistance provide stewardship and help in that management. However, if commercial racehorse training is retained inside the reserve, all of their efforts would be to nought.

Key management theme #5: Research and monitoring

How supportive are you of the strategies for 'Research and monitoring' included in the draft management plan?

Supportive

I strongly support this chapter's goal and strategies and the indicators to be used to evaluate the effectiveness of the management plan. However, the plan fails to explain how it will lower the extreme risk presented by commercial racehorse training revealed in the table on page 29. That table proves that it cannot and so commercial racehorse training should be removed from the reserve.

Conclusion

In conclusion there is an extraordinary contradiction within the draft plan.

The plan outlines the various threats and risks to the natural and cultural values of the reserve and recommends strict controls on where and how recreational uses are to be managed in the future to mitigate these threats and risks. At the same time, it seems totally illogical that there is a recommended expansion of commercial racehorse training in parts of the reserve.

Recreational horse riding and commercial racehorse training are very, very different activities and often the plan appears to seek to confuse these activities and to downplay the intensity and impact that commercial racehorse training has on the values of the reserve. This includes the safety and enjoyment of people using the reserve.

It is increasingly difficult to understand how the support for the racing industry that is inherent in the plan is relevant, desirable or even worthy of being considered in the management of the reserve.

All the justifications used by the racing industry for using the dunes and beaches in the reserve do not stack up against protecting the values and visitor experience to the reserve.

There is a government funded sand training track at the Warrnambool racing club and one of the main trainers using the beaches has also built his own sand track at Maldon. The economic justification for allowing commercial racehorse training on any section of the reserve – i.e. that the racing industry is of regional economic importance - does not in any way justify the trashing of the values of the reserve. It also disallows consideration of the regional economic importance of tourism, which for Warrnambool generates more than half of the total economic output of 3.3 billion.

Belfast Reserve is one of our last remaining wild places in the South West and should be protected and kept as wild and natural as possible – this can't happen if commercial horse training is allowed

Yours Sincerely

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

As an owner of horse/s trained in Warrnambool, the opportunities beach training presents as well as the relaxed country environment the district has to offer is the key reason why I will continue to support the continuation of horse training in the region.

The horse I have a share in has, I believe, benefited greatly from being able to be trained in a beach environment.

If this opportunity was not available, the opportunities for these horses would become limited, thus there would be potential for them to retire from racing all together. This would have huge effect on the local horse trainers, horse numbers would decrease as well as taking away the opportunity for any return to continue to fund future horses to be trained in the region.

The opportunity to train horses on Levy's Beach and the dunes is critical for the ongoing success of horse training in Warrnambool which I am fully supportive of.

Regards,

<INSERT OWNERS LETTER HEAD
AND/OR LOGO>

Friday, 16 March 2018

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

As an owner of horse/s trained in Warrnambool, the opportunities beach training presents as well as the relaxed country environment the district has to offer is the key reason why I will continue to support the continuation of horse training in the region.

If this opportunity was not available, the opportunities for these horses would become limited, thus there would be potential for them to retire from racing all together. This would have huge effect on the local horse trainers, horse numbers would decrease as well as taking away the opportunity for any return to continue to fund future horses to be trained in the region.

The opportunity to train horses on Levy's Beach and the dunes is critical for the ongoing success of horse training in Warrnambool which I am fully supportive of.

Regards,

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

As an owner of horse/s trained in Warrnambool, the opportunities beach training presents as well as the relaxed country environment the district has to offer is the key reason why I will continue to support the continuation of horse training in the region.

One of our horses was struggling with injury last year, and following a spell at Warrnambool, where she was able to use the beach as a part of her recovery, she managed to be back in racing within a relatively short time.

I cannot believe that you are proposing to remove the opportunity for horses to use this area.

If this opportunity was not available, the opportunities for these horses would become limited, thus there would be potential for them to retire from racing all together. This would have huge effect on the local horse trainers, horse numbers would decrease as well as taking away the opportunity for any return to continue to fund future horses to be trained in the region.

The opportunity to train horses on Levy's Beach and the dunes is critical for the ongoing success of horse training in Warrnambool which I am fully supportive of.

I strongly give my support to the continuation of horses using the beach and dunes.

Regards,

Thursday 15th March, 2018

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke Street
Melbourne Vic 3000

Dear Sir/Madam

Re: Warrnambool Beach/Horse Training Access

I am an owner of Horses Trained at Warrnambool, I believe Beach Training gives our Horses a unique advantage and varies their Training which can only be good for them.

I support the Racing Industry, in particular Country Trainers as I believe they make a big contribution to Racing Victoria.

The ongoing success of Horse Training at Warrnambool in my opinion is crucial to Beach Access and I am fully supportive of it.

Regards,

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

this letter is written to provide my support to the continuation of Beach training in Warrnambool.

I am very proud of the fact we have the beaches to offer this unique horse training opportunity, this for certain provides significant positive economic benefits to our local community, and employs many passionate people.

Not only does beach training provide benefits to our local community it may also ensure the longevity of a horse's racing career; it allows horses to recover from strenuous exercise much more efficiently and it also safeguards their mental health - it is common for horses to become sour in traditional training environments.

What we have is unique and something our community is proud of and as a result I am fully supportive of and highly advocate the continuation of horse training on our local beaches.

Regards,

The Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

Dear Sir/Madam,

Re: Warrnambool Beach Training Support Submission

I write as both the owner of a racehorse being trained at Warrnambool and equally as importantly the livelihoods of Trainers and their staff which will be jeopardized should access to training at Levy's beach be denied.

Amongst the many issues racehorse owners are faced with in choosing to have bloodstock trained in Warrnambool is the access to beach training and the dunes. I cannot stress this enough as most of the horses being sent to Warrnambool are for these two critical reasons.

Put simply, many racehorses cannot cope with the rigors involved in being trained on conventional grass tracks. The work involved frequently leads to jarring up resulting in both feet and leg problems and all too frequently early retirement.

I respectfully request you to take these points into consideration as they are critical to our ongoing support of Warrnambool horse trainers. Make no mistake this is a genuine plea for help. I strongly believe country training at Warrnambool will be seriously effected should access to Levy's beach be denied.

In closing I need to mention that many owners like me,

Beach training
and a relaxed country environment that Warrnambool offers are the very reason we have our horses trained at Warrnambool. Take this away and I honestly believe many owners will move there horses elsewhere.

Yours truly

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

As a long-term owner of horses trained in Warrnambool, I can honestly see what the beach training presents for horses as well as the relaxed environment the district has to offer.

These are my reasons why I will continue to support the continuation of horse training in the region. If this opportunity was not available there would be potential for them to retire from racing all together.

This would have huge effect on the local horse trainers, horse numbers would decrease as well as taking away the opportunity for any return to continue to fund future horses to be trained in the region.

The opportunity to train horses on Levy's Beach and the dunes is critical for the ongoing success of horse training in Warrnambool which I and my family are fully supportive of.

Many early mornings we have visited the beach to watch the horses train at 7am and honestly over the Winter months they are the only ones there.

If you wish to discuss this any further my details are listed below.

Regards,



STEALTH LODGE PTY. LTD. ACN 127 635 107

ATF FOR STEALTH RACING TRUST T/AS

STEALTH LODGE RACING

ABN 36 774 717 569

294 Conn's Lane, Yangery Vic 3283

Friday 16 March 2018

Manager

Parks Planning

Parks Victoria

Level 10, 535 Bourke St

Melbourne VIC 3000

Dear Sir/Madam,

Re: Warrnambool Beach Training Support Submission

I am writing this letter in support of the continuation of beach training in Warrnambool and the surrounding Belfast Coast.

Critical to the success of my stable is the beach, this acts as a perfect relaxed environment to train my horses, that is also very therapeutic and utilising the beach has given many of my horses the opportunity to pro long their racing careers. In turn providing financial returns to my owners, and most importantly allows me to provide and maintain employment opportunities and further investment in the local community.

Due to the proximity of Levy's Beach, I firmly believe that 150 horses on the beach and 60 horses in the dunes is a realistic and very manageable number for all trainers in the district. Additionally, a key element of gaining access to the Levy's Beach is having access to the area from first light to 2pm, 7 days a week, to ensure it is able to be utilised by all trainers large and small. The longer the time period available, the more the volume of horses can be shared throughout the morning, into midday.

-2-

Friday 16 March 2018

I ride myself daily at The Lady Bay, Warrnambool foreshore. I am confident that my large group of staff and other trainers can self regulate and will abide by rules imposed.

I fully support the Warrnambool Racing Club, Racing Victoria and Country Racing Victoria to enable beach training to continue.

Yours faithfully,

<INSERT OWNERS LETTER HEAD
AND/OR LOGO>

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

As an owner of horse/s trained in Warrnambool, the opportunities beach training presents as well as the relaxed country environment the district has to offer is the key reason why I will continue to support the continuation of horse training in the region.

If this opportunity was not available, the opportunities for these horses would become limited, thus there would be potential for them to retire from racing all together. This would have huge effect on the local horse trainers, horse numbers would decrease as well as taking away the opportunity for any return to continue to fund future horses to be trained in the region.

The opportunity to train horses on Levy's Beach and the dunes is critical for the ongoing success of horse training in Warrnambool which I am fully supportive of.

Regards,

Thursday, 15 March 2018

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

As an owner of horse/s trained in Warrnambool, the opportunities beach training presents as well as the relaxed country environment the district has to offer is the key reason why I will continue to support the continuation of horse training in the region.

We have researched the benefits of beach training extensively and compared other horse training methods which do not include beach training and there are significant differences in many examples. Beach training offers additional benefits to the overall outcome of horse performance and adds a credible niche in the Warrnambool horse training approach.

If this opportunity was not available, the opportunities for these horses would become limited, thus there would be potential for them to retire from racing all together. This would have huge effect on the local horse trainers, horse numbers would decrease as well as taking away the opportunity for any return to continue to fund future horses to be trained in the region.

The opportunity to train horses on Levy's Beach and the dunes is critical for the ongoing success of horse training in Warrnambool which I am fully supportive of.

Regards,

14/3/2018

Monday, 19 March 2018

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

this letter is written to provide my support to the continuation of Beach training in Warrnambool.

I am very proud of the fact we have the beaches to offer this unique horse training opportunity, this for certain provides significant positive economic benefits to our local community, and employs many passionate people.

What we have is unique and something our community is proud of, as a result I am fully supportive of the continuation of horse training on our local beaches.

Regards,



Thursday, 15 March 2018

Manager, Park Planning,
Parks Victoria
parkplan@parks.vic.gov.au
Melbourne, VIC 3000

Dear Manager,

Re: Warrnambool Beach Training Support Submission

Woodford Racing Club has conducted race meetings in the Warrnambool area since 1900 and has been a tenant club of the Warrnambool Racing Club since 1946. We race once a year on New Year's Eve and last year broke all records with over 5000 people attending. Our meeting is catered to regional and visiting families (over 1000 children attended) and they like what we do. Many come to Warrnambool for the beach environment and this translates into a great day of racing and entertainment put on by the horses that train on the regions beaches.

We are very proud of the fact we have the beaches to offer this unique horse training opportunity. This certainly provides significant positive economic benefits to our local community, employing many passionate people who love horses and the outdoors work environment.

Specifically dealing with some of the key issues of the Belfast Coastal Reserve Draft Management Plan. **Woodford Racing Club believes:**

- The industry needs **access to the Levy's Point** area from Sunrise to Midday to ensure less congestion in the area and minimal disruption to any public access to the dunes.
- We agree with the **plans information that allows access** of a minimum of 120 horses **on the beach** each day with 40 horses being able to access **the dunes**.
- Any changes to the Draft plan need to take into account the demonstrated huge economic driver the racing industry is to our region and the effect any changes would have on jobs.
- The **access to the beach and dunes** has seen huge **growth in the number of horses being trained in Warrnambool and surrounding regions**. This beach access has been a main reason for this increase. Equally the reverse must be true and if **access is curtailed then numbers will diminish** which will put **small clubs like our own at risk of not being able to attract viable horse numbers** that generate the huge growth we have experienced in recent years. I believe this would also impact on smaller regional clubs like Terang, Camperdown and Hamilton.

PO Box 884
2-64 Grafton Road
Warrnambool VIC 3280

www.country.racing.com/woodford
woodford@countryracing.com.au



As well **the number of people engaged to work in the industry** can only be appreciated if a visit is made to the training tracks and beaches between 5 and 8 am on every morning of the year. We believe not many of the people negative to the proposed plan have bothered to understand the amount of employment created by this industry.

The industry appears to have embraced all the measures proposed that ensure best environmental practise. **The Levy's beach proposal** seems to us to tick all the boxes to meet the needs of all beach users.

Regards,

Woodford Racing Club

PO Box 884
2-64 Grafton Road
Warrnambool VIC 3280

www.country.racing.com/woodford
woodford@countryracing.com.au

**PORT FAIRY TO
WARRNAMBOOL
RAIL TRAIL Inc.**
ABN 94814266215



Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke Street
Melbourne
VIC 3000

24 February 2018

Dear Sir,

the Port Fairy to Warrnambool Rail Trail Committee of Management
I have been requested by the committee to comment on the Belfast Coastal Reserve
Draft Coastal Management Plan.

The Rail Trail forms the northern boundary of the reserve between Levys Point car
park and the board walk crossing Kellys Swamp and although it does not appear
(from the maps) to impinge on the Reserve, a number of recommendations in the
Draft Plan will have a material effect on the Rail Trail.

As noted in the Draft, the section of the Rail Trail between Levys Point car park and
Kellys Swamp is managed by Moyne Shire Council and Warrnambool City Council.
The Rail Trail Committee has an interest in the Rail Trail as a whole and was involved
in the initial planning of the Trail.

The Levys Point Track is the most dangerous section of the Rail Trail as it has
cyclists and walkers using the same narrow and winding track as farm vehicles,
horses and off road recreational vehicles (four wheel drive vehicles, motor bikes, four
wheel motor bikes and trail bikes)

The Committee regularly receives comments from both cyclists and walkers of near
misses particularly with four wheel drive vehicles. The writer in fact needed to ride off
the track into "the bush" to miss a four wheel drive vehicle coming in the opposite
direction and around a bend.

1.0 The map of the reserve indicates a proposed gate near "Spookys".

In the initial planning of the Rail Trail, the trail between Levys Point car park
and Kellys Swamp was to be open to allow adjoining land holders access to
their properties.

We would suggest that the landholders be consulted prior to the construction
of the gate.

The Rail Trail Committee is strongly in favour of the gate being constructed
providing it allows easy access for cyclists and walkers and is built such that it
cannot be broken down to provide access for recreational vehicles as has
other gates been in the past.

- 2.0 The upgrading of "Spookys" car park and the Levys Point track surface to enable two wheel drive vehicles access will add significantly to the number of vehicles using the trail and hence increase the danger to walkers and cyclists, unless a separate trail to allow separation of vehicles from cyclists and walkers is constructed.

Currently there are speed limit signs on the track however these are rarely observed and the track is used by "joy riders" as a speed way.

The Rail Trail Committee is strongly against any increase in vehicular traffic along the existing track

- 3.0 As mentioned previously the section of the Rail Trail between Levys Point car park and the board walk across Kellys Swamp is shared by walkers, cyclists, vehicles and in a small section horses.

The Rail Trail Committee believes that a trail on the north side of Levys Point Track to be used solely by cyclists, walkers and recreational horse riders and which is physically separated from vehicles is necessary to ensure the safety of walkers, cyclists and horse riders.

The Committee thanks Parks Victoria for the opportunity to comment on the Draft Report and would be willing to meet and discuss our comments in detail.

Your ly

Lynrowan Stud

PO Box 2131, Lower Sandy Bay, Tasmania, 7005

Jeune Drive, Acton, Tasmania

Thursday, 15 March 2018

Manager
Parks Planning
Parks Victoria
Level 10, 535 Bourke St
Melbourne VIC 3000

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

As an owner of horse/s trained in Warrnambool, the opportunities beach training presents as well as the relaxed country environment the district has to offer is the key reason why I will continue to support the continuation of horse training in the region.

We have sent horses recently to the region for both pre-training and training. Currently we also have horses with , one of , who also send horses to the region for beachwork. We also race other horses in Tasmania, who currently train at Seven Mile Beach and Five Mile Beach on the Eastern Shore of Hobart and specifically look for a similar environment for them to be trained.

If this opportunity was not available, we would go back to having them trained in Tasmania and would have to be satisfied with a little less prizemoney, but our training fees and it's generated employment stays in Tasmania.

The opportunity to train horses on Levy's Beach and the dunes is critical for the ongoing success of horse training in Warrnambool which I am fully supportive of.

Yours Sincerely,

Lynrowan Stud