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**From:**  
**Sent:** Thursday, 1 February 2018 12:52 PM  
**To:** Lily D'Ambrosio  
**Cc:**

Lily D'Ambrosio

**Subject:** Letter to Lily D'ambrosio - The Minister Responsible for Implementing The New Belfast Coastal Reserve Management Plan

Good Afternoon Lily D'ambrosio

**RE: Belfast Coastal Reserve - Draft Coastal Reserve**

I would like to introduce myself.  
My name is

**Pre-amble**

the wide scale changes soon to be imposed upon us in the Armstrong Bay Coastal Precinct.  
As you are aware, in the recent past there has been a great deal of community discussion about our the use of the local beaches by the community.  
The conversations have come to a head in recent years because of the Commercial Horse Trainers using the beaches for their morning training sessions.

It seems that this issue is being currently resolved by the interested parties, and it is not what I wish to write to you about.

**Drastic Changes to the Armstrong Bay Beaches – and how it will Affect our Lives.**

The new Draft Plan for the Belfast Coastal Reserve just recently released by Parks Vitoria has been “sprung” upon our community with no previous consultation.

As the community begin to read and understand the ramifications of what it will mean to lives of the people who live in the South West of Victoria, the more the incensed the community becomes.

I am not sure whether you have visited our district at all, but if you have you will know that the Armstrong Bay beaches are loved and cared for by the local South West Community.

The Armstrong Bay Beaches are not tourist destinations. They are not the usual surf beaches that attracts lots of visitors. They are our community beaches.

The South Western Victoria community may use the beach only a handful of times in any one year, but when they do they will often walk the dog, ride a horse with a friend or a family member, run, spend time playing along water’s edge or even ride a bike.

By imposing these new drastic restrictions on the beach will be akin to taking the beaches away from the community.

May I say that;

The carving up of usage areas along our beach is insulting.

The allocation of areas for “legal use activities” is arrogant.

The dictatorial manner in which Parks Victoria have decided how we should live our lives down here in South West Victoria, is objectionable.

The total disregard for “us country people” is hurtful.

**The Belfast Coastal Reserve Plan and It’s Relevance to the Armstrong Bay Beach Precinct.**

I therefore wish to question the relevance of the New Management Plan to this area.

I question why such a generic document has been applied so irresponsibly to our precinct.

This document seems to be more applicable to a larger populated area such The Bellarine Coast or The Morning Peninsula.

As South West Country people, we live simply and most of the times it involves horses and dogs.

Most people who have purchase property down this way have done so because of the lifestyle it provides.

The closing down of Car Park Access Tracks and the banning of Dogs and Recreational Horse Riding from our Community Beaches would be equivalent to taking a Football Oval away from a County Town.

It would be devastating.

Thank you for the time you have taken to read my letter, and I hope you give my comments your most thoughtful consideration.

Kind regards,

## Response to Draft Belfast Coastal Reserve Management Plan

### Far West Friends of the Hooded Plover



This response is on behalf a group of volunteers who are actively engaged in monitoring and protecting Hooded Plovers in Belfast Coastal Reserve (on behalf of Birdlife Australia Beach Nesting Birds Program), and who also have gained a deep understanding of other beach-nesting and migratory birds and in the Reserve.

Responses to the draft management plan also draw on the environmental, recreational and social knowledge and experience that I have gathered over twelve years of on-ground experience and observation whilst volunteering for Birdlife Australia and the various land managers of Belfast Coastal Reserve. It is important to note the significant population of hooded plovers in Belfast Coastal Reserve, and sadly to also note their diminishing breeding success that clouds their future.

I have accumulated extensive experience of liaising with land managers, community members, funding agencies and sponsors, allied environmental organisations, school groups, volunteers and beach users. I have also given numerous presentations, advocated and lobbied for improvement in the management of hooded plovers and other beach birds in Warrnambool – Pt Fairy area in that time. This voluntary role has been coupled with active monitoring and protection of hooded plover nest sites including the temporary fencing and signing of nests in Belfast Coastal Reserve during the breeding season, and ongoing seasonal data collection and reporting to Birdlife Australia.

Hooded plover volunteers have been encouraged by many users of the beaches of Belfast Coastal Reserve in their ongoing endeavours to protect the birds and raise awareness with Reserve users, however there has been an increasing struggle to cope with the combined escalating impacts of unregulated activities on all of the beach nesting birds, particularly in relation to the failure of cohesive land management by the various agencies, the lack of regulation to control multiple threats and to support the Reserve environment, and increasing 'bogan' behaviours towards the wildlife, the environment and volunteers.

As seasonal dog regulations were introduced in nearby Warrnambool and Port Fairy, the lack of regulation in the Reserve has seen increasing influxes of dogs (mostly off-leash), including a peak in visitors bringing dogs during the summer into the Reserve. Large numbers of uncontrolled recreational horse riding groups, vehicles, camping, and in recent years a sudden surge in commercial race-horse training have all combined to create a very difficult environment for volunteers to continue their environmental work, and a reduction in the success of hooded plover breeding across the Reserve over the last two seasons. The combined increase in threats has increased much faster than any mitigating measures have been implemented to address them. There has been inadequate management of the Reserve by Parks Victoria, without a regulatory framework for them to effect change, very few resources, almost no education available to users, and a 'handball' approach from other land managers responsible for the Reserve. Supporting and protecting hooded plover breeding has fallen on the shoulders of volunteers, and it is apparent to us all that the hooded plover and other beach nesting birds of Belfast Coastal Reserve are at the cross roads of their future survival for this important local population (approx 10-12% of Victorian adult population).

Volunteer visits have increased markedly over the last few seasons, managing the constant nest failures and movements of the birds as they have continually tried to find viable nesting spots where they are not under threat. I estimate that volunteer visits to Belfast Coastal Reserve have averaged between 50-100 monitorings of individual nests per week over the last two seasons. Many nests have not survived more than a few days, many chicks have perished soon after hatching, and a number of hooded plover chicks and an adult bird have been found dead on the beach.

Increased observation and data has shown that nesting failures due to humans, their vehicles and their animals have increased markedly, particularly where access points cannot be controlled. The section of beach from The Basin (Killarney east) easterly to Levy's beach (via Gormans & Rutledge Cutting) has been most affected, with nil chicks surviving in this stretch this current season, and few nests surviving to hatching stage. The users of this stretch are persistently indifferent in their attitude toward any birds, resistant to conversation, and at times hostile and cavalier to volunteers and Parks Victoria staff. This stretch has been included in the conservation zone in the Draft Management Plan, and it is vital that it remains a conservation zone to improve the rate of breeding success in this critical section of the Reserve.

Over the last few seasons, targeting of hooded plover beaches and nest sites by 4WD's and motorbikes has occurred throughout the season, particularly in the same stretch of beach from Killarney East to Levy's Pt. At times motorbikes have churned up the entire stretch of beach, impacting on/in many hooded plover nest sites. Not only do these vehicles present a danger to volunteers and other beach users, it is truly heart-breaking to find multiple nest fences broken down, eggs crushed or chicks gone. Some of these vehicles camp overnight on the beach, and at times people put up tents near nesting birds. I have even witnessed one 4WD parked overnight inside a signed and fenced nestsite with multiple fishing rods in use (the site was abandoned by the nesting birds).

A number of reports were made over the season to Parks Victoria of personal safety threats, with the result that FW FoHP volunteers and Parks Victoria staff were instructed to work 'two-up' and to undertake a training workshop in managing/mitigating threatening behaviours on the beach. Volunteers have had to call in/out from visits to the beach, and to interchange vehicles and access points to avoid potential conflict.

I have had multiple race horses race past myself and another volunteer at high speed in formation across the beach in attempts to intimidate, I have reported race horses trainers training on beaches that are in breach of the current licence arrangement, to find the same horse trainers then continually occupying the space around and inside fenced nesting sites on the beach, resulting in nest failures. I have even had to attempt to monitor nest sites with several naked horse trainers alongside the nearby fenced nestsite, have been bailed up numerous times by multiple unleashed threatening dogs (whilst their owners took no action) and have witnessed people openly putting their dogs into fenced hooded plover nest sites.

It has been estimated by volunteers of FW FoHP that over 90% of dogs currently accessing Belfast Coastal Reserve between The Basin (Killarney east) and Levy's are unleashed, and that this behaviour has escalated due to the acknowledgement that the Reserve is unregulated, and that many dog visitors are seeking to avoid controls elsewhere. Some of these individuals have multiple and intimidating dogs and have remained on the beach for hours at a time, using various sections of the beach.

Volunteers of Far West Friends of the Hooded Plover were relieved and hopeful when the Environment Minister Lily D'Ambrosio announced the drafting of a management plan for Belfast Coastal Reserve. Experience has taught us that our efforts in protecting the species are ineffective without appropriate regulation, unified management and education.

Unfortunately, following the announcement of the consultation period, volunteers have had to cope with increased and malicious behaviours targeting hooded plovers, including the removal of hooded plover eggs from nests, the destruction and removal of signage and nest site materials, an increase in unleashed dogs actively impinging on hooded plover nest sites, aggressive interactions and ongoing breaches of permit conditions by race horse trainers, and more recently false accusations made towards FW FoHP volunteers by a small group of people against the draft management plan claiming to be 'local custodians' of the Belfast Coastal Reserve, despite little knowledge or experience in protecting the reserve environment.

The consultation process has been a difficult and disappointing process, with volunteers singled out and verbally attacked at BCR management plan events, misinformation publicly released relating to hooded plover nesting and threats statistics, and hooded plover volunteer emails misused and untrue statements attributed to volunteers.

Despite the profound difficulties experienced during this season, FW FoHP look forward to the introduction of many positive aspects that have been identified in the draft management plan.

#### Supported Aims:

- The creation of the conservation zone as described (no dogs)
- The creation of two conservation-recreation zones as described (leashed dogs)
- Recognition of Traditional Owners and Cultural awareness
- Controlled recreational horse riding
- Banning of shooting and a number of recreational activities that impact on hooded plovers & birdlife
- Protection of hooded plover habitat and the environment of Belfast Coastal Reserve

Far West Friends of the Hooded Plover strongly oppose and condemn the introduction of commercial race horse training as suggested in the Draft Management Plan. It is our contention that this activity is opposed to all values defined in the draft management plan and will impact heavily on the hooded plovers and other shorebirds of Belfast Coastal Reserve - impacting on breeding, foraging and habitat protection.

#### Unsupported Aims:

- Commercial Race horse training
- Fragmented land management

#### Responses to the Draft Management Plan:

##### 2. Vision:

FW FoHP is supportive of the Vision as defined in the draft management plan with the exception of the following statements:

- The term 'horse riding' makes no distinction between recreational horse riding and race horse training. FWFoHP believe that recreational riding may be able to co-exist (carefully managed) with the environment and other user groups in Belfast Coastal Reserve, however race horse training is highly destructive, dangerous and should not be included in the Vision. We do not support race horses in any way as compatible with the conservation and recreation aims of the Reserve.
- The timeframe for review has been set at fifteen years. FW FoHP believes that a review of introduced changes should be undertaken within a short space of time to quickly respond to changes that are harmful or not effective.
- The statement at the end of the vision statement regarding 'the area being important habitat and refuge for native species, particularly threatened migratory birds that breed and feed here is not correct'. This statement should be corrected to 'the area being important habitat and refuge for native species, particularly the threatened hooded plover that breed and feed here, and also threatened migratory birds that feed here'.

### 3. Zoning:

FW FoHP is highly supportive of the following:

- Conservation Zone as described from east end of Killarney boat ramp to Big Baldy track, to ensure protection of the highest cultural and environment values.
- Conservation and Recreation Zones (two) as described in the eastern and western end of the Reserve to protect cultural and environmental values and allow for low-impact recreation. (Table 3.1) (altered)

It is vital that the conservation zone includes the area as defined in the draft.

FW FoHP is highly supportive of the conservation zone in respect to protecting the high number of hooded plover breeding sites, red-capped plover nest sites, oystercatcher nest sites, and the food sources and habitat of high numbers of migratory birds roosting and foraging in the zone. This zone also includes the largest known flocking site of the hooded plover (Rutledge Cutting) and one of five priority areas for the critically endangered orange-bellied parrot. Exclusion of dogs, vehicles, hunting, camping, dune boarding and horse riding within this zone and effective management of other identified threats will have a significant positive outcome on the breeding success of these BCR shorebirds.

However, FW FoHP has strong reservations regarding the adequate protection of 4-5 pairs of hooded plovers and 1-2 pairs of oystercatchers that consistently nest/attempt to nest in the Mills Reef/Golfies stretch of beach, particularly regarding the impacts of race horse and recreational horse riding. (conservation/recreation zone). This zone is a significant breeding area with a very narrow beach and eroding dunes in most parts.

It is also noted that the eastern boundary of the conservation zone and conservation-recreation zone includes approximately half of the Kelly's Swamp wetland area. The boundary to the east end of the conservation zone should be adjusted to include all of Kelly's Swamp to ensure maximum birdlife protection and cohesive management.

4. Cultural landscape and living heritage: (Page 23)

FW FoHP strongly support statements in this section relative to the importance of recognition and maintenance of geological features, the recognition of traditional owners and history, ensuring cultural landscape values are protected in heritage management and establishing strong partnerships with traditional owners to protect and conserve heritage features. Our support includes the protection of reefs, cliffs, rocky outcrops, water courses, dune formations and the beaches, and includes protection from impacts that are likely to promote/escalate erosion, including man-made structures. The recognition of nearby local prominent geological features that are significant in cultural connections such as Tower Hill, Thunder Pt., Levys Pt, Merri river/wetlands and Belfast Lough should be identified, recorded and protected in the cultural landscape and living heritage.

FW FoHP notes a connection between identified aboriginal midden sites and current popular hooded plover breeding sites. Like many other aspects of BCR history, there is so much yet to understand.

FW FoHP strongly supports the goals of further historical and cultural learning, visitor education and interpretation of Belfast Coastal Reserve.

FW FoHP also strongly supports the right of traditional owners to protect their cultural heritage, including the rationalisation of access paths, formalisation of vehicle controls, protection of middens, and respect given to their opposition to race horse training and other horse activities that damage beaches, dune formations, wetlands, vegetation and cultural sites in Belfast Coastal Reserve.

5. Healthy Country:

FW FoHP acknowledges statements relating to Belfast Coastal Reserve providing habitat and refuge for animal and plant species of local, national and international significance, including over 50 listed threatened species, and that Belfast Coastal Area has been identified as a key biodiversity area.

FW FoHP strongly agrees with statements regarding the reduction of impacts on hooded plovers, in particular by controls on the key impact activities of dogs, horses and people. We argue that controls designed to protect the hooded plovers will also protect other bird species in the reserve.

We believe the above statements support the use of the conservation zone in the management plan, addressing key impact activities.

Key natural values considered to be an importance focus of conservation effort (Page 28) include:

- *Coastal Dune Scrub*
- Wetland Habitats
- *Resident Shorebirds (Hooded Plover indicator species)*
- *Migratory Shorebirds*
- Waterbirds
- *Orange-bellied parrots*

FW FoHP consider four of the above key natural values (in bold) to be adversely affected by horse activities, both recreational and race horse training.

FW FoHP also notes (Page29) that race horse training has been identified as an extreme risk to nesting,

fledging and feeding hooded plovers and resident shorebirds.

A major fault identified with the Belfast Coastal Reserve draft management plan is that race horse training has been included and is contradictory to the management plan goals and strategies, and is contradictory within the conservation zone.

We reiterate our strong opposition to race horse training in any parts of Belfast Coastal Reserve, and from observation, have identified the acceleration of erosion of fore dunes where race horse training has occurred on the upper part of beaches, at the base of sand dunes and on access tracks and entrances. We also note that race horse training has a marked detrimental effect on beach wrack which is crucial to hooded plover and shorebird foraging.

FW FoHP question the existence and effectiveness of evaluation and mitigation strategies of current race horse training activities. We consider that this comprehensive management plan is devalued by the inclusion and expansion of race horse training.

FW FoHP have observed the the current practices of the race horse industry training in Belfast Coastal Reserve, and have noted constant breaching of licence conditions, inadequate monitoring of the training activities and general non compliance around mitigation strategies, and considers this practice is non sustainable in a coastal reserve and is designed to fail with its current monitoring regime. FW FoHP believe that race horse training activity should be removed to a private facility.

#### Vegetation (Page 30)

It has been identified that the area between Rutledge Cutting and Warrnambool has important and large populations of hairy spinifex on primary dunes. FW FoHP advises that this vegetation is favoured by hooded plovers for nesting, whereas marram grass is an impediment to nesting.

It is also noted that hairy spinifex creates a gentle gradient and more natural dune formation. FW FoHP find it a travesty that this identified stretch of hairy spinifex beach has also been selected to allow intensive race horse training, risking the health and stability of the foredunes.

#### Goal: Habitat Protection (Page 32)

FW FoHP strongly agrees with all statements including the goal and strategies, however removal of horses from dunes, foredunes and wetlands needs to be included in this table.

FW FoHP plover also advocates for protection of other shorebirds nesting sites, including rocky points, off-shore reefs, rocky outcrops and cliffs. There are breeding colonies of tern, cormorants, scattered kelp gulls, white faced heron and dune birds that require protection along the beaches and off-shore. Preservation of beach wrack, vegetation along the dunes and limiting the further destruction of dune vegetation by Pt Fairy Golf Course should be a priority.

Purchase of privately held land within the Reserve should be considered as part of this Plan.

Goal: Reducing impact of visitors at key locations to allow for an increase in the extent and richness of vulnerable fauna, and the occupation of most of their potential habitat (Page 34)

The goal here is strongly supported by FW FoHP

The strategy to protect hooded plovers by erecting temporary fencing and erecting signage at individual nesting sites is currently employed by FW FoHP volunteers at most of the nest sites across Belfast Coastal Reserve. This strategy is also strongly supported, however it is essential that the volunteer workload is supported at the management level, including signage, zoning, dog and horse control, compliance and resources. It is also worth noting that the public can perceive that 'chicks/birds live within the fencing', thus education/interpretive signage is necessary. It should also be considered that this goal should reduce the work load of volunteers and break the reliance on fencing of nests for hooded plover breeding success.

FW FoHP strongly support no dogs or horses within the conservation zone as described.

#### Key threats to Hooded Plover Breeding Success (Page 35) Seaweed

It has not been mentioned on this page that one of the biggest impacts of horses (particularly intensive race horse training) noted in Belfast Coastal Reserve has been the repetitive use of the soft sand at the top of the beach and the interface of the dune. This has resulted in the pulverising of seaweed deposits on the sand, causing it to dry out and to become devoid of insects and other micro-organisms usually found around seaweed deposits.

This effectively changes the ecology of the beach.

FW FoHP strongly supports no horse riding above the high tide mark

FW FoHP strongly supports no removal of beach wrack from Belfast Coastal Reserve beaches.

FW FoHP strongly supports no horse riding at times of high tide (includes 1 hour before/after high tide)

FW FoHP strongly supports no galloping or cantering of horses

FW FoHP strongly supports no race horse training on any beaches

FW FoHP strongly supports strict permits for recreational horses for use outside of the conservation Zone

#### Protection of Reefs

It has not been noted in the draft management plan report that a number of hooded plovers (and other shorebirds) actively nest in rocky points/cliffs/reefs on/off shore).

FW FoHP recommends that reefs/cliffs/outcrops in the Reserve are protected from disturbance (e.g. rock removal, man-made constructions, recreational activities) and that this information is advised in educational/interpretive signage

## 6. Recreation and Use

FW FoHP strongly support the Goal of 'opportunities for a range of recreational visitor activities and Strategies' as defined on pages 53/54 with the exception of the following statements:

1. Effective dog control (leashing) must be implemented in the conservation-recreation zones
2. Effective compliance regimes need to be implemented to enforce dog regulation. Leashing compliance is very low, particularly in less busy sections of the beach, and it is critical that regulations are enforced so that they are meaningful to the community.
3. Increased hooded plover/shorebird protection should be implemented around the Mills Reef-Golfies nesting zone at the west end of conservation-recreation zone (from dogs and horses) to protect this

zone from recreational users.

4. It is suggested leashed dogs could be walked in a loop from the current carpark at the eastern end of Pt Fairy golf course easterly towards the old entrance, onto the beach and walked westerly back to the eastern end of the golf course. This suggestion would give people an option to exercise their dog, access the beach for a swim, but not have to pass by the mills reef nesting area. (map attached)
5. A further suggestion is for dogs staying at the camping ground to loop around westerly from the camping ground beach entrance, westerly until the second point, and looping back via the dunes and vehicle track back to the camping ground (this may require some fencing arrangement). This would result in few impacts on nesting hooded plovers or shorebirds.
6. A final suggested dog-walking option at the eastern end of the reserve would be to walk dogs on to the beach at Levy's and return via a loop through Spooky's entrance, which may be a popular on colder days, and could provide a long walk if people were seeking one. This option would need to consider controlling dogs from uncontrolled access into the dunes.
7. It has not been noted in the draft management plan about the dog walking opportunities adjacent to the reserve. This highlights the failure of fragmented management. It is possible that some people who feel aggrieved may not realise that opportunities currently exist in Pt Fairy, at the eastern bound of Belfast Coastal Reserve (east of golfies car park) if that is to be considered acceptable by DELWP.
8. There should also be encouragement for the land managers at each end of the reserve to investigate further off beach opportunities for dog walking, including Dennington, Koroit and Pt Fairy, and to consider the current impact on hooded plovers and shorebirds outside the boundaries of the draft management plan. (Example: 3kms of leashed dog walking has been suggested west of Levy's Point, however there is also a similar stretch east of Levy's Pt. It would make sense to prohibit dogs east of Levy's Point to protect all breeding birds in that section -- 6 kms is a long stretch of dog walking to impact on birds. It would be better to provide the same distance in a dune loop.
9. It should be considered that the western end conservation/recreation zone (golfies) provide opportunities for learner people learning to ride horses, accompanied by adults, due to the gentler beaches in that area, riding on the lower beach and by permit. (avoiding upper beach) and the fact that a gentle pace is compatible to the significant hooded plover breeding area in this section.
10. Experienced riders and larger groups (capped in numbers and permits) could be accommodated at the eastern conservation/recreation zone but must avoid the upper beach (10-15m below dune) and high tide. The eastern end would provide a longer experience.
11. It should be noted that Page 51 states that recreational riders are small groups. This is a misunderstanding and FW FoHP observes regularly that there are large groups of trail riders and out-of-town groups riding in the reserve (images attached). These groups often have significant impacts in the dunes/on the beach, and have been recorded as causing mass horse escape in the past, causing a catastrophic failure of all hooded plover sites on the beach, and the death of several wallabies on the beach from fright.
12. It should also be noted that Warrnambool Trail Riding group is a regular user of the Reserve, and has had significant impacts to beaches and dunes in BCR. Despite developing a scholarly document on riding to protect hooded plovers, this is not evident in practice. (images attached).
13. Recreational riders should be restricted to avoiding times of high tides.
14. Large groups of horse riders 'camping out' should no longer be allowed, and group size should be capped. There is often evidence of camp fires, drinking and other activities in various sections of the back dunes. Vehicles have also been observed on occasion with some large horse group activities (supplying water and feed).
15. The number of horses using the reserve should be capped, as the risk to foraging birds is cumulative.
16. No support vehicles should be allowed with horse groups, or activities such as barrel racing etc as seen in the past. No lunging, rolling, training, breaking in etc.
17. Riders need to follow water line on the beach, no cutting of corners
18. No commercial horse ventures
19. No trampling of vegetation, access via formal tracks
20. Maximum two horses abreast
21. More than 6 horses should be categorised as an event and extra rules apply
22. No sulkies or horse-drawn vehicles

23. Strict permit conditions and education/induction should be provided to recreational riders
24. Motorised boating, boating and jet-ski's should not be allowed in wetland areas of Belfast Coastal Reserve
25. Jet-ski's should not be permitted in the reserve due to impacts on nesting birds and passive users
26. Wind-surfing & kite surfing should not be allowed in wetland areas of Belfast Coastal Reserve
27. No 'sand bikes' or other types of sand vehicles.
28. Infrastructure of the Reserve boundaries and access points need need to be upgraded to adequately control illegal vehicle access to all beaches.
29. Significant fines should apply where vehicles target nest sites and drive through nesting habitat.
30. Reasonable fines should apply to people not complying with many BCR regulations
31. Events taking place in Belfast Coastal Reserve require a permit and environmental audit, and permits should be revoked if conditions designed to protect threatened species are breached. Permits should be designed to prevent disturbance to breeding birds.
32. FW FoHP recommends a strategy to encourage visitors to pick-up and deposit plastics from the beach

## 7. Managing in partnership

FW FoHP strongly supports the goals and strategies in this section of the report, with the exception of the following comments:

Belfast Coastal Reserve still remains fragmented by four land managers and various political leanings at the end of this discussion. It has been made clear in this process that local council's are subject to more political influence than a dedicated government agency. Despite Warrnambool City Council and Moyne Shire Council having Coastal Action Plan's that clearly identify many of the issues in BCR that require addressing, and despite there being numerous documents (including the recently published 'Protecting Victoria's Environment Biodiversity 2037) to support improved environmental outcomes, politics continue to play an ugly hand in the constant handball between the four land managers.

FW FoHP argues strongly for one land manager for the Reserve.

FW FoHP advocates for a 12 month review to address any failings in the newly implemented system, followed by a three year review, then five years.

FW FoHP advocates for Belfast Coastal Reserve to become a national park

Working with community:

FW FoHP strongly agrees with the stated goal: 'Community skills, knowledge and assistance provide stewardship and help in managing the Reserve.

However: It is the opinion of FW FoHP that the groups mentioned on page 74 will be severely disappointed if race horse training is permitted and expanded in Belfast Coastal Reserve.

The community needs to be supported by good government.

The local stewards (genuine environmentalists) who called upon Minister D'Ambrosio to protect the Reserve, will most certainly find it difficult to continue their environmental efforts whilst race horse trainers benefit financially from the Reserve whilst engaging in destructive behaviour.

It is not something that dedicated environmentalists care to witness.

Not only would this result compromise the entire premise of the management plan, it is a direct contradiction and a immoral outcome for groups of people such as Far West Friends of the Hooded Plover advocating for environmental protection. There is no indication in the draft management plan

that the race horse industry will be required to protect/restore damaged dunes and vegetation. In all likelihood, the current custodians will be left to witness more race horses worked to death in the reserve, dreading the first fatality caused by a race horse in Belfast Coastal Reserve.

The community of this area have not bought the 'story' of the 'rich and powerful' racing club that must have access to the beaches 'to cater for trainer preferences', and to provide training outcomes 'critical for the future of the club'.

The critical issue at hand for the Belfast Coastal Reserve Management Plan is the conservation of the wildlife and environment of Belfast Coastal Reserve.

What is understood is that there is no logical reason why off beach facilities cannot be provided to/by the Warrnambool Racing Club. The 'stories' of the 'magic sand' and the impossible 'swimming' of horses outside of Lady Bay in Warrnambool, and the 'wellbeing' of the horses are fanciful at best. Expanding race horse training in Belfast Coastal Reserve is unsustainable, the environment will be inevitably sacrificed, and it presents a real danger to people using the Reserve and to the long term survival of hooded plovers and other shorebirds.

There have been a number of examples of horses throwing riders over the last two years, one rider injuring themselves against fixed signage on the beach, horses escaping trainers and fleeing outside the training areas and very scared horses grappling with the tides, causing fear to volunteers on the beach. It is a real concern to run into race horses in entrance ways, especially where they are eroded and there is no where for people to escape to. Most people do not know how to manage horse behaviours, and it is frightening for many people (myself included) and children when confronted with a flighty or unmanaged horse.

The proposal to legitimise race horse training into Belfast Coastal Reserve can only be interpreted as an entirely inappropriate political decision for it to be considered in this management plan designed around environmental and recreational values.

FW FoHP strongly condemns the use of the fragile and amazing environment of Belfast Coastal Reserve for commercial race horse training.

Far West Friends of the  
Hooded Plover

13 March 2018

Google Maps

Suggested Day Walking Loop  
Killarney Caravan Park  
Beach

Google Maps



Imagery ©2018 CNES / Airbus, DigitalGlobe, Map data ©2018 Google 100 m

Google Maps

Page 1 of 1

Suggested Dog-Walking Loop  
Skene's Rd Car-park  
East end of Pt Fairy Golf Course

Google Maps

skenes Rd CarPark (East end of Golf Course)



Mills Reef

Imagery ©2018 CNES / Airbus, DigitalGlobe, Map data ©2018 Google 100 m

Google Maps

Page 1 of 1

Alternative suggestion  
Dog Walking Loop  
Levy's Pt -> Spooky's

Google Maps



Imagery ©2018 CNES / Airbus, DigitalGlobe, Map data ©2018 Google 200 m



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Friday 16 March 2018

Manager, Park Planning  
Parks Victoria  
Level 10, 535 Bourke Street,  
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Via email: [parkplan@parks.vic.gov.au](mailto:parkplan@parks.vic.gov.au)

Dear

Re: Belfast Coastal Reserve Management Plan

Thanks for the opportunity to contribute to the Draft Management Plan for the Belfast Coastal Reserve. RV is fully respectful of the current situation and are committed to working with all stakeholders to ensure a sustainable solution for all. We wish to acknowledge the significant amount of work involved in the development of the plan and congratulate those responsible for its production.

Racing Victoria (RV) believes that if the Government had a goal to create a suitable balanced approach via the plan then they have achieved that goal. RV is supportive of the overwhelming majority of recommendations from the draft plan. However, should there be significant changes from the draft plan to the final plan then that balance may be lost.

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, many decades. There is considerable risk to the racing industry and local region in removing access to the beaches for horses.

It is our view that implementation of a final plan cannot come quick enough for all parties. We believe this will assist all parties to move forward in line with a final plan.

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 RACING VICTORIA**

### **EXECUTIVE SUMMARY**

Racing Victoria (RV) welcomes the opportunity to contribute to the Management Plan for the Belfast Coastal Reserve. Congratulations to those involved in the development of the Draft Plan, it is the culmination of a huge amount of work.

We believe that the draft plan is well constructed and that the Government has achieved a balanced solution. RV is supportive of the overwhelming majority of the recommendations in the draft plan.

Horse trainers have been using the beaches in the region for many, many decades and it is critical for the local horses, trainers and owners, the local Race Club and the wider racing industry. The racing industry makes a significant contribution to the economic and social wellbeing of the south-west of Victoria.

We believe that there is significant support for the use of Levy's Beach to train horses, that it has potential to be a major part of a balanced future solution and that it has many advantages, in particular; it will improve safety; dramatically reduce unwanted interaction between conflicting beach users; can be accommodated with appropriate environmental and cultural heritage controls; provides marketing and promotional opportunities; and will assist to secure the future of the racing industry in the south-west. There are roles for other beaches and the benefits for each are discussed further in the submission.

The racing industry is committed to working with Traditional Owner Groups (TOG's) and believe that the CHMP developed for the activity area at Levy's (including Hoon Hill) recognises concerns and proposes practical protocols. We will collaborate with relevant authorities and TOG's on all aspects of protection for cultural heritage.

A key ingredient for the final plan is to ensure that horse access numbers, while limited, are sustainable. The numbers outlined in the Cultural Heritage Management Plan (CHMP) for the Levy's Beach area represent a viable, sustainable and supported solution. The numbers as outlined in the Draft Management Plan for other beaches are supported by RV.

Apart from numbers the other key ingredient to sustainable use is the access times allowed for horses on beaches. The key to this solution is to allow enough time for sustainable, practical use of the beaches and associated infrastructure. Levy's Beach as the main beach should have access permitted to 12noon so that numbers can be divided per hour from sunrise onwards. Other beaches can have less time allowed given the lower horse numbers proposed for these beaches.

There are a number of very real risks for racing and the local region should the balance achieved in the Draft Plan be compromised in the Final Management Plan. These risks are discussed further in the body of this submission and include risks to the future of racing in the region, to the number of racing events in the region (including the May Racing Carnival), and to the economy and social benefit provided by racing.

RV will work with PV, DELWP, TOG's and other authorities and interested parties on the development activities like access paths, fencing or other requirements to ensure that as much protection as possible can be provided for the environment, cultural heritage and other critical factors.

The racing industry is committed to compliance and strongly believe that a Final Management Plan with clear guidance will greatly assist all involved. Signage is important in this regard as is a collaborative approach between the racing industry and the Government authorities. It is also considered important that a statement is made relating to relevant individuals who seek to be obstructionist to the guidance provided by the Final Management Plan.

## **BACKGROUND**

Horses have been trained on beaches around Warrnambool for virtually as long as there has been racing in the district. The very first race meeting was actually conducted by the sea at Lady Bay and Lake Pertobe.

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. 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 RV that they too would be forced to relocate to other parts of the state if beach access was impacted significantly.

Warrnambool is also home to the famous May Racing Carnival, which generates huge economic and social benefits to the region. Local horses, trainers and owners all aim their horses at the Carnival with beach training often a key to their success. The latest report on the economic contribution of the Carnival to the local region suggests that \$10m was injected into the local economy and over 30,000 people were attracted to the event.

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 RV is committed to retaining.

The racing industry has worked with various groups to develop a Cultural Heritage Management Plan (CHMP) for the Levy's Beach area (including Hoon Hill). This is a critical document aimed at appropriate management of cultural heritage and will be a key component of proposed plans for the use of the area. The activity area is outlined in the CHMP and provides clear direction on management requirements. We are unaware of any other user groups who have developed this same level of management planning for cultural heritage and completed a CHMP.

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 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. For background purposes a number of these items are considered in more detail in Appendix 1. Items such as;

- why doesn't racing only train horses at the racetrack?
- the horses do too much damage to the beach?
- the Club cannot be trusted to manage compliance with regulations for beach use? and so on will be discussed.

Suitable access times and horse numbers are critical to a sustainable solution and must be appropriate. There are some suggestions that horse numbers have dramatically increased in the last year or so in Warrnambool, however this is not the case. The proposed numbers outlined in this submission do represent limits, whereas previously there may not have been limits and do represent a potential reduction in horse usage on beaches.

Any sustainable and balanced solution needs a reliable compliance program. As with any new system, education, induction and clarity around rules is critical to compliance. The submission will also consider compliance arrangements and some comments in relation to regulation of the activity.

The racing industry is keen to work with all parties on a sustainable and balanced solution which involves horses accessing beaches and the dunes in the Belfast Coastal Reserve area. We have been willing to work with all parties on a community minded approach and this has been evidenced over the last two years. The industry as a whole has endured significant pain over this period but has been willing to contribute to the process to ensure that the best and most sustainable long term outcome is achieved.

## **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 the Levy's Beach area and as such it will take up the majority of the submission re identified beaches. It is considered an exceptional option to develop as a horse access beach with many advantages.

Each beach for horse access is considered in more detail in this section.

### **Levy's Beach (including Hoon Hill)**

#### Key Benefits of Levy's Beach Area

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

#### Safety

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

Levy's reduces the risks of incidents by creating improved, clearly marked access points to the beach.

Levy's reduces the incidence of conflict between beach users as the area has significantly less activity. If there are a small number of beach users there will be clear signage to alert them to the horses.

RV is willing to consider some appropriate fencing to horse access paths and Hoon Hill usage areas that will fundamentally reduce the incidence of horses getting onto other areas of the dunes or foreshore.

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

#### 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 identified 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 subsidence and / or contamination.

Management of horse numbers will ensure sustainable levels of activity for the beaches, dunes, and car park areas.

Arrangements 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.

Other paths / trials, outside of the identified activity area, are not required by the racing industry and can potentially be closed off, as per those identified in the draft management plan.

#### 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 noting that in the last 18 months the following projects have been completed; 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, this is more likely to occur at Lady Bay.

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.

Protects the May Racing Carnival and the benefits it provides for marketing and promotional benefits.

#### 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.

The racing industry is fully 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 WCC 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 this 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, in fact it just will not work without suitable horse numbers and access times.

It is the view of RV that the numbers as provided for the in the CHMP are suitable. They do represent a reduction in historical levels of overall access however RV 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, in particular relating to car parking and the number of horses on the 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 at least 12noon. This is explained simply by dividing the number of hours available by the number of horses. With an average of 5 hours (7am to 12noon) 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 an average of 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 proposed, as per the CHMP, that horses can access Levy's Beach all year round.



### **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.

RV 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 could 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.

RV 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 could likely be restricted to sunrise to 10am.

### **Gorman's Lane**

RV 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.

RV 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 as a permitted use.

## **CULTURAL HERITAGE MANAGEMENT PLAN (CHMP)**

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 this 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 at any time and is not necessarily subject to the Coastal Management Plan being 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 per day) and full management plans, including appropriate reviews.

## **KEY RISKS IF HORSE ACCESS TO BEACHES IS RESTRICTED**

The reduction in horse numbers or removal of beach access for horses will see a flow on effect throughout the south-west of Victoria. Trainers and owners will look to relocate their stables, and horse numbers will decrease. There has already been one large trainer depart Warrnambool due to issues around beach access and the racing industry is aware of other large 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.

The social and community value provided by the key race meetings in the region, in particularly the May Carnival is at risk should access to the beaches be restricted so much as to make it unsustainable for trainers and owners.

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

## **COMPLIANCE / REGULATIONS**

RV 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 number of noted non-compliance against the license which was introduced in June 2017. 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. After WRC

staff and PV 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.

RV is committed to work with the WRC and all other relevant parties on the introduction of such licence and to ensure all uses remain compliant. The licence and management plan however will need time to enable all parties to be fully aware of the conditions and an induction process will assist.

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, in association with local PV staff have divided breaches of rules into different severities and punish accordingly.

Minor Breach:

— 2 written warnings and then suspensions of beach permit.

Moderate Breach:

— 1 written warning and then suspension of beach permit.

Major Breach:

— Instant suspension of permit and 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 which will be sent to the WRC from \_\_\_\_\_ for 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 or relevant authority considers that the safety and welfare of the beach is prejudiced by Trainers failing to obey the Club, Council or Government beach rules, it may revoke or amend the permissions previously granted.*

*Please note that if you do breach the Warrnambool Racing Club, Council or Government 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."*

## **OTHER GENERAL ITEMS**

The following items relate to certain aspects of the Draft Management Plan that RV would like to take the opportunity to respond.

RV is supportive of the proposal for consolidation and ongoing review of the track network within the reserve.

Given the strong commitment to Levy's Beach as the major horse beach, RV is not necessarily committed to delivery of an upgraded and new car park at Golfies. RV would prefer to commit any funding and planning to the car park, signage and other requirements at Levy's Beach.

RV is supportive of renaming Hoon Hill.

RV is not supportive of horses utilising any areas outside the activity area identified in the CHMP process.

There are more horses in training at Warrnambool than what is identified in the draft management plan. It is more likely that there is up to 250 horses in daily work at Warrnambool at any one time. The number of horses utilising the beaches prior to the introduction of regulations and licenses is not clear as records were not kept. Racing industry feedback would suggest that this number could be as high as 200 - 250 on any one day. Further this number was suggested to be progressively rising to that number from around 2012 and is not as new an issue as what some other people have suggested.

Given the interim usage license is only valid until 14 June 2018 it is preferred that a new management plan is in place prior to this time.

RV is concerned with any suggestion that licence allocations have been preferred to larger trainers over smaller trainers. The allocation was made via horse numbers on a pro-rata basis and due to the overall reduction in license numbers all trainers received less than they desired. We would support a payment system, managed by the WRC, for the access to the beaches. RV would prefer that this is pro-rata based on application by trainers and assessment of horse numbers (which are on record at RV). RV finds it very difficult to apply any logic to flat numbers per horse trainer because it will not allow the adequate number of horses to be worked.

RV consider that Hoon Hill is part of Levy's Beach access and does not represent a "new" beach for horse access.

RV would like to work with PV and DELWP to understand how to assess days when beach access should be restricted.

It is absolutely clear from previous photographic evidence that the horse access path at the dunes at Hoon Hill has actually reduced in size in the last ten years and revegetated and not subsided.

## **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 option at Levy's Beach. Normally a horse will be trained at a location where it can access the beach and then the water however this is not considered possible for the Levy's Beach region. 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. This is another reason why times need to be suitable at Levy's Beach.

The numbers for swimming and wading need to be maintained at Lady Bay all year round as they are at the moment. Without Lady Bay access for swimming and wading 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 a terrific one stop option we understand that the WCC and others did not support this proposal.

## **SUMMARY**

The racing industry is an integral part of the 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. This includes providing full time employment for approximately 1000 people.

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. We further believe we can work closely with Governments of all levels to do our utmost to support a sustainable beach solution involving horses.

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.

## **SUGGESTIONS TO THE RACING INDUSTRY**

There have been many suggestions directed towards the racing industry during this process. We felt it was worthwhile to provide a response to some of these items.

### **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 south-west have accessed the beaches in and around Warrnambool and the Belfast Coastal Reserve for more than any local can remember. 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

Whilst the racing industry has invested heavily at the Warrnambool racecourse, it has been impossible to replicate the benefits of the beach at the racecourse or any other racecourse around the world.

### **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 racing industry will be very alert to these issues and work with PV / DELWP and other authorities to ensure vigilance and compliance with Belfast Coastal Reserve Management Plans.

### **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 racing 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.

WRC's policy for handling non-compliance with licence conditions is as follows.

The WRC, in association with local PV staff have divided breaches of rules into different severities and punish accordingly.

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— 2 written warnings and then suspensions of beach permit.

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The above has been well supported by the racing industry and specifically the Racing Victoria Stewards. Below is an excerpt from a letter which will be sent to the WRC from \_\_\_\_\_ to all licensed trainers with local beach permits/licenses.

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*Please note that if you do breach the Warrnambool Racing Club, Council or Government 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.”*



**Submission by the  
Belfast Coastal Reserve Action Group  
to the  
Draft Belfast Coastal Reserve Management Plan  
*16 March 2018***



**The Belfast Coastal Reserve (BCR) stretches for 18-20 km between Warrnambool and Port Fairy in South-west Victoria.**

**BCRAG Objective:**

To protect into perpetuity the environmental, ecological, cultural and social values of Belfast Coastal Reserve (BCR)

**BCRAG Aims:**

**To protect BCR for future generations.**

**To protect BCR and adjacent public land from inappropriate commercial activities and exploitation.**

**To prevent degradation of the BCR environment, the fragile dune system, swamplands/wetlands and shorebird and wildlife habitat.**

**To protect native wildlife, shorebird and migratory birdlife.**

**To support a recovery program for endangered and threatened shorebirds and migratory birds.**

**To protect BCR from non-conforming and incompatible activities.**

**To provide a clean and safe beach for beach goers and passive recreational pursuits.**

**To rehabilitate BCR and adjacent public land – biodiversity links.**

**To respect and support the current volunteer contribution and further engage and support the local community in protecting and rehabilitating BCR**

**To support the enhancement of the visitor experience and understanding of this unique environment i.e. bird observing (resident and migratory), eco-tourism, Mahogany walk, education – school groups.**

**Honour and uphold all previous documentation; implementation of findings and recommendations that support these objectives.**

**GENERAL STATEMENT:**

In January 2018, Parks Victoria released the draft coastal management plan for the BCR. The Draft Belfast Coastal Reserve Management Plan came about as a direct result of community concerns about the impacts of commercial racehorse training on the reserve's natural, cultural and recreational values. The protection of these values was the reason the reserve was created in the first place, during the 1980s.

**Belfast Coastal Reserve Action Group (BCRAG)** has always maintained that the development of a Coastal Management Plan would have a predetermined outcome to justify the inclusion and legalising of commercial horse training within the reserve. These concerns were raised repeatedly during several meetings with representatives from Department of Environment Land Water and Planning and Parks Victoria during the consultation phase of the Management Plan. Nothing contained in this document alters that view. Yet, if this document is read thoroughly, independently and without bias it clearly identifies why commercial horse training should not occur in the reserve, not why it should be included. Off beach, purpose built training facilities are the best way to achieve this.

Although there are many good elements to the draft plan and the background information may help raise community awareness of the values of the reserve and why they must be protected, it remains deeply flawed because of its complicity in entrenching and expanding the use of the reserve by commercial racehorse trainers.

BCRAG has identified this as the **single biggest flaw** in the plan.

**Under the proposals in the CRCMP, commercial racehorse training would be allowed on multiple beaches and sand dunes within the BCR. This will have catastrophic effects on the recreational, cultural, social and environmental aspects of the Reserve.**

The regulation of over 250 horses a day within the reserve will have devastating effects for the nationally threatened Hooded Plover—the reserve is its most important breeding area in the state according to the plan. Other beach nesting birds and Internationally recognised migratory species would also be affected.

This activity would also cause great damage to the integrity of the primary dunes and native flora within the reserve. Reducing the impacts and fragmentation of dunes, foredunes and wetlands and preventing erosion is an immediate priority in the plan.

The activity would also have the capacity to damage culturally sensitive sites within the reserve. Though this is not an area of expertise for BCRAG, we strongly oppose the proposed 'salvage and storage' of cultural artefacts to allow for commercial horse training to occur within the reserve.

In June 2017 the Government issued an interim licence to Warrnambool Racing Club to allow commercial horse training at two locations in the reserve; Golfies and Rutledge Cutting. When this licence was issued the government claimed that racehorses would be...

*'reduced to a maximum of 65 across the reserve. Before the introduction of the licence, the numbers of horses being trained in the area had increased from about 180 to 250 in two years, with a significant increase in the number of those horses using the beaches'.*

But after almost two years of consultation, during which racing interests were given elevated status; at some meetings racing industry representatives held 25% of the seats at the table, now the draft coastal management plan is set to expand horse numbers to 256 per day.

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 any future expansion.

The draft plan would also allow racehorses back into 750 metres of fragile dunes behind Levy's Beach. where in the past they have caused severe dune erosion.

This activity would also cause great damage to the integrity of the primary dunes and native flora within the reserve. Reducing the impacts and fragmentation of dunes, foredunes and wetlands and preventing erosion is an immediate priority in the plan; **Habitat Protection page 32.**

The proposal to remove Aboriginal Cultural artifacts from areas of commercial horse training is astounding. It would be physically impossible to remove and store a shell midden in its natural state. The Draft Plan notes, 'the Cultural Heritage Management Plan also calculated soil disturbance and incising of trails within the proposed activity area would result in a decrease of surface levels and that erosional activity may result in further reduction of ground surface.' It goes on to say, cumulative impacts to the dune system will have to be monitored and 'if required licencing conditions or defined routes may be changed', **page 64.** So basically, when one area becomes damaged, as it will inevitably will be, the activity will be moved to another area where the process is repeated.

This sounds like a plan from the 1960's. Does this mean a new CHMP would have to be implemented if a training area was relocated? Who would be responsible for the rehabilitation of any damaged area caused by training activities and the associated cost?

The plan even recommends racehorse training within the Conservation Zone at Rutledge's Cutting (dogs and recreational horse riding would be banned there) and a return to Killarney main beach. Killarney beach has been a controversial subject in regard to commercial horse training for over two years and was finally prohibited in this area after a community consultation process instigated by Moyne Shire Council in December 2016 and conducted in accordance with the Local Government Act. This process showed the local community overwhelmingly opposed horse training on Killarney beach. (76% of respondents were opposed ). The Draft Plan ignores community sentiment.

The CMP mentions commercial horse training several times as being of 'community interest'. Yet the results of the Phase Two consultation shows in **Section 3** that commercial and recreational horse riding rated 7th of 11 activities that were important to people using the reserve. And yet the Draft Plan suggests that the priority is to implement commercial horse training immediately.

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 reduce the impact. Worse still, the plan's risk assessment reveals that management of this will not 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 Plan is introduced the rating still remains Extreme.



**KEY POINTS NOT ADDRESSED IN THE DRAFT MANAGEMENT PLAN**



**COMPLIANCE WITH REGULATIONS:**

Belfast Coastal Reserve Action Group conducted a community monitoring program at two locations within the reserve, Golfies East beach and Rutledge Cutting, that were allocated for commercial horse training purposes during a period of 2016 - 17. Trainers were operating under an interim licence agreement during this time. A total of 32 breaches of that agreement were recorded in this period.

State Environment Minister, Lily D'Ambrosio and Wildlife officers were witness to one such incident. This involved

operating in a restricted and at the time, off limits area.

Managing and enforcing compliance at all the proposed horse training locations throughout the reserve would be a logistical nightmare and costly exercise. The Levys beach to Hoon Hill area, because of its size and proposed numbers would be virtually impossible to regulate.

BCRAG community monitoring has shown that self regulation by the racing industry will not work.



**WORKSAFE/Occupational ,Health & Safety:**

It is understood that Worksafe have not been consulted in the development of the Draft Plan. This is a glaring oversight and a failure to acknowledge the inherent dangers of commercial horse training. It is also understood by BCRAAG after consultation with Worksafe that any beach training location will be deemed a place of work and therefore bound by OH&S protocols and regulations such as the following.

*“Horse Stables and Track Riding Safety is provided in accordance with section 7(1)(f) of the Occupational Health and Safety Act 2004 (OHS Act) to assist employers and employees to comply with their duties and obligations under this Act and associated Regulations (#2)”*

**Occupational Health and Safety Concerns Regarding Horse Training on Public Beaches – Belfast Coastal Reserve**

This document aims to highlight some of the risks and hazards associated with horse training on public beaches:

**DOCUMENT LINK :**

**<https://www.dropbox.com/s/ev0bru6vwwftaok/Occupational%20Health%20and%20Safety%20Concerns%20Regarding%20Horse%20Training%20on%20Public%20Beaches.doc?dl=0>**



**ZONING:**

There are serious questions around the legality, or more to the point, the permitted or prohibited activities in an area covered by the **Public Conservation and Resource Zone or PCRZ.**

The area of Levys beach, within WCC boundary, is covered by that zone. Advice from a leading authority on Crown Land law would suggest commercial horse training in the section of Levys beach under committee of management of Warrnambool City Council is a prohibited activity under the State Planning Act, clause 36.03 and 62.10

**DOCUMENT LINK: PCRZ ZONING INFORMATION**

**<https://www.dropbox.com/s/2px2vcse2h16ylx/PCRZ.pdf?dl=0>**



### **ECONOMIC BENEFITS:**

The main reason for proposing to allow commercial horse training in the reserve is the supposed economic benefit to the region.

Page two of the document gives no mention of such benefit.

*'The main economic drivers of the region are agriculture, fisheries, retail, manufacturing, health and community services, education and construction, while agriculture, forestry and fishing are the major employers, providing nearly 25 per cent of total employment (Glenelg Hopkins CMA 2013). Coastal areas of the region, particularly around Warrnambool, are experiencing unprecedented increases in population and tourism activity, with pollution, erosion and overdevelopment perceived by the community to be major threats to the coastal environment (ibid).'*

This paragraph notes that **tourism** is a vast driver of the economy and **erosion** is a major concern. Having large numbers of horses in the dunes and on the beaches is completely incompatible with either of these.

Page 63 of the document claims that the racing industry contributes \$ 97 million to the area. A closer look at this reveals that area takes in the entire Western District, including ten different racing clubs and includes gambling revenue to the amount of almost **40%** - a large proportion of which would be lost to the community and local economies.

The Western District racing industry contributed \$100.1 million which included 10 x thoroughbred racing clubs, 3 x harness racing clubs and 1 x greyhound racing club in an area spread over five Local Government Areas (LGA's). The thoroughbred racing contributed 75% of the \$100.1 million i.e. \$75 million across these five LGA's.

It is interesting to note that in the Warrnambool Economic Profile ([Regional Cities Economic Profiles, Warrnambool March 2016 – Regional Development Victoria Working Paper 8](#)) the racing industry does not feature in the document at all.

However within this document “Strategic Industry - Tourism – Great Ocean Road” lists the Key tourism assets and attractions as:

- Gateway to Great Ocean Road (Port Campbell National Park, Twelve Apostles Gourmet Trail)
- Proximity to Port Fairy and Shipwreck Trail

“Visitors to Port Fairy are the major contributors to the strength of the local economy” and “domestic” visitors contributed a “Total \$301 million (Port Fairy Destination Action Plan 2015-2017)”.



**RESPONSES TO POINTS IN BELFAST COASTAL RESERVE DRAFT PLAN**

**Cultural landscape and living heritage..... 13**

- 1. 4.1 Geological features 13
- 2. 4.2 Cultural landscape 14
- 3. 4.3 Aboriginal and colonial settlement history 16
- 4. 4.4 Managing Aboriginal cultural heritage with Traditional Owners 19
- 5. 4.5 Cultural traditions and activities 24

Goals and strategies that enhance the protection of the cultural landscape and living heritage are broadly supported. A collaborative approach with traditional owners, land managers and other appropriate groups to achieve this is desired.

Implementation of place names to reflect cultural values, promoting and enhancing visitor and tourism experiences and involving or employing traditional owners to do this is welcomed.

Minimising risk to these cultural values, both tangible and intangible is paramount.

The biggest threat to these values are commercial horse training, uncontrolled recreational horse riding and illegal vehicle access.

The Draft Plan identifies the fact that commercial horse training cannot be managed appropriately so as to remove the risk of damage to cultural values ( page 64 ). Commercial horse training should not be allowed to occur within the reserve and in particular through the ecologically and culturally sensitive dunes.

Recreational horse riding and illegal vehicle access can be managed through regulations and enforcement by the relevant land manager.

**Healthy Country ..... 27**

- 1. 5.1 Managing coastal ecosystems 27
- 2. 5.2 Managing marine ecosystems 38
- 3. 5.3 Water management 39
- 4. 5.4 Fire management 40
- 5. 5.5 Climate change 40

The goals and strategies to maintain and enhance the condition of Coastal Dune Scrub and Swamp / Aquatic Herbland Mosaic communities and wetlands are broadly supported with one exception. The strategy to 'Reduce the impacts of fragmentation in dunes, foredunes and wetlands and prevent erosion by'.....and given immediate priority of implementation makes no mention of commercial horse training or uncontrolled recreational horse riding and the threat it poses.

Other goals and strategies are broadly supported.

**Recreation and use..... 45**

- 1. 6.1 Visitor experience 45
- 2. 6.2 Recreational activities 47
- 3. 6.3 Access and visitor facilities 55
- 4. 6.4 Site strategies 56
- 5. 6.5 Authorised uses 62
- 6. 6.6 Risks and safety 65
- 7. 6.7 Information, interpretation and education 66
- 8. 6.8 Tourism partnerships, marketing and promotion 68

**Goal #1** 'Opportunities for a range of recreational visitor activities are provided with minimal impacts on natural values, cultural values and other users' and the strategies to manage this are strongly supported.

**Table 6.1 : Summary of activities**

Jet skis should not be permitted on any waters in the reserve. They are dangerous and disruptive to all Water birds and the general public.

Commercial horse training should not be permitted anywhere in the reserve.

**Goal #2 access and infrastructure** are strongly supported.

**Goal #3 : Golfies.** Strategies would be supported if commercial horse training and expensive infrastructure upgrades were removed.

**Goal #4 : Golf course East.** Strategies strongly supported.

**Goal #5 : Killarney beach.** Strategies supported with the exception of commercial horse training. This is a beach that is used year round by the local community and visitors with direct access from the adjacent camping ground and recreational facilities. It provides an ideal location for safe, family friendly, and passive recreational activities. A community consultation process undertaken by Moyne Shire Council in accordance with the Local Government Act in December 2016, showed that the community overwhelmingly supported the prohibition of commercial horse training on Killarney beach in 76% of submissions.

OH&S and Worksafe requirements and protocols would make this activity unviable and unmanageable.

**Goal #6 : The Basin, Pelicans and Towilla Way beaches.** Strategies are strongly supported.

**Goal #7 : Rutledge Cutting.** Strategies strongly supported with the exception of permitting commercial horse training. This area is identified in the Draft Plan as one of those with the highest environmental values within the reserve and is within the Conservation Zone. Recreational horse riding and dogs are to be excluded from this area to protect those values. To then allow commercial horse training is completely contradictory to those values as identified in the Draft Plan. The area is also popular year round with beach users, surfers and fishers. This has the possibility to lead to conflict in carparks and on the beach as has happened in the past.

**Goal #8 : Kelly's Swamp Track West of Big Baldy.** Strategies strongly supported.

**Goal #9 : Kelly's Swamp Track East of Big Baldy.** Strategies supported with the exception of licenced horse training at Hoon Hill. This activity is not consistent with the goals and strategies outlined on page 32 of the Draft Plan, **Habitat Protection**. This area of dunes is already badly eroded, unstable and denuded from past commercial and recreational horse activity and illegal vehicle access. Adequate risk management and compliance with Worksafe and OH&S protocols in such an area will be almost impossible. This area is frequently used by fishers and surfers.

**Goal #10 : Levy's beach access.** Strategies supported with the exception of licenced horse training for the reasons outlined above under **Goal # 9** and earlier in regard to damage to cultural heritage. This section of beach is extremely popular with surf fishers. When the Australian Salmon are running there can be 40 - 50 people on the beach from Levys car park entrance to the West.

**Goal #11 Beach training of racehorses.**

Page 64 of the document states that commercial horse training be proposed at several locations in the reserve. '**due to community interest**'.

What exactly is 'community interest' in commercial horse training? Parks Victoria's **Phase two summary report** summation, **3. Who was involved, page 8**, shows that out of 11 identified public uses of the reserve **horseriding/training ( combined )** was only the seventh most popular. Therefore it can only be assumed there was very little community interest or support for commercial horse training in Belfast Coastal Reserve. Commercial horse training in the Levys beach and Golfies, East beach areas is not an historical activity. These are new phenomena that have eventuated in very recent times due to the sudden escalation of racehorse numbers not the Warrnambool area.

Community monitoring of commercial horse training at Golfies during the Summer of 2016-17 and 17-18 have shown that compliance with interim licence and permit conditions have been continually breached.

There is no support for the strategies under this goal. Commercial horse training should be removed from the reserve and regulations passed that make it illegal in the entire reserve.

**Goal #12 : Risks and Safety.** It is a glaring oversight in the development of the Draft Plan that Worksafe have not been consulted. This is dealt with in our General Statement.

**Goal #13 : information, interpretation and education.** All strategies are supported.

**Goal #14 : Tourism, partnerships, marketing and promotion.** Broadly supported with strict guidelines for any proposed tour operator licensing to have stringent appraisal by the land manager, Traditional Owners and Conservation Groups.

**Goal # 15 : Coordinated management.** This goal is supported but some of the strategies to achieve it take the reserve's management in the wrong direction. The BCRCMP recommends retaining the fragmented management across the Warrnambool City Council, Moyne Shire Council and Parks Victoria for the land but there is no clarity on the marine area. It also recommends leaving the reserve under the Crown Lands (Reserves) Act. The reserve should become a park under the National Parks Act to provide greater protection and a stronger sense of purpose.

Although the plan mentions the problem of having the reserve zoned Farming Zone, which is inappropriate for public land, it fails to include the rezoning as an immediate strategy (it should be rezoned to Public Conservation and Resource Zone).

Any exploration of opportunities for consolidation of land management should be immediate, not as they arise.

There is nothing in the strategies about integrating land and marine management. There should be.

It is sensible to cooperate with the adjoining landholders, as one of the strategies recommends.

**Managing in partnership..... 71**

- 7.1 Coordinated management
- 7.2 Managing with Traditional Owners
- 7.3 Working with community

**Goal # 16 : Managing with traditional owners.** Strongly supported.

**Goal #17 : Working with community.** Broadly supported but community groups would be reluctant to continue much of their work if commercial horse training is legalised within the reserve. This would undermine many of their efforts.

**Goal #18 : Research and monitoring.** Broadly supported but there is no indication as to how the extreme risk posed by commercial horse training is removed. The table on **page 29** suggests it cannot so commercial horse training should be removed from the reserve.

**FINAL STATEMENT and CONCLUSION:**

There would appear to have been a great deal of effort and research invested in detailing the cultural, ecological, biological and natural values and assets of the Belfast Coastal Reserve and the authors of the document need to be congratulated. Most of the goals and strategies should be supported.

**But the Draft Management Plan fails when it comes to commercial racehorse training.**

To include commercial horse training as a proposed activity within the reserve completely contradicts the values of the reserve as identified in the document and the mitigation of the threats also identified. Most of the 88 pages of the document bear this out. This document clearly identifies why commercial horse training should not occur in the reserve, not why it should be included.

Around the time the interim licence was issued \$600,000.00 of taxpayer money was given to Warrnambool Racing Club for the development of a state of the art sand fibre track and a further \$50,000.00 to install an equine pool. It was claimed at the time these facilities would reduce the need for beach access to commercial horse training. The Draft Plan seems to ignore this fact. BCRAAG has always supported the development of off beach training facilities such as those at Ballarat Turf Club. This would provide long term security and equity of access to all trainers and benefit the wider community.

**THE SOLUTION:**

The solution to the ongoing conflict between commercial horse training activities and other user groups and the threats this poses to the environment, wildlife and culture is realistically achievable. First class, purpose built facilities that meet the needs of all trainers and achieve equitable access for all must be an immediate priority in the final plan. Not the immediate implementation of commercial horse training in the reserve.

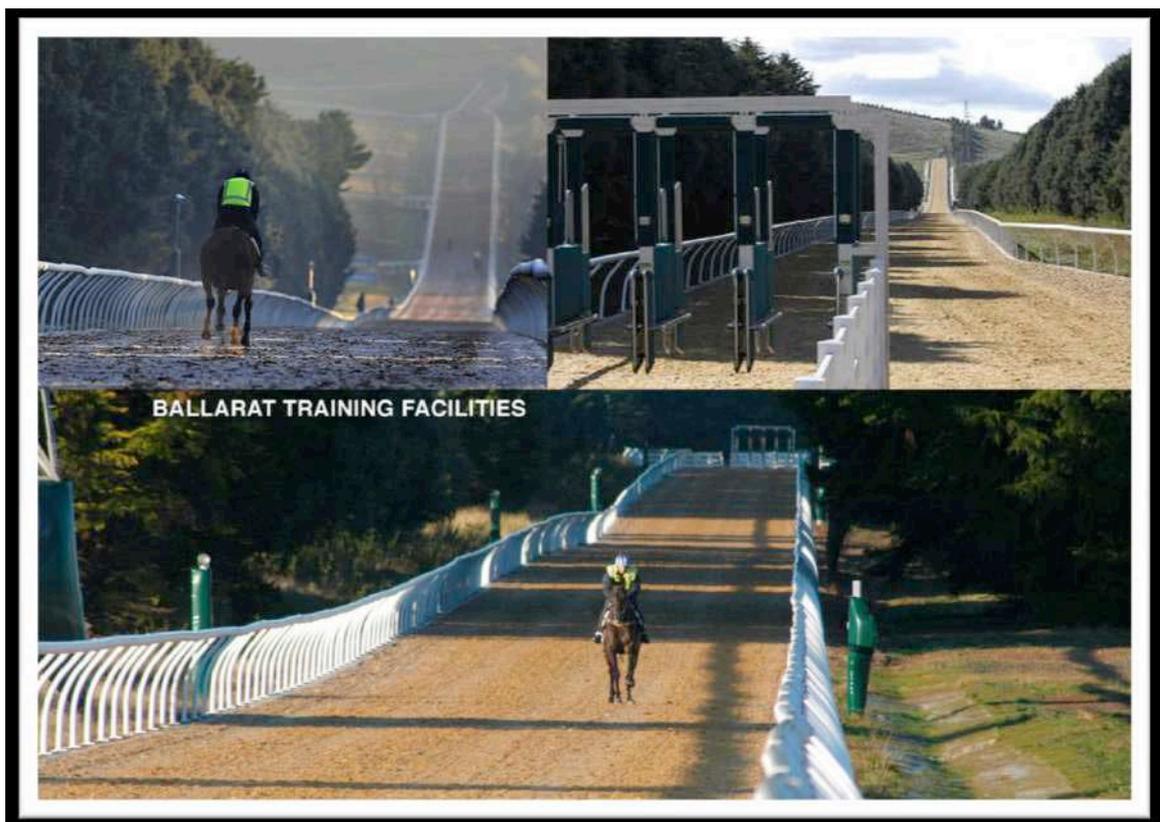
Ballarat Turf Club have built training facilities that replicate beach and dune training, including an uphill sand track and swimming pools.

*has imported 'bloody endless truckloads' of sand from some natural sandpit near Mildura to create his own inland beach. The sand is a metre deep'* -  
Racing.com – Nov 2017

If this can be achieved at these locations it can be achieved in the Southwest of Victoria. This would provide an immediate and ongoing economic boost to the region with associated employment in construction and maintenance. It would attract interest from trainers to locate to the area and provide long term security to the Warrnambool Racing Club, the racing industry and associated groups and businesses.

Representatives of state and local government, and the racing industry need to have the vision to make this happen. Reliance upon access to sensitive public coastal land to ensure the future of any industry is shortsighted and irresponsible.

BCRAG would fully support development of any such facilities as this would be a positive outcome for all parties involved in the Management Plan process.



Regards,

Belfast Coastal Reserve Action Group

**END OF STATEMENT**



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.

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](mailto:parkplan@parks.vic.gov.au)

29 March 2018

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

by email: [ParkPlan@parks.vic.gov.au](mailto:ParkPlan@parks.vic.gov.au)

Dear Sir/Madam

**Belfast Coastal Reserve Draft Coastal Management Plan**

I am writing in response to your invitation for Moyne Shire Council to make a submission on the development of the Belfast Coastal Reserve Coastal Management Plan. At its Ordinary Meeting of 27 March 2018, Council resolved to make a submission on the Draft Plan as detailed below.

It is understood the initial trigger for developing the plan was the prevalence of racehorse training activities on the beaches within the reserve and in particular, Killarney Beach. It is therefore appropriate that the plan deals with this issue without over reacting to other less contentious uses of the reserve.

Prior to the release of the draft plan, the majority of correspondence to Council concerned commercial racehorse training within the reserve. Since the release of the draft plan, a number of other issues have been identified as of concern to the community including:

- Use of the reserve for recreational horse riding;
- The presence of dogs within the reserve; and
- Proposed track closures.

**Recreational Horse Riding**

The exclusion of recreational horses from the conservation zone is a significant change in use from that currently available to locals and visitors. Recreational riding is low volume and if managed correctly, should have minimal impact on the coastal environment.

There is an element of inconsistency in permitting racehorse training in the conservation zone but not recreational riding of either a private or commercial nature.

Consideration should be given to permitting horses to pass through the conservation zone along the water's edge at a walk with no trotting, cantering or galloping permitted. As commercial racehorse training is proposed to be permitted within the Conservation Zone at Rutledges Cutting, it may also be appropriate to provide for commercial recreational trail horse rides on this section of beach subject to the limitations detailed above. Council also resolved to submit that all commercial (ie trail rides) and private recreational horses be allowed in the Conservation Zone along the water's edge, between Rutledges Cutting and the Killarney boat ramp. Furthermore, Council wishes that these horses be permitted to swim all year round in the vicinity of the Killarney boat ramp and in accordance with the requirements of Council's resolution of 24 October 2017 (copy attached).

### **Dogs**

It is acknowledged that unleashed dogs can have an impact on other beach users and pose a threat to native fauna on the beach, in particular, shore-nesting birds. However, excluding dogs from the conservation zone is a major change from current use and does not consider other methods of minimizing the impact of dogs on beach users and shore birds including the use of leashes. As stated on page 35 of the draft plan, unleashed dogs have a much greater impact on Hooded Plovers. The use of leashes should be considered as an approach to improving shore-bird breeding success while also providing for continued use of the beach for dog walking. Council submits that dogs on leashes be permitted in the area between Rutledges Cutting and Killarney boat ramp all year round.

Furthermore, section 48 of the Wildlife Act provides for offences relating to dogs chasing, attacking, worrying or biting wildlife. The introduction of more rules may not solve problems related to dogs impacting wildlife if existing laws are not effectively enforced. There may be an opportunity to better enforce existing laws or making administrative changes to make these existing laws easier to enforce such as provision for penalty infringement notices.

### **Tracks and Carparks**

It is understood the Belfast Coastal Reserve is traversed by a number of informal tracks and rationalizing some of them may benefit the reserve. However, the community has been very clear in stating the track leading from Towilla Way to the beach must be retained. A statement in the plan confirming this track will be retained will improve both Council's and the community's confidence in the plan.

As the detail of which tracks are being considered for closure is not specified in the draft plan, it is appropriate to ensure the community is provided with notice of any intention to close tracks and afforded the opportunity to participate in the decision making process. Council resolved to submit that Towilla Way and main beach accesses within the reserve be maintained.

The proposal to relocate the Golfies west carpark will be a significant impost on users of this beach as it provides for surfers and fisherman to access the beach without having to carry equipment over a long distance. It also provides a rare opportunity for mobility impaired people to access a remote beach and enjoy the isolation. Prior to commercial racehorse training occurring at this beach, the car park was subject to low intensity use.

While the development of a car park for horse transport vehicles at an alternate location is justified, it is appropriate for the existing beachside carpark to be retained. It is also important for the design of any new carpark to be sympathetic to the environment and consider the visual impact on users of Skenes Road and the reserve.

### **Commercial Racehorse Training**

As the main issue driving the development of the plan, commercial racehorse training is an important consideration. In principle, Council supports the continued use of the beach for commercial racehorse training and in particular, provision for continued use of Killarney Beach by local trainers. This was confirmed by Council at its Ordinary Meeting of 24 October 2017 when Council resolved that:

*“Moyne Shire Permit the South West Owners, Trainers and Riders Association (SWOTRA), restricted, regulated and controlled access to Killarney Beach (between the boat ramp and a point 600m west of the boat ramp) for the exercise and rehabilitation of Moyne Shire based horses subject to ... conditions”*

However, the draft plan lacks detail regarding how many trainers it proposes to provide for and the controls that will be put in place to protect the local environment and ensure the safety of other beach users.

As above in “Recreational Horse Riding”, Council also wishes that commercial racehorses be allowed to swim all year round in the vicinity of Killarney boat ramp upon the same terms as previously mentioned.

### **Council Actions**

Page 58 of the draft plan identifies Moyne Shire as being responsible for a number of actions. As committee of management, Council will commit to continuing to maintain the carparks and boat ramp at Killarney Beach. However, there is no assurance Council can or will close the boat ramp during unfavorable sea conditions. This commitment needs to be deleted.

Moyne Shire supports the retention of the local law provision regarding dogs on Killarney Beach. However, the action misstates the existing law. "Dogs are allowed off-leash year round except for between 9am and ~~after~~ 6pm from December 1 to Easter Monday inclusive when dogs are not permitted on the beach."

Pages 59 and 60 identify Moyne Shire as a delivery partner for a range of actions involving access, signage, asset maintenance and controlling horses and dogs. It is unclear specifically what would be Moyne Shire's role with respect to these actions. Based upon current legislation and responsibilities, Council officers cannot patrol or undertake enforcement activities on any part of the Belfast Coastal Reserve, other than on Killarney Beach unless offences are committed against the Domestic Animals Act 1994.

Similarly, on page 60, Moyne Shire is identified as responsible for closing carpark 3 by installing a gate for management vehicles only. It is unclear where carpark 3 is located, however, as all three carparks in proximity to Rutledges Cutting appear to be contained within the Belfast Coastal Reserve, it is unlikely Council will accept responsibility for this action.

At the bottom of page 57, the words 'when a caretaker is in residence' should be deleted as the caretaker is present permanently.

On page 58, any references to a 'business case' or a 'business plan' should be replaced with 'strategic review'.

In conclusion, it is the view of Council that the Draft Belfast Coastal Reserve Coastal Management Plan is a welcome response to the land use challenges associated with the reserve. Council recognizes that there are important cultural heritage values within the reserve which should be protected. Equally, the presence of shorebirds within the reserve is also recognized by Council. Their use of the shoreline for breeding and other purposes should be protected by Parks Victoria through regular monitoring of compliance with relevant regulations controlling permitted activities.



However, there is no clarity or detail provided to indicate how commercial racehorse training is to be provided, which trainers will benefit, how the environment will be protected and how the safety of other beach users is to be maintained. By contrast, issues that were not initially identified as critical including dog walking and recreational horse riding have been responded to with prohibition rather than providing for controlled use. Providing for dogs on leads and constrained recreational horse riding should at least be trialed prior to making a commitment to prohibit these activities throughout a large section of the reserve.

Thank you for the opportunity to be involved in the development of the plan. Please contact Council's Manager Environment and Regulatory Services on [redacted] if you require further information or clarification.

Yours sincerely,

16 March 2018

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

Dear Sir/Madam,

**RE: BELFAST COASTAL RESERVE DRAFT MANAGEMENT PLAN**

We provide this submission in response to the request for public commentary to the Parks Victoria (PV) subject Draft Management Plan. This is lodged in support of the racing industry user groups.

Thoroughbred racing in Warrnambool is time honoured, with the May carnival a world-renowned event. It clearly produces significant economic benefit for the local community.

Racing Victoria, the state's governing body, has made significant investment at Warrnambool over many years to support the industry. More recently, a sand fibre training track, together with a new equine swimming pool, were built at Warrnambool race course. Further works are in planning around track and infrastructure upgrades.

This is all predicated however on the continued health of the training population, which is also very much dependent upon facilities - of which the beach is central.

The racehorse industry has been a constant user of the beaches that form the Belfast Coast precinct for many, many years. Beach related activities for horses is an integral part of the training and rehabilitation regime for those stabled in Warrnambool and at associated townships.

It is an imperative that access to the beach not only continues, but in a manner that encourages continued investment in Warrnambool by the circa 50+ trainers who are registered users of the local racecourse, together with Racing Victoria.

- 2 -

We support 100% the proposals submitted already by SWOTRA (the local trainers' association) and the Warrnambool Racing Club, which propose recommended operating times, beach access, horse numbers, and a management plan for licencing.

Lastly, we commend PV for producing a broadly balanced draft plan to this point. Clearly, the aim of this exercise is to produce a workable plan that safeguards the beach from effects of overuse, and furthermore, protects the natural habitat and fosters local wildlife. Equally, the plan must accommodate all beach users, and their needs, in a safe and equitable manner - and that includes the racing industry participants.

Please contact the undersigned should you require any further information on this subject.

Yours faithfully

**ABOUT THE ATA**

The Australian Trainers' Association is the peak national body representing thoroughbred racehorse trainers nationally. Established in 1967, the ATA has branches in all states and territories, working together with the national pool of over 3,400 trainers to actively support, promote and safeguard the interests of the licenced trainer, the training profession, and the racing industry generally.



To Whom it May Concern,

**Re: Belfast Coastal Reserve Draft Land Management Plan.**

**Support for Horses on Beaches within the reserve (including racehorses); with the specific qualification that relevant land managers ensure the promotion of genuine, formally facilitated partnerships and transparent accountability between all beach users groups, to ensure the safeguarding of environmental and cultural assets for future generations.**

it  
could be said I possess an interest in all sides of the debate regarding the management of the Belfast Coastal Reserve.

A comment first, based on feedback from close acquaintances who attended multiple public forums. It is exceptionally disappointing, that the appointed Consultants consistently allowed abusive and intimidating behaviour to go unchecked during forums which should have been safe, tightly facilitated spaces for participants to contribute to civilised and constructive information exchange and the co-design of solutions.

Credible expert representatives from each area covered by the draft management plan should have been present to inform and lead discussion; rather than sessions descending into the dominance of the loudest voices with the most numbers stacked at each table. This appears to have been a significant failure, arguably undermining the integrity of the whole process; and undoubtedly further contributing to the polarisation of community views.

**This aside, as eluded to above - and as mentioned in my previous submission in the first round of consultations - I support horses accessing the beaches within the Belfast Coastal Reserve (including racehorses, as identified by the submission from SWOTRA). As I do not believe that horse use within the reserve and the proper protection of environmental and cultural assets are mutually exclusive pursuits.**

That said, my views diverge from those of SWOTRA when it comes to the area of responsibility for land management and administration of permit systems.

**It is clear that there is a genuine need for land managers to step-up and facilitate public/partner and user group collaboration. This can only be done through transparent, accountable, respectful and cooperative process.**

**As I mentioned in my last submission - prior to any of the issues mentioned below - Warrnambool Racing Club should not be used as a delegated means of management in terms of the administration of a permits and the employment of beach supervisors; as there is an inherent commercial conflict of interest here which is glaring.**

The administration of permits by Warrnambool Racing Club since has lacked any accountability in regard to equity of access or transparency of process. Moreover, it has clearly been administered preferentially towards large commercial trainers.

Other than an initial acknowledgement of my correspondence after I expressed written interest in a permit via email (prior to their release), I have not once received an email or phone notification from Warrnambool Racing Club advising of the availability/offer of a permit.

In fact – notwithstanding a follow up phone call I made to Warrnambool Racing Club (WRC) immediately upon hearing confirmation of the release of permits

who advised me they had received a personal phone call the previous day from WRC offering a permit - I am yet to receive any notification from WRC in relation to any beach permits/issues; despite their clear ability to continue providing me with invoices for the use of their facilities.

**Permit systems ideally should be administered through the relevant Land Managers or Parks Victoria; or failing this through a regulated, centralised body, independent of localised commercial interests, like Racing Victoria Limited. Access to permits should be fair and equitable; and based on numbers that can be environmentally sustained. The measure of such numbers should be evidenced based. To determine legitimate impacts of each land use, research needs to be undertaken, preferably while existing activities continue to be conducted. To do otherwise, is to discriminate based on assumptions and opinion; rather than empirical evidence (see suggestions below).**

**SWOTRA is a genuine organisation, and while it is not their responsibility, permits could be issued by this group as a last resort. However, in the interests of transparency, the person employed as beach supervisor at each location should have a relevant skill set and qualifications (with a focus on the environmental/cultural); with no overt ties to the racing industry (past employment/ industry registration/horse ownership). Perhaps Trainee Rangers would be a good fit for such roles.**

**Partnerships should be promoted to facilitate accountability and enable understanding/ collaboration between user diverse groups. Partnerships would enable research into the impacts/benefits of use within the reserve; with subsequent adjustments to later management plans based on research findings.**

**For instance, surplus funds raised through daily horse beach use fees (over those funds required - and transparently accounted for - in paying a supervisor) should contribute to goals identified in the cultural landscape and living section (section 4), and healthy country section (section 5); going to the intent of Goal 4 on p. 64 of the BCR M. Plan**

**For instance, funds could go towards the purchase of cameras for the Hooded Plover nest sites, to show what exactly is causing unsuccessful breeding attempts and any loss of chicks. Not only would this contribute to environmental research; but it would also reliably inform responses and the development of future management plans. Camera could also enable time-lapse footage of dune impacts; identifying any required management actions.**

**Funds could also purchase of drones which would be highly effective in monitoring beach use/compliance; and could also be used to purchase plants to assist revegetation works to stabilise any problematic dune areas; and/or to contribute to relevant cultural works and community education.**

**Kind regards,**





- /n eÚgate and supp r k k e heri k e signi tance + k e reser e;Úcú kural landscape and alueÚ'
- Supp r k k e c n k nuati n and re i al + Tradik i nal A" nerÚ;! n " ledge( kradik i nÚand cú kural practiceÚ'
- Pr k eck 7b riginal and hiÚ k ric placeÚand +eatureÚ+r m k e impac kÚ + uÚe + k e reser e'

B " supp r k i e are % u + k e Ú k a k e g i e Ú r =Cú kural landscape and li ing heri k e; included in k e draf k managemen k plan C

**X Very supportive** D Supp r E e D < k sure. D n; k ! n "

D Unsupp r E e D #er%un supp r k i e

g mmen kÚ3>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).

/supp r k all k e Ú k r a t e g i e Ú included in Seck i n @

The " all ing k r a c ! Ú m a r ! e d n Map O a d n k include k e A l d g a c h R a d ( a signi t i c a n k k p Ú k s e k k e m e n k heri k e g e K a s s e k ' Š r m k e l d 8 l + g u r s e + a s t c a r p a r ! ( k h i Ú r u n Ú i n l a n d + k e m a r ! e d k r a c ! Ú k a l i k k e i n l a n d + k e H i l l a r n e % A a l ' T h e r e " u l d b e h i Ú k r i c a l a n d r e c r e a k i n a l a l u e i n p r e s e r i n g k h i Ú l d r u k e + r " a l ! e r Ú ' S i n c e k e c l Ú r e + k e l d 8 l + g u r s e + a s t c a r p a r ! ( i k h a s b e e n b e c m i n g i n c r e a s i n g l y i m p a s s a b l e ( \* a s h a e k e m a r ! e d k r a c ! Ú ( a n d i Ú i n d a n g e r + b e i n g l Ú k e n k i r e ! %

## Key management theme #2: Healthy Country

The reÚer e iÚh me k a rich a r i e k % + n a k i e p l a n k Ú a n d a n i m a l Ú m k e " e k a n d Ú ( k e Ú e a , n k e b e a c h e Ú a n d k h r u g h k e d u n e Ú'

**Key strategies include:**

- +Ú b l i s h a g n s e r a t i n a n d R e c r e a k i n L n e 3 k p r k e c k e n i r n m e n k a l a n d c u k u r a l a l u e Ú " h i l e a l l " i n g + r r e c r e a k i n ' \* ) c a t i n s h " n n m a p 2 i n k e d r a f k p l a n ,'
- +Ú b l i s h a g n s e r a t i n L n e 3 k p r k e c k e a r e a s + k e h i g h e Ú k e n i r n m e n k a l a n d c u k u r a l a l u e Ú " \* ) c a t i n s h " n n m a p 2 i n k e d r a f k p l a n ,'
- P r k e c k k e r e Ú e ; Ú n a t u r a l a l u e Ú ( i n c l u d i n g \* l r a a n d \* a u n a , k h r u g h c n s e r a t i n p a r k n e r s h i p Ú a n d p r g r a m Ú'
- P r k e c k a n d i m p r e k e c n d i k i n + n a t i e e g e k a t i n a n d p r i r i k % h a b i k a t Ú b % r e d u c i n g d i Ú k u r b a n c e Ú ( r e h a b i l i k a i n g p r i r i k % a r e a Ú ( m a n a g i n g " e e d Ú a n d p e Ú Ú ( a n d i m p l e m e n k i n g c n k r l m e a s u r e Ú + r a p p r o p r i a t e a n d s u Ú s a i n a b l e a c c e Ú Ú k k e r e Ú e'
- P r k e c k u l n e r a b l e \* a u n a , Ú c h a s B d e d P l e r Ú ( b % c n k r l l i n g k e i m p a c k Ú c a u s e d b % d g Ú ( h r s e Ú a n d p e p l e'

B " supp r k i e are % u + k e Ú k a k e g i e Ú r =B e a l k h % g u n k r % included in k e draf k managemen k plan C

**X Very supportive** D Supp r E e D < k sure. D n; k ! n "

D Unsupp r E e D #er%un supp r k i e

g mmen kÚ3>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).

/supp r k all k e Ú k r a t e g i e Ú included in Seck i n 4'

The luncheon "h mar! khe B ded PI er neÚng areas d a " nder\*ul - b and sh uld be supp rked' /k iÚm%e9perience khat (li!e m%Úl\*(I cal (regular d g " al!erÚare er% c ncerned ab uk and mind\*ul + khe ulnerabili% + B ded PI erÚ(\*b kh " ikhin khe Reser e (and k khe " eÚk " ardÚ (and be% nd (P rk \$air% /n ccasi nal c n ersati nÚ (man%ha e iced delighk khat khe mar! ing. \*encing pr gramme appearÚ k ha e been succeÚÚtl er khe %earÚ'

**Key management theme #3: Recreation and use**

The reÚer e iÚuÚed + ra arie% + l " inkensik%recreati nal acki ikieÚsuch as " al!ing( Ú"imming( \*ishing( sur\*ing( hi!ing( c%ling( picnic!ing( bird" atching( ph k graph%and beachc mbing' The reser e iÚalÚ \*re>uenk% isikéd b% d g " nerÚand recreaki nal h rse riderÚ'7ukh rised useÚcurrenk%include h rÚe riding k urÚand raceh rÚe k raining at speci\*c l cati nÚand kimeÚ'

Use + khe reÚer e b%pe ple(d gÚ(h rÚeÚand ehicleÚhas been a !e%+ cuÚ +c nsulkati n' Passi e recreati n acki ikieÚare general%supp rked gi en kheir limiked impack n en ir nmenk and culkural alueÚ'There are(h " e er(mi9ed pini nÚab ukkhe ng ing impack + d gÚand h rseÚ'

**Key strategies include:**

- /mplemenkpar! N neÚk minimiÚe khe impack + isik r acki ikieÚsuch as d g " al!ing and recreati nal h rse riding( n en ir nmenk and culkural alueÚ'
- Manage licence c ndiki nÚ n aukh rised useÚ(including c mmercial h rse k raining and k ur perat rÚ(k ensure minimal e\*\*eck n b kh alueÚand isik rÚ'
- De el p n sike in+ rmati n and inkerprekaki n+ r khe reÚer e n alueÚand riÚ Ú(k enhance isik r awareneÚand e9perience'

B " supp rki e are % u + khe ÚkakegieÚ+ r=Recreati n and use; included in khe draft management plan C

D #er%supp rE e D Supp rE e D < ksure.D n;k!n "

D Unsupp rE e **X Very unsupportive**

g mmenkÚ3\*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).

& hilÚk/supp rkm Úk + khe ÚkakegieÚincluded in Secti n 6(/ha e resp nded " ikh #er%unsupp rki e l ab e due k seri uÚc ncernÚab ukkhe pr p salÚ+ r b kh d g " al!ing and c mmercial raceh rÚe k raining' These k' imp rkank issueÚseem k be kreated in une>ual " a%Úkhak are c nkradick r%in kheir c ncern + r khe en ir nmenk and safe%  
 An khe ne hand(en ir nmenk and safe%c ncernÚaboukd gÚare addressed b%much reduced acceÚÚen- %menk khr ugh pr hibi% n and n leash n!re>uiremenkÚ' These (in e\*\*eck " ill dri e awa% l cal (regular d g " al!erÚinclined k + ll " khe ruleÚc nscienki us!% An khe kher hand(en ir nmenk and safe%c ncernÚab ukkhe recenk dramakic increase in c mmercial raceh rse k raining are adreÚÚed " ikh n limikati nÚ n currenkacki ikieÚand (in \*ack a pr p sed increase in khe areas + Úuch use( \*including in an area deemed k sensiki e+ r an% d g k be preÚenk,' S ik seemÚkhat (l ng eÚÚablshed (hiÚk rical%Úkable( recreati n b% d g " al!erÚiÚk be penaliÚed M hilÚk khe c mmercial e9pl ikati n + a public assek b% increasing numberÚ + raceh rse k rainerÚiÚk be acc mm dated'  
 ThiÚd eÚn k appear k be c nsiÚenk \*tekal ne -uÚk (and /pr p Úe appr acheÚÚel " khat adreÚÚ en ir nmenk c ncernÚ" ikh a m re e en hand'

**Licensed horse training**

The + ur l cati nÚ" e are keÚkng " íkh khe c mmunik%in khe drafkmanagemnk plan include3

- 8 l\*ieÚ\*as per currenk licencing,
- Hillarne%\*based n hiÚk rical use,
- RuúledgeÚCukkingÚ\*based n hiÚk rical uÚe,
- )e %ÚB n Bill \*pr p Úed,

& hat are % ur kh ughkÚ n khe pr p sal k c nkinue licensed h rse k raining in + ur l cati nÚacr ÚÚkhe reser eC

The Reser e iÚan en ir nmenkall%Úensikí e public aÚek kha k khe pr p sed Managemnk Plan see! Úk pr keck and nurkure (" hilÚk enc uraging recreaki nal en- %menk The recenk dramatic increase in use b% c mmercial raceh rse k rainerÚ" uld seem k be e9pl ikati n b% busineÚÚnkereÚÚkhat iÚb kh uk + !eeing " íkh khe purp se + khe Reser e( and damaging k khe en ir nmenk

Much has been said( including in khe pr p sed Managemnk Plan( \*Seckí n 6'4( page 61,( ab uk khe benefikÚ + c mmercial raceh rse k raining k khe l cal ec n m% / khe induÚk%in l eÚÚuch signi\*ican k \*inanceÚ( khen ik" uld be reas nable k e9peck ik k pr ide necessar%\*acilikieÚi ksel\* rakher khan k rel%up n a public assek The pr p Úed Managemnk Plan gi eÚ-uÚksuch an e9ample + J& arrnamb l Racec urse( " íkh a 00'2 milli n Únkhekic sand \*ibre k rac! pened in 200l available k k rainerÚ( \*Seckí n 6'4( page 61,'

The pr p sed Managemnk Plan implieÚ as d khe n keÚ+ r khiÚ Theme P1 ab e( khat ik iÚp ssible k diÚknguish bek' een khe l cal k rainerÚkhat ha e hiÚk rical%used khe reser eJ( \*Skateg%at k p + page 60( Seckí n 6'@( and khe m re recenk( larger Útale uÚe b% kher k rainerÚ' )ekÚcall khesse k BiÚk rical TrainerÚK and K< n hiÚk rical TrainerÚK respeckí el%

ThuÚ/" uld suggeÚkhat use b%< n hiÚk rical TrainerÚsh uld cease " hen JThe currenk k raining licence e9pireÚ0@Úne 200R( \*Seckí n 6'@ page 42,( and khat khere be n c mmercial raceh rÚe k raining at 8 l\*ieÚ r)e %ÚB n Bill k hereafker' Managed use b% BiÚk rical TrainerÚc uld c nkinue at Hillarne% k especial%+ k hiÚiÚ" al! ing and bathing rather khan k raining at speed'

The pr p sed Managemnk Plan implieÚ greater en ir nmenk al Úensikí ik%at RuúledgeÚCukking J" here ik iÚ c nsidered criical k minimise diÚkurbance b% d gÚ h rseÚ( ehicleÚand high isik r uÚeJ( \*Seckí n 6'2( page @,' g mmercial raceh rÚe k raining khere( " íkh in khe pr p Úed cen kral g nser aki n L ne( " uld seem k be in c n\*lick" íkh khe er%idea + khat g nser ati n L ne' ThuÚ(ik" uld be desirable k " r! " íkh khe BiÚk rical TrainerÚk agree a leÚÚensikí e alkernaki e " here k heir uÚe c uld c nkinue under suikable managemnk

\*nkereÚkng khat in khiÚcase Jc nkinueJ in khe sur e%>ueÚk n ab e c erÚan e9pansi n in l cati nÚ " hereas Jc nkinueJ in khe Úur e%>ueÚk n bel " c erÚa reÚrickí n in b kh l cakí nÚand manner + uÚe',

**Dog walking**

The drafkmanagemnk plan pr p ÚeÚa mi9 +3

- D gÚ n leash \*in khe c n ersati n and recreati n N ne,
- D gÚ + leash \*in Hillarne%as per currenk M %ne Shire regulati nÚ
- < d gÚ \*in khe c nÚer ati n N ne,

& hat are % ur kh ughkÚ n khe pr p sal k c nkinue all " ing d gÚacr ÚÚkhe reÚer eC

/en- %" al! ing and running n khe ReÚer eÚ beacheÚ " hich( as khe pr p sed Managemnk Plan n keÚ(\*Seckí n 6'2( page @,( iÚg d + r khe " ellbeing + b khJ + uÚ' Ane + khe - %Ú + li ing in P rk\$air%iÚkhe ariek% + beacheÚ( + " hich m%av urikeÚare in khe Reser e( khat all " Ú+ r

di+erenk( ūimulakng e9cursi nŪeach day( en- ūa dip in kŕe S ukŕern Acean(" hate er kŕe seaŪ n(and li!eŪk \*ekŕa ūk! kŕr " n in kŕe " akŕr' She l eŪk run al ng kŕe sh re in shall " " ater and /li!e k alkŕnate running( and " al!ing(al ngside her as inkŕ al kŕaining' & e al" ayŪŪkŕ clear +B ded PI erŪand pr babl%!n " aŪ" ell as an% ne " here kŕe%li!e k be' & e isik kŕe reser e Ūe eral kimeŪa " ee!( ringing kŕe changeŪ+ r l cati n3m Ūkŕe>uenk%k " ardŪkŕe " eŪkŕn end +r m 8 l!eŪk The Basin(buk isikng kŕe " h le Reser e + r ariek%

< " (kŕese bene\*icial akŕi ikieŪ" uld n kbe p ssible " ere be re>uired k be n leash at all kimeŪ( \* n kŕe reduced number +beacheŪ" here she " uld be all " ed,' /ur ukngŪ" ere k bec me n leash kŕudgeŪ(kŕhen all ur bene\*ikŪ + isikng kŕe Reser e " uld be l ŪleŪŪe9erciŪe " ikŕn Ū"imming r running( leŪŪŪimulati n( and a much degraded senŪe +reed m in kŕe " ide ukd rŪ' /n +ack( an n leash " al! ar und k " n " ikŕ kŕingŪk sni++ " uld be m re Ūimulating + r ' S (JPr iding d g n leash acceŪŪ" uld all " d g " nerŪk ŪŪl en- %kŕe Reser e " ikŕ kŕeir pekŪŪ \*SeckŪ n 6'2( page @,( " uld ackuall%pr ide n bene\*ik+ r uŪ' 7ŪŪ me ne " h " uld abide b%kŕe ruleŪ/" uld n l nger +ind kŕe Reser e atŕackŪ e and " uld cease using ik /" uld n kŕha e kŕe kime r energ%k " al! Ū me" here else and kŕhen isik kŕe Reser e " ikŕ ukŕer,' /imagine kŕe same " uld applk kŕe c nscienkŪ uŪam ngŪkŕe kŕer l cal(regular d g " al!erŪ' These " uld seem k be kŕe great ma- rikŪ -udging +r m kŕe care /Ūe kŕem kake ar und B ded PI er areas, \*n +ack( ikseemŪk be " al!erŪ" ikŕ uk d gŪ" h (i+an% dri+kŕnear k B ded PI er areas,'

An leash d g " al!ing ma%be +bene\*ik k isik rŪ and ccasi nal l cal uŪerŪ(" h " ish k e9pl re n a ne ++ ukng' B " e er(c nscienkŪ uŪl cal(regular d g " al!erŪ(" uld be dri en awa%" hich " uld seem k g againŪkŕe pr p sed Managemenk PlanŪŪaim k Jmpr e pr m kŪ n +Jkŕe recreati nal pp rkunikeŪik +erŪŪ \*SeckŪ n 6'0( page @,' T kŕe c nkrar% kŕiŪ" ill penaliŪe kŕe main current recreati nal uŪerŪ ukŕside kŕe m re cr " ded S240m Hillarne%Beach ŪeckŪ n( \*L ne # n kŕe map n page R4,'

A+ leash d g " al!ing in kŕe Hillarne%Beach ŪeckŪ n " uld be +likŕde c nŪ lati n as ikŪŪ n!%a sh rk diŪŪance( \*eŪŪŪhan 4T + kŕe ReŪer e,(and p pular " ikŕ isik rŪ" ikŕ ukd gŪ' & hilŪŪ lea eŪpe ple al ne( ikŪŪclear kŕat ++ leash d gŪ(e en " al!ing >uiek%k heel(unsekŕde Ū me \*amilieŪ(Ū /pre+er k sh " kŕem c nsiderati n and av id such pred minank%n n " al!ing areas.

7 +urkŕer l ŪŪunder kŕe pr p Ūed Managemenk Plan " uld be kŕe rem al + kŕe p ssibiliŪ% + " al!ing kŕe " h le lengkŕ + kŕe reŪer e in kŕe c mpan% + neŪŪ+ai kŕ+ul canine +riend(i+d g " al!ing iŪpr hibikŕed akall kimeŪ" ikŕin kŕe pr p Ūed cenŕal g nser ati n L ne' Man%pe ple kal! ab uk" al!ing +r m & arrnamb l k P rkŒair% making ik a c mm n l cal aspirati n " hich iŪemp " ering + r kŕ Ūe " h ackuall%d ik( and a icari uŪpleasure + r man% " h d n kŪ D g " nerŪ \* " h (as habikual " al!erŪ(are perhapŪm re li!ely k underkake kŕe " al!,( " uld( +c urse( be much leŪŪŪ! el%k plan kŕat ad enkure i+ kŕe%c uld n kŕa! e a d g' The imp rkance +such aspirati nal p ssibilikieŪsh uld n kbe disc unked3+reed m iŪn k-uŪkŕe liberŪ%k en- %" hat ne " uld li!e k d in e er%da%li+e( buk alŪ kŕe p ssibilik% + underkaking kŕe unusual' ThuŪ(kŕe k kal pr hibikŪ n + d gŪ" uld diminish li+eŪŪrichneŪŪ r man% \*and c nse>uenk%all,'

7ll kŕiŪiŪparkularl%galling gi en kŕak kŕe pr p sed Managemenk Plan d eŪn kappear k inc n enience( in kŕe leask( c mmercial raceh rŪe kŕainerŪgaining a busineŪŪad ankage +r m ur public assek

S (inŪŪead +pr hibikng all d g " al!erŪ+r m much + kŕe Reser e( and making kŕe reŪkunatŕackŪ e k regular d g " al!erŪ(" hat can " e d C & hilŪŪk/en- %using kŕe ReŪer e kŕe " h le %ear r und( /appreciate kŕe ulnerabiliŪ% +B ded PI erŪ' ThuŪ(/and " uld accep kŕe alue +seas nal reŪkŪkŪ nŪbased up n kŕe JB ded PI er breeding season \*0 Sepkember k 10 7pril,( \*SeckŪ n 6'@ page 42,( i+ kŕat " ere k enhance kŕeir breeding succeŪŪ'S " uld % u c nsider kŕe + ll " ingC

- g nŪer ati n? Recreati n L neŪ3
  - D gŪ n leash n!%during B ded PI er breeding season(\*k acc mm date isik rŪe9pl ringM /imagine kŕat( li!e mŪŪel+( kŕer l cal( regular d g " al!erŪ" uld n k isikat kŕat kime,'
  - D gŪunder c nkr l ukŕside B ded PI er breeding seas n'
- g nŪer ati n L ne3
  - < d gŪduring B ded PI er breeding seas n'

D gÚnder c nkr l úkside B ded PI er breeding seas n'

ThiÚalkernaki e c uld balance realiÚic Úeas nal en- %menkb% cal(regular d g " al!erÚ " ikh en ir nmenkal c ncernÚand khe B ded PI er breeding season' The resultÚma%be \*ar bekkér khan khe JM rningk n Peninsula UD gÚ7cceÚÚgase Skud%( \*Secki n 6'0( page 40,( gi en khat isik r numberÚc ncnkrati nÚare li!el%k be much leÚÚkhan n khe M rningk n Peninsula. /n " inker( úkside B ded PI er breeding season(/\*ind kher d g " al!erÚare \*e" and \*ar bek" een' 7k khat kime( khe%tend k be l calÚ" h Úem er%aware and care\*ul + " ildli\* e Ú c n+ rmance k kthese regulati nÚma%be much higher khan + r khe M rningk n Peninsula e9perience'

**Key management theme #4: Managing in partnership**

The draft plan c mmikiÚk mainkaining khe c mmuniÚ%Úimp rkankr le in khe \*ukure + khe reÚer e( Úkengkhening h " khe c mmuniÚ%and parkner agencieÚ" r! k gekher' The plan pr m keÚc llab rati n and impr ed alignmenkacr ÚÚg ernmenk(c mmuniÚeÚ(7b riginal #ick rianÚ(busineÚÚ(icenÚeÚand pri ate land managerÚ'

**Key strategies include:**

- /n l e Tradiki nal A" nerÚin managemenkdecisi n ab uk khe reÚer e'
- +Úab lish and Úkengkhen parknershipÚ" ikh khe c mmuniÚ% Tradiki nal A" nerÚ(ShireÚand kher !e% rganisati nÚ(and pr m ke pp rkuniÚeÚ+ r" r!ing k gekher k achie e shared g alÚ'

B " supp rki e are % u + khe ÚkakegieÚ+ r =Managing in parknership; included in khe draft managemenk planC

**X Very supportive** D Supp rE e D < ksure.D n;k!n "

D Unsupp rE e D #er%unsupp rki e

g mmenkÚ3>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).

/supp rkall khe ÚkstrategieÚincluded in Secki n l '

**Key management theme #5: Research and monitoring**

Research and m níking are ikal + r in+ rming khe n gr und managemenk + khe reser e' The draft plan see!Úk build a shared !n " ledge( an underÚandng + managemenkissueÚ( and appreciati n + science based decisi n making'

**Key strategies include:**

- g nduckresearch and m níking acki ikieÚ( in c llab rati n " ikh Tradiki nal A" nerÚand khe br ader c mmuniÚ% k supp rke+eckí e managemenk + khe reser e;Úec l gical( culkural and isik r alueÚ'

B " supp rki e are % u + khe ÚkakegieÚ+ r =Research and m níking; included in khe draft managemenk planC

**X Very supportive** D Supp rki e D < ksure.D n;k!n "

D Unsupp rE e D #er%unsupp rki e

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).

Support all the strategies included in Section R'

**Belfast Coast Management Plan: - Individual Survey Submission**

Name: .....

Signature .....

Email Address: .....

Post Code: 3280 .....

Age Range: 15 .....

Gender: Female .....

Is this submission to be treated as Confidential: .....

How often do you use the Reserve: in summer .....

How do you Get to the Reserve: .. Walk, Drive, Ride a Bike, Ride a Horse

Drive

What do you mainly use the Reserve for: (For example: Bird watching, Swimming, surfing, kitesurfing, windsurfing, snorkelling, horse riding, dog walking, fishing, boating, camping, family time at the beach with or without a pet)

Swimming, walking our dog, family time

How important is it to you to be able to continue these activities within the entire Reserve?

really important

Which part of the Reserve do you use most frequently:

Killarney Beach

West of Killarney Beach to Port Fairy

East of Killarney Beach to The Cutting

West of The Cutting towards Warrnambool

What is your area of interest (For Example: Conservation, Recreational, Cultural, With Animals – Horses or Dogs)

Recreational

Is there a specific change that you want made to the Draft Proposal.

How important is the Cultural Heritage of the Reserve to you?

How important is protection of the Natural Environment and Bird life to you

its important

How important is the ability to enjoy recreation activities to you

very important

Is your Personal Health and Wellbeing associated with your use of the Reserve? If so in what way.

Do you believe that the current use of the reserve that allows for both Recreation and Conservation should continue?

yes it should as everyone is entitled to you use the beach

Do you believe that Recreational Activities should be allowed throughout the Whole Reserve, or do you believe that certain areas should be set aside for conservation only (Eg. No Dog and No Recreational Horse Areas).

the whole reserve should be able to be used.

If you believe dogs and horses should be banned – which areas should they be banned from:

Do you wish to add any further comments:

The beach is a place for everyone to be able to use.

### Belfast Coast Management Plan: - Individual Survey Submission

Name: ..

Signature ..

Email Address: ..

Post Code: 3280

Age Range: 21

Gender: Male

Is this submission to be treated as Confidential: No

How often do you use the Reserve: often

How do you Get to the Reserve: .. Walk, Drive, Ride a Bike, Ride a Horse

Drive.

What do you mainly use the Reserve for: (For example: Bird watching, Swimming, surfing, kitesurfing, windsurfing, snorkelling, horse riding, dog walking, fishing, boating, camping, family time at the beach with or without a pet)

Swimming, dog walking, Fishing.

How important is it to you to be able to continue these activities within the entire Reserve?

Important.

Which part of the Reserve do you use most frequently:

Killarney Beach ✓

West of Killarney Beach to Port Fairy ✓

East of Killarney Beach to The Cutting ✓

West of The Cutting towards Warrnambool ✓

What is your area of interest (For Example: Conservation, Recreational, Cultural, With Animals – Horses or Dogs)

Animals - let them continue using

Is there a specific change that you want made to the Draft Proposal.

Stop with the pathetic banning rules

How important is the Cultural Heritage of the Reserve to you?

A beach is a beach important for all needs

How important is protection of the Natural Environment and Bird life to you

Important - But no need to ban dogs/horses

How important is the ability to enjoy recreation activities to you

Is your Personal Health and Wellbeing associated with your use of the Reserve? If so in what way.

Do you believe that the current use of the reserve that allows for both Recreation and Conservation should continue?

Do you believe that Recreational Activities should be allowed throughout the Whole Reserve, or do you believe that certain areas should be set aside for conservation only (Eg. No Dog and No Recreational Horse Areas).

Allow everything. Nobody owns beach

If you believe dogs and horses should be banned – which areas should they be banned from:

None

Do you wish to add any further comments:

### Belfast Coast Management Plan: - Individual Survey Submission

Name: .....

Signature .....

Email Address: .....

Post Code: 3280 .....

Age Range: 40 - 50 .....

Gender: F .....

Is this submission to be treated as Confidential: No .....

How often do you use the Reserve: Twice a month .....

How do you Get to the Reserve: .. Walk, Drive, Ride a Bike, Ride a Horse

Drive .....

What do you mainly use the Reserve for: (For example: Bird watching, Swimming, surfing, kitesurfing, windsurfing, snorkelling, horse riding, dog walking, fishing, boating, camping, family time at the beach with or without a pet)

Family Time, Dog walking, horse riding, Swimming .....

How important is it to you to be able to continue these activities within the entire Reserve?

Its extremely important .....

Which part of the Reserve do you use most frequently:

Killarney Beach  .....

West of Killarney Beach to Port Fairy .....

East of Killarney Beach to The Cutting .....

West of The Cutting towards Warrnambool  .....

What is your area of interest (For Example: Conservation, Recreational, Cultural, With Animals – Horses or Dogs)

Recreational - everyone should be able to use the beach!

Is there a specific change that you want made to the Draft Proposal.

How important is the Cultural Heritage of the Reserve to you?

How important is protection of the Natural Environment and Bird life to you

How important is the ability to enjoy recreation activities to you

This is extremely important to be able to walk your dog or ride your horse with family & friends

Is your Personal Health and Wellbeing associated with your use of the Reserve? If so in what way.

Its a place to go to chill out and relax.

Do you believe that the current use of the reserve that allows for both Recreation and Conservation should continue?

absolutely it should. who has the right to say who can use the beaches? I dont understand.

Do you believe that Recreational Activities should be allowed throughout the Whole Reserve, or do you believe that certain areas should be set aside for conservation only (Eg. No Dog and No Recreational Horse Areas).

Yes it should.

If you believe dogs and horses should be banned – which areas should they be banned from:

Do you wish to add any further comments:

let everyone use the beach  
what gives the likes of Shane Howard, Bill Yates & Co the right to dictate who uses the beaches. Its so wrong!!

### Belfast Coast Management Plan: - Individual Submission / Survey

Name: .....

Signature .....

Email Address: .....

Post Code : .....

Age Range : 50-60

Gender : Female

Is this submission to be treated as Confidential : no

How often do you use the Reserve : once a month

How do you Get to the Reserve: .. Walk, Drive, Ride a Bike, Ride a Horse

Drive, when ride a horse, walk my dog

What do you mainly use the Reserve for: (For example: Bird watching, Swimming, surfing, kitesurfing, windsurfing, snorkelling, horse riding, dog walking, fishing, boating, camping, family time at the beach with or without a pet)

horse riding, dog walking

How important is it to you to be able to continue these activities within the entire Reserve?

I need the light green areas to remain

accessible, and would like the dark green

to be assessed as possible light green.

Which part of the Reserve do you use most frequently:

Killarney Beach

West of Killarney Beach to Port Fairy

East of Killarney Beach to The Cutting

West of The Cutting towards Warrnambool

What is your area of interest (For Example: Conservation, Recreational, Cultural, With Animals – Horses or Dogs)

horses, dogs, conservation, recreational,  
cultural - (all of the above)

Is there a specific change that you want made to the Draft Proposal.

As long as areas are signposted & plovers fenced off -  
allow access to wet sand vicinity (ie turn  
dark green into light green)  
How important is the Cultural Heritage of the Reserve to you? very

How important is protection of the Natural Environment and Bird life to you

very

How important is the ability to enjoy recreation activities to you

very

Is your Personal Health and Wellbeing associated with your use of the Reserve? If so in what way.

Yes - mental health, physical activity,  
public enjoyment of our beautiful foreshore

Do you believe that the current use of the reserve that allows for both Recreation and Conservation should continue?

Yes.

Do you believe that Recreational Activities should be allowed throughout the Whole Reserve, or do you believe that certain areas should be set aside for conservation only (Eg. No Dog and No Recreational Horse Areas).

If the plovers' numbers are stable + they are  
protected - allow complete access.

If you believe dogs and horses should be banned – which areas should they be banned from:

sand dunes + above the wet sand areas.

Do you wish to add any further comments:

I think race horses  
should be welcomed within the same  
restrictions outlined above - perhaps no  
dune galloping IF this is shown to be  
detrimental to the health of the dunes.

## 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: \_\_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

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 checked="" 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 checked="" type="checkbox"/> Fishing/boating
<input type="checkbox"/> Picnicking	<input type="checkbox"/> Birdwatching	<input type="checkbox"/> Socialising
<input checked="" type="checkbox"/> Other (please specify): educating my children about natural history.		

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 you of the vision for the Belfast Coastal Reserve?

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

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 plan contains a good level of background information which is generally well supported by cited literature and I support the overall vision, although some of the recommendations contradict this.
- This draft plan states that it focuses on protecting and enhancing the outstanding cultural and natural values of the Belfast Coastal Reserve while allowing for recreation and use compatible with the protection of those values. The recommendations around horse training contradict this statement (see section on recreational use).
- Recommendations to increase threatening processes which are based solely on economic justifications sets a dangerous precedent for the management of other conservation assets throughout the state, nullifying the overall objectives of conservation planning and management.
- Economic driver information is now outdated – please refer to latest ABS data or <https://economy.id.com.au> for up-to-date figures.

## 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).*

- This section was well researched and presented and goals and strategies are generally supported by the material presented. However, the overarching consensus is that commercial horse racing is not compatible with protecting cultural sites. A precautionary approach would dictate that much more detailed assessment of heritage sites is warranted (and acknowledged as an immediate priority) before further non-complimentary activities are undertaken.
- The recommendations (recreation and use) contradict all of the information presented in this section so it is unclear what the purpose of this section is if it is not informing recommendations.

## 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).*

- Some discussion surrounding the original extent of coastal dune scrub prior to the introduction of marram grass and subsequent dune stabilisation is warranted. This would be aided by historical and contemporary photographs and/or surveys. Some pre-European estimates of vegetation communities needs to be more clearly articulated so that there is an effective management reference point and that “we” are not managing to shifting baselines.
- Does not list commercial activities – horse training is not recreational and needs to be listed as an additional threatening process and assessed independently of other threatening processes.
- It would be useful to see a time-coded map showing the dates of species observations. This may provide a more contemporary vision of significant flora and fauna across the reserve and help focus flora/fauna priorities.
- Information signage should be an immediate priority. It is relatively low cost and targets a major threatening process i.e. uneducated dog owner.
- Whilst the site does not contain a Ramsar site, it would be best-practice to incorporate a theme of wise-use of wetlands. A future Ramsar nomination would be a good aspirational target as the site meets several criteria justifying such a nomination.

### **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 unsupportive

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).*

- This component of the management plan is highly contentious and reflects the diversity of users and competing expectations, but with a clear bias. The diversity of expectations should not detract from the central objective (and the original philosophy) behind the gazetting of land as a Coastal Reserve i.e. for conservation, education and compatible recreation.
- Enforcement of on-leash requirements needs to be fully implemented and executed if this component of the plan is to be effective. Almost every time I go to an on-leash beach I see a majority of dogs off-leash. Whilst unpopular, greater enforcement is the only effective way of increasing community awareness of the regulations. I support the notion that additional constraints be considered if compliance is low.
- High intensity horse activity contradicts Victorian Coastal Strategy recommendations i.e. protection of coast and dune systems from damage.
- Commercial racehorse training is also not a coastal dependent activity and therefore does not warrant consideration as a “special use” within this type of reserve.
- The emphasis on permitting high numbers of horses for beach training contradicts the focus of the plan as stated in the executive summary i.e. protecting and enhancing the outstanding cultural and natural values of the Belfast Coastal Reserve while allowing for recreation and use compatible with the protection of those values.
- Previous sections explicitly identify horse related activities as a threatening process, in ecosystems which occur within the designated training areas. Commercial horse training is also not compatible with other recreational uses through disruption (obstruction of access and parking, visual amenity, safety concerns) and effectively disallowing other to carry out their recreational activities.
- Commercial race training is an illegal activity within areas falling under City of Warrnambool’s planning scheme, public conservation and resource zone.
- The cited documents (Warrnambool Racing Club 2016, 2017) have not been peer-reviewed so I cannot comment as the accuracy of the figures quoted. However, all other information throughout the document indicates that horse training is an incompatible activity, so the only justification appears to be economic.
- The draft plan neglects to mention marine plastic pollution. This is an acknowledged threat and was the subject of a national senate enquiry. Whilst I can understand why it wasn’t recognised as a threat during draft development, the events of late 2016 and early 2017 warrant recognition.

#### **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).*

- The goal of coordinated management is a good one, but this is not achievable under a fragmented framework such as currently exists and is proposed to continue under the plan. The whole site needs to be managed as a single unit with a single, primary manager.
- The allowance of commercial activities which disrupt other users, and introduce further threats, will negate any positive partnerships with capacity to deliver on the wider objectives outlined in this section.

### 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).*

- Whilst I notionally support the concepts of research and monitoring, I fail to see how this will be effectively implemented under current funding models. Community groups and volunteers are listed as responsible for delivery of citizen science research. Community members and groups may be invested enough to collect the data, but this requires appropriate experimental design, continuity and meaningful interpretation. The time taken, and expertise required to achieve this often fall beyond the capacity of most community members and/or groups. Government funding programs have a critical role to play and therefore government agencies and their associated funding streams should be duly recognised under responsibility.
- The emphasis on community and volunteers for monitoring places greater emphasis on effective partnerships but, as outlined above, these are likely to be compromised by perceived government support for threatening processes, such as commercial horse training. This will lead to a majority of regular users of the resource feeling disenfranchised and ultimately drawing a lot less amenity from the natural asset. In this respect the plan is set up for failure.
- Recreational horse use is identified as a threatening process. A tangible extension of this is that higher intensity horse use, as a result of allowance of commercial training, will increase threats and negate any community activities which are compatible with the plans stated objectives.



**Submission by the  
Victorian National Parks Association  
to the  
Draft Belfast Coastal Reserve Management Plan  
*16 March 2018***



## **VNPA submission to the Draft Belfast Coastal Reserve Management Plan**

### **General comments**

The January 2018 release of the draft Belfast Coastal Reserve coastal management plan (BCRCMP) came as community concerns continued to mount about the impacts of commercial racehorse training on the area's natural, cultural and recreational values, the protection of which was why the reserve was created in the 1980s.

Although there are many good elements to the draft BCRCMP—cultural heritage protection; joint management; monitoring; research; and the management of dogs, recreational horse riding, invasive species and illegal access—it remains deeply flawed because of its complicity in entrenching and expanding the use of the reserve by commercial racehorse trainers.

Under the draft BCRCMP, commercial racehorse training would rapidly expand onto multiple beaches and into fragile 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, as well as the workplace safety of those in the racing industry.

This follows on from the Andrews Government's questionable interpretation of crown land management laws when in June 2017 it issued a 12-month licence to the Warrnambool Racing Club to coordinate racehorse training on the reserve's beaches, effectively privatising the management of coastal public land. The licence fee set was less than \$3 a day for each horse being trained.

For the government, the licence signaled the start of a 'bright future' for the reserve and its resident hooded plovers. According to a fact sheet released at the time, racehorse numbers would be:

'reduced to a maximum of 65 across the reserve. Before the introduction of the licence, the numbers of horses being trained in the area had increased from about 180 to 250 in two years, with a significant increase in the number of those horses using the beaches'.

But after almost two years of consultation, during which racing interests were given elevated status, the draft BCRCMP would increase length of beaches available to racehorse training by 250% (from 2 km to 5 km) and the number of horses by 400% (from 65 to 256 each day). That would make 25% of the reserve's beaches available to racehorse training, with nothing in the plan to stop future expansion. This is in stark contrast to the government's disingenuous spin when announcing the licensing that only 1% of the reserve would be available to racehorses.

The draft BCRCMP would also allow racehorses back into 750 metres of fragile dunes in the Levy's Beach–Hoon Hill area, where in the past they have caused severe dune erosion. The plan even recommends racehorse training within the proposed Conservation Zone at Rutledge's Cutting, although dogs and recreational horse riding would be banned there.

On more than 20 occasions the draft BCRCMP refers to damage caused by racehorses (see Appendix 1 of this submission for each mention of damage) but fails to explain how increasing the area available to them by more than 250% or by increasing their numbers by 400% will mitigate those impacts. Worse still, the plan's risk assessment table (table 5.1 on page 29) reveals that management will not 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! And the risk assessment only considered 'Golfies' and Rutledge's Cutting, not the more fragile Levys Beach–Hoon Hill area, which the draft BCRCMP proposes being opened up again to commercial racehorse training.

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 and the number of racehorses will simply make that worse. By entrenching and expanding commercial horse training the draft BCRCMP is a relic of past coastal mismanagement and inappropriate use. It will undermine the values that the plan claims it will protect, including:

- 'This unique piece of land represents one of a small handful of public land reserves in the local area' (page 1)
- 'beach-nesting birds, migratory waders and a rich variety of native plants and animals can be found in the Reserve's wetlands, beaches, dunes and waters' (page v)
- 'an important refuge for species of local, national, and international significance' (page v)
- 'an important cultural landscape of Victoria's south west coastline for its scenic beauty, environmental attributes and cultural significance' (page iii)
- 'of outstanding cultural heritage value for the high density of middens and other types of Aboriginal places it contains' (page 19)
- '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 (identified for emergency intervention), Hooded Plover, Australasian Bittern and Eastern Curlew' (page 33)
- 'a Key Biodiversity Area by BirdLife Australia given it is known to support key or 'trigger' bird species (Orange-bellied Parrot and Hooded Plover) and habitat for these species, as defined by global scientific criteria' (page 33)
- 'Orange-bellied Parrots are one of Australia's most threatened species, with less than 20 parrots thought to exist in the wild. The Belfast Coastal Reserve is the third most significant site on the mainland for the species, behind Western Port Phillip and Bellarine Lakes/Swan Bay' (page 33)

In entrenching and expanding industrial-scale, commercial racehorse training, the draft BCRCMP will create an intensively used workplace that is in a fragile, dynamic and unpredictable workplace, a recipe for industrial accidents. Yet, WorkSafe Victoria and its protocols are not mentioned once in the draft BCRCMP, and safety is only mentioned in relation to the safety of other beachgoers (which is of great importance), but not the riders, trainer and horses in what is currently a worksite.

The draft BCRCMP indicates that its support of commercial racehorse training is 'due to community interest' and so: 'proposes that commercial horse training be permitted at Golfies beach, Levys beach and Hoon Hill into the future (see Map 6) and horse training be permitted at Rutledges Cutting and Killarney Beach to provide access for local trainers that have historically used the reserve. Future considerations will have regard to comprehensive evaluation of community feedback, equity of access, protection of natural and cultural values, visitor services and infrastructure requirements (page 64).

But in the Parks Victoria phase two summary report summation, out of 11 identified public uses of the reserve, horseriding/training (combines recreational and commercial horse riding) was only the seventh most popular. That is hardly an overwhelming sense of community interest. The genuine community interest is for the reserve to be managed in ways that uphold the reasons for its existence: the conservation of coastal landforms and natural and cultural heritage, and support for passive recreational activities.

This VNPA submission follows the structure of the draft coastal management plan.

### **Draft management plan**

On page iii of the draft BCRCMP, it makes the following claim:

It has been prepared in accordance with section 30(3) of the *Coastal Management Act 1995* and consequently is to be consistent with the Victorian Coastal Strategy 2014.

Curiously, the section on consent for use and development in the *Coastal Management Act* was ignored by the Andrews Government when issuing the licence to the Warrnambool Racing Club for commercial racehorse training in the reserve in June 2017 (although the local trailriders group had to seek consent under the same Act for limited access to the reserve in 2012). It also ignored the Victorian Coastal Strategy in relation to preventing damage to coastal systems and ensuring that uses of the coast were dependent on the coast. Commercial racehorse training is not a dependent coastal use.

But VNPA does support the following statement:

'The Reserve provides a place enjoyed by many who value the ability to escape to nature, appreciate the scenery, rest and relax, socialise or exercise in a setting removed from the busier developed areas of Warrnambool and Port Fairy. Strong partnerships with local Traditional Owner groups, neighbouring land owners, volunteers and community groups will be vital to the Reserve's future management'.

It is a great pity that the draft BCRCMP doesn't support it by excluding the industrial-scale commercial racehorse training that is incompatible with the sentiments of the above statement. As Maguire et al. 2011 (*Ocean & Coastal Management* 54 (2011) 781e788) found, people value clean, uncrowded beaches with opportunities to view wildlife. The draft BCRCMP acknowledges that the reserve can offer that but compromises itself by allowing the industrial scale of commercial racehorse training that undermines the cleanliness (horse faeces and urine in car parks and sand dunes and on beaches), the lack of crowds (car parks full of horse floats and the beaches dominated by racehorses with high safety risks) and reduced opportunities for the viewing of wildlife (disturbed wildlife and damaged habitats).

The final BCRCMP should be consistent with the:

- *Crown Land (Reserves) Act 1978*: commercial racehorse training is neither 'reasonable' nor 'appropriate'
- *Coastal Management Act 1995*
- *Flora and Fauna Guarantee Act 1988* and the *Environment Protection and Biodiversity Conservation Act 1999*
- Victorian Coastal Strategy with regard to protection of coastal dune systems and coastal dependent uses (racehorses training is not a coastal dependent use. Most racehorses in Victoria are not trained on beaches, and the Warrnambool Racing Club has its own sand training track and exercise pool built with taxpayer funds
- Victoria's biodiversity plan 2037
- recommendations of the Land Conservation Council.

It is inconsistent with each of these.

The final BCRCMP should:

- ensure the long-term protection of the coastline from Lady Bay, Warrnambool to Griffiths Island, Port Fairy for the enjoyment and appreciation of future generations
- protect the unique and fragile Belfast Coastal Reserve environment and habitat
- prevent the setting of a precedent for the authorising of commercial race horse training in Victoria's sensitive coastal zones and public recreational spaces.

It can only achieve this by removing commercial racehorse training from the reserve.

### Executive summary

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 was the Land Conservation Council that recommended the area for a coastal reserve for the protection of coastal landforms, wildlife and cultural heritage, and support of passive recreation. Not one of the LCC's six recommended zones mapped in the draft management plan's Appendix I refers to commercial horse training (or recreational horse riding) but refers to conserve wildlife, provide for low-intensity recreation and public education, maintain the scenic beauty and stability of the area, provide for nature study activities, walking, and fishing. Allowing commercial racehorse training flies in the face of that, as it does with the Victorian Coastal Strategy.

The coastal strategy 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. It should be using the new taxpayer-funded pool and sand track training facilities at the Warrnambool Racing Club. Commercial racehorse training is also inconsistent with the *Crown Land (Reserves) Act* and the *Coastal Management Act* because of its extreme risk to the reserve's natural a cultural heritage.

Under the City of Warrnambool's planning scheme, the Levy's Beach–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 other uses are prohibited. Commercial racehorse training is not listed to be allowed with or without a permit, so by definition it should be prohibited. Again, commercial racehorse training is inconsistent with 'existing strategies and guidelines'.

On page vii the draft BCRCMP articulates a vision and direction that provide 'a strategic guide to the management of the natural and cultural values of the planning area which defines and provides for a range of continuing and future uses including coastal protection, recreation, conservation, interpretation and education'. No mention of commercial racehorse training there.

## Introduction

This section is a useful summary of the Belfast Coastal Reserve's tenure, cultural, legislative and strategic context of the Belfast Coastal Reserve. A major flaw in this section is the lack of a map, which would have helped better understand the tenures described in 1.2. It could have been a scaled down version of the first fold-out map at the back. Neither the body text nor the fold-out map clarifies the status of the Belfast Lough, which is assigned a goal in Chapter 6 but is unclear whether it is viewed as part of the Belfast Coastal Reserve. This uncertainty also applies to the dunes and beach west of Golfies, which is not marked on the map as being in the reserve but an on-site visit reveals signage proclaiming it is in the reserve.

## Chapter 2 Vision

Parks Victoria visions for the places it manages are typically very long and this one for the Belfast Coastal Reserve is no exception. However, it is worthy of strong support 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 more than 20 references to the impacts that horses have on the reserve's natural, cultural and recreational values. More on this when we comment on Chapter 5 Healthy Country.

## Chapter 3 Zoning

The photo fronting the first page of this chapter, which depicts a racehorse and plovers, symbolises the distorted attitude of the Andrews Government towards the conflict between beach-nesting birds and commercial racehorse training. For the Government, there is no conflict because the birds and racehorses can exist side-by-side. But they can't.

VNPA supports the intent of the zoning system as outlined in this chapter but not its later application in the draft BCRCMP. We accept the purpose of the two zones as described in chapter 3:

- Conservation Zone: covering the areas with highest cultural and environmental values with closely managed recreation and ecotourism activities and
- Conservation and Recreation Zone: covering cultural and environmental values with dispersed recreation and ecotourism activities, the scale of which does not impact on natural processes.

If the zones were applied in this way, VNPA might only be arguing about the spatial extent of each zone in the draft BCRCMP. But when the zones are applied in Chapter 6, commercial racehorse training appears out of the blue and is even included in the Conservation Zone with reference to it as an 'historical' use as if it has some cultural heritage value in the cultural landscape. This will be discussed further in our comments about Chapter 6.

## Chapter 4 Cultural landscape and living heritage

According to the World Heritage Centre, cultural landscapes are: 'Combined works of nature and humankind, they express a long and intimate relationship between peoples and their natural environment'.

This section does a reasonable job of referring to the human elements and the geological features in the 'cultural landscape' but largely ignores the 'nature' of habitats within that landscape, leaving a limited discussion of that for the next section under 'Healthy Country'. There is no mention of coastal vegetation, hooded plovers, other resident shorebirds or the fish off the beaches and reefs. By doing this it fails to adopt an integrated and holistic management approach.

**Table 1 VNPA comments on BCRCMP goals and strategies in Chapter 4**

Goal	VNPA Comment
4.1—Geological features and functioning dune systems are maintained and protected from avoidable damage	<p>One of the aims of the Belfast Coastal Reserve when it was created was to protect coastal landforms, so this goal is an important one, as are the strategies. But the goal and strategies should also make specific reference to the habitats of dunes, beaches, reefs and cliffs. A focus on erosion is important but it needs to recognise that dune erosion is in part caused by damage to and loss of coastal vegetation. There is plenty of evidence to show that commercial racehorse training causes significant damage to and instability in sand dunes, especially along the Levy’s Beach and Hoon Hill dunes. It also damages beaches (a geological feature) and their habitats and impacts on the animals that use those habitats.</p> <p>The strategy under this goal—‘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’.</p>
Goal 4.2—The cultural landscape of Belfast Coastal Reserve is recognised and landscape features and values, including Traditional Owner and local community connections, are recognised, respected, protected and celebrated	<p>This goal is supported. So too are its strategies, including the renaming of features to better reflect traditional culture, but it is unclear how community heritage or historical groups can be expected to have responsibility for implementing the first strategy.</p>
Goals 4.3—Historic heritage and connections are recognised and understanding of heritage values and places is enhanced and Contemporary Traditional Owner and local community connections are recognised as an integral part of heritage management	<p>This goal is supported</p>
Goal 4.4—Partnerships with Traditional Owners protects and conserves Aboriginal features, places and objects of cultural significance.	<p>This goal is supported but the strategies ignore the risk to cultural heritage from commercial horse training, even though its impacts are mentioned in the preceding body text: ‘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’</p>
Goal 4.5—Partnerships with Traditional Owners protects and conserves Aboriginal features, places and objects of cultural significance	<p>This goal is supported.</p>

### Chapter 5 Healthy Country

This chapter jumps right into threat and risk management without first describing the key features of the reserve’s natural heritage or describing what healthy country looks like. This is a missed opportunity to educate the community on the various habitats, plants and animals within the reserve and why they need protection. This also presumes that unless there is a risk or threat to natural and cultural values they don’t need protection. But there is also the need to protect these values before they are threatened to ensure their future resilience.

It is in this section where the draft plan’s underlying contradictions of commercial racehorse training are exposed. In Table 5.1 on page 29 (see below), 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 (see the fourth row of ‘threat agents’ in the table extract below). The above statement implies that the extreme impacts of commercial racehorse training can be ‘managed’ when the plan admits that they cannot. Commercial racehorse training and the reason for the reserve’s creation—the conservation of wildlife and cultural heritage and support for passive recreation—do not mix. This fundamental contradiction in the plan will undermine the achievement of the goals and strategies in this chapter, even though most of them are worthy of support.

Table 5.1 – Key threats to the conservation assets of the Reserve

Threat Agent	Coastal Dune Scrub (Marram) 1. Veg cover (less) and impact to the integrity of biological Cultural Values in dune areas including mires and heath		Wetland Habitats (Marram) 1. Veg cover (less) and impact to the integrity of biological Cultural Values in dune areas including mires and heath		Wetland Habitats (Marram) 1. Veg cover (less) and impact to the integrity of biological Cultural Values in dune areas including mires and heath		Wetland Habitats (Marram) 1. Veg cover (less) and impact to the integrity of biological Cultural Values in dune areas including mires and heath		Wetland Habitats (Marram) 1. Veg cover (less) and impact to the integrity of biological Cultural Values in dune areas including mires and heath		Wetland Habitats (Marram) 1. Veg cover (less) and impact to the integrity of biological Cultural Values in dune areas including mires and heath		Wetland Habitats (Marram) 1. Veg cover (less) and impact to the integrity of biological Cultural Values in dune areas including mires and heath	
	Risk Current	Risk Future	Risk Current	Risk Future	Risk Current	Risk Future	Risk Current	Risk Future	Risk Current	Risk Future	Risk Current	Risk Future	Risk Current	Risk Future
Habitat Degradation: Includes access roads, tracks, fuel storage	Medium	High	Medium	High	Medium	High	Medium	High	Medium	High	Medium	High	Medium	High
Habitat Degradation: Recreational activities including walking, beach activities, swimming, surfing, fishing	Medium	High	Medium	High	Medium	High	Medium	High	Medium	High	Medium	High	Medium	High
Habitat Degradation: Recreational activities (disturbance from domestic dogs)	Medium	High	Medium	High	Medium	High	Medium	High	Medium	High	Medium	High	Medium	High
Habitat Degradation: Recreational activities (disturbance from horses, including recreational riding and training activities)	High	Very High	High	Very High	High	Very High	High	Very High	High	Very High	High	Very High	High	Very High

Prior to a licence being issued to the Warrnambool Racing Club in June 2017, the Department of Environment, Land, Water and Planning (DEWLP) moved commercial racehorse training to the eastern end of the popular East Beach, Port Fairy from 1 December 2016. Training had never previously occurred there but continues today and is included in the draft BCRMP. This is an area where there are several active hooded plover breeding sites.

The area between Port Fairy and Warrnambool has been identified as a Key Biodiversity Area by Birdlife Australia with ‘trigger’ bird species—orange-bellied parrot and hooded plover—with two of the main threats being horses and dogs. The area is a most important breeding ground for the hooded plover, but the bird is experiencing unprecedented pressures along this section of coast. Although the draft BCRMP includes a list of the threatened fauna species found in the reserve, by allowing existing and increasing pressure on them from the commercial racehorse training undermines its own vision and objectives.

Table 2 VNPA comments on BCRMP goals and strategies in Chapter 5

Goal	VNPA Comment
Goal 5.1—Habitat protection: The condition of Coastal Dune Scrub and Swamp Scrub/Aquatic Herbland Mosaic communities and wetlands is maintained and enhanced to support dependent flora and fauna species	This goal is supported but it won’t happen if commercial racehorse training remains in the reserve. The risk assessment table on page 29 of the BCRMP proves that. Marram grass, which dominates the coast between Warrnambool and Port Fairy, needs serious consideration. It is a high threat to the future resilience of beach-nesting birds such as the hooded plover. The draft BCRMP skips over the issue of weeds, in particular marram and sea spurge, and needs to address them.
Goal 5.1—Significant fauna1: The impact of predation is reduced to maintain and increase native fauna populations	This goal is supported but should have following words added after reduced: ‘and destructive activities removed’.
Goal 5.1—Significant fauna2: 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	This goal is supported with the following words added after reduced” ‘and ‘destructive activities removed’.
Goal 5.2—Managing marine ecosystems: The diversity and productivity of the marine habitats is maintained and impacts from new pests and other threats are reduced	This goal is supported. Disappointingly, it is the only marine goal even though the half of the reserve is marine. Its strategies focus on marine pests and water quality and fails to consider fisheries management and strong habitat protection from extractive use
Goal 5.3—Water management: Water levels in the Lower Merri are managed to maintain resilience and aquatic values in the wetlands and estuary	This goal is supported. 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 the motor boats and jet skis, which in the shallow waters can significantly impact on shallow-water habitats and birdlife.
Goal 5.4—The risk of bushfire into and from the Reserve is minimised and ecologically appropriate fire regimes are maintained to enhance Reserve ecosystems	This goal is supported where the fire management is ecologically sustainable.

<p>Goal 5.5—Management activities build resilience of coastal systems, ecosystems, species and dependent species to climate change risks and minimise impacts on Reserve facilities</p>	<p>This goal is supported but it will be undermined by the entrenchment and expansion of commercial racehorse training in the reserve. Reducing threats and impacts are a commonly used measure to build resilience to climate change within natural systems. Horses have the most impact, 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. There is already ample evidence of sea-level rise and its associated erosion. The proposal for a sea wall to defend a fairway of the Port Fairy Golf Course is a symptom of this. Rather than build another sea wall along this section of coast, which will reduce available habitat for hooded plovers and space for recreation, a policy of planned retreat should be implemented by relocating the fairway.</p>
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## Chapter 6 Recreation and use

This chapter is largely about recreation but a two-page section on commercial racehorse training, a lot of which refers to the regional importance of the racing industry, is included under the heading of ‘Authorised uses’. Frequently the plan conflates recreational horse riding and commercial racehorse training by often referring to horses or horse riding. Although both recreational riding and commercial racehorse training can impact the values of the reserve, the scale, intensity and frequency of training is vastly different.

Recreational riding and commercial race horse training were also conflated in ‘Ways participants use the Reserve’ in the Phase 2 Engagement Summary Report on p.8) and was ranked 7<sup>th</sup> out of 11 activities. By including racehorse training within a chapter mainly on ‘recreation’, the draft BCRCMP again tries to downplay its highly commercial, industrial and intensive nature.

### *The impacts of commercial racehorse training in the Belfast Coastal Reserve*

For many years the use of the reserve by horses was minimal but since 2015 there has been an invasion by commercial horse trainers. This accelerated when the trainer of the 2015 Melbourne Cup winner put much of that win down to training on local beaches. Moyne Shire Council’s Environment Officer described the increased horse activity to his council in March 2016:

‘Reports and officer observations confirm up to 20 horses are working on the beach at any one time with training occurring on the beach on a daily basis, including weekends, from sunrise until about 10.30am. However, a resident reported racehorses on the beach at about 4pm on 10 February 2016. Council officers have observed horse trucks, horse oats and vehicles blocking access to the boat ramp and making access to the car parking areas difficult with up to 12 horse trucks and oats using all of the available car parking. Horses then access the beach from the boat ramp causing the sand to become loose and difficult to drive on when launching and retrieving a boat. Horses are also using pedestrian access tracks to enter and leave the beach, increasing the risk of a serious injury arising from a horse versus pedestrian incident’.

In a letter to *The Standard*, the Far West Friends of the Hooded Plover wrote that:

*“Horses have been galloping over the soft sand at the top of the beach where they nest. Over nearly all of the beaches. On some stretches of beach the birds were forced off completely, others tried to nest but the nests were trampled and some tried repeatedly all summer but couldn’t succeed in the traffic. If chicks were born, it was impossible to feed on the sand or get down to the water without getting trampled...if this level of horse training continues, the beach birds will not be able to breed on these beaches. It will be a matter of time before they are locally extinct.”*

In response to this escalating problem, DELWP and Parks Victoria, the reserve’s manager along with Moyne Shire Council (MSC) and Warrnambool City Council (WCC), did nothing. They finally stirred after the Killarney community began to publicly call for action after forming the Belfast Coastal Reserve Action Group (BCRAG) in May 2016.

The invasion of the reserve by commercial horse trainers before and after the issuing of the licence is causing:

- dune erosion: the horses are trained at the base of the dunes, creating dune instability, the reverse of what the reserve was created for
- damage to cultural sites: trampling by horses causes dune instability and damages cultural sites. It is for this reason that horse access to Levy’s Beach, for the moment, has been banned by WCC
- public amenity: the community’s enjoyment of the reserve is being opened with car parks full of horse floats, up to 50 horses using Golfies Beach near Port Fairy each day, and sanitation problems with horse droppings, urine and rubbish

- public safety: there is a dangerous mix of narrow beaches, fast moving and highly strung horses and recreational users that could lead to people being injured
- workplace safety: horse training guidelines under the *Occupational Health and Safety Act* advise that to be safe, training facilities should have quality lighting (pre-dawn), high visibility, barriers to contain horses and restrain the general public, control of dogs, and designated areas for oat parking, mounting yards and spectating. None of these exist in the Belfast Coastal Reserve, nor should they as training is an inappropriate use.

#### *'Licensing', 'authorising' and 'legitimising' commercial racehorse training*

When the draft BCRCMP refers specifically to commercial racehorse training, it uses words like 'authorised' or 'licensed' to remind people that the Andrews Government has 'legitimised' commercial racehorse training by the issuing of a licence, although that was after the questionable use of the *Crown Land (Reserves) Act* and the ignoring of the *Coastal Management Act* (legal advice to VNPA is that the issuing of the licence is likely unlawful).

In the introduction to chapter 6 and when commenting on the results of consultation, the draft BCRCMP states, with our 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.

In this statement, the plan is suggesting 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. There is no indication nor evidence that local residents support commercial race horse training in the Belfast Coastal Reserve. In fact, the opposite was the case when they were surveyed by Moyne Shire Council in December 2016; 76% were against horse training at Killarney.

Numerous documented breaches of 'interim licence' conditions (those in place between December 2016 and June 2017 when the licence was issued to the Warrnambool Racing Club) are not mentioned in the draft BCRCMP but include:

- horses being in the reserve at the wrong time and in the wrong location
- horses being ridden too close to the public and to hooded plovers
- inadequate identification on horse and saddle
- failure to wear hi-vis vests
- failure to leaving the car park in a clean and tidy condition
- failure to place warning signs at training location
- horse-training vehicles blocking access to other users

Community monitors have also observed two instances of horses throwing the rider, one horse careering down the beach toward Port Fairy, the other, charging up the dune face, through the dunes and into close proximity of the Port Fairy Golf Club. At times there have also been too many horses on the beach and more than three horses to a group, again in breach of conditions.

DELWP and its Minister, along with the Racing Minister (who is also Attorney General) determined that the best way to protect the reserve from the impacts of commercial racehorse training was to 'legalise' it by issuing the Warrnambool Racing Club (WRC) a licence under section 17B of the *Crown Land (Reserves) Act 1978* and without any process for consent under the *Coastal Management Act 1995*. VNPA's legal advice has indicated that the government's approach to 'legalising' commercial racehorse training in the Belfast Coastal Reserve is likely unlawful under both statutes. Two key clauses in section 17B apply to licensing: they set out mutually exclusive tests for the minister to use when approving the licence.

The first clause states that where the Governor-in-Council has given notice of a reserve recommendation from the Land Conservation Council (LCC), the use to be licensed must be consistent with the purposes of the reserve-in this case protection of the coastline. Such a recommendation exists for the Belfast Coastal Reserve. The second clause states that where a reserve has no LCC recommendation, the minister must cite special reasons which she believes make the issuing of a licence 'reasonable and appropriate'.

The Minister mistakenly chose the second clause and by so doing ignored the LCC recommendation. If the minister had chosen correctly and used the first clause, we believe she could not genuinely argue that commercial horse

training was consistent with the reserve's purpose.

VNPA legal advice has also indicated that under section 37 of the *Coastal Management Act 1995*, the WRC should have sought consent to use the reserve for racehorse training. It didn't. Just four years earlier, the Warrnambool Horse Trail Riders had applied for consent under the Act to conduct a 2–4-hour trail ride with 20 horses twice per year at each of four locations in the Belfast Coastal Reserve. The trail riders' successful application included the group's environmental rules and research on environmental impacts and acknowledged the Victorian Coastal Strategy and Indigenous people's interests. We also understand that the recent upgrade to the car park at Golfies require Coastal Management Act consent. Yet again, intensive and extensive commercial racehorse training did not require an application for consent.

Well-managed, respectful, small-scale, occasional recreational horse riding should not be an issue in the Belfast Coastal Reserve although anecdotal evidence suggests that recreational horse riding has put unnecessary pressure on natural and cultural values in the reserve, especially along the Levys Beach section. The big issue is the daily and intense workouts by racehorses that threaten hooded plovers, other coastal wildlife, cultural sites and beachgoer safety and enjoyment. Yet, the commercial racehorse industry was somehow exempt from the provisions of the Coastal Management Act.

### *Skewed consultation*

In October 2016 the ministers for Environment (D'Ambrosio), Racing (Pakula) and Aboriginal Affairs (Hutchins) announced the consultation process that was to be coordinated by the DELWP regional office in Geelong. The announcement was made via Warrnambool's local paper, *The Standard* (15/10/16). The paper portrayed the process as a way of 'ramping up efforts to resolve beach access issues for south-west horse trainers before the end of the year'. According to Minister D'Ambrosio:

*Resolving this issue will require the cooperation of Parks Victoria, Aboriginal Victoria, the City of Warrnambool, Moyne Shire, Racing Victoria, South West Owners, Trainers and Riders Association and the Warrnambool Racing Club, Ms Ambrosio said.*

There is no mention of community in that quote nor in other statements by the three ministers, which also failed to mention the natural and social values of the reserve and appeared to relegate the issue to a 'local' or 'regional' one. Trying to keep it local may be the reason VNPA was not invited to be part of the first phase of the coastal management plan consultation process. And later, at a major consultation workshop for the planning process, invited community representatives were outnumbered by those invited from horsing interests. The community views the consultation process as a way to 'legitimise' an unauthorised and inappropriate use, namely commercial racehorse training.

### *Escalating horse numbers*

In a fact sheet issued on 15 November 2016, at the time of the government's announcement that it would licence commercial racehorse training in the reserve, it stated:

'The Belfast Coastal Reserve is approximately 750 hectares in size, of which approximately five hectares will be accessible by commercial horse trainers under the special conditions. In other words, commercial training will be prohibited at 99% of Belfast Coastal Reserve. The number of horses permitted to train on beaches within the Belfast Coastal Reserve will be reduced to a maximum of 65 across the reserve. Before the introduction of the licence, the numbers of horses being trained in the area had increased from about 180 to 250 in two years, with a significant increase in the number of those horses using the beaches'.

The draft BCRCMP proposes increasing daily racehorse numbers by 400% to up to 256. It would also give over 25% of the reserve's beaches to the racing industry and return racehorses to 750 metres of sand dunes at Levy's Beach near Warrnambool, where in the past they have caused severe erosion. The daily numbers of horses would be:

#### *Golfies*

50 horses per day December 1st to March 1<sup>st</sup>

20 horses per day March 2nd to November 30<sup>th</sup> (based on current licence)

#### *Rutledges*

15 horses per day 1 May to 31 August (based on licence).

#### *Levy's and Hoon Hill*

WRC wants 280 horses per week (40 per day assuming 5 days per week) in the dunes area and 120 horses per day in the foreshore beach (based on management plan).

#### *Killarney*

WRC wants 30 per day when Lady Bay closed and 10 per day when Lady Bay open (based on FOI documents with WRC estimate of numbers desired in an email from WRC to DELWP in Warrnambool).

The total number of racehorses in the reserve under the new plan when Lady Bay is closed would be  $50+56+120+30=256$ . When Lady Bay is open, the maximum number of racehorses per day would be  $20+15+56+120+10=221$ . There could be between 221-256 racehorses per day in the Belfast Coastal Reserve under the draft BCRCMP.

The draft coastal management plan would return racehorse numbers to more than what they were before the licence was issued. Will a 400% increase in racehorse numbers initiate a 400% increase in the licence fee, which was very low to begin with, and will taxpayers continue to cover the cost of Parks Victoria surveillance and monitoring, which will have to be over five sites, not two?

### *Commercial racehorse training is a dangerous business*

The 2006 report, "Prevention of injuries that result from working with horses in the Victorian thoroughbred horse racing industry" was prepared by the Victorian Institute of Occupational Safety and Health (VIOSH) at the University of Ballarat ([https://www.worksafe.vic.gov.au/\\_data/assets/pdf\\_file/0003/207930/NOC-Prevention-of-injuries-that-result-from-working-with-horses-in-the-Victorian-thoroughbred-horse-racing-industry-2006-03.pdf](https://www.worksafe.vic.gov.au/_data/assets/pdf_file/0003/207930/NOC-Prevention-of-injuries-that-result-from-working-with-horses-in-the-Victorian-thoroughbred-horse-racing-industry-2006-03.pdf))

It reported on several fatalities within the industry: between January 2001 and December 2005 there were four fatalities among jockeys recorded by WorkSafe Victoria and there are a number of references in the literature to the potential. Many authors emphasise that the falls that occur during racing are from a height of 3 metres measured to the jockey's head or from 2 metres measured to the saddle at speeds of up to 60km/hr (Turner et al 2002).

A search of the Victorian State Coroner's database (NCIS) for the years 2001–2005 revealed the death of an apprentice jockey at Benalla during 2001; the death of a trainer in 2002 as a result of being crushed by a horse during unloading at a float park; and the death of a strapper in 2002 as a result of a fall during track work. The death of a horse breaker was reported during 2006. The report outlines various figures from different data sets, which shows:

- 67% of falls injuries recorded in the Racing Victoria Limited (RVL) data set are suffered by jockeys at race events;
- 33% of falls injuries recorded in the RVL data set are to licensed jockeys at track work;
- 43% of falls injuries recorded in the VWA data set are to track work riders (excluding licensed jockeys) at track work.

The report concluded:

'Based on these analyses, it is apparent that a reasonably large proportion of falls injuries are to track riders and licensed jockeys at track work'.

Further analysis in the report found that 25% of injuries were related to buildings and grounds.

A later 2007 report, 'Injuries in the Victorian thoroughbred racing industry', published in the British Journal of Sports Medicine (*Br J Sports Med.* 41(10):639-643 <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2465182/>), notes that:

'Many of the injuries reported by workers in the sector in Victoria were serious and involved fractures, and the patterns are similar to those reported in other countries where fractures to the lower limb, upper limb and shoulder predominate'.

The report recommended, among other things, to '...include increasing the focus on the safety of riders during track riding through attention to track design and track work rules and procedures'.

Horse Stables and Track Riding Safety is provided in accordance with section 7(1)(f) of the *Occupational Health and Safety Act 2004* (OHS Act) to assist employers and employees to comply with their duties and obligations under this Act and associated Regulations (<[https://www.worksafe.vic.gov.au/\\_data/assets/pdf\\_file/0018/211239/ISBN-Horse-stables-and-track-riding-safety-2007-06.pdf](https://www.worksafe.vic.gov.au/_data/assets/pdf_file/0018/211239/ISBN-Horse-stables-and-track-riding-safety-2007-06.pdf)>)

A later and more-detailed study of insurance claims found that:

“Between 1 August 2002 and 31 July 2010, the direct cost of workplace injuries to jockeys and apprentice jockeys was at least AUD\$9 million per annum. Less than half (41%) of the *WorkCover* claims made by jockeys were the result of an incident at a race meeting.” It concludes “..costs of workplace injuries to the Australian Thoroughbred racing industry have been greatly underestimated because the focus has historically been on incidents that occur on race-days’  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4598712/>

Understandably, Worksafe has produced guidelines. Horse Stables and Track Riding Safety is provided in accordance with section 7(1)(f) of the OHS Act to assist employers and employees to comply with their duties and obligations under this Act and associated Regulations. The guidelines note that:

‘It is expected that stable and training facility management, employees (staff), Health and Safety Representatives (HSR) and contractors use this guide to form an opinion about suitable health, safety and welfare risk controls under the test of ‘reasonably practicable’. WorkSafe Inspectors and Racing Victoria stewards should also refer to this guide for the same purpose’.

[https://www.worksafe.vic.gov.au/data/assets/pdf\\_file/0018/211239/ISBN-Horse-stables-and-track-riding-safety-2007-06.pdf](https://www.worksafe.vic.gov.au/data/assets/pdf_file/0018/211239/ISBN-Horse-stables-and-track-riding-safety-2007-06.pdf)

The Worksafe guide provides information that can be used to determine the most effective solutions for providing safe stables and training facilities. It contains tables with two columns. Work practices undertaken in the stable environment or at a training facility deemed unacceptable under occupational health and safety legislation appear in the red column. To avoid exposing employees and contractors to risk of injury or illness, the practices described in the red column must not be allowed to occur. Common risk control solutions to prevent exposing employees or contractors to unacceptable work practices appear in the green column. These solutions are regarded as ‘reasonably practicable’ for most stables and training facilities where track work is undertaken and therefore would be expected to be implemented when required. That said, the risk controls listed in the green column are not exhaustive and where alternative risk controls are identified, these should be implemented.

Section 20 of the OHS Act outlines what you must consider when determining if something is ‘reasonably practicable’. Specifically, the factors to be taken into account are:

- the likelihood of the hazard or risk eventuating
- the degree of harm that would result if the hazard or risk eventuated
- what you know, or ought reasonably to know, about the hazard or risk and any
- ways of eliminating or reducing the hazard or risk
- the availability and suitability of ways to eliminate or reduce the hazard or risk
- the cost of eliminating or reducing the hazard or risk, if the cost is grossly
- disproportionate to the hazard or risk.

All factors listed above have to be taken into account when deciding if something is ‘reasonably practicable’. No single factor is more important than another—they all contribute equally. The Worksafe guide outlines procedures for a number of areas including stable safety, but importantly for the issues around Belfast Coastal Reserve, track riding safety, which includes track security and a range of other issues. On even a superficial assessment against these guidelines, it is unlikely that racehorse training in Belfast Coastal Reserve could comply with track security requirements, track facilities and amenities, emergency access and track supervision and possibly more without a huge investment in infrastructure that would severely damage the reserve’s values and undermine the draft BCRCMP. Table 4 highlights the guide’s unacceptable work practices and risk control solutions within the context of a dynamic, unpredictable and fragile natural environment popular with people for recreational activities. VNPA comments are included with images of the reserve.

**Table 3 Problems (red) and solutions (green) in the Worksafe guidelines on horse stables and track riding safety**

UNACCEPTABLE WORK PRACTISE	RISK CONTROL SOLUTIONS
Work practices in the red column should not be used in a stable environment or at a training facility (e.g. race track). Stable or training facility managers who allow these work practices to be used are likely to be in breach of OHS legislation.	The solutions in the green column are the most effective at reducing risk and should be the target for all stables and training facilities.

**Table 4 Racing industry infrastructure requirements to satisfy Worksafe horse training safety guidelines**

Infrastructure requirements of the Worksafe guidelines	VNPA comment						
<p><b>5. TRACK SECURITY</b> Training facilities must be secure. Hazards such as loose horses escaping onto adjoining properties or roads, animals such as dogs, kangaroos or cattle roaming onto training facilities and unauthorised access by the public must be adequately controlled.</p> <table border="1"> <thead> <tr> <th data-bbox="322 432 674 459">UNACCEPTABLE WORK PRACTICE</th> <th data-bbox="674 432 1025 459">RISK CONTROL SOLUTIONS</th> </tr> </thead> <tbody> <tr> <td data-bbox="322 459 674 746"> <p><b>Perimeter fencing</b></p> <p>- No perimeter fencing or minimal fencing provided only.</p> </td> <td data-bbox="674 459 1025 746"> <p>- Fencing suitable to retain a horse erected around the entire training facility.</p>  <p><i>Full perimeter fencing erected around the training facility that is high enough to contain horses.</i></p> </td> </tr> <tr> <td data-bbox="322 746 674 1209"> <p><b>Access and egress</b></p> <p>- Uncontrolled access and egress points. - Gates or suitable barriers not used to secure access and egress points.</p> </td> <td data-bbox="674 746 1025 1209"> <p>- Access and egress to training facilities limited to one point only (if possible). - Automatic self closing gates used at primary access and egress points.</p>  <p><i>Fully automatic security gates – access is strictly controlled.</i></p> <p>- Barriers (such as 'horse shoe' design) help to entrap a loose horse coming from the track. Most effective when:</p> <ul style="list-style-type: none"> <li>• positioned between the 'gap' and the main entrance to the track riding area;</li> <li>• the main entrance and the 'gap' are in line of sight;</li> <li>• positioned closer to the main entrance than the 'gap' itself; and</li> <li>• the area between the 'gap' and the main entrance is reduced as much as possible.</li> </ul> </td> </tr> </tbody> </table>	UNACCEPTABLE WORK PRACTICE	RISK CONTROL SOLUTIONS	<p><b>Perimeter fencing</b></p> <p>- No perimeter fencing or minimal fencing provided only.</p>	<p>- Fencing suitable to retain a horse erected around the entire training facility.</p>  <p><i>Full perimeter fencing erected around the training facility that is high enough to contain horses.</i></p>	<p><b>Access and egress</b></p> <p>- Uncontrolled access and egress points. - Gates or suitable barriers not used to secure access and egress points.</p>	<p>- Access and egress to training facilities limited to one point only (if possible). - Automatic self closing gates used at primary access and egress points.</p>  <p><i>Fully automatic security gates – access is strictly controlled.</i></p> <p>- Barriers (such as 'horse shoe' design) help to entrap a loose horse coming from the track. Most effective when:</p> <ul style="list-style-type: none"> <li>• positioned between the 'gap' and the main entrance to the track riding area;</li> <li>• the main entrance and the 'gap' are in line of sight;</li> <li>• positioned closer to the main entrance than the 'gap' itself; and</li> <li>• the area between the 'gap' and the main entrance is reduced as much as possible.</li> </ul>	 <p>It is very difficult to see how the Belfast Coastal Reserve could be fenced and comply with the perimeter fencing requirements—and where would the gates go?</p> 
UNACCEPTABLE WORK PRACTICE	RISK CONTROL SOLUTIONS						
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Infrastructure requirements of the Worksafe guidelines		VNPA comment
UNACCEPTABLE WORK PRACTICE	RISK CONTROL SOLUTIONS	
	<p style="text-align: center;">Access and egress (continued)</p>  <p style="text-align: center;"><i>'Horse shoe' designed barrier looking towards the main entrance from the 'gap'.</i></p>  <p style="text-align: center;"><i>View from inside the main entrance towards the 'gap'.</i></p>  <p style="text-align: center;"><i>View from outside the main entrance looking towards the 'gap'.</i></p>	<p>How many kilometres of gates and fencing would be required to control access and egress? And how would that separate racehorses from swimmers, surfers, anglers and other beachgoers? Where will the main entrances for each of the five areas be located? Will the areas be closed off to the public during training times each morning?</p>  

Infrastructure requirements of the Worksafe guidelines	VNPA comment										
<p style="text-align: center;"><b>Track facilities and amenities</b></p> <ul style="list-style-type: none"> <li>- No appropriate facilities and amenities such as:                             <ul style="list-style-type: none"> <li>• Toilets, and</li> <li>• access to hot and cold drinking water.</li> </ul> </li> <li>- Available facilities or amenities are in a poorly kept condition and unfit for use.</li> </ul> <ul style="list-style-type: none"> <li>- Toilet, showers, change rooms and tea rooms are available (where appropriate) and accessible to all track users.</li> <li>- All facilities and amenities are fit for use and regularly maintained.</li> </ul>	<p>There are toilets at the Killarney Beach Recreational Reserve but nowhere else in the reserve. Where would the toilets be located in the five areas earmarked by the BCRCMP for commercial racehorse training?</p>										
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This position often provides the best location as monitoring and communicating to riders coming on and off the track is easier.</i></p> </div>	<p>There is no mention of an emergency evacuation plan in the draft BCRCMP. When a racehorse died in the dunes at Levys Beach, it had to be cut into pieces with a chainsaw because it was too difficult and damaging to get vehicles into the area. How will emergency vehicles be able to gain clear access the five areas earmarked for commercial racehorse training in the reserve? And where would the best place be to locate one of the reserve's five required supervisor's boxes in the Levys Beach area, when 2 kms of beach and 750 metres of sand dunes will have to be supervised?</p> <div style="text-align: center; margin-top: 10px;">  </div>
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Infrastructure requirements of the Worksafe guidelines		VNPA comment
UNACCEPTABLE WORK PRACTICE	RISK CONTROL SOLUTIONS	Five widely distributed training areas would presumably require five emergency sirens, one for each supervisors box.
	<p style="text-align: center;">Track supervision</p> <div style="display: flex;"> <div style="background-color: #d9534f; width: 100%; height: 100%;"></div> <div style="width: 100%; padding: 10px;">  <p><i>The supervisor box is well elevated to provide total visibility of the entire course proper.</i></p> <ul style="list-style-type: none"> <li>- Track supervision box (or boxes) equipped with emergency siren and light systems.</li> </ul>  <p><i>Emergency siren and lighting devices provided at the supervisor box.</i></p> <ul style="list-style-type: none"> <li>- Training facility management ensure that:                             <ul style="list-style-type: none"> <li>• approved track riders are registered with RVL</li> <li>• details of incidents at the track are recorded according to track procedure</li> <li>• riders have approved helmets, body protectors and other safety equipment as required by RVL and track management, and</li> <li>• track riders comply with safe track riding policy.</li> </ul> </li> </ul> </div> </div>	

### *Animal welfare in the racehorse industry*

In a review of integrity issues in the Victorian racing industry, the author Paul Bittar noted that:

'These issues [race fixing; live baiting; drug use and other scandals] have all had a bearing on the perception of the adequacy of, and confidence in, integrity services of Victorian racing. In addition, it is a matter of public concern that the self-regulation of Victorian racing has exposed weaknesses in its ability to safeguard animal welfare and to avoid conflicts in the integrity processes'.

<http://assets.justice.vic.gov.au/justice/resources/3d6028a3-70cf-49fb-93fe-ad42824353e0/review-of-the-integrity-structures-of-the-victorian-racing-industry.pdf>

There have been at least two racehorse deaths in the Belfast Coastal Reserve, and other incidents where riders have been thrown and lost control of the racehorses. Training in a natural environment like the reserve is fraught with risk to rider and beachgoer safety, as well as racehorse and wildlife welfare.

### *Costs and benefits of commercial racehorse training*

Chapter 6.5 has a two-page section entitled 'Authorised uses', code for commercial racehorse training and its licensing. Much of the emphasis in this section is the regional economic importance of racing industry as justification for the damage that it is causing and will continue to cause if it remains in the Belfast Coastal Reserve. The industry-supplied data are rubbery and exaggerates its importance to south western Victoria but the plan states that: 'In particular, horse training in the Reserve has been highlighted as an important activity for the regional economy'

But in a September 2013 report prepared for the Victorian racing industry by consultants IER ([https://cdn.racing.com/~media/rv/files/reports/ier\\_vicracingstudy\\_lowres.pdf?la=en](https://cdn.racing.com/~media/rv/files/reports/ier_vicracingstudy_lowres.pdf?la=en)), it was revealed that the racing industry generates a gross value added of \$75 million 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 the gross value added statewide for horse racing is from gambling, which takes money out of the community. There is no regional breakdown for the gambling figure, but an extrapolation of the 40% would indicate that in the Western District, \$30million of the gross value added is from gambling, which leaves \$45million of gross value added shared across all of the Western District racing clubs.

In relative terms, the racing industry is a small contributor to Warrnambool and district, with most jobs 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.

If the BCRCMP is going to extend itself beyond the scope of a coastal management plan to promote the economic value of the racing industry, it should seek to be more honest in its analysis by including the value of other sectors that use the reserve i.e. tourism and recreation, science and education. As part of the analysis, it should also include the costs in terms of both expenditure and opportunity costs. It should also ensure that the data being used is independent and reliable. It should not simply accept the industry data at face value. As a previous section highlighted, for the racing industry to operate within Worksafe guidelines, the cost of infrastructure would be enormous. The opportunity costs of losses for recreation and tourism activities from disturbance by racehorse training should also be factored into the analysis, along with the costs to ecosystem services from damage and disturbance.

But even if we were take the racing industry's data of its worth at face value, why would it cry so poor when asked to supervise training? Just five days after the licence was signed on 15 June, documents supplied under a VNPA FOI request revealed that the Warrnambool Racing Club (WRC) was wanting to weaken the licence condition requiring WRC staff at all training locations as it would be a 'cost that will not be worn by the trainers using the area for 9 months of the year for 35 horses. The cost would not be able to be absorbed by the WRC either'. This case of the industry crying poor is surprising when it and the government frequently state its great worth to the Warrnambool region.

Twice a week, two PV staff monitor the training for breaches of licence condition. Due to limited staff numbers in Warrnambool, one of those is brought in from another region, adding travel and accommodation costs. A quick calculation would reveal that the cost of that throughout the year along would far exceed the licence fee of \$25,320. With the draft BCRCMP proposing that commercial racehorse training be allowed in not two but five locations, this cost to taxpayers will skyrocket.

Using rubbery figures to justify the destructive use of the reserve is one thing, but the main justification for a 400% expansion in the number of racehorses in the reserve, and a 250% increase in the areas available to them, is 'due to community interest' and because 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':

'Due to community interest, the draft plan proposes that commercial horse training be permitted at Golfies beach, Levys beach and Hoon Hill into the future (see Map 6) and horse training be permitted at Rutledges Cutting and Killarney Beach to provide access for local trainers that have historically used the reserve. Future considerations will have regard to comprehensive evaluation of community feedback, equity of access, protection of natural and cultural values, visitor services and infrastructure requirements'.

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. But the implied meaning in the second sentence in that quote is also of great concern. The criteria listed for future consideration should be used by the plan in the here and now to assess the racing industry's use of the reserve and not be kicked down the road for future consideration. If they were, the plan would have to conclude that commercial racehorse training was neither ecologically, culturally nor socially sustainable. But this second sentence also implies that in the future, such consideration could be used to justify an expansion of commercial racehorse training in the reserve.

Even so, the racing industry continues to receive significant public funds for new infrastructure: \$70,000 for a new swimming pool and \$600,000 for a sand training track. It also demanded and received a taxpayer-funded upgrade of the Golfies car park in November 2017, and before Killarney Beach was excluded from the list of beaches licensed for training in June 2017, the WRC was seeking a car park upgrade there too. No doubt the WRC will expect further upgrades at Killarney, Levys Beach and Hoon Hill, if the draft BCRCMP remains intact.

In a 2017 round of grants to community groups, the Far West Friends of the Hooded Plover received \$17,671 from the Victorian Government to strengthen hooded plover monitoring in south-west Victoria between Warrnambool and Portland. Although the funding is welcome, it is a tiny fraction of the funding received by the racing industry, which is putting intense pressure on the little birds being monitored, and Parks Victoria's compliance and enforcement costs in the Belfast Coastal Reserve.

**Table 5 VNPA comments on BCRCMP goals and strategies in Chapter 6**

Goal	VNPA Comment
Goal 6.2—Recreational activities: Opportunities for a range of recreational visitor activities are provided with minimal impacts on natural values, cultural values and other users	This goal is supported, along with the strategies to manage vehicular use, dog walking and recreational horse riding, and to ban dune boarding, hunting and off-road vehicles. But 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, and area restrictions should be placed on motorboats. Commercial racehorse training should not be permitted anywhere in the reserve.
Goal 6.3—Access and visitor facilities: A range of access and infrastructure is provided and maintained to support passive recreation, emergency response and management of the Reserve while minimising the environmental and cultural impacts of visitation. Tracks are closed or access modified where they do not support this goal. Generally, the undeveloped character of the Reserve is maintained	This goal is supported, especially the reference to passive recreation. However, jet skis cannot be considered passive recreation and should be excluded from the reserve.
Goal 6.4 Site strategies Golfies Beach Access: Golfies will continue to be a key site for active recreation providing for a variety of uses including walking, horse and dog exercise, beach fishing and surfing	This goal would be supported if commercial racehorse training is excluded from the goal and the strategies. Without commercial racehorse training, there is no need to use scare resources on a separate parking area for horse floats. Repositioning of the car park further inland is supported.
Goal 6.4—Site strategies Golf Course East Beach access: Golf Course East will continue to provide for more passive recreation, including walking and fishing	This goal and its strategies to close and rehabilitate West Beach access, ensure dogs are on-leash and maintain gravel access at Golf Course East are supported.

Goal 6.4—Site strategies Killarney Beach access and Camping Reserve: Killarney beach access and recreation reserve will continue to support high visitor numbers as a popular site for camping, fishing and swimming	This goal would be supported if commercial racehorse training is excluded and dogs are not allowed off-leash from 1 August to 30 November, which coincides with the first part of the hooded plover breeding season.
Goal 6.4—Site strategies Basin beach access plus Pelicans and Towilla Way: The Basin, Pelicans and Towilla Way beaches will support recreational activities which are managed to reduce their impact on natural and cultural values	This goal and its strategies are supported.
Goal 6.4—Site strategies Rutledges Cutting, Gormans Road carparks number 1, 2 and 3 Rutledges Cutting will provide a key site for nature appreciation, including birdwatching and citizen science	This goal and its strategies that include prohibiting dogs, rationalising access and constructing a viewing platform will be supported if the commercial racehorse training strategy is deleted.
Goal 6.4—Site strategies Kellys Swamp Track west of Big Baldy (including Sarahs and Roller Coaster beach access) Kellys Swamp Track west of Big Baldy (including Sarahs and Roller Coaster beach access), will provide a dedicated trail for walkers and cyclists to enjoy the scenic wetland system and connect to remote beaches	This goal and its strategies that include dog and horse bans, track closures and more formal beach access are supported.
Goal 6.4—Site strategies Kellys Swamp Track between Big Baldy and Spookys beach access: Kellys Swamp Track east of Big Baldy will continue to provide access for surfers, anglers, dog walkers, recreational riders and other beach users, as well as connection to dedicated trail for cyclists and walkers	This goal and its strategies for increased enforcement, dog restrictions, track closures and access track rationalisation will only be supported with the exclusion of commercial racehorse training from the Hoon Hill area. It is ludicrous to consider renaming Hoon Hill to 'improve expectations on visitor behaviour' when those same visitors will witness horses and their riders 'hooning' up and down the dunes of the hill.
Goal 6.4—Site strategies Levys Beach access: Levys Beach access will be a key site for active recreation providing for a variety of uses	This goal and its strategies of dog restrictions, rationalisation of beach access and amenity improvements will only be supported if commercial racehorse training is excluded. Such an intensive and commercial use contradicts the goal for recreation.
Goal 6.5—Authorised uses: Authorised uses of the Reserve are managed to minimise the effect on values and visitors	This goal is very strongly condemned as incompatible with the goals of the plan and the purposes of the reserve.
Goal 6.6—Risks and safety: Promote visitor safety and awareness of safety issues and risks associated with access and use of the Reserve	This goal and its strategies to improve safety and emergency procedures will be supported if the extreme risk from commercial horse training is removed from the reserve.
Goal 6.7—Information, interpretation and education: Visitors appreciate, understand and care for the values of the Belfast Coastal Reserve	This goal is supported.
Goal 6.8—Tourism partnerships, marketing and promotion: Tourism experiences focusing on nature and cultural heritage are supported to generate opportunities for economic and social benefits to communities, including Traditional Owners	This goal is supported

## Chapter 7 Managing in partnership

The majority of Belfast Coastal Reserve was reserved for 'Protection of the Coastline' by Order in Council on 11 October 1984. During 2017, unreserved Crown land south of the high-water mark between Mills Reef, Port Fairy and Killarney, was also reserved for Protection of the Coastline to enable regulations under the *Crown Land (Reserves) Act 1978* (introduced on 16 July 2017 by Minister D'Ambrosio). This was to be consistent with the Land Conservation Council 1978 recommendation for the land as a coastal reserve.

But the land in question was merely given temporary reservation status, whereas the reserve established after the LCC recommendation is permanently reserved. That is not the only inconsistency with the LCC recommendation; the other is that the purposes of the permanently reserved area were conservation and recreation, not commercial use.

Like many coastal reserves along the Victorian shoreline, Belfast has had no specific regulations that managers can use to enforce compliance with its objectives. It is also beset by fragmented management (Parks Victoria, Moyne Shire Council and City of Warrnambool manage separate sections of the reserve), off-leash dogs, illegal camping and off-road vehicle use, sand dune erosion and invasive species. The use of the reserve by other wildlife, walkers, swimmers, surfers, boaties and anglers, and the protection of cultural sites, are also at risk.

On 16 July 2017, the Minister introduced regulations to support the licensing of commercial horse training. Although limited in scope (they don't refer to dogs, illegal campaign and other issues facing the reserve), they do provide some additional enforcement powers for managers. Additional regulations will be gazetted with the finalisation of the coastal management plan being prepared for the reserve.

In the VNPA report, *The Coast is Unclear*, it was recommended that the reserve become a park protected under the National Parks Act under the management of Parks Victoria, with a set of regulations that provided rangers with the authority to implement the objectives of a new management plan. This would provide greater protection and a stronger sense of purpose.

**Table 6 VNPA comments on BCRCMP goals and strategies in Chapter 7**

Goal	VNPA Comment
Goal 7.1—Coordinated management of the Reserve enables efficiencies in program delivery and is supported by consistent land status and regulations	<p>This goal is supported but some of the strategies to achieve it take the reserve's management in the wrong direction.</p> <p>The BCRCMP recommends retaining the fragmented management across the Warrnambool City Council, Moyne Shire Council and Parks Victoria for the land but there is no clarity on the marine area. It also recommends leaving the reserve under the Crown Lands (Reserves) Act. The reserve should become a park under the National Parks Act to provide greater protection and a stronger sense of purpose.</p> <p>Although the plan mentions the problem of having the reserve zoned Farming Zone, which is inappropriate for public land, it fails to include the rezoning as an immediate strategy (it should be rezoned to Public Conservation and Resource Zone).</p> <p>Any exploration of opportunities for consolidation of land management should be immediate, not as they arise.</p> <p>There is nothing in the strategies about integrating land and marine management. There should be.</p> <p>It is sensible to cooperate with the adjoining landholders, as one of the strategies recommends.</p>
Goal 7.2—Managing with Traditional Owners: Traditional Owners caring for their Country is an integral part of the Reserve's management	This goal and its strategies are supported
Goal 7.3—Working with the community: Community skills, knowledge and assistance provide stewardship and help in managing the Reserve	This goal is supported but community groups will be reluctant to work with government agencies if commercial racehorse training is retained inside the reserve. All of their efforts would be to nought.

### Chapter 8 Research and monitoring

Effective research and monitoring is key to the long-term adaptive management of the Belfast Coastal Reserve. For that to be successful will require strong community involvement. That involvement, which to date has been the hallmark of research and stewardship in the reserve, is under serious threat because of the government's continuing support for commercial racehorse training in the reserve.

**Table 7 VNPA comments on BCRCMP goals and strategies in Chapter 8**

Goal	VNPA Comment
Goal 8.1—Monitoring and evaluation improves management decisions and techniques through enhanced ecological, cultural and visitor use knowledge	This goal and its strategies and the indicators to be used to evaluate the effectiveness of the management plan are supported. However, there is no indication as to how the plan would lower the extreme risk presented by commercial racehorse training. The table on page 29 suggests that it cannot and so commercial racehorse training should be removed from the reserve.

**VNPA recommendations**

The VNPA makes the following recommendations to improve the Belfast Coastal Reserve coastal management plan before it is finalised:

1. Commercial racehorse training should be removed as an allowable use in the reserve and the existing licence be withdrawn.
2. A more comprehensive description of the reserve’s natural values be included in Chapter 5 Healthy Country
3. That the area of the reserve south of the high-water mark and recently given temporary reservation be permanently reserved for Protection of the coastline.
4. That the public land of Belfast Lough, the strip of dunes between Golfies car park and the first houses of Port Fairy, and Griffiths island be included within the Belfast Coastal Reserve.
5. That the Belfast Coastal Reserve become a conservation park under the National Parks Act.
6. That there be one single manager of the park, Parks Victoria.
7. That an Indigenous ranger group, funded by the Australian and Victorian governments, be established to jointly manage the park with Parks Victoria.
8. That the reserve be rezoned from Farming Zone to Public Conservation and Resource Zone in the Moyne Shire Council planning scheme.
9. That the use of jetskis be prohibited in the Belfast Lough and other waters in the reserve.

## Submission Appendix 1

Here are extracts from the draft plan that implicate racehorse training in damage to the natural, cultural and recreational values of the reserve:

Furthering the plans contradictions in relation to commercial racehorse training, there are at least 23 instances where the impacts of horses on natural, cultural and recreational values are highlighted:

- 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 (pages vii and 27).
- Horse riding can impact dune health, cultural heritage, public safety and disturb beach-nesting birds. It is critical that the most significant areas for shorebird breeding are protected from disturbances including those from dogs and horses (page vii)
- Other significant threats include weed invasion, predation from introduced species such as foxes, the impacts of vehicles, horses and dogs on wildlife (particularly shorebird disturbance) and dune structure, extreme weather events and coastal erosion (page vii).
- Other significant threats include predation from introduced species such as foxes, weed invasion, the impacts of vehicles and horses on beach nests and dune geomorphology, extreme weather events and coastal erosion (page 28)
- The Statement [Flora and Fauna Guarantee Action Statement] notes a key threat to breeding success is disturbance (including by domestic dogs, walkers, vehicles and horses) (page 35)
- Zoning will be used to protect the most significant areas from impacts associated with activities including horse riding (page 9)
- There are currently potential risks and impacts to Aboriginal cultural heritage from existing authorised activities including recreational horse riding, licensed horse riding tours and licensed commercial racehorse training which are being undertaken in the Reserve under a range of varying conditions (page 22).
- 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) (page 22)
- After being closed for a relatively short period (approximately 3 months) vegetation within the shell midden impacted by horse and foot traffic has begun to regenerate and cover the ground that was once exposed by repeated trampling (page 22)
- On steep faced dunes, 'blowouts' are common; any removal of vegetation, for example, tracks created by horse riding or illegal driving over the crest of a dune, can cause the wind to funnel through the gap and quickly blow away a deep cutting (page 30)
- Remnant native vegetation can be readily degraded by human, animal and vehicle disturbance. For example, 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 (Dyring 1990). The rate of soil stress is dependent on the amount of horse trampling and characteristics of soils, however structurally unstable deposits such as dunes are more readily impacted by this process (Phillips and Newsome 2002). Deluca *et al* (2001) and 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 (page 30)
- Dogs, vehicles and horses can displace wildlife, create disturbance and stress in animals, and cause direct and indirect wildlife mortality (page 33)
- Horses can trample eggs or run over a chick or adult bird, particularly when riding above the high-tide mark or in dunes. Horses also leave craters in the sand that make chick navigation across the beach difficult. Chicks can become trapped in hoof craters if they are deep enough, leading to death from predation, trampling, dehydration or starvation (Barwon Coast 2009) (page 35).
- The threat from horses at those monitoring sites 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). NB: This survey was carried out before the racehorse invasion in 2015 (page 36)
- Riding of horses for recreational or commercial purposes was viewed [during consultation] 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 (page 45)
- Of the range of activities undertaken in the Reserve, it is the competition between people, vehicles, dogs and horses that presents the most significant challenges. This conflict in demand can impact public safety, cultural heritage, environmental values and threatened species, dune stability, visitor enjoyment and amenity (page 46)

- The areas of the Reserve with the widest, most remote or uncrowded beaches are around Armstrong Bay and Rutledges Cutting - which are key areas for shorebirds during both breeding and wintering. These areas are within the Conservation Zone where it is considered critical to minimise disturbance by dogs, horses, vehicles and high visitor use (page 49)
- Beach access from carparks requires ongoing maintenance to minimise erosion of the primary dune system, particularly where horses or vehicles access the beach e.g. at boat ramps (page 55)
- Recently the site has been used by racehorse trainers to access beach from the carpark towards Mills Reef (for a distance of 800m) under specific conditions e.g. weekdays between dawn and 10am. There has been a consequential increase in use of the carpark by horse floats and trucks, coupled with exacerbated erosion of the beach access by horses and trampling of the protective dune vegetation by people. The carpark and beach access are also at risk from beach recession (page 56)
- The road and carpark 2 can also accommodate horse floats (as opposed to carparks 1 and 3), however when several horse floats are present the carpark is crowded (page 59)
- Horse riding has both created new tracks and caused deep incising of existing tracks in several places (page 60)
- Both horse and trail bike riders are riding off tracks, damaging dunes and impacting cultural heritage (page 62)
- The approved CHMP has determined that the proposed activity [commercial racehorse training] cannot be conducted in a way that minimises harm to Aboriginal Cultural Heritage and proposed the salvage and storage of artefacts from the area before the activity commences (page 64)
- Concerns currently exist relating to people, vehicles, dogs and horses within the Reserve, including risks to public safety (page 65)
- Having horse trucks and floats travelling to and from carparks at the Reserve alongside other visitor vehicles also presents a safety risk (page 65)

## **Submission to Parks Victoria re: Belfast Coast Management Plan**

This submission is made on behalf of The Friends of the Hooded Plover (Mornington Peninsula) Inc. (FoHP MP) a not for profit group of 57 members who monitor beach nesting birds on the ocean beaches in the Mornington Peninsula National Park and Westernport. They report their data to Parks Victoria and BirdLife Australia. They have been doing this for over 25 years.

The Belfast Coast is critical habitat for the Eastern Hooded Plover, containing 12% of the Victorian population, 2.5% of the Eastern subspecies.

FoHP MP has personally invested thousands of in-kind hours to help protect the Hooded Plover. We assist local, state and federal governments in threatened species management. We feel our voice should be heard when decisions are being made that will directly effect what happens to beach-nesting birds state wide.

The Hooded Plover (*Thinornis rubricollis*) is described as Nationally Vulnerable EPC Act

The Hooded Plover is listed by Department of Environment 2015 - Threatened Species Strategy Action Plan 2015-2016 – 20 birds by 2020

Hooded Plovers are the most threatened beach-nesting bird in south Eastern Australia they live only on ocean beaches. They have nowhere else to live.

### **Friends of the Hooded Plover overview**

FoHP MP was formed by a concerned group of local residents in the late 1980s. With the help of the local Parks Victoria Ranger, the group commenced a monthly walk to count Hooded Plovers on the ocean beaches.

This group slowly grew and finally incorporated in 2010.

The group works with Parks Victoria and BirdLife Australia. Data is collected on a regular basis 3-5 times/week during the breeding season (August – March) fortnightly – monthly in the non-breeding season.

FoHP MP are a skilled group of volunteers, many of whom are members of other bird watching groups. Some of our mentors have as much as 25+ years experience watching the behaviour of Hooded Plovers and also recording, threats and the behaviour of beach goers.

## The Beach-nesting Bird project

FoHP groups range from NSW to Sth. Australia. All groups work together across the species range and regularly come together to share ideas and work toward recovery of the species as a team. We feel everyone's local actions are amounting to change for this species, in line with the Threatened Species Strategy.

Reasons why FoHP MP supports the proposed Conservation Zone to be dog and horse free to alleviate pressures on these birds

:

- Dogs off-leash allowed wander all over the beach. Hooded Plover eggs and chicks can easily be crushed
- Dogs may predate on eggs and chicks if they detect their presence
- When dogs off-leash walk above the high tide line and into the dunes where Hooded Plovers are nesting, they cause disturbance to the incubating adults. Adult birds will leave the nest. On hot days when there are multiple disturbances 10 minutes away from the nest can be lethal.
- Disturbance of chicks – tiny chicks need to feed by the waters edge soon after hatching. They do not depend on their parents for food.
- The parent's role is to warn the chicks of approaching danger.
- The chick will then run up the beach to hide. If a dog approaches off-leash and chases the adults, the chick will be left unattended and at risk of predation by gulls, kestrels or ravens. Walkers can also crush the chick.
- Dogs movements are not predictable so when a dog is off-leash on a beach where there are Hooded Plover chicks the chick will go into hiding for so long it can become dehydrated or starve to death

In 2011 Parks Victoria on Mornington Peninsula reviewed it's Management Strategy. BirdLife Australia , FoHP MP , Mornington Peninsula Shire, the Victorian Dog walker Association and Nepean Conservation Group were invited to participate in this review ( 2 casual participants were also permitted to attend). A dog ban was recommended. In 2014 a PV **dog regulations review** called for submissions. The outcome was to remove set asides from three beaches with a review in 12 months. If the new regulations were not observed then all set asides would be removed and the National park would revert back to no dogs. In November 2016 the Mornington Peninsula National Park removed all set asides and the Park became dog free. This was with bi partisan State Government approval.

Since November 2016, the number of dogs observed by volunteers has dramatically decreased. There has also been a significant increase in Hooded Plover chick success. in 2017- 13 chicks fledged and this year 12 chicks have fledged some in territories **{5 years ago only 1 chick fledged (flying stage)}**

It will take many years to know if the removal of these set asides have made a difference to chick survival, but it is looking good so far. Another huge benefit is improved fox control, baits can now be used in some areas of the NP, this is far less expensive than trapping and in some areas more effective. This also improves chick survival. There have been roll on effects.

**FoHP does not support commercial horse training in the reserve. There are extreme risks to threatened species, habitat, cultural heritage sites, and public safety.**

The Mornington Peninsula has one beach area where horses are permitted.

There are casual riders and two trail ride companies who regularly visit the beach.

Parks Victoria has put in place strict regulations.

- Horses must only walk along the waters edge.
- Trail ride leaders must wear an identifying vest.
- Only 20 horses are allowed on the beach at a time.
- Parks Victoria rangers contact/ visit the companies before the Hooded Plover breeding season begins to ensure regulations are observed.
- FoHP have paid for large signs at the entrance to the beach so all horse riders are aware of the regulations.
- We are have taken a coexistence approach.

With these regulations in place 2 Hooded Plover pairs have successfully raised chicks in 2017 and 2016.

If the plan promotes such high impact activities then it will weaken the success of the entire recovery effort, this means OUR efforts won't have the same outcomes that they should in terms of making a difference at the population level.

**FoHP MP is 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.**

It would reinforce the significance of this area; benefit a nationally threatened bird and other rare fauna Parks across Australia.

It will provide a safe environment for all visitors to the National Park.

**Privacy** - Parks Victoria is committed to protecting your personal information by complying with the information privacy principles set out in the Privacy & Data Protection Act 2014. Parks Victoria's privacy policy can be viewed online at [www.parkweb.vic.gov.au/privacy](http://www.parkweb.vic.gov.au/privacy).

## Submission template for Draft Belfast Coastal Reserve Management Plan

**About you:**

Your name

Your Organisation (if relevant): private person

Address:

---

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

**Your Comments:**

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

**QUESTIONED – red flag issue**  **? Racing Victoria had preferential access to government**

(Acknowledgements),

- This plan is unmanageable with no Independent Environmental Impact Study to underpin its direction.
- It lacks scientific information, local information and maps which identify locations and kilometres given to high-impact activities.
- It lacks information on innovations which can avoid trashing the coast. It does not provide a range of alternatives.
- It is deceptive in its use of positive imagery and avoids images which depict the current coastal destruction.

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

- Environmental Impact Studies
- Science and Innovation
- 21<sup>st</sup> Century thinking
- Growth in new Passive Recreation industries: Tours down under for:
  - 'ship wreck' history,
  - coastal study, science, coastal and marine study, conservation, geology
  - bird preservation,
  - non-equipment/non-machine beach activity – surfing, wind surfing
  - well being and menal health groups visit the beach ; yoga and tai chi classes
  - opportunities for drug rehab patients to visit a calm beach

**Treasure not trash**



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?

- Passive recreation / health and wellbeing/ swimming

Areas cross out are not supported by me because we don't have an Environmental Impact Study to determine what will be the affect of such activities on a fragile and unique reserve.

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

Dog walking – ~~leash only~~; create onland dog parks for off leash

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

- I use the Killarney Public Beach
- I use the beach accessed by Skenes Road
- I frequent the coast line from the Killarney Boat ramp to Port Fairy and sometimes from the Killarney Boat Ramp eastwards.

**QUESTIONED – red flag issue** **? Location descriptions rely on very specific local knowledge; occasional visitors to the beaches are not able to answer this question properly.**

- 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 you of the vision for the Belfast Coastal Reserve?

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

- This plan is unmanageable with no Independent Environmental Impact Study to underpin its direction.
- It lacks scientific information, local information and maps which identify locations and kilometres given to high-impact activities.

- It lacks information on innovations which can avoid trashing the coast. It does not provide a range of alternatives.
- It is deceptive in its use of positive imagery and avoids images which depict the current coastal destruction.

QUESTIONED – red flag issue  ? Why is this draft not underpinned by an Environmental Impact Study to determine effect over 1, 2, 5, 7, 9, 11, 13 and 15 years.

QUESTIONED – red flag issue  ? Why is this draft not underpinned by an Environmental Impact Study to determine effect over 1, 2, 5, 7, 9, 11, 13 and 15 years.

This is an unmanageable plan with no Independent Environmental Impact Study to underpin its direction. It must be scrapped. Start again.

### 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     Unsupportive

QUESTIONED – red flag issue  ? This draft does not define 'cultural landscape' or living heritage. It is not clear to the reader how cultural landscape is distinct from 'landscape'.

The word Amenity is absent – defined here as: those natural or physical qualities and characteristics of an area that contributes to people's appreciation of its pleasantness, aesthetic coherence, cultural and recreational attributes. People are motivated to seek places offering the greatest level of amenity to minimize stress, maximize restoration, and induce a positive sense of wellbeing. Source: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3734455/>

QUESTIONED – red flag Issue  ? Belfast Coastal Reserve – **Definition of Reserve:** *A tract of land managed so as to preserve its flora, fauna, and physical features.*

**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     Unsupportive

QUESTIONED – red flag issue  ? Where is the scientific evidence underpinning the plan's claim - better care for and showcase Belfast Coastal Reserve? The use of the word healthy is misleading in this context.

QUESTIONED – red flag issue  ? Where is the map showing the areas designated for high-impact activity fully labelled with names and kms overlaid with information about the vulnerable species ?

*Chicks trapped in craters*

	<p><b>VULNERABLE HOODED PLOVER BIRDS GET TRAPPED IN THESE CRATERS</b></p>
	<p><b>Horses.</b> Horses can trample eggs or run over a chick or adult bird, particularly when riding above the high-tide mark or in dunes. Horses also leave craters in the sand that make chick navigation across the beach difficult. Chicks can become trapped in hoof craters if they are deep enough, leading to death from predation, trampling, dehydration or starvation (Barwon Coast 2009).</p>
	<p>Source: Page 35 Belfast Coastal Reserve Management Plan, January 2018 (word doc)</p>

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     Unsupportive

- This plan is unmanageable with no Independent Environmental Impact Study to underpin its direction.
- It lacks scientific information, local information and maps which identify locations and kilometres given to high-impact activities.
- It lacks information on innovations which can avoid trashing the coast. It does not provide a range of alternatives.
- It is deceptive in its use of positive imagery and avoids images which depict the current coastal destruction.



QUESTIONED – red flag issue |  ? The 'Conservation and Recreation' Zone is a smokescreen. This Zone is identified for a range of high impact activities which include business activities and the work cover issues for paid employees on the beach working have not been discussed

QUESTIONED – red flag issue |  ? Isn't the use of the words 'active recreation' (page 57) a smokescreen for high Impact damaging use of this fragile and unique coastline?

QUESTIONED – red flag issue |  ? Isn't having Racing Victoria as a Delivery Partner (page 57) in corruption - putting the fox in charge of the chickens?

QUESTIONED – red flag Issue |  ? Isn't using names, not able to be viewed on a map, such as Kellys swamp track rutledges cutting, Gormans road, golfies, big baldy, pelicans, towilla way etc been done to 'smoke screen' the average reader – have no idea where some of the places mentioned are.

QUESTIONED – red flag Issue |  ? Isn't it true that horses were using the beach unauthorised for a time when a ban applied and that it is impossible for government's to enforce regulations; already failing the coast through lack of resources and that policing horse activity as the industry expands **expedientially** is not going to happen.

### 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     Unsupportive

QUESTIONED – red flag issue  ? Having the racing industry as a sectional and profitable interest for the management of the fragile coast is not a long term strategy. Moyne Council cannot manage what they have already – they have told me as an individual to take up issues with State authorities and would not represent me as a ratepayer at all. They have no hope of managing in partnership. The state government does not have the resources to manage the coastline either. 100s of people are stealing shell fish from this coast on a daily basis and are undetected by and large because the resources to manage are just not there. So this is an unmanageable plan with no Independent Environmental Impact Study to underpin its direction. It must be scrapped. Start again.

QUESTIONED – red flag issue  ? Isn't the plan consolidating ongoing altercation between high impact users of the coast and those interested in preservation of the coastline listing community groups as a **'Delivery Partner'**.

### 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     Unsupportive

QUESTIONED – red flag issue  ? No research partner has been named. The information on research is vague and futuristic.

## Draft Belfast Coastal Reserve Management Plan Submission guide prepared by



The Belfast Coastal Reserve, in south west Victoria, stretches for 20 kilometres between Warrnambool and Port Fairy.

The Reserve was set aside in 1861 to afford dune stabilisation and to protect the natural values of its unique coastal features. The Reserve was formally created in 1980 to protect the Reserve's natural, cultural and recreational values.

Just over a year ago, environment minister D'Ambrosio agreed to establish a BCR Draft Coastal Management Plan to be conducted by Parks Victoria. As a community we abided by the process and took part in good faith.

A draft coastal management plan was released by Parks Victoria in January 2018, as a direct result of continuing community concerns and outrage at the recent introduction of large scale commercial horse training.

In the past few years, Warrnambool City Council, permitted a large escalation in racehorse training numbers, when Darren Weir Racing was allowed on Lady Bay Beach. In the Summer of 2015/2016, WCC then closed the beach to commercial racehorse training. We can only assume this was for public safety reasons and the unfavourable impact on tourism during the peak Summer season.

As a direct result, 80 plus racehorses a day began industrial scale training on Killarney Beach, in the BCR. Suddenly, Warrnambool had shifted their problem to Moyne Shire and as locals,

we were understandably upset. No warning, no notice, no consultation, no respect.

It became evident also that Darren Weir Racing had been given the go-ahead, (unlawfully), to train racehorses in the dunes at Levy's Point, until concerns that cultural significance was being impacted, if not destroyed, saw it shut down by Aboriginal Victoria in 2016.

These were all unauthorised activities that breached several State and Federal Acts of parliament.

Effectively, the permitting of the destruction of nature and culture was to satisfy the needs of one large-scale trainer.

You would think that such a sensitive environment would require the very best science and environmental and cultural impact assessments. You can imagine our dismay and skepticism when we discovered that the minister had given Racing Victoria a prominent seat at the community consultation table to determine the future of our local Reserve and beaches.

How is a commercial racing entity, like Racing Victoria, permitted to have such a powerful say in the future of what should be, first and foremost, environmental and cultural concerns, on Crown land.

This is Coastal Reserve that has been in recovery for the past 30 years after being under assault for 150 years. The Native wildlife, the birdlife, are hanging on by a thread. The vegetation had just started to make a recovery, thanks to thousands of volunteer hours of revegetating and fencing off threatened bird nesting areas. It's a tough enough battle for survival for these vulnerable species, before the commercial horse trainers ever got there. These birds are battling predators like dogs off lead, foxes, crows and human folly. We should be recovering and expanding our environment, not destroying and reducing.



### 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 contradictory and 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)**

#### *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.

### **CHAPTER 4 - Key management theme #1: Cultural landscape and living heritage (pages 13-24)**

#### *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.

I support the goals and strategies that encourage the protection of the cultural landscape and living heritage. I support a collaborative approach for traditional owners to be encouraged to work with land managers and other appropriate groups to achieve a wholistic outcome. (Country Needs People).

I strongly support the use of Aboriginal place names to reflect the reserve's cultural values. I also strongly support the opportunities to increase the Indigenous ranger presence.

Employing traditional owners will strengthen the depth of experience for visitors and tourists and will have beneficial employment outcomes for our Aboriginal communities. The capacity also exists to expand the Indigenous ranger presence through exploring possibilities of Federally funded Indigenous Ranger Programs. This will only be achievable through the upgrading of the Reserve to Coastal Park status, or similar, under National Parks legislation.

Risk minimisation to the tangible and ephemeral cultural assets and values is essential

Commercial horse training, uncontrolled recreational horse riding and illegal vehicle access are the biggest threats to these values.

The Draft Plan identifies the fact that commercial horse training cannot be managed appropriately so as to remove the risk of damage to cultural values (page 64).

For these reasons commercial horse training shouldn't be allowed to occur within the reserve and in particular through the ecologically and culturally sensitive dunes.

Recreational horse riding and illegal vehicle access can be managed through regulations and enforcement by the relevant land manager.

## **CHAPTER 5 - Key management theme #2: Healthy Country (pages 28-42)**

### *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.
- *"The Belfast Coastal Reserve contains critical habitat for several threatened bird species including the Hooded Plover. Unfortunately, there is a strong contingent in the horse racing industry who want to be able to use this coastal area as a training track for their horses. This is likely to destroy the environmental values of the reserve as well as jeopardise the future of the Hooded Plover species.*

*"We've heard people say 'move the birds' or 'breed them in captivity' but these are not feasible options, as you can't replicate their habitat requirements and they need to be able to survive and persist in the areas that are of highest value to them! There's no such thing as remote, untouched sites and this area has a low human population so has the most hope for the birds, if the community will get behind them and make changes to the way they use the beach. Some of those changes will be inconvenient in the short-term and we acknowledge this.*

*BCR is of such high value, it needs high levels of protection. We support the proposed conservation zone which will alleviate the highest impact threats to the birds (dogs and horses) in the most significant part of the reserve. This being said, the entire reserve is of significance but a coexistence approach works in that 57% of the reserve is available for dog walking (on leash in areas where the birds occur) and for recreational riding (under strict conditions to minimise impacts).*

*A reserve of such high significance is no place for commercial race horse training, when this can be effectively done on synthetic sand tracks.*

*Managing dogs more effectively in the reserve also helps with fox control, in that it can then be extended to more areas as there aren't risks of poisoning dogs being walked (compliance with dog leashing is incredibly low in Victoria even with signs saying poison baits in area!)."*

***Birdlife Australia***

- *However, the habitat within Belfast Coastal Reserve is still unparalleled in its quality (namely food availability) and is why the reserve is one of only two locations in Victoria that contains the highest density of Hooded Plovers of anywhere in the world! The other location is Mornington Peninsula National Park which was designated a National Park due to its significance to the species. The Belfast Coastal Reserve is even more valuable because it is also habitat for several migratory shorebirds which occur here in internationally significant numbers as well as nesting habitat for oystercatchers and red-capped plovers, not to mention being significant for the critically endangered Orange-bellied parrot. It has taken over a decade for a management plan to be written for this high biodiversity area, which will finally attempt to restore the balance that has been lost.*

*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. This in time will drive a population decline and that's what we are aiming to avoid by putting balances in place. The main drivers of poor breeding success have been well-studied and include disturbance and predation (of chicks) by off leash dogs, predation by ravens, disturbance and crushing of nests by horses and vehicles, tidal inundation and predation by foxes. Snakes are not a major threat for these birds and have never been recorded as a nest predator from thousands of nests monitored. The balance for these birds has been greatly upset by the introduction of people, dogs, horses, vehicles, predators and changes to habitat like Marram. A management plan should seek to balance the threats to achieve sustainable use of the coasts. Identifying appropriate sections of coast for dog walking and recreational horse riding will be key to this process.*

- 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 the 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.

## CHAPTER 6 - Key management theme #3: Recreation and use (pages 45-69)

### *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, 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.
- 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.

Moyne Shire's own community consultation revealed that 76% of community respondents said an emphatic, "No", to commercial horse training on Killarney Beach and within the BCR.

- 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.

## 6.5 Authorised uses 62

### Beach training of racehorses

DCMP states: "Local racehorse trainers have been using beaches in the Reserve for many years for resistance training and rehabilitation".

I strongly refute this statement. The beaches have been used by a handful of local trainers historically, most of whom have been 'hobby' trainers, with one or two horses only. By historical, I mean going back for thirty to fifty years. They have had a small impact and have been respectful of the sensitive environment. The dramatic escalation of horse trainers and numbers of horses being trained has made their tenure unsustainable.

Population density is constantly increasing and this hobby activity needs to be curtailed.

#### **Goal #9 : Kelly's Swamp Track East of Big Baldy.**

Strategies supported with the exception of licenced horse training at Hoon Hill. This activity is inconsistent with the goals and strategies of the Draft Plan, Habitat Protection and Cultural Heritage protection.

Horse training activities were shut down in this area by Aboriginal Victoria over a year ago, because of the damage to cultural heritage sites. The DCMP states, within the report:

“The approved CHMP has determined that the proposed activity cannot be conducted in a way that minimises harm to Aboriginal Cultural Heritage and proposed the salvage and storage of artefacts from the area before the activity commences. Gunditj Mirring Traditional Owners Aboriginal Corporation have expressed that they do not support commercial racehorse training occurring within the reserve at this time.” Page 64

the repatriation of the remains of Mungo Man at Lake Mungo, late in 2017 and the deep grief and anxiety that the removal of those remains had caused the local Aboriginal community, it is inconceivable that any agency would talk in terms of 'salvage and storage' of cultural artefacts. How can anyone arrange the salvage and storage of a midden site? This is a highly offensive proposal.

This area of dunes is already badly eroded, unstable and denuded from past commercial and recreational horse activity and illegal vehicle access.

“The CHMP also calculated soil disturbance and incising of trails within the proposed activity area would result in a decrease of surface levels and that erosional activity may result in further reduction of ground surface. It is therefore a requirement to rationalise the network of tracks within the activity area at Hoon Hill, monitor cumulative impacts to the dune system and if required licensing conditions or defined routes may be changed”.

#### **CHAPTER 7 - Key management theme #4: Managing in partnership (pages 71-75)**

##### *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.

If the reserve were to become a park under the National Parks Act, this would allow access to the Federal funding of the Indigenous Ranger program. This funding would complement existing state funding and increase capacity for Indigenous involvement.

However, if commercial racehorse training is retained inside the reserve, all of these efforts would be for nought.

## **CHAPTER 8 - Key management theme #5: Research and monitoring**

**(page 77-79)**

### *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.

## Final Statement

South West Victoria is one of the most environmentally damaged landscapes in Victoria.

As a consequence of colonisation, Victoria's Indigenous community is one of the most impacted of all Australia's Indigenous peoples.

At the time of settlement, Melbourne was never a planned city and Western Victoria was never a planned colonisation and was never properly regulated.

Colonists, or Squatters as they were then known, ostensibly from Tasmania, simply moved on to the land, with their sheep and cleared Indigenous people and vegetation as they went.

It represented one of the largest land grabs in World history with an area the size of England being occupied within 3 - 4 years.

In South West Victoria, we live with the consequences of this legacy.

Wholesale land clearings and land titles that run to the rivers edges and the high water mark of the ocean have also left an indelible scar and made environmental restoration difficult.

Significant environmental recovery programs did not commence in the region, on any large scale, until the 1970's, other than at Tower Hill, (1960's).

The Belfast Coastal Reserve lies in the shadow of Tower Hill, Australia's first gazetted National Park, in 1892. By the 1950's, it was so degraded and diminished through commercial activities of land clearing, grazing and quarrying, that its native vegetation was gone, it was completely denuded and its waters polluted.

In 1955, VNPA and LCP acted to improve administration of National Parks. As school children, many of us went in bus loads to take part in one of the largest single revegetation programs in Victoria's history, at Tower Hill. We now walk under a forest of our own making, in a restored landscape.

The Belfast Coastal reserve suffered a similar fate through its history and by 1980 was almost a completely denuded landscape, except for introduced Marram grass for dune stabilisation.

BCR was gazetted in 1861, for conservation and stabilisation of the coastal dunes. In 1980 it was gazetted as a Coastal Reserve for conservation, recreation, inspiration and preservation of Aboriginal cultural heritage.

Since then, the Reserve has been on the long, slow road to recovery.

It has numerous cultural sites of significance, including burial sites and the largest midden site in the Southern half of Australia. Before colonisation, the BCR region would have had one of the highest population densities in Australia.

Food sources were particularly plentiful in the BCR. The overflow of the Merri River also formed a large swamp near Tower Hill, which occupied this rich, diverse, and ancient landscape.

BCR is a haven for bird life. A variety of fish and eels were caught in the rivers and the coastal wetland systems that lie behind the dunes, from Warrnambool to Port Fairy. The landscape is marked with evidence of the Aboriginal peoples rich cultural life. There are earthen mounds, burials and skeletal remains and a highly concentrated number of kitchen middens throughout the BCR; the middens at Armstrong's Bay are dated at around 500–5500 years old.

Scientists are now exploring the possibility that shell middens and evidence of human fireplaces at Point Ritchie, on the mouth of the Hopkins River, could be older than 60,000 years and perhaps date to 80,000 years ago.

BCR was home to the Tarerer Gunditj, Moonwer Gunditj, Koroit Gunditj, Pyipgil Gunditj and other clans of the Peek Whurrong tribe of the greater Gunditjmarra or Dhauwurd Whurrong language group.

In 1842, George Augustus Robinson, Chief Protector of Aborigines, travelled through this country and witnessed one of the last great gatherings of the clans at Tarerer, below Tower Hill, in the BCR, where upwards of 800 people assembled for annual gatherings. During the whale-breeding season, stranded whales provided the opportunity for Aboriginal clans gathering and feasting.

For Aboriginal people the land was an intrinsic part of cultural and spiritual life, with natural features representing deep religious or 'dreaming' significance. For Europeans, however, the land was principally the means by which to develop an agricultural economy. The arrival of Europeans, with their hard-hoofed cattle and sheep and horses, was detrimental to Indigenous peoples way of life. The introduced animals devoured the native grasses and edible plants, and deprived indigenous animals of grazing land, thus denying Aborigines an important food source.

Dispossessed of their lands, Aborigines faced much reduced access to food sources. It became difficult to maintain their traditional cultural life, which relied fundamentally on an intimate relationship with the land. In addition to the high mortality rates resulting from European diseases, the early contact period was wrought with severe conflict and loss of life. In addition to the physical effects of illness and hunger, people suffered the devastation of large-scale loss of family and kin, and dislocation from country.

At the centre of the Coastal Reserve is the **Two Sisters Dreaming**, a powerful creation story that recurs throughout Australia, from Arnhem Land to the Kimberleys, Tasmania and the Western Desert. It is a powerful and significant Dreaming site.

The Belfast Coastal Reserve is a thin 20 km strip of remnant dunes, wetlands and beaches between Warrnambool and Port Fairy, rich with endemic and migratory birds, including the little Hooded Plover, that is vulnerable to extinction. It is an ecosystem rich with recovering

wildlife and plant life: Echidnas, Swamp Wallabies, Long necked tortoises, Blue Tongue Lizards, a number of snake species, Blue whales, Southern Right Whales, short finned eels, all manner of sea creatures and so much more. There are kelp forests, weedy sea dragons, numerous seal species and hundreds of species of birds.

They live on the edge of existence in a recovering environment; recovering from the ravages of colonialism. Indigenous people share the same fate and are also in recovery from an era of unspeakable colonial brutality. 180 years ago, this country was whole and intact: environmentally and culturally. Environmental and cultural values are intertwined. Now, as a shadow of its former self, it hangs by a thread, in the slow and long process of recovery.

To look at a map of this region is to gaze upon a carelessly colonised landscape, transformed by European clearing. The only significant areas of bushland that survive are the Framlingham Forest, the Tower Hill Nature Reserve, (a recovering landscape) and the Belfast Coastal Reserve, (a recovering landscape). In size, they are 'postage stamp' Reserves, in a sea of cleared farming land. They are a sad reflection of the former beauty of this South West region and a sad reminder of our ugly colonial history and the consequences of unregulated commercial activity.

As we understand it, Warrnambool to Portland is the only unregulated stretch of coast in Victoria.

We request that the Minister charged with the responsibility for the environment, does not consign yet another of the few remaining parcels of recovering landscape, our **Public Commons**, Crown Land, to the scrapheap of history. We ask you to also stand up for the survival of the Hooded Plover, already vulnerable to extinction, as well as the several species, migratory and resident, that are also vulnerable.

The controversy over the commercialisation of Public Land at Bangaroo in Sydney and the debacle over public land mismanagement in the Caulfield Racecourse are but two further examples of public fury over the compromising of our Public Commons.

Commercial horse training in the BCR is a non-conforming activity and is at odds with its gazetted purpose and the State and Federal Acts, recommendations and regulations that govern the Reserve and its ecosystem.

Commercial Horse training in the BCR will significantly contribute to the decline of the integrity of this ecosystem and landscape. This recovering ecosystem, this country, deserves better and is deserving of our full attention, our prudence and sensitivity.

**The full group of the Gunditj Mirring supported BCRA's proposal for the upgrading of the Belfast Coastal Reserve to a Coastal Park, under the National Parks legislation and a change of name to reflect its ancient Aboriginal history. We ask that you support the proposal and give certainty to our shrinking Public Reserve.**

**References:**

1835 - James Boyce - Black Inc.

Campfires At The Cross - Heather Le Griffon - Australian Scholarly Press

The Colonial Earth - Tim Bonyhady - Melbourne University Press  
Ian Clark – Aboriginal Languages & Clans: An Historical Atlas of Western & Central  
Victoria 1800 – 1900 – Monash Publications  
Helen Doyle – A History of the Moyne Shire

## Submission to the Managing Belfast Coastal Reserve: Draft Management Plan

Firstly, I would like to congratulate the authors of the draft plan for producing a comprehensive set of actions for what is a very important asset to the local community. There are many challenges in managing coastal environments in Victoria (and indeed, throughout the world) given the various pressures from growing populations, commercial activities and climate change. Most of the recommended actions seem sensible and consistent with the vision proposed for the area, outlined in Chapter 2.

I particularly like the section on Aboriginal and colonial settlement history (4.3) – an interesting history not often presented in a concise manner. Chapter 4 as a whole could be a valuable resource for many locals or visitors not aware of the history of the area.

My submission covers three areas – a minor suggestion, a request for further information to be included, and comments on the appropriateness of some activities within the Conservation Zone.

Thank you in advance for your consideration of this submission and I appreciate the opportunity to have a say in the development of the final plan.

### **A minor suggestion**

It is initially unclear whether the Coastal Reserve actually includes any of the marine areas shown on the maps. It would appear that it does not, given the statements that “The Belfast Coastal Reserve protects a narrow section of land” (p. v). All the maps show the zones extending out to sea (presumably 200m), and many of the activities proposed to be regulated (boating, diving, water sports, jet skiing, surfing) have marine components. It is not until Chapter 5 that we are made aware that “The Reserve itself comprises terrestrial and marine areas. Coastal ecosystems cover 1,130 hectares of onshore environment, while marine ecosystems encompass 1,132 hectares of the nearshore marine environment, seabed and waters out to the boundary of the planning area.” (p. 27). This needs to be included earlier as a clear statement of the areas covered by the plan (perhaps in Section 1.2).

### **A request for further information**

There needs to be a more detailed explanation of the selection of the boundaries of the two zones – Conservation and Recreation, and Conservation. It is stated that “The Conservation Zone covers the areas where the highest cultural and environmental values are found” (p. 10) but it is unclear what data this is based on. Figure 5.1 (p. 31) suggests that EPBC listed fauna only occurs in the Conservation Zone, but the map only includes that area. Does this mean that these species do not occur outside this area? Similarly, the distribution of significant EVCs (listed on page 28) should be expanded to show whether the Conservation Zone has “more” of these EVCs than the rest of the reserve.

This is a significant issue as the boundaries of the two zones has a major impact on the types of activities that can be conducted in the two zones.

### **Inappropriate uses in the Conservation Zone**

I submit that a number of activities allowed in the Conservation Zone are incompatible with the stated purpose of the zone to *protect the areas where the highest environmental and cultural values are found* (p. 10). In particular, vehicle access by 4-wheel drives, motor cycles and trail bikes and commercial training of horses should not be allowed in the area.

#### *Recreational vehicles*

While recognising that placing restrictions such that vehicles would only be permitted on public vehicle tracks and not-permitted off-road or on walking tracks, dunes or beaches, it is obvious that a small number of users will not adhere to this restriction as “Illegal vehicle activity in the Reserve is evident” (p. 48). The strategy to “Control illegal vehicle access to dunes and wetlands using bollards, gates and barrier fencing with clear signage at illegal vehicle access points” (p. 53) sounds good but experience elsewhere suggests that these are often disregarded or by-passed.

It is unlikely that adequate monitoring or policing of the restriction will be put in place, and any damage to the environment would only be discovered well after the perpetrator has left the area.

I accept that people accessing the area for other, less damaging, activities will use their 4-wheel drives responsibly, so a complete ban on all vehicles would not be possible. But I think that the Plan needs to make a clear statement that trail bikes should be banned completely from the Conservation Zone.

I know this shows my bias against noisy trail bikes, but as the plan states “Visitors commonly value the ability to escape to nature, enjoy the scenery, rest and relax, socialise or exercise in a setting removed from the busier developed areas to the immediate east and west. This accords with the vision for the Reserve as providing a ‘wild feel’, a place to appreciate and connect to nature” (p. 47). Trail bikes are incompatible with this – and while you’re at it, ban jet skis.

#### *Commercial training of horses*

While my comments here are particularly directed at the proposal to allow commercial horse training at Rutledges Cutting within the Conservation Zone, I think the issue applies to the entire Coastal Reserve. The case that commercial horse training must be conducted on beaches – that it is essential, or has some large advantage over any other form of training, such as a dedicated sand training track – has not been made adequately. But if the final decision is to allow it, then it should not include areas in the Conservation Zone.

The concentration of records for Hooded plover, Australasian bittern and Orange bellied parrot around the area of Rutledges Cutting (Figure 5.2) suggests that this area is totally unsuitable for commercial training of horses. Dog walking (both on- and off-lead) are not permitted, so allowing horses onto the coast seems inexplicable. Recreational horse riding and commercial horse riding tours are not allowed in the Conservation Zone, so again the inclusion of horse training in this zone seems inconsistent with the stated goals of the zone. The plan recognises the threat from horses:

*Horses can trample eggs or run over a chick or adult bird, particularly when riding above the high-tide mark or in dunes. Horses also leave craters in the sand that make chick navigation across the beach difficult. Chicks can become trapped in hoof craters if they are deep enough, leading to death from predation, trampling, dehydration or starvation.*  
(p. 35).

This is emphasised in Table 5.1 where the current risk to coastal scrub, resident shorebirds and migratory shorebirds from horses is listed as Extreme (p. 29). Allowing training under licence, with times and numbers restricted, will not alleviate these threats. The risk to these important

environmental assets following management actions remains as Extreme (Table 5.1). Given this, it is very hard to accept that horse training is an acceptable activity within the Conservation Zone (or one could argue, anywhere within the Belfast Coastal Reserve).

The strategy that “Permit small numbers of horse training under license at Rutledges Cutting to provide for local trainers that have historically used the reserve.” (p. 60) needs to be explained in more detail. How many horses constitute “small numbers”? How many local trainers have “historically used the reserve”? What constitutes a “local” trainer? When these trainers retire, will the licence be revoked? In any case, just because some training was historically conducted there, does not mean that it should continue into the future.

The statement is made that “The use of local beaches by the horse racing industry attracted increased attention after it was revealed the 2015 Melbourne Cup winner, Prince of Penzance, used the Lady Bay Beach as part of its training program.” (p. 63). This is a bit of a furphy – lots of winning horses haven’t used the beach! Interestingly, the trainer states that “The beach and dunes have been the key to my success and others.” (Warrnambool Standard, February 9<sup>th</sup> 2016). Horses clearly do not only use the beach, but the fragile dunes as well, as shown below.



This photo, captioned “The Darren Weir-trained Zanteca works on the sand dunes at Levys Beach” shows that the beach area is not the only part of the reserve used.

From the Herald-Sun (September 14, 2016<sup>1</sup>)

The success of Prince of Penzance also led to a large increase in the number of horses using the local beaches. The figure of “140 training on a daily basis” is quoted in the plan (p. 63). If trainers wish to train all these horses on the beach, there is no way that numbers can be restricted (without favouring some trainers over others). I do not see how any plan can provide “equity of access for all trainers” (p. v) given this number of active horses. Indeed the plan for Rutledges Cutting is only for local trainers that have historically used the reserve.

I conclude with the purpose of the Conservation Zone, as stated on page 10:

*To protect the areas where the highest environmental and cultural values are found.*

The training of horses is clearly incompatible with this purpose and should not be allowed within the Conservation Zone.

<sup>1</sup> <http://www.heraldsun.com.au/sport/superracing/vic-racing/darren-weirs-spring-plans-take-a-hit-as-warrnambool-beach-ruled-off-limits-for-horses/news-story/387f4db79738fc62cf60efe2ba97102c> (Accessed 7/2/1018)

**Addressed to specific issues.**

**Table 6.1 Page 54 : Prohibition of Windsurfing Kitesurfing and Surfing on the Belfast Lough and Rutledge's Cutting (saltwater swamp).**

I use the Belfast Lough and Rutledge's Cutting on a small number of occasions per year. I windsurf when I have the spare time and often this is not when conditions elsewhere are optimal. I use the Lough or Cutting when the waves in the Ocean are too big or too choppy or if there is an offshore wind that is too dangerous to go into the Ocean for my ability level. Both the Lough and Cutting are only waist deep so this adds to my safety.

I notice that Parks Vic motto is "**healthy parks healthy people**". It certainly gives me great peace of mind to know that I have two safe venues to windsurf. The physical exercise of Windsurfing is great for my flexibility and mobility. It also improves **my** mental health and wellbeing as I return home in a content state of mind. Surely, this fits Parks Vic motto.

I notice that Boating, Jetsking and Yachting are allowed on these places but Windsurfing is not. How does that make any sense? Why is equity of access being denied to Windsurfers?

Windsurfing and Kitesurfing on the Belfast Lough and Rutledge's Cutting are very passive activities with zero negative environmental effect.

Windsurfers and Kitesurfers do not clash with other user groups on the Lough or Cutting, as they are usually the only water user group on the Lough or Cutting. They also keep these areas clean as they collect rubbish and care for the surrounds. Surely, Parks Vic should embrace this major positive effect.

I hope that Parks Vic amend the draft plan to allow windsurfing and Kitesurfing on the Belfast Lough and Rutledge's Cutting. Both groups do not have a negative effect on the environment.

Name:

Date: 16/03/2108

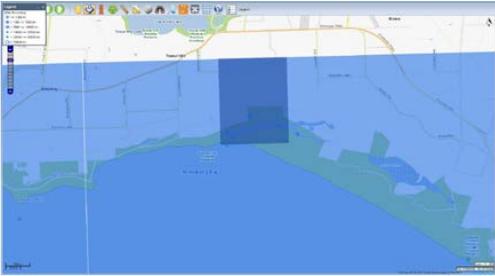
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Between Warrnambool and Port Fairy is the location of Belfast Coastal Reserve(BCR)

<https://engage.vic.gov.au/belfast>

Parks Victoria welcome community feedback on the draft Management Plan. **The closing date for providing your feedback is Friday 16 March, 2018.**

Page	<a href="https://engage.vic.gov.au/application/files/7515/1555/5733/Belfast_CMP_v2_WORKING_DRAFT_January_03012018.pdf">https://engage.vic.gov.au/application/files/7515/1555/5733/Belfast_CMP_v2_WORKING_DRAFT_January_03012018.pdf</a>
Front/Back cover	Shows Killarney Beach(have mentioned this place in the past favourably a few times!) about ten years ago V Line stopped(drop off Saturday, pick up Sunday) at Killarney camping reserve for one of the Tarerer Festivals.
Map 6	<p>“Historical” On a warm day wanted to rest on Killarney main beach all pock marked by horses hooves from sea to high tide mark.</p> <p>Few years ago walked along Golfies only two (still too many for small BCR) racehorses training. p. 64 “...from dawn to 10am Monday to Friday, with a maximum of 50 horses per day December 1st to March 1st...”.</p>
Map 5	Fyi! February 2018 walked over horse manure east of Killarney boat ramp.
Map 4	Over ten years have seen ‘grey nomads’ dogs off leash west of Killarney beach, no obvious problems to untrained eyes.
Map 3	Need toilet at every car park. Adding high resolution photos for current conditions and for future of BCR. Photo shows numerous tracks in the dunes at Levys Beach. <a href="https://earth.google.com/web/@-38.37064655,142.43011952,20.58456487a,1864.1911898d,35y,331.32409315h,0t,Or">https://earth.google.com/web/@-38.37064655,142.43011952,20.58456487a,1864.1911898d,35y,331.32409315h,0t,Or</a>
Map 2	BCR is small, have one zone the Conservation Zone with women allowed dogs.
Map 1	Merge the four Land Managers creating a National Park.
86/7	<p>Victorian Biodiversity Atlas – Adding Flora.</p> <p>2 Birds critically endangered, 10 Birds endangered. Orange Bellied Parrot less than 1000m Levys Beach (bottom right hand corner, click image then click green corners to enlarge), p.33 ‘Port Fairy to Warrnambool...human disturbance...rapid to severe deterioration(BirdLife International 2017)’.</p>  <p>Discontinue licences relocating commercial horse training to local synthetic sand track.</p>
83/84	Accounting and updating for the LCC recommendations from 1978 with current conditions – “maintain dunes...scenic beauty and stability...as a whole”, adding p.79 “Support research into the impacts of climate change on coastal areas and mitigation

	measures that could be applied in the Reserve” replacing vi zones with one National Park.
80	<p>“Clark, I.D. 1995. Scars on the Landscape. A Register of Massacre sites in Western Victoria 1803-1859, Aboriginal Studies Press.”</p> <p>Historical horse training marked on BCR map, add Massacre sites (historical)  <a href="https://cv.vic.gov.au/media/oldmedia/5755/massacre_File0001.jpg">https://cv.vic.gov.au/media/oldmedia/5755/massacre_File0001.jpg</a></p>
	<b>8 Research and monitoring</b>
77-79	<p>Coastal dunes – the species in the dunes (or likely to be in the dunes) are:</p> <p>Senecio pinnatifolius</p> <p>Lotus australis var. australis</p> <p>Colobanthus apetalus</p> <p>the above species are likely to be adversely affected, as a result of trampling by horses in the BCR see p. 64, “120 horses per day...utilising...steep dune areas of Hoon Hill.”</p> <p>State paid \$6m for clean up of Tambo river tailings dam  <a href="https://www.weeklytimesnow.com.au/news/politics/tambo-valley-water-at-risk-from-benambra-dam-minewaste-proposal/news-story/35951c84c0ee3ed7c23a7418544c8c73">https://www.weeklytimesnow.com.au/news/politics/tambo-valley-water-at-risk-from-benambra-dam-minewaste-proposal/news-story/35951c84c0ee3ed7c23a7418544c8c73</a></p>
78	LTO’s commercialise our public reserve.
	<b>7.3 Working with community</b>
75	Adding the number of paid Managers to number of Volunteers.
74	<p>Adding number and cost(\$25/hr/per person) of Volunteers who discontinue if commercial horse training continues.</p> <p>Tarerer Festivals: with Sudanese Dancers, Gormans Road Tree planting June 2011 by Volunteers, by November 2011 overgrown with introduced plants</p>  <p>and a Whale Dreaming at Rutledges Cutting p.11 November 2011.</p> 

71	Support Traditional Owners for “single land manager” to explore if duplication is reduced.
65	Visitors may watch horses training on local synthetic sand track.
64	<p>Adding cost of “..cumulative impacts to dune system and if required licensing conditions or defined routes may be changed.”                      For example a seawall “\$2000/lineal metre to \$5000/lineal metre.” p.31/33 (2017)  <a href="http://www.coastalconference.com/2017/papers2017/">http://www.coastalconference.com/2017/papers2017/</a> % .pdf</p> <p>In 2013, Mills Reef car park, “...public pedestrian beach access...board and chain...poor condition due to undermining of the dune.” p. 40/385  <a href="http://www.moynes.vic.gov.au/files/assets/public/documents/our-community/environment/portfairycostalazardassessment.pdf">http://www.moynes.vic.gov.au/files/assets/public/documents/our-community/environment/portfairycostalazardassessment.pdf</a></p> <p>Golfies carpark wasn’t this affected by “...erosional activity...” last time I walked up the dune to see.  <a href="https://earth.app.goo.gl/?apn=com.google.earth&amp;ibi=com.google.b612&amp;isi=293622097&amp;ius=googleearth&amp;link=https%3a%2f%2fearth.google.com%2fweb%2f%40-38.36192712,142.2702836,9.58702703a,375.4119574d,35y,-169.3014149h,60.00136614t,0r">https://earth.app.goo.gl/?apn=com.google.earth&amp;ibi=com.google.b612&amp;isi=293622097&amp;ius=googleearth&amp;link=https%3a%2f%2fearth.google.com%2fweb%2f%40-38.36192712,142.2702836,9.58702703a,375.4119574d,35y,-169.3014149h,60.00136614t,0r</a> compare with page ii(Killarney photo)</p>
6	Yes do enjoy the ‘wild feel’ and telling people about BCR.
8	Currently commercial horse training can access synthetic sand track locally.

## Submission template for Draft Belfast Coastal Reserve Management Plan

### About you:

Your name:

Your Organisation (if relevant): \_\_\_\_\_

Postcode: 3280

Email or Postal address:

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**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)*

Local resident and user of the park.

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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 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 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 **Un**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).*

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**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).*

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**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 Unsupportive

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).*

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### 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 Unsupportive

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).*

#### Horse Riding

When initially considering this management plan I was supportive of continued use of the foreshore by horses and having a management plan that was in principal closely aligned to present use.

As the Management Plan indicates, the basis of the plan should be evidence driven, and on review of available research my position has changed. This concerns, in particular, management of the reserve for critically endangered fauna (orange bellied parrot and hooded plover, both indicator species of health of the environment for other species)

The report Managing the Hooded Plover in Victoria (MHPV) by Maguire et al. is the principal source of data on success of management strategies for hooded plover breeding in Victoria. It catalogues a significant record of breeding outcomes under a range of conditions, including changes in outcome after implementation of different management strategies.

MHPV data shows that in the Belfast Coastal Reserve (BCR) the numbers of plovers is in decline and that the breeding success of those remaining is poor. The reserve contributes to the loss of plovers in Victoria in contrast to other reserves where management strategies have had some success in managing the decline.

The MHPV report recommends that the risks associated with use of horses on the BCR be mitigated with a management plan, with the intention that such a plan control the potential damage caused by existing use of the BCR by horse riders. The extension of horse access to the foreshore to include racehorse training is incompatible with the aim of mitigating risks posed by horses and is a distortion of the aim of the recommendation.

The BCR Draft Management Plan Risk Matrix (Table 5.1) identifies key threats and their risk before and after proposed management action. Only two threats remain Extreme after implementation of the plan; these are storm surge and horse use. Relatively little can be done in the short term to manage storm surge but limiting horse use can be done quickly and is likely to have an immediate effect on the chick survival of plovers and other shore nesting birds.

#### Horse Training

The BCR Draft Management Plan notes the importance of the racing industry to Warrnambool. This is true, and has been true for many years before racehorses were trained in the BCR. It is disingenuous to suggest that the success of the racing industry and therefore its contribution to the Warrnambool economy relies on training in the BCR.

**Historical Exemption for Horse Training**

One other area of concern is the allowing of horse training in conservation areas where this has occurred historically. I have tried to find evidence of the extent and timeframe of such training and have been unable to locate any. Knowing the history of this training is necessary before deciding on any exemption of restrictions, but particularly with in the conservation zone that is set aside from even recreational use!

A second area of risk concern is the walking of dogs in the BCR. The Draft Management Plan presents data from the Mornington Peninsular, stating

Monitoring results from BirdLife Australia for the Hooded Plover breeding seasons between 2013-15 found that dog use corresponded exactly with the locations where Hooded Plovers pairs experienced the poorest breeding success. This is despite volunteers erecting temporary fencing and signage alerting beach users when they were approaching a nest site.

In 2016 dogs were banned entirely from the Mornington Peninsular National Park, and

The subsequent season was the most successful Hooded Plover breeding period in at least 10 years...

While more data is needed before this can be assigned as a causal link, the correlation is striking.

It is worth noting that compliance with dog-walking regulations was poorest where dogs were allowed for part of the year, at specified times or on-leash only. Compliance was highest where dog walking was prohibited, which informed the change in regulations banning dogs in the park.

Observations taken at the BCR show that dogs are being walked outside of permitted times and off-leash and that at least some owners are aware that they are not complying with requirements. On Griffiths Island in Port Fairy, an area where dogs are clearly prohibited, there is a high level of compliance.

A more stringent restriction on dogs is a prudent option because of the risk that dogs present to shorebirds.

The highest non-compliance appears to be associated with dogs off-leash in leashed only areas, and removing the option of walking dogs on-leash in the conservation and recreation zones should provide a significantly higher level of protection to the species under threat.

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**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).*

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**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).*

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**GUNDITJ MIRRORING**  
Traditional Owners  
Aboriginal Corporation  
RNTBC

Submission to the  
Managing Belfast Coastal  
Reserve Draft  
Management Plan  
January 2018

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GMTOAC welcomes the proposal of the Crown for the Belfast Coast to be protected and managed for the cultural, spiritual, natural, social and recreational values which the land and sea along the coastal landscape has provided to our Gunditjmarra ancestors and our communities for millennium upon millennium.

On behalf of Gunditjmarra traditional owners, Gunditj Mirring Traditional Owners Aboriginal Corporation RNTBC (GMTOAC) is a Prescribed Body Corporate under the Native Title Act 1993 and a Registered Aboriginal Party under the Aboriginal Heritage Act 2006.

In respect of traditional Gunditjmarra country which extends from the Glenelg River to the Hopkins River and up to the Wannon River, Gunditjmarra people describe our ancestral country as Gunditjmarra country. Gunditjmarra country looks after 58 clan areas and our traditional language is Dhauwurd Wurrung. Dhauwurd Wurrung has 5 dialects.

GMTOAC has a current application before the Victorian Aboriginal Heritage Council to be recognised as a RAP for the area; and awaiting engagement with the Crown through the Threshold Statement by the traditional owners represented by Eastern Maar Aboriginal Corporation (EMAC) under the Traditional Owners Settlement Act 2010.

With mutual respect and obligation, GMTOAC and EMAC hold agreement with each other for the area from Yambuk up to Lake Linlithgow as shared country and to respond to native title, cultural heritage and the continuing connection of Gunditjmarra country. Our relationship of mutual respect and obligation continues to work with the Crown to protect and manage places like Moyjil - Point Ritchie.

Traditional owners have cultural rights and obligations to care for country and to maintain our continuing connection to country. Traditional owners are not stakeholders in our own ancestral country. The Crown and others have staked a claim to Gunditjmarra country and waters and are to be afforded the status of 'stakeholders'. The primacy of the living rights of Gunditjmarra country itself are to be recognised and respected along with the ownership of cultural rights and obligations of Gunditjmarra people.

GMTOAC expects that where appropriate, the connection to country as described in the Ngootyoong Gunditj Ngootyoong Mara South West Plan's Koonang Mirring section be applied to the understandings and management principles of the proposed Belfast Coast Reserve Management Plan.



**GUNDITJ MIRRORING**  
Traditional Owners  
Aboriginal Corporation  
RNTBC

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Through GMTOAC, Gunditjmarra traditional owners have continually expressed their disappointment at the damage that commercial horse training has caused to the Belfast Coast over the past few years. Our community is as equally distressed at the Crown for providing its tentative permission to allow commercial horse training to continue its destructive practice on such fragile koonang mirring where the coast and tidal zone provide habitat for the threatened and endangered life of the animals living there.

Gunditjmarra people are not blind to the Victorian Racing Industry and its encroachment onto public land for the commercial self-interest of the industry itself. As quoted by Racing Victoria, the industry is “.. an economic contributor, the Victorian thoroughbred racing industry:

- *Generates nearly \$2.1 billion in value for the Victorian economy*
- *Sustains the employment of more than 19,600 full time equivalent jobs for Victorians*
- *Provides \$1.1 billion per annum in household income*
- *Generates \$1.5 billion in spending – this incorporates both breeding and preparation of racehorses as well as on-and off-course customer expenditure. Nearly half of this spending occurs in regional parts of the state.*
- *Generates more than \$483 million in total customer expenditure (incorporating both on-course and non-raceday expenditure).*
- *It engages close to 72,000 people as an employee, volunteer or participant. Almost 63% of these participants reside in regional Victoria;*
- *There are more than 50,000 owners connected with thoroughbred racing, and almost 10,000 horses being trained by approximately 1,000 trainers;*
- *In Victoria there are more than 1,700 breeders; and*
- *There are more than 1600 racing club volunteers across the state and close to 500 community organisations are financially supported by thoroughbred racing.”*

Given that the industry has declared its own worth at \$2.1b, the industry itself must invest in commercial horse training facilities away from the Belfast Coast where their practice does impact on the coast and other places where their practice would negatively impact on the social, cultural, spiritual and environmental values held by



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Traditional Owners  
Aboriginal Corporation  
RNTBC

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traditional owner groups and the broader community. Given the recent investment by the Crown of \$600,000 to the commercial horseracing industry ...

The current position of the Crown with tentatively permitting commercial activities on public land sets an outrageous and dangerous precedent. If the current political party who acts on behalf of the Crown consolidates and confirms its permission to allow commercial activity on public land then by automatic default, other political parties will trample over the protections currently afforded to the cultural, social and spiritual enjoyment of public land by people including National Parks, protected waterways and marine parks.

The practice of commercial horse training is not a traditional livelihood associated with the Belfast Coast. The expedient use of the Belfast Coast by commercial horse trainers in recent years has negatively impacted on the health and wellbeing of the Koonang Gunditj and all its beings primarily Moon.bul and Too.wul.

Moon.bul and Too.wul are the physical and tangible revelation and lasting presence of our continuing connection to Gunditjmarra country.

**Cultural Heritage Management and Protection.**

The recent attempts of cultural heritage management and protection by the commercial horse racing industry are viewed by Gunditjmarra traditional owners as conceited at best. The attempt diminishes purpose and integrity of the Aboriginal Heritage Act 2006 and by extension, the Traditional Owners Settlement Act 2010.

Gunditjmarra people, through GMTOAC and EMAC, have not been appropriately resourced to survey entire area of the proposed Belfast Coast Reserve area through our respective cultural heritage management and protection practices under the Aboriginal Heritage Act 2006.

The management recommendations of the recently completed Cultural Heritage Management Plan sponsored by the Warrnambool Racing Club are not applicable to the entirety of the proposed Belfast Coast Reserve area. GMTOAC did not want this document to proceed before the proposed Belfast Coast Reserve Management Plan was completed and the Racing Club was very aware of this.

Again, the conceit to which the government and industry have held a very dark shade over the inherent and expected 'good faith' in dealings between the Crown and Traditional Owners is frightening clear as the draft plan has not defined 'commercial horse training' as a practice that damages and destroys the values held



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Traditional Owners  
Aboriginal Corporation  
RNTBC

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along Koonang Gunditj. If the current practices continue, the same people and agencies responsible for the management and protection of the cultural heritage sites, places and stories will be the same people and agencies who allow the damage to continue.

The vision for a reserve must not include commercial activities. Aboriginal and historic places and features must be protected from damage with works being planned, designed and conducted to minimise any potential impact.

If further information is required, please contact Gunditj Mirring  
Traditional Owners Aboriginal Corporation RNTBC. [www.gunditjmirring.com](http://www.gunditjmirring.com)



Australian Government

Department of the Environment and Energy

Manager, Park Management Planning  
Parks Victoria  
parkplan@parks.vic.gov.au

Dear

I am writing to congratulate you and your organisation on the community consultation process underway for the Belfast Coastal Reserve Draft Management Plan, and the ongoing conservation efforts for threatened species across the Parks Victoria estate.

is to raise awareness and support for threatened species conservation and this public consultation process is an excellent example of involving and engaging community in decision making about the environment.

Australia's first *Threatened Species Strategy* was launched in July 2015. It is part of the Australian Government's new approach to addressing the growing number of native plants and animals facing the threat of extinction. The Strategy sets ambitious targets to recover threatened species, and includes the hooded plover as a species targeted for improved trajectory by 2020. The hooded plover is also identified in the Belfast Coastal Reserve Draft Management Plan as a species that will benefit from improved management of dogs and horses.

I look forward to hearing more about the outcomes of this process and promoting environmental outcomes associated with the Management Plan. In particular, I would be delighted to celebrate with you any increased protections you employ to effectively manage the threatened hooded plover across the reserve, and the exclusion of threats such as horses and dogs from the proposed Conservation Zone.

I would also like to recognise the efforts of Parks Victoria to protect threatened species across Parks Victoria estate, including the decision to exclude dogs from Mornington Peninsula National Park. I look forward to establishing a strong working relationship with Parks Victoria and the Department of Environment, Land, Water and Planning, so together we can improve the trajectories of some of Australia's threatened plants and animals.

Yours sincerely

16 March 2018



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

**WWF-Australia**  
Suites 14-15/Baileys Cnr  
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enquiries@wwf.org.au  
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wwf.org.au  
ABN 57 001 594 074

Sent by email: [parkplan@parks.vic.gov.au](mailto:parkplan@parks.vic.gov.au)

16 March 2018

Dear Sir/Madam,

**Submission to the draft Belfast Coastal Reserve Management Plan**

1. Thank you for the opportunity to make a submission on the draft Belfast Coastal Reserve Management Plan ('the draft Management Plan').
2. WWF-Australia is part of the WWF International Network, the world's largest independent conservation organisation. WWF's global mission is to '*stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature*'. WWF-Australia has approximately 750,000 financial and non-financial supporters.
3. WWF-Australia supports the submission made by BirdLife Australia on the draft Management Plan, and this submission should be read alongside that of BirdLife Australia's.

**Key issues**

4. WWF-Australia notes that the Belfast Coastal Reserve has local, statewide, national and international significance to several species and groups of birds.
5. WWF-Australia supports actions taken to mitigate threats and to improve the protection of species and their habitat within the Reserve.
6. WWF-Australia strongly supports 43% of the onshore area being protected in a Conservation Zone. This encompasses the area used by:
  - the Orange-bellied Parrot (Rutledges Cutting has been identified as one of five priority sites in Victoria for the species, Adams and Purnell 2016);
  - the bulk of Hooded Plover breeding sites (28 of 44 breeding sites in total within the Reserve);

- the largest known winter flocking site for Hooded Plovers with flocks varying across the winter months from 20-61 birds (adults and juveniles);
- 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).

7. The plan states (page 10), “the conservation zone covers the areas where the highest cultural and environmental values are found. The intention of this zone is to ensure a very strong management emphasis on protection of the environment and identified values. Recreation and nature-based tourism are permitted when managed in a way that is sensitive to the identified values.” WWF-Australia supports this statement.

8. WWF-Australia strongly supports the proposed Conservation Zone being free of high impact threats including hunting, off-road vehicles, dogs, horses, camping, and dune boarding.

9. Further, WWF-Australia strongly supports:

- Cultural Heritage protection;
- Joint management;
- Education and interpretation;
- Monitoring and research;
- Rationalisation and closure of inappropriate beach access;
- Dog control;
- A permit system for recreational horse riding (in areas where this is sustainable);
- Pest animal and weed control.

10. WWF-Australia does not support commercial racehorse training within the Reserve, including permitting this activity within the conservation zone.

11. Under the draft management plan, the length of beaches available to racehorse training would 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 or to review compliance and impacts of the commercial horse training on the Reserve's natural and visitor values. The draft plan is permitting racehorses in to 750 metres of fragile dunes at Levy's Beach where in the past they have caused severe dune erosion. The plan permits racehorse training within the Conservation Zone at Rutledge's Cutting. This is incongruent with the recommendations of the conservation zone.

12. WWF-Australia notes that throughout the draft plan, damage caused by racehorses is referred to but the plan fails to address how increasing the area available to them will mitigate these impacts. Worse still, the plan's risk assessment (page 29) reveals that the current proposed management plan won't reduce the threat of this commercial activity. Prior to management plan implementation, the risk to coastal dune vegetation, cultural heritage, resident and migratory shorebirds from racehorse training is rated *extreme*. After the management plan is put in place, the rating remains *extreme*. In other words, no effort has been made to address the threat commercial racehorse training poses to multiple values of the Reserve, including visitor safety, and instead, it has been expanded within the Reserve.

13. Since access was granted to commercial racehorse trainers in 2016, there have been numerous breaches of licensing conditions, high risks to public safety and the channeling of limited resources and state government staff in to surveillance and infrastructure. This has stretched local Parks Victoria and DELWP beyond capacity and taken already limited support and resources away from environment and visitor services. Expanding the number of training beaches will make conditions even harder to monitor and be costly to the local economy and values of the Reserve.

14. In closing, WWF-Australia submits that it is critical to implement appropriate zoning and restrictions of recreational activities to achieve a balance within the Belfast Coastal Reserve, and to invest in mitigation of predator and weed impacts, monitoring and research, and community education. These are fundamental to the future preservation and resilience of the significant species and values that exist within this Reserve.

15. If you have any questions about this submission, please contact

on or [@wwf.org.au](mailto:wwf.org.au).

Yours faithfully,

## Response to the Draft Belfast Coastal Reserve Management Plan.

*Respondant:*

Thank you for the opportunity to meet, discuss and submit a response to the above mentioned plan.

I use the Killarney Beach 5 days out of 7 to take in the wonder of the natural world which helps me keep a perspective on life in this very diverse and controversial world we are confronted by daily. I swim at the beach most days and walk the beach area. I use the car park and have at times used the public amenities

I do not use the whole coastal reserve but support the provision noted in the Crown Land (Reserves) Act 1978.

### The Act

The majority of public land in the area was set aside in 1983-84 under the *Crown Land (Reserves) Act 1978* for protection of the coastline, to be managed for conservation, education and compatible recreation.

- Under **The Act** it is clear there is no place for commercial use regardless of the industry.

### Responsibility

- Everyone who uses the area.
- The Current Managers and their delegations

The Reserve is managed by several land managers under delegation of the Minister for Energy, Environment and Climate Change, through agreement with the Department of Environment, Land, Water and Planning (DELWP). The planning area covers a total area of approximately 2,260 hectares. Parks Victoria is the delegated land manager of an area totalling almost 1,660 hectares within the Reserve. Moyne Shire Council is the delegated land manager of approximately 23 hectares which includes Killarney Beach. Warrnambool City Council is the delegated land manager of the eastern section of the Reserve including parts of Levys Point Coastal Reserve, totalling approximately 176 hectares. The remaining area of the Levys Point Coastal Reserve is outside the planning area and covered by Warrnambool City Council's Warrnambool Coastal Management Plan 2013. DELWP manages nearly 400 hectares of public land within the extent of the planning area.

1. Cultural Landscape and living heritage.

Respect and ongoing support of the traditional owners and acknowledgement of the uninterrupted presence of emigrants to the district, since first settlement, should go hand in hand with the preservation of the cultural landscape and living heritage. Use of the coast for education on natural history, human history and education incorporating compatible recreation is also supported with areas that I believe should be omitted outlined under Recreation and Use.

2. Healthy Country

I support all efforts to keep the country healthy.

Weeds, pests, pets and human lack of respect are all threats to the landscape, ecology and ongoing wellbeing for land and people.

Enforcement of the uses of the coast as outlined in The Act will be required.

3. Recreation and Use

Table 6.1: Summary of activities Page 54.

**Horse Riding: Commercial training** is not acceptable under The Act as it contravenes all of the criteria - *for conservation, education and compatible recreation*.

Commercial horse racing is a trillion dollar international industry with a dubious reputation including proven corruption. There is conflict of interest with local and state politicians, local, national and international commercial business. Public declarations of conflict of interest, by powerful people, has been open which does not make the conflict go away and simply confirms the fact that "The Connections", to use a racing parlance, are not looking to support The Act but would have their commercial interests override The Act.

Commercial industry Horse Racing should have its own facilities that are specific for the industry with OH&S, regulations, guidelines and facilities that support the health and wellbeing of the horses and workers. These should be purpose built facilities as any mature industry would have.

Horse Racing is the only industry I am aware of that requires a MICA with staff, at their events, due to the lack of control of horses, on several occasions, resulting in the death of jockeys and riders as well as horses. In some instances when the horse has leapt over the barriers, members of the public have also been seriously injured. I am not aware of public deaths but there may be cases I am not aware of. Horses are not able to be controlled when given to fright and can become out of control putting everyone in danger.

There are a couple of local people who have had interests in race horses and training on a small scale for many years and have used the beaches for their horses. These unfortunate few bear the brunt of the large commercial industry invading the public lands and not being responsible for their industry by providing the infrastructure needed for their industry. My heart goes out to the small individual owner/ trainer and their loss of rights and their traditional use of the beaches. However, it is not possible to distinguish between the small and big trainers when it comes to commercial horse racing not being compatible with The Act.

All licences for commercial horse racing/training, under the current system, should be put on notice the licences will cease as from the 14<sup>th</sup> June 2018.

### Horse Riding Recreation

Green spaces and NON swimming beaches, **ONLY**.

As noted above Horses and the public together do not mix safely.

The ownership of pets requires a responsibility to be able to manage the pets wellbeing at all times. The escalation of horse ownership in recent times has found mature horses living in small paddock areas that are unable to support appropriate exercise, fresh feed or riding space. The pet owners expect the community will support their pet by providing free access to the public spaces.

Horse Registration should be in place with regulations requiring pre purchase conditions related to the area needed and the ability to keep a horse. The RSPCA may be able to handle such a registration and compliance system.

However, in the interim, it is reasonable that green spaces be available for horse exercise. The use of the Rail Trails, the Shire/s and council/s green spaces would be considered along with any consideration of the use of the delicate coastal areas. NO swimming beach area, such as Killarney Beach, should be used by any horses as a matter of safety. ONLY beaches known to be hazardous for people should be considered for controlled recreational horse use. Facilities for vehicles and floats to be limited to the number of horses allowed at any time. E.g. 4 car and float park spaces.

### Horse Riding Commercial Tours

Green spaces and NON swimming beaches, **ONLY**.

Horse Riding Commercial Tours have many benefits for the horse loving public.

People would not have to own their own horses to have the enjoyment of horse riding. The cost to the people for the commercial tours would be a saving on keeping their own horse. The horses would be more likely to have their care and living circumstances scrutinised as a commercial business. The Commercial Tours would be by reputable companies with an invested interest in keeping the green spaces and non swimming coastal areas in pristine condition. The Commercial Tour operators would take responsibility of the behaviour of the riders, the care of the landscape and the removal of all faeces/excrement.

The licenses could be variable to enable more services for school holidays to teach children how to care for animals and the landscape. The education to be coordinated with indigenous and land care groups to be incorporated in the conditions of the license to operate Commercial Horse Riding on public lands.

Monitored and Controlled there would be serious remedies and repercussions including loss of license if all conditions, rules and guidelines are not followed.

### Pet Dogs.

It has been without doubt that, although not all, pet owners do not pick up faeces/excrement, do not work within the guidelines of on leash and off leash and do not prevent their pets from harassing the wildlife and the people on the beaches. I have watched pet dogs off leash in and out of the designated area for the plovers.

The dogs running in the dunes and digging is unacceptable.

2. Recreation and Use

Pet Dogs contd..

All of the above have been witnessed by me and I have been subject to the harassment by the pet dogs and the disdain of my reaction wanting safety for myself, by the pet owners, over the last 2 years in particular.

I have photographs of the dog and horse faeces/excrement, the dogs off leash in the day. I attest to my personal experience of having 2 & 3 dogs racing towards me when I am walking in the shallows which has been stressful and scary. These are my daily experiences as a person who is at the beach 5 days out of 7.

Pet dogs should be managed on green spaces with time frames that do not put them in conflict with the pet horse owners and the people who use the rail trail. Time frames for use could include separate and overlapping time for use.

Green spaces are many in the district and as noted in the report many roads lead to the beaches. The pet dogs and owners would be able to use the roads and green spaces such as the green space adjacent to the Killarney Caravan Park to exercise their pets then tie/contain the pet whilst the people go and enjoy the beach. All faeces/excrement to be managed by the pet owners at the time.

Dog Walking on Leash

The pet owners do not abide by this rule of being on leash. The few I have noted who do, still walk the dogs into the soft sand and around the plover barriers, seeming oblivious to the smell and effect of the pet dog on the fauna and flora.

Dog Walking off Leash

**This should not be allowed on any beach at any time.**

Green Spaces such as the Rail Trail, Shire & Council green spaces should include designated areas for dogs off leash.

Some pet dog owners, as with some pet horse owners, have the animals without the amenity or ability to look after them.

Pet dog owners bring their pets to exercise and defecate in the public spaces. On green land this is able to be picked up or is mowed into the earth or rots into the earth. On the sand it sits there for people to encounter, is washed out to the bay for people to swim with. The beach is the wrong ecological area for management of excrement. Green spaces is the only option.

Vehicle access

Unfortunately this is not policed and will not be able to be policed with the resources available.

Currently anything goes as you cannot control the situation.

Personally, I think people should park the vehicle and walk around.

Access for small time boating as is in the report.

3. Managing in partnership.

It is imperative that there is a combined committee with all The Current Managers and their delegations, the traditional owners and the community representation that has no conflict of interest with the use of the coast. This is imperative so the “right hand knows what the left hand is doing” and there is seamless and cohesive management, support, collaboration with the community and communication that is transparent, timely and inclusive.

4. Research and monitoring.

Independent research and monitoring devoid of any conflict of interest should be ongoing forever to ensure we are prepared for the evolution from local to significant international tourism. The commercial imperative should understand the natural setting is the priceless resource and must be maintained.

Tourism in many countries is now synonymous with invasion and destruction of the very things that made the places enticing for visitors.

**General Comments.**

Page after page in the report notes the special qualities of this very special district. The push for space and use by people and their pets must be controlled so the very human experience of being in direct contact with nature where we can see and feel ourselves as so transient in the vast magnificence of nature is important for a balanced human view of the world.

- Duck Hunting and all hunting should be confined to Tower Hill Reserve.

Tower Hill Reserve can be monitored as everyone going in and coming out can potentially be vetted for the equipment (type of fire arm) coming in and the number of birds per person going out. The visitors can be controlled so there is a mitigation of anyone being shot by accident. Other Wet lands can then be breeding grounds to enable the ongoing viability of the cull.

- Children and Families.

These people are not even mentioned in the report as far as I could see.

Please excuse me if I missed it.

The Killarney Beach is one of only two beaches in the immediate district that are safe for children to learn to swim. The other being the “Pea Soup” at the South Beach in Port Fairy.

Families from all around the area come to Killarney Beach because it is a safe beach for children.

More should be done to create and promote a summer Learn to Swim in the Beach programme for the district families, maintain the access to the beach, car park and amenity to ensure the people are looked after. Families can be encouraged to also support the local cricket competition at Killarney Park and in the winter the local football.

**Killarney Beach should not be used by dogs or horses but should be reserved for people.**

Green space adjacent to the Killarney Beach football oval for use by pet dogs.

**The Map**

Zoning is fundamentally flawed. Too restrictive and will not enable people and people with pets to comply.



Horse feces

Dog feces



Sorry, don't know how to rotate..

Horse feces right side of frame in walkway to the Killarney beach.

Dog feces right side of frame.



Dogs off leash during the day for photo shoot.



**Prohibition of Windsurfing Kitesurfing and Surfing on the Belfast Lough and Rutledge's Cutting (saltwater swamp).**

He uses the Belfast Lough and Rutledge's Cutting on a small number of occasions per year. He will use them if the waves in the Ocean are too big or too choppy or if there is an offshore wind that is too dangerous to go into the Ocean. Both the Lough and Cutting are only waist deep so this adds to his safety.

I notice that Parks Vic motto is "**healthy parks healthy people**". It certainly gives me great peace of mind to know that he has two safe venues to windsurf. The physical exercise of Windsurfing is great for his flexibility and mobility. It also improves **his** mental health and wellbeing as he returns home in a content state of mind. I feel assured that all is well when he uses the Lough or Cutting. Surely this fits Parks Vic motto???

I notice that Boating, Jetsking and Yachting are allowed on these places but Windsurfing/Kitesurfing is not. How does that make any sense??

Windsurfing and Kitesurfing on the Belfast Lough and Rutledge's Cutting are very passive activities with no environmental effect. The Lough and the Cutting are not used frequently and then only by a small number of enthusiasts.

Windsurfers and Kitesurfers do not clash with other user groups on the Lough or Cutting, as they are usually the only water user group on the Lough or cutting. They also keep these areas clean as they collect rubbish and care for the surrounds. Surely, Parks Vic should embrace this major positive effect.

I hope that Parks Vic will amend the draft plan to allow windsurfing and Kitesurfing on the Belfast Lough and Rutledge's Cutting. Both groups do not have a negative effect on the environment.

Name

Date 16/3/18

Email

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 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.

It has long been proven that a lot of horses thrive in this environment and it actually aids some horses in there rehabilitation from injury , or horses who just prefer this method of training over the boring grind of City training . Since seeing the positive result of seeing my first horse trained in the sand Dunes and up the beach ,

It will have a detrimental outcome on the industry as a whole and on me personally . my horses will have to be retired earlier than they should have been meaning there racing lifespan is reduced or non-existent at all. Less returns

to us owners , means less to reinvest in new horses , ultimately harming the livelihoods of the local Warrnambool trainers.

It would have a huge impact on the whole racing industry in Warrnambool specifically , as that is there point of difference as trainers and the reason we send horses there to be trained.

Without the Sand Dunes or beaches I may as well just send my horses to Melbourne City Trainers

I don't know how many staff are employed by these trainers , however they would lose their jobs as owners moved there horses away from the Warrnambool Trainers to be trained elsewhere , harming the local economy and the morale of the Township.

I would imagine any bans on being able to Train Horses on Levy's Beach and the dunes would have a massive impact in the success of Warrnambool Trainers which I am fully supportive of as an owner and racing enthusiast and really hope it does not come to this .

Regards,

To whom it may concern,

I am writing this letter in response to the Belfast Reserve Draft Management Plan.

Following a discussion with one of your staff members at Killarney beach on Saturday 27<sup>th</sup> January 2018, I have a few points I would like to comment on.

### **Access to the Reserve**

Public access to the Reserve has always been the root of all issues trying to be addressed by the plan. The public drive off formed tracks, destroy native vegetation, deliberately cut fences, destroy private property, and illegally dump rubbish (including high risk items such as asbestos, which are then expensive to have removed). These are issues that are always going to be difficult to curb or deter people from doing, unless access to the reserve is restricted from the public. I propose that the reserve be locked at the Knackery, with access only allowed to local landholders and rail trail pedestrians.

For many years now, careless and malice users have destroyed fences through their rough driving and attempts to bypass existing reserve gates, often resulting in stock being released into the reserve. If a gate is installed at the northern end of Spooky's Track (named Jack's Track since the 1950s), then this will simply create an additional "challenge" for 4WD users who will simply cut another landholder's fence. This action will not resolve issues, but instead create additional ones.

I understand that the department still wants to leave an area of the reserve accessible, and I believe that ample beach access is provided from Levy's Beach for fisherman and walkers, and the also for low impact rail trail users. The alternative to this would be to set a curfew for public access; however this would be very difficult to police, as 4WD users often access the reserve under the cover of darkness, when they do their most damage. If this was considered, I would suggest installing a 24hr surveillance camera at the knackery to track traffic entering and leaving the reserve, so hopefully catch illegal rubbish dumpers.

I believe that the reserve should be locked from public vehicle access, with gated access given to local landholders who need to access their properties. If the department wishes to maintain public access, then landholders will be forced to hold the department responsible for covering the costs of rectifying the continuous vandalism to private fences and property.

### **Horse Riding**

It was mentioned that horse riding would be banned within the reserve, accept for those existing users who use it for business purposes. These people have been offered a grandfather clause.

So what about landholders who have always used ridden horses in the reserve responsibly for the past 70+ years? Why is it that we are now being told that our infrequent, low impact activity is no longer allowed, while frequent commercial users are allowed to continue their access?

With 4WD users cutting fences to get around department installed gates, in turn releasing cattle into the reserve, sometimes landholders accessing the reserve on horseback is required in order to bring cattle back into the property. With inaccessible tea tree growth, access by horseback is the most low impact way of rounding up cattle that have been carelessly released by members of the public.

I believe that adjoining landholders should be offered the same grandfather clause as existing horse riding users. Will the clause to cease if at any point the property is sold outside of the family.

If adjoining landholders are not being offered the same grandfather clause as those commercial horse riding users, then all horse access should be removed. It is hypercritical that users, who have established a business based on the utilisation of a reserve, be allowed to continue to operate while recreational riders be removed. If anything, they should be forced to find alternative private grounds to undertake their business actions.

### **Weed / Pest Management**

The land managers for the reserve have been historically careless in their weed management within the reserve. Weeds such as box thorn and cape weed, which landholders are actively trying to control, are running rampant in the reserve and reinvesting private property, costing landholders hundreds of dollars each year to control.

There is such a thing as the good neighbour policy, where one person's actions (or rather inactions) should not impact on their neighbours' property. This is not being used by the managers of the reserve.

In the same context, pest animals within the reserve are out of control. There are couples rabbit and foxes, which would be having a higher impact of nesting coastal birds than any horse access.

The Department needs to focus more on managing invasive species within the reserve, to minimise the impact they are having on private land.

### **Ministerial Approval**

It was mentioned that all feedback would be taken into consideration, the draft updated and distributed to the Minister for approval. This is unacceptable.

Further consultation is required in order to ensure that the plan is suitable to manage access and management of the reserve, without causing great impact to adjoining landholders. If anything, the aim of the plan should be to make things better for everyone.

For this reason, there should be another period of consultation before the final draft is distributed for approval.

I would like to request feedback on the points that I have raised, prior to ministerial approval being sought.

Kind regards,

## Submission template for Draft Belfast Coastal Reserve Management Plan

### About you:

Your name: \_\_\_\_\_ :

Your Organisation (if relevant): **Casual surfing and snorkelling**

Postcode: 3284

Email or Postal address: \_\_\_\_\_ )  
\_\_\_\_\_ )

**THIS SUBMISSION IS:**  **NOT CONFIDENTIAL** Date: 12/3/2018

### 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)*

---

Recreation and use: Surfing, swimming, snorkelling and walking

---

How often do you or your organisation use the reserve?

**Daily**

How do you or your organisation mainly use the reserve?

- |   |   |  |
|---|---|--|
| <input type="checkbox"/> Walking and Running                                    | <input type="checkbox"/> Dog walking    | <input type="checkbox"/> <b>Using the beach (swimming and surfing)</b> |
| <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 type="checkbox"/> Birdwatching   | <input type="checkbox"/> Socialising                                   |
| <input type="checkbox"/> Other (please specify): <b>Snorkelling and walking</b> |   |  |

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**

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

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

- Very unsupportive

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).*

### **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 unsupportive

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).*

### **Key management theme #2: Healthy Country**

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

Very unsupportive

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).*

### **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 unsupportive

**Addressed to: Page 59 Recreation and Use: Stated Goal. The Basin, Pelicans and Towilla Way beaches will support recreational activities which are managed to reduce their impact on natural and cultural values.**

#### **Access to Pelicans (Long Reef), Towilla Way and Gormans Lane**

I have been a surfer and enjoyed underwater activities of snorkelling and scuba.

Less frequently I enjoy walking from Golfies carpark to Killarney car park and return.

Also used is a small car park and walking track further along leading to Pelicans/Long Reef for access to snorkelling. It is important to keep this access open.

The car park at end of Basin Road is also used frequently as a staging point for snorkelling, with a walk of about 500 metres westward to a suitable diving spot.

**Addressed to page 57: Golfies will continue to be a key site for active recreation providing for a variety of uses including walking, horse and dog exercise, beach fishing and surfing.**

**Reposition of the carpark further inland ....separate parking for horse floats and general public.**

Golfies has been used for decades by anglers, surfers, swimmers, families, dog walkers, windsurfers and kite boarders. It is an important access to this "wilder" beach area. Many users carry heavy equipment such as fishing tackle, surfboards, windsurfing and kitesurfing gear and picnic gear. It is also a great spot for people to relax and is important for the mental health of the many user groups. Golfies car park's main attraction is its proximity to the ocean. Users have a parking place with direct viewing of the sea. Consequently, Golfies carpark should remain in its present location for recreational users.

The main wear and tear on this car park has occurred recently and has been caused by commercial horse trainers. If commercial horse riding is relocated to the proposed location at Levis Beach, horse floats will not use this carpark and it can remain in its present position as it has for decades.

**Golfies carpark should remain in its present location for recreational users.**

#### **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 unsupportive

*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).*

#### **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 unsupportive

*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).*

## 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?

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

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.

Ref: Submission relating to the Draft Management Plan for the Belfast Coastal Reserve 17/01/2018

16/03/2018

Parks Victoria

parkplan@parks.vic.gov.au

16/03/2018



Dear Sir/Madam,

As a concerned Victorian citizen, I would like to strongly disagree with the proposed Management plan to include the training of race horses within the Belfast Coastal Reserve, while restricted recreational horse riding. Listed below are my reasons.

1. The draft management plan describes in detail why horses and dogs are a danger to the unique shorebirds and natural landscape.
2. Natural tourism is documented as the fastest form of tourism.
3. Port Fairy Tourism brings in around \$300 Million each year;
4. After carrying out aerial photography of all of Victoria's coastline and parts of Australia, I know this is unique and needs to be protected for all to see and experience.
5. I have documented 16 Endangered Southern Right whales off The Cutting and Killarney. 12 in 2012, 2 in 2014 and 2 in 2017. All these sightings have been sent to DELWP via photographs.



6. There are international treaties that we are required to uphold to protect the feeding grounds of the migrating waders and this area with its offshore reefs and narrow beaches are unique.



7. The Hooded Plovers are endangered and to still have racehorse training through their area of occupation is ridiculous when horse training can be done off the beaches and on purpose built facilities. Note \$600,000 of tax payer's money has been provided to the Warrnambool racing club for these facilities.
8. The report justifies to horse training in the reserve due to the \$97 million it provides to the Warrnambool area. This figure is made up of gambling and covers Terang, Ararat, Hamilton and Warrnambool;
9. Even with the racing industry why the Belfast Coastal Reserve would be risked. The lost to the tourism in the area would be massive. This reserve is regularly used by walkers, bird watchers, photographers, beach goers, surfers, fisherman, dog walkers and recreational horse riders.



10. Presently only one trainer uses Eastern Beach at Golfies ensuring only his trucks are at the beach.
11. The danger to the public using the beach while horses are trained on these narrow beaches is ridiculous.
12. The area is subject rising sea levels and why would erosion via the horses being encouraged in such a situation. The Victorian Coastal Inundation Dataset identifies anticipated sea level rise (SLR) and storm surge extents (STM), to define inundation extents. This dataset presents eight spatial layers that depict the modelled extent of land likely to be subject to inundation due to projected SLR from 2009 to 2100. The base SLR for 2009 was a 0cm increase, for 2040 a rise of 20cm is anticipated, for 2070 a rise of 47cm, and for 2100 a projected rise of 82cm.

13. The Hooded Plover nests sites are only fenced upon discovery and why they nest if racehorses are constantly travelling and training through areas where they nest.
14. The Hooded Plovers chicks need to feed at the water's edge as they do not get feed by their parents.
15. Do not embarrass our state and country with lack of compassion for endangered species and the unique coastal habitat.
16. The Environment Minister claims that 95% of the reserve is being protected when around 90 % is swamp and dunes.



17. 30% of this unique beach has be marked for Commercial Race horse training and other uses like recreational horse riding is to be prohibited.

In summing up this is such a unique area and we need to treasure and protect them. As a normally proud Victoria the present plan goes against the current world awareness for our environment.

Should you have any queries regarding the above, please do not hesitate to contact us on

Yours sincerely

### Belfast Coast Management Plan: - Individual Submission / Survey

Name: .....

Signature .....

Email Address: .....

Post Code .....

Age Range : 54 .....

Gender : Female .....

Is this submission to be treated as Confidential : No .....

How often do you use the Reserve : Weekly sometimes daily .....

How do you Get to the Reserve: .. Walk, Drive, Ride a Bike, Ride a Horse

Drive .....

What do you mainly use the Reserve for: (For example: Bird watching, Swimming, surfing, kitesurfing, windsurfing, snorkelling, horse riding, dog walking, fishing, boating, camping, family time at the beach with or without a pet)

Dog walking, Swimming .....

How important is it to you to be able to continue these activities within the entire Reserve?

Very important .....

Which part of the Reserve do you use most frequently:

Killarney Beach 3 times .....

West of Killarney Beach to Port Fairy .....

East of Killarney Beach to The Cutting 2-3 times a week .....

West of The Cutting towards Warrnambool .....

What is your area of interest (For Example: Conservation, Recreational, Cultural, With Animals – Horses or Dogs)

Conservation, Recreational

Is there a specific change that you want made to the Draft Proposal.

No restrictions to access - Current access okay

How important is the Cultural Heritage of the Reserve to you? Very important but it needs to ~~coexist~~ coexist with community access

How important is protection of the Natural Environment and Bird life to you

Very important but as above

How important is the ability to enjoy recreation activities to you

Extremely important for well being + community

Is your Personal Health and Wellbeing associated with your use of the Reserve? If so in what way.

Yes - Physical + mental health is enhanced by being able to walk + view the environment

Do you believe that the current use of the reserve that allows for both Recreation and Conservation should continue?

Yes it is a good balance -

Do you believe that Recreational Activities should be allowed throughout the Whole Reserve, or do you believe that certain areas should be set aside for conservation only (Eg. No Dog and No Recreational Horse Areas).

No

If you believe dogs and horses should be banned – which areas should they be banned from:

No - current restrictions work well - Policy of rules should be increased

Do you wish to add any further comments:

Focus on eradication of feral pests + <sup>introduced</sup> plants

### Belfast Coast Management Plan: - Individual Submission / Survey

Name: .....

Signature .....

Email Address: .....

Post Code : .....

Age Range : 50-55

Gender : female

Is this submission to be treated as Confidential : NO

How often do you use the Reserve : 3-4 a week

How do you Get to the Reserve: .. Walk, Drive, Ride a Bike, Ride a Horse

Drive

What do you mainly use the Reserve for: (For example: Bird watching, Swimming, surfing, kitesurfing, windsurfing, snorkelling, horse riding, dog walking, fishing, boating, camping, family time at the beach with or without a pet)

Dog walking, fishing, camping, swimming

How important is it to you to be able to continue these activities within the entire Reserve?

Very hard to maintain physical and emotional/mental health.

Which part of the Reserve do you use most frequently:

- Killarney Beach 2-3 times a week
- West of Killarney Beach to Port Fairy 2-3 a time a week
- East of Killarney Beach to The Cutting 2-3 times a week
- West of The Cutting towards Warrnambool once a month

What is your area of interest (For Example: Conservation, Recreational, Cultural, With Animals – Horses or Dogs)

Exercise of self and pet Recreational  
e.g. fishing.

Is there a specific change that you want made to the Draft Proposal.

Change the proposed closure to access  
to ~~the~~ part of the beach

How important is the Cultural Heritage of the Reserve to you? Not.

How important is protection of the Natural Environment and Bird life to you

Somewhat.

How important is the ability to enjoy recreation activities to you

Very important

Is your Personal Health and Wellbeing associated with your use of the Reserve? If so in what way.

Yes: able to ensure the many  
beneficial effects of walking/exercise to self  
(and pet)

Do you believe that the current use of the reserve that allows for both Recreation and Conservation should continue?

Yes

Do you believe that Recreational Activities should be allowed throughout the Whole Reserve, or do you believe that certain areas should be set aside for conservation only (Eg. No Dog and No Recreational Horse Areas).

should be available through whole Reserve

If you believe dogs and horses should be banned – which areas should they be banned from:

No

Do you wish to add any further comments:

Increase program to eradicate feral port,  
especially foxes.

## Belfast Coast Management Plan: - Individual Submission / Survey

Name: \_\_\_\_\_

Signature \_\_\_\_\_

Email Address: \_\_\_\_\_

Post Code : \_\_\_\_\_

Age Range : 60-65 \_\_\_\_\_

Gender : Male \_\_\_\_\_

Is this submission to be treated as Confidential : no \_\_\_\_\_

How often do you use the Reserve : weekly \_\_\_\_\_

How do you Get to the Reserve: .. Walk, Drive, Ride a Bike, Ride a Horse

drive \_\_\_\_\_

What do you mainly use the Reserve for: (For example: Bird watching, Swimming, surfing, kitesurfing, windsurfing, snorkelling, horse riding, dog walking, fishing, boating, camping, family time at the beach with or without a pet)

swimming, walking, family and grandchildren time. Community social events. School events. \_\_\_\_\_

How important is it to you to be able to continue these activities within the entire Reserve?

Extremely important. It is an essential part of our lifestyle. \_\_\_\_\_

Which part of the Reserve do you use most frequently:

Killarney Beach : frequently \_\_\_\_\_

West of Killarney Beach to Port Fairy: occasional.

East of Killarney Beach to The Cutting: often. Frequently during whale watching season.

West of The Cutting towards Warrnambool: occasional

What is your area of interest (For Example: Conservation, Recreational, Cultural, With Animals – Horses or Dogs)

In priority: Highest Priority 1. Recreation ( Walking, Fishing, Swimming) 2. horse access Training and recreational riding. 3. Conservation, bird and whale watching. School /student activities.

Is there a specific change that you want made to the Draft Proposal.

That all areas have human access. There should not be areas that are out of bounds to humans or visitors and particularly the local population.

How important is the Cultural Heritage of the Reserve to you? It is important but a low priority. Recognising the significant cultural sites should not dictate the access conditions of the reserve. Cultural Heritage in my eyes includes the Mahogany Ship area. Still a lot of searching to be done.

How important is protection of the Natural Environment and Bird life to you

1. natural environment: It is coastal/ ever changing with the seasons. The weather elements, particularly the ocean ( beyond our control) are going to determine the evolving natural environment. Keep the rabbits under control as a high priority.

2. Bird life: important but not the most important factor.

How important is the ability to enjoy recreation activities to you

Very very important. We have a growing population in the area with increased numbers wanting to camp at the Killarney Recreation Reserve.

Walking and exercising is so important for the health of our community and national population, particularly with obesity a national health issue.

frequently use the reserve for recreation and I would be be extremely disappointed if they were denied access to any section of the reserve.

It is the closest beach to the growing population of Koroit. They also consider Killarney their beach and reserve.

Is your Personal Health and Wellbeing associated with your use of the Reserve? If so in what way.

1. My personal physical fitness by walking the beaches in the reserve has a most positive impact on my personal health and well being.

so having the ability to access safe swimming areas in the reserve during the summer months is vitally important to my / our well being.

Do you believe that the current use of the reserve that allows for both Recreation and Conservation should continue?

Yes most definitely. It is a matter of the government providing enough funding to staff the present/future management . If proper management levels and annual maintenance was appropriately financed then Recreation and Conservation can happen together, not against one another.

**Do you believe that Recreational Activities should be allowed throughout the Whole Reserve, or do you believe that certain areas should be set aside for conservation only (Eg. No Dog and No Recreational Horse Areas).**

I do not mind conservation areas that excludes certain animals but not humans. People should be able to access all conservation areas for their own passive recreation, eg, walking.

**If you believe dogs and horses should be banned – which areas should they be banned from:**

1.Dogs. Should only be banned from specific/high risk areas of conservation section. Otherwise should have access to all other areas, either on leash and or off leash areas and also within certain designated time periods.

2. Horses: Should be banned between Killarney beach car park and boat ramp. There are plenty of other stretches of beach/sand along the coastal reserve. Special parking and access sites need to be established to accommodate these needs. Horse training is not new on beaches, it is just that it has become bigger.

**Do you wish to add any further comments:**

You can have the greatest of plans but unless there is a long term commitment to finance the physical resources and staffing, needed for such a diverse natural resource/reserve then all is wasted. This reserve serves an ever increasing diverse local and visiting population who deserve to have access to all areas, to enjoy and witness its' many and varied assets and resources.

## Belfast Coast Management Plan: - Individual Submission / Survey

Name .....

Signature .....

Email Address: .....

Post Code : .....

Age Range : 30 to 40 .....

Gender : Female.....

Is this submission to be treated as Confidential : No.....

How often do you use the Reserve : 5 times a week.....

How do you Get to the Reserve: .. Walk, Drive, Ride a Bike, Ride a Horse

Drive.....

What do you mainly use the Reserve for: (For example: Bird watching, Swimming, surfing, kitesurfing, windsurfing, snorkelling, horse riding, dog walking, fishing, boating, camping, family time at the beach with or without a pet)

Dog walking, swimming, snorkelling, bird watching and exercising.....

How important is it to you to be able to continue these activities within the entire Reserve?

It is very important to both my physical and mental health. These activities are key elements of my life and I derive much enjoyment from responsibly using the reserve.....

Which part of the Reserve do you use most frequently:

Killarney Beach several times a week.....

West of Killarney Beach to Port Fairy several times a month.....

East of Killarney Beach to The Cutting several times a week.....

West of The Cutting towards Warrnambool several times a month.....

**What is your area of interest (For Example: Conservation, Recreational, Cultural, With Animals – Horses or Dogs)**

With animals and recreational

**Is there a specific change that you want made to the Draft Proposal.**

I would like no change to the access to the Reserve. The Reserve should not be closed or access limited.

**How important is the Cultural Heritage of the Reserve to you? Semi- important**

**How important is protection of the Natural Environment and Bird life to you**

I would like to see more work on pest plants and feral animals – I see no evidence of domesticated pets or horses negatively impacting birdlife.

**How important is the ability to enjoy recreation activities to you**

Extremely important

**Is your Personal Health and Wellbeing associated with your use of the Reserve? If so in what way.**

Regular exercise is to walk my dogs in the Reserve. Also recreational activities like swimming, snorkelling etc represent a major benefit of living on the coast.

**Do you believe that the current use of the reserve that allows for both Recreation and Conservation should continue?**

I strongly believe that the current use of the reserve should continue.

**Do you believe that Recreational Activities should be allowed throughout the Whole Reserve, or do you believe that certain areas should be set aside for conservation only (Eg. No Dog and No Recreational Horse Areas).**

I believe that recreational activities should be allowed throughout the whole reserve

**If you believe dogs and horses should be banned – which areas should they be banned from:**

No. Restrictions on Killarney beach work well in peak periods when the beach is very crowded with tourists

**Do you wish to add any further comments: Focus on the eradication of feral pests ie rabbits, foxes and cats.**

## Submission for Draft Belfast Coastal Reserve Management Plan

### About you:

Your name:

Your Organisation (if relevant):

Postcode: 3161

Email or Postal address:

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**THIS SUBMISSION IS:**  CONFIDENTIAL  NOT CONFIDENTIAL Date: 16/03/18

### 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)*

Conservation and environmental interest. Education interest. 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?

Walking or running  Dog walking  Using the beach (swimming and surfing)  
 Horse riding  Horse training  Volunteering  
 Camping  Hun. ng  Fishing/boaÃng  
 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

### **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).*

I largely support the Vision statement, with the exception of the inclusion of "horse riding." If the Vision seeks "to give reality to the concept of Healthy Parks – Healthy People at Belfast Coastal Reserve" (page 7 of the draft), allowing horse riding within the reserve is just contrary to this statement. Given the sensitivity of this coastal Reserve, its value to birds which are highly prone to disturbance and with highly camouflaged eggs and chicks, it would be more appropriate to avoid specifying horse riding in the vision for the Reserve's future. Many studies have demonstrated the connection between a healthy ecosystem and its huge benefits for human wellbeing. A healthy ecosystem means is sustainable, which means it has the ability to maintain its structure and function over time in the face of external stress (Costanza & Mageau 1999). Hence, allowing activities, like horse riding, that are a great threat for the wildlife inhabiting the reserve degrades both ecosystem and people's health.

### **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. The proposed Conservation Zone would benefit these cultural heritage sites.

I also strongly support the right for Traditional Owners to protect their cultural heritage and to be directly involved in guiding the management of this Reserve. Respecting the connection of Traditional Owners with their land and learning from them, should be key in any Australian management plan.

### **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 strongly support a Conservation Zone and believe it is required. The reserve is home to over 50 species listed as threatened and has been identified as a Key Biodiversity Area. Therefore, a Conservation Zone is a must in this Management Plan to be based on an Evidence-based approach. A conservation zone will reduce the impact of dogs and horses on Hooded Plover and migratory shorebird sites. **I strongly oppose a conservation zone that allows commercial racehorse training. Hooded Plover is one of the top 20 bird species that the Australian Government has committed to improve the trajectory of by 2020** (see <http://www.environment.gov.au/biodiversity/threatened/species/20-birds-by-2020>). Allowing commercial racehorse training is totally incompatible with this goal. Furthermore, **migratory shorebirds are one of the most endangered group of birds** because of the many threats they face along their migration pathways, which cover thousands of km, from the Arctic circle to the Southern Hemisphere for some species. If this is not enough, **Belfast Coastal Reserve is home to the Critically Endangered Orange-bellied Parrot, with less than 50 individuals left in the wild!** See <http://www.iucnredlist.org/details/22685203/0> I really think Australia should be an international example of best practise measures for wildlife conservation and allowing commercial racehorse training in such critical habitat for endangered native birds is definitely not a good practise at all.

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”.

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.

This chapter, however, 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.

### **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 many of the goals and strategies that relate to the recreational use of the Belfast Coastal Reserve: 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.**

The CONSERVATION ZONE is one of the most critical areas of habitat for a number of highly threatened and nationally significant species (as discussed above, in the Key management theme #2). **Conservation advice from the Australian Government supports the removal of high impact threats, namely dogs and horses, from critical habitat,** therefore, the plan should manage such threats in accordance.

### **Licensed Horse Training**

- I do not support access for commercial 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. This does not make sense and again it's totally contradictory to the vision and goals of the plan! I'll develop my point: 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.
- I do not support and strongly condemn permits for horse training at Golfies, Rutledgs Cutting or Hoon Hill/Levys beach.
- 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".

### **Dog Walking**

- 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. In the other most important area for breeding Hooded Plovers in Victoria, the Mornington Peninsula NP, a dog ban has been established for the last two years and the productivity of the species has greatly increased (13 chicks fledged on season 2016/2017 compared to only 11 chicks over the previous 3 seasons!). Again, this should be incorporated as an evidence-based practise for the management of Belfast Coastal Reserve.
- 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.

#### 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. 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 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. Furthermore, the key of any successful management is a good monitoring, hence a 5 and 10 year reviews are not an appropriate time frame.

#### 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. That table proves that it cannot and so commercial racehorse training should be removed from the reserve.**

#### References

Costanza R, Mageau M (1999) What is a healthy ecosystem? Aquatic ecology 33:105-115

2018



# Belfast Coastal Reserve

PERSONAL SUBMISSION

My submission for the Belfast Coastal Reserve is set out below.

I over all found the Draft Belfast Coastal Reserve Management Plan to be fair, well thought out and constructive – BUT, then it seems that it had been handed to the racing minister who added sections that were contradictory, inconsistent and conflicting with the main body of the draft and some parts just plain “Daft”. So what we ended up with was the Daft Draft BCR Management Plan.

I endorse the BCR Management Plan but with the removal of all the references of allowing Commercial Racehorse training in the reserve as this is morally wrong, ethically wrong and in fact illegal under the *Flora and Fauna Guarantee Act 1988*, *Environment Protection and Biodiversity Conservation Act 1999*, *Crown Land (Reserve) Act 1978* and the *Wildlife Act 1975*, as well as contravening *Australia’s Threatened Species Strategy* that was launched by Minister for the Environment Greg Hunt MP on the 16 July 2015 at the Threatened Species Summit in Melbourne; of which 2 of the threatened species on that list are the local Orange Bellied Parrot and the Hooded Plover.

Before any consideration for any Commercial Racehorse training to be considered (and it seems that the horse has bolted on this before the stable door was shut) there should be an independent environmental study on the impact of horses hoof on the Intertidal benthic invertebrates, macromolluscs and macrocrustaceans that are part of the food chain of all shorebirds?

Clinically test have been carried out (Witte et al., 2004) on nine sound Thoroughbred racehorses of mean age 2.9 years (range 2–5 years), mean mass 476 kg (range 460–500 kg) and mean height 1.62 m (range 1.59–1.67 m) were used in the study. The animals were stabled at a single yard, were all undergoing the same regime of race training and were close to race fitness. Prior to kinematic assessment the height of each horse was measured at the fourth thoracic vertebra using a standard height stick and the mass measured using standard equine scales. The mass of the jockey and riding equipment was 63.5 kg.

Each horse was equipped with four foot-mounted accelerometers and the jockey with a stand-alone GPS data logger. A  $\pm 50$  g accelerometer (ADXL150, Analog Devices, USA) was mounted on the dorsal midline of each hoof, ensuring that the sensitive axis of the sensor was orientated axially (Witte et al., 2004).

Measurements were made on nine elite Thoroughbred racehorses during gallop locomotion over a range of speeds from 9 to 17 m s<sup>-1</sup>. No statistically significant differences were seen in any variables between

the lead and non-lead limbs for either the fore or hind pairs of limbs. Peak limb forces (from duty factor) at 17 ms<sup>-1</sup> were 24.7 N kg<sup>-1</sup> body weight (range 22.6 to 26.0 N kg<sup>-1</sup> body weight) for the forelimbs and 15.3 N kg<sup>-1</sup> (range 13.7–16.2 N kg<sup>-1</sup> body weight) for the hindlimbs.

The massive amount of weight from these horses are killing and obliterating all of the intertidal invertebrates, arthropods and crustaceans in the top 100mm of sand with every vertical limb impact force from horses at any gait above a walk - the shorebirds feed in the top 10mm of the sand; the result of this is that the Racehorses are killing and thus reducing the feed with every hoof print of the critical habitat of taxa or community of fauna which has been nominated for listing on Crown land – namely The Belfast Coastal Reserve.



Sanderling feeding holes on the Left verses horse hoof prints killing everything they stand on.

Biodiversity — the variety of plants, animals, micro-organisms and ecosystems that constitute our living environment — is not static; it is constantly changing. It can be increased by genetic change and evolutionary processes, and it can be reduced by threats which lead to population decline and extinction; and commercial racehorse training in the BCR are a threat which can easily be eradicated.

The Daft Draft has noted (P43) that the Habitat degradation by horse training on the Hooded Plovers and Migratory Shorebirds are “Risk currently” is “Extreme”, “Risk following management action” is “Extreme” and “Risk following management action (Conservation Zone)” is also “Extreme”! All these “Risk’s” contravene the four aforementioned acts, namely:-

## **Habitat Critical to Survival**

The *Environment Protection and Biodiversity Conservation Act 1999* requires that habitat critical to the survival of the listed threatened species is identified in the Recovery Plan. In addition, the Australian Government Minister for the Environment and Heritage may identify and list critical habitat to the survival of a listed threatened species or ecological community. Details of this identified habitat have been recorded in the Register of Critical Habitat.

The *Environment Protection and Biodiversity Conservation Act 1999* is the primary Commonwealth legislation for environment protection. Under the EPBC Act, an action will require approval from the Australian Government Minister for the Environment and Heritage if the action has, will have, or is likely to have a significant impact on a matter of national environmental significance. Nationally listed threatened species and ecological communities are matters of national environmental significance.

## ***Flora and Fauna Guarantee Act 1988* - (Ver - 1 May 2017)**

### **4 Objectives**

- (1) The flora and fauna conservation and management objectives are—
  - (a) to guarantee that all taxa of Victoria's flora and fauna other than the taxa listed in the Excluded List can survive, flourish and retain their potential for evolutionary development in the wild; and
  - (b) to conserve Victoria's communities of flora and fauna; and
  - (c) to manage potentially threatening processes; and
  - (d) to ensure that any use of flora or fauna by humans is sustainable; and
  - (e) to ensure that the genetic diversity of flora and fauna is maintained

## ***Wildlife Act 1975***

### **1A Purposes**

The purposes of this Act are—

- (a) to establish procedures in order to promote—
  - (i) the protection and conservation of wildlife; and
  - (ii) the prevention of taxa of wildlife from becoming extinct; and
  - (iii) the sustainable use of and access to wildlife; and
- (b) to prohibit and regulate the conduct of persons engaged in activities concerning or related to wildlife.

## ***Australia's Threatened Species Strategy***

Australia is a country rich in unique plants and animals. They are core to our identity, culturally significant to Indigenous peoples, important to the health of

our environment and a strong contributor to our economy. Our distinctive plants and animals are a gift and ours to protect. There are 20 priority birds on the Australia's Threatened Species Strategy list to have improved population trajectories by 2020; 2 of those 20 are the Hooded Plover and the Orange Bellied Parrot. You don't "improved population trajectories" by introducing Commercial racehorse training!

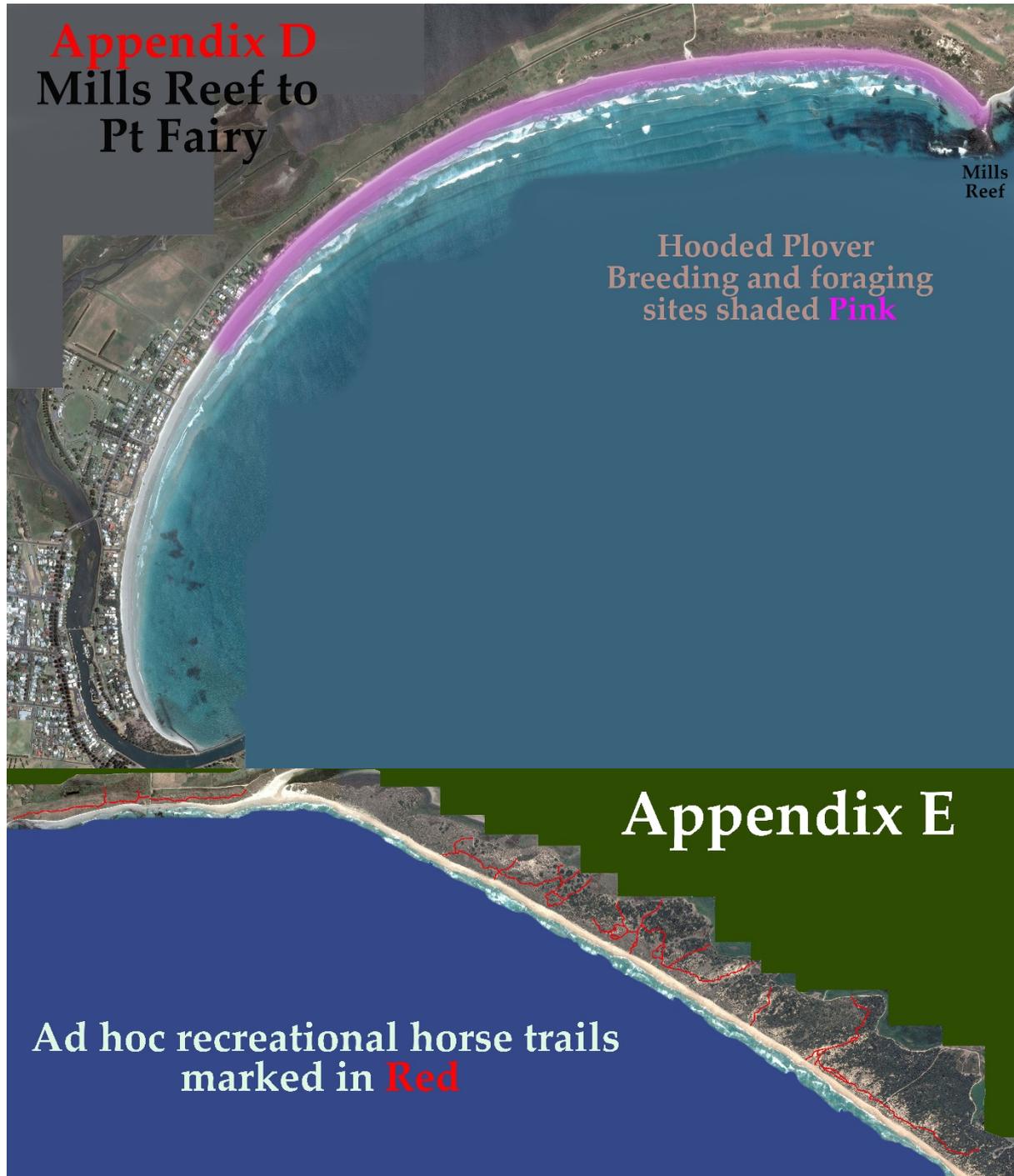
But! Of course this only applies to where Hooded Plovers (and all other shorebirds) nest, forage and live. See [Appendix A](#), [B](#), [C](#) and [D](#) for all the sites between Levy's Point and Port Fairy.

Recreation horse riding in the reserve should be probationary for 6 months, and ONLY be allowed to ride on designated tracks – namely Spooky's track, Baldy track (NEVER in all my time in the area have I ever heard it called "Big Baldy", with the one exception OIC Parks Warrnambool!), Hoon Hill – which is an ad hoc horse track used by the commercial riding school "Rundell's" and the beach BELOW the high water mark. Big ask as the recreational horse riders like to ride anywhere they like. In [Appendix E](#), I have drawn in most of the ad hoc horse tracks that I know of between Levy's Point and Towilla. All recreational horse riders are to remove their horse faeces as per Parks Victoria Crown Land regulations; something that I have NEVER witnessed ever! Failure to abide by Parks Vic regulations would mean removal of permission to use the reserve for all recreational riders.

Dogs on leads at all times when in the coastal reserve.

Thank you for allowing me to make my submission.  
Yours truly,





## Belfast Coast Management Plan: - Individual Survey Submission

Name .....

Signature .....

Email Address: .....

Post Code: .....

Age Range: 50 .....

Gender: Female .....

Is this submission to be treated as Confidential: No but my email address is confidential .....

How often do you use the Reserve: 2 x Annually .....

.....

How do you Get to the Reserve: .. Walk, Drive, Ride a Bike, Ride a Horse

Drive .....

What do you mainly use the Reserve for: (For example: Bird watching, Swimming, surfing, kitesurfing, windsurfing, snorkelling, horse riding, dog walking, fishing, boating, camping, family time at the beach with or without a pet)

Horse riding .....

.....

How important is it to you to be able to continue these activities within the entire Reserve?

Very important. The experience of riding a horse on the beach is extraordinary, wonderful, exciting, relaxing all at once. .... over the years has built wonderful memories and an amazing bond. .... respect the beach, the hooded plovers and other beach users at the same time has also been a wonderful learning experience for life in general. To lose this for us and others would be a terrible unnecessary loss. ....

Which part of the Reserve do you use most frequently:

Killarney Beach – From Killarney to Warrnambool mostly .....

West of Killarney Beach to Port Fairy .....

East of Killarney Beach to The Cutting .....

West of The Cutting towards Warrnambool .....

What is your area of interest (For Example: Conservation, Recreational, Cultural, With Animals – Horses or Dogs)

Recreational horse riding.....

**Is there a specific change that you want made to the Draft Proposal.**

**How important is the Cultural Heritage of the Reserve to you? Very.....**

**How important is protection of the Natural Environment and Bird life to you**

Very important. That is what we go there to enjoy. We can enjoy it without destroying it though if we respect it as I always have.....

**How important is the ability to enjoy recreation activities to you**

We need the ability to enjoy recreation activities to live. That is what life is about.....

**Is your Personal Health and Wellbeing associated with your use of the Reserve? If so in what way.**

YES. The reserve plays a big part in physical exercise and mental health for us all. A necessary part of a healthy life.....

**Do you believe that the current use of the reserve that allows for both Recreation and Conservation should continue?**

Absolutely.....

**Do you believe that Recreational Activities should be allowed throughout the Whole Reserve, or do you believe that certain areas should be set aside for conservation only (Eg. No Dog and No Recreational Horse Areas).**

Some areas could be set aside for no dogs or horses however, the areas have to be practicle and sensible. Not blocking access or dividing areas so only one end of the beach can be used for example.....

**If you believe dogs and horses should be banned – which areas should they be banned from:**

Just the immediate swimming area in the summer and there should be access to the beach on either side from the car parck etc.....

Do you wish to add any further comments: Please don't stop us from riding on the beach. It really is the experience of a lifetime for so many.....