

## Windsurfing Victoria, Inc.

221 Esplanade West, Port Melbourne, Vic 3207  
Reg No. A0049214P ABN 59 441 540 713

13 March 2018

**Parks Victoria**  
**RE: Belfast Coastal Reserve Management Plan**

Dear Sir or Madam,

A number of our fellow windsurfers have approached Windsurfing Victoria (the State body representing the sport of Windsurfing) and the Australian Windsurfing Association (the National body), with regards to the proposed restriction of windsurfing in the Belfast Lough and Rutledge's Cutting areas. As described in the draft Belfast Coastal Reserve Management Plan issued by Parks Victoria.

In respect of Belfast Lough and Rutledge's Cutting areas, as with the other well used windsurfing areas, we request (as per the *Marine Safety Act 2010*) '*Equity of access*' is used as the key principle in defining this area's future usage and that the draft plan be re-assessed so that windsurfing is not restricted in these areas. We also suggest the local windsurfing community, with support from Windsurfing Victoria, work closely with Parks Victoria on future planning and potential changes to ensure all water users and environments are managed appropriately.

We are aware that Australian Windsurfing Association has already made contact and is in communications with Parks Victoria about this matter. We would like to extend this communication to directly include Windsurfing Victoria.

Over the past years Windsurfing Victoria has worked closely with Parks Victoria. This includes developing strategies and safe locations for our beginner windsurfers to progress in their beloved sport (i.e. 'Shared Watersports Zones'). Additionally we have worked together with Parks Victoria and continue to cooperate with regard to the Port Philip Bay boating and non-boating zones.

Thanks in advance for your support and open communications regarding this issue and request.

Best Regards

## COMMENTS ON BELFAST COASTAL RESERVE DRAFT MANAGEMENT PLAN

The decision whether to restrict beach access appears to have already been made.

- \*. Towilla Way walking track to the beach already has a “No Beach Access” sign installed.
- \*. Gormans Lane walking track to the beach is already wired up with a no access sign (beach end).

This appears to make the effort of writing a submission rather pointless!

However, a few quick points regarding the PROPOSED CONSERVATION ZONE AREA.

1. The use of the beach in the proposed conservation zone is minimal (e.g. 0-4 groups/individuals per km at most at any time) but is extremely important to those who go there, especially locals.

The sandy track to the beach at Towilla Way only occupies less than 1/17000<sup>th</sup> of the reserve area (less than 0.006%) so should not cause too much worry overall!

2. During gales 2 or 3 times a year, waves up to 1 metre high hit the dunes at the top of the beach causing natural erosion as sand collapses onto the beach. Wind is always shifting sand around and tends to rebuild the base of the dunes in between times.  
All this makes any human use of this beach totally insignificant by comparison!
3. The track at the rear of the dunes (road reserve) has also been closed off. This should be reopened to provide an alternate route for horses instead of the beach and for walkers when the beach is too windy and unpleasant. The quick regeneration of this track shows that previous use did not cause any permanent damage.
4. Dogs can be an occasional nuisance, but few and far between, with most people using a lead while they are walking their dog on the beach.

5. Horses :

If they are banned from the beach, it is unfair to locals who enjoy the occasional ride on the beach. They do not seem to be a problem to other beach users.

If zoning allows for horses, then use will increase due to publicity.

Therefore best to leave things as they are on this stretch of beach.  
Don't specify a change of zoning.

6. To quote from your Draft Management Plan

The natural values of the coastal landscape have been maintained and enhanced. The impacts of pest plants and animals have been progressively reduced through coordinated programs with agencies and neighbouring landholders. Native plants and animals are flourishing and significant rare and threatened species are recovering. The area continues to provide important habitat and refuge for native species, particularly threatened migratory birds that breed and feed here. Sound decision making is assisting to moderate the impacts of erosion and climate change

Things seem to be thriving under the present system.

Therefore, rather than trying to change the present management by creating an unnecessarily restrictive "Conservation Zone" here, the Department's effort should be put in at places where there is a real need for controls and "enhancement".

12<sup>th</sup> March 2018

12<sup>th</sup> March, 2018

**SUBMISSION TO BELFAST COASTAL RESERVE  
DRAFT MANAGEMENT PLAN**

Friends of the Hooded Plover, Breamlea is pleased to have the opportunity to provide a submission to the above-mentioned Draft Plan.

We believe that we bring to the discussion experiences which closely match those of the Belfast Coastal Reserve, as our own environment contains similar high conservation values and geomorphology of our foreshore.

Breamlea is located between Torquay in the west and Barwon heads in the east. The coast of Breamlea is formed of high sand dunes that create a ridge at the back of the beach from near Point Impossible to the lava flows at Black Rock. The dunes have been formed from the cementation of old wind blown sands with calcium carbonate from shell fragments within the sands. The saltmarsh that borders Thompsons Creek to the north of the township is relatively untouched and so is important for its vegetation communities and as a roosting area for many species of indigenous birds, including the Orange-bellied parrot.

We have Hooded Plover pairs from Point Impossible to Black Rock and as volunteers of the Friends of the Hooded Plover, Breamlea, we have been monitoring these pairs since the formation of our group under Birdlife Australia's Beach-Nesting Birds Project. This is a species for which we have personally invested hundreds of volunteer hours to protect, and in so doing, assist local, state and federal governments in threatened species management. Our beaches also host migratory shorebirds such as the Red-necked Stint, Ruddy Turnstones and Double-banded Plovers, as well as local species like the Red-capped Plover.

It has been crucial to have a management plan for this threatened species within our region. The City of Greater Geelong (CoGG) has developed a 'Conservation Action Plan' for the Hooded Plover which covers beaches under their management from Point Lonsdale to Thompsons Creek estuary (approx. 25 km of surf beaches). This plan outlines goals and targets to be met.

Both Friends of the Hooded Plover groups - Bellarine and Breamlea - work closely with the City of Greater Geelong to achieve these goals as we recognise that bottom-up efforts have to be met by top-down support in order to achieve long-term sustainable use of the coast and to give wildlife the chance to survive and thrive in heavily impacted areas.

The strategies in this plan include a permanent 'no dogs' section of the beach, 'dogs on leash' during the Hooded Plover breeding season and 'no horses' (recreational or commercial) on the beach or in the dunes at all times. There is no vehicle access and no camping, dune boarding or boot camp training in the dunes. A high emphasis on educating the public through the media, training on Hooded Plover protection for by-laws officers and organisations such as surf schools, as well as beach signage and fencing. CoGG has also developed a Dogs on Beaches card-sized pamphlet- to fit in your wallet- conveying the all year-round beaches rules for dogs (on or off-leash, or no dogs) and the details of the seasonal controls of dogs throughout the year.

These actions have made a significant difference to Hooded Plover species recovery within our area, with the number of breeding pairs under the municipality having doubled over the past 8 years.

Through our connection with Birdlife Australia, The Friends of the Hooded Plover, Breamlea is aware that the Belfast Coastal Reserve site is a particularly critical habitat for the Eastern Hooded Plover, containing 12% of the Victorian population, 2.5% of the Eastern subspecies. In addition, it is one of five priority locations for Orange-bellied Parrots, plus internationally significant habitat for Sanderling and Sharp-tailed Sandpiper, and nationally significant habitat for Ruddy Turnstones and Double-banded Plovers. We all work together across the species range and regularly come together with the volunteers from Warrnambool to Port Fairy to share ideas and work toward recovery of the species as a team who want to change the trajectory of the species at the population level. Everyone's local actions are amounting to change for this species, in line with the Threatened Species Strategy.

When BirdLife reviewed the breeding success in the Reserve, they found 44% of sites had not produced Hooded Plover fledglings in 5 breeding seasons of monitoring. Sites were under extreme pressure from horses, dogs off-leash and even illegal vehicles, as well as weeds and foxes. The narrow, rocky beaches are subject to high pressure from horses and dogs which are squeezed into this narrow zone. This area happens to contain one of the densest populations of Hooded Plovers known.

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

We are particularly supportive of the proposed Conservation Reserve being free of high impact threats including hunting, off-road vehicles, dogs, horses, camping, and dune boarding. Our own experience of CoGG's resolve to not allow these types of activities, convinces us that not only should such strategies be put in place, but that these regulations must be enforced.

We also understand that the geomorphology of the coast within the Conservation Zone consists of many rocky embayments, small headlands and a narrow beach that then opens out in to the estuary at Rutledges Cutting. Horses on the upper beach along these narrow beaches and the cutting across each headland at the multiple 'pinch' points has been well documented through the Hooded Plover monitoring program. Avoiding critical breeding habitat cannot be successfully achieved in this particular beach morphology. This is a similar case with our Breamlea beaches. We have volcanic rocky headlands on several sections of our beaches and an estuary at the western end near Point Impossible, that also cause 'pinch points'. That is why our council has enacted a 'no horses' policy of our beaches.

We do not support commercial horse training in the Reserve, including permitting this activity within the Conservation Zone. There are extreme risks to threatened species, habitat, cultural heritage sites, and public safety. Hooded Plovers cannot co-exist with commercial racehorse training because it churns up the sand, disturbs the chicks and nesting birds, crushes eggs and damages protective nest fencing. We understand that an alternative sand track and pool was built in 2017, and several trainers are using the sandy soil in their paddocks. Many racehorse trainers across the country do not have access to beach and dune environments, yet through other training methods, have proven results. The racing industry and state government is primarily using one example of the Melbourne Cup winner, Prince of Penzance being trained on the beaches of Warrnambool. This is overinflating the situation. Trainers will still achieve the results they desire for their horses but it does not have to be on the beach where there is so much to lose. Access to these fragile environments is not a prerequisite for success.

We are alarmed to see that the state government plans to reward the commercial racehorse trainers by giving them a licence to continue, and allowing a major increase of up to 250+ racehorses per day along the beaches. Under the draft management plan, the length of beaches available to racehorse training would be increased by 250% (from 2 km to 5 km). That represents 25% of the Reserve's beaches with nothing in the plan to stop future expansion or to review compliance and impacts. It even recommends racehorse training within the Conservation Zone at Rutledge's Cutting, which is at odds with the recommendation of the Conservation Zone.

This draft coastal management plan for the Belfast Coastal Reserve suggests reversing a cap on racehorses numbers put in place in 2016. Just 12 months earlier a factsheet produced by the state government acknowledged the rapid increase in horse numbers. The draft management plan itself recognises that it fails to reduce risks to high conservation zones. Such a situation must not be allowed to happen.

We strongly support the goals and strategies within the 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 traditional owners of the land at Breamlea are the Wathaurong people and protection of the cultural sites within the dunes, which include significant middens, as well as wetland sites, is outlined in the 'Breamlea Foreshore Masterplan and Management Plan'.

The City of Greater Geelong, along with community groups, work closely with the traditional owners to ensure this protection. We therefore support the right for the Gundijmarra people to protect their cultural heritage and to be directly involved in guiding the management of the Belfast Coastal Reserve.

We would like to advocate for Emergency Beach Number signs (yellow triangles mounted on posts) to access points for the safety of beach users and volunteers in the Reserve. These are extensively used on our beaches to denote nesting sites and to assist volunteers. These have also been used over the years to locate injured beach-users and wildlife.

We do not support the current 5 and 10 year reviews of implementation of the Plan. This is too long a timeframe for threatened species likely to be impacted by the Plan. A one to two yearly review cycle is required.

We urge a coordinated management approach to the Reserve which would enable efficiencies in program delivery and is supported by consistent land status and regulations. However, 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. Due to its significant environmental, threatened species and cultural heritage values, consideration should therefore be given to the Reserve becoming a park under the National Parks Act, as recommended by the Victorian National Parks Association.

Thank you for providing the opportunity to engage in this process. A Reserve with such local, statewide, national and international significance to several species and groups of birds is of importance to all members of the community. As members of a Friends of the Hooded Plover group, we especially recognise that decisions made through the process will impact on our efforts to protect this nationally threatened species.

## **Belfast Coastal Reserve Plan 2018- Windsurfing and Kitesurfing in Belfast Lough**

Submitted by

I wish to outline my disappointment at the banning of non powered vessels (in particular-windsurfers) on Belfast Lough.

every time I visit, if the wind is up, I will find a place to windsurf.... and more often than not, the place I end up at is The Lough. I must outline, that at the time I access the Lough, I am one of a handful of windsurfer/ kitesurfers. There is no one else out using the waterway at the times we are on the water...this is because the conditions aren't conducive to other pursuits (eg too windy for pleasure craft, fishing or rowing)

It's fair to say The Lough is an intriguing and unique place to windsurf. It's not exactly the finest of water quality but windsurfers can be incredibly hardy people! It's quite shallow which makes it safe for beginners. The other safe element is that it is an enclosed waterway which provides a place to sail when the wind is offshore and the ocean conditions are too dangerous. But most importantly the low-surrounding terrain creates a situation where there is "clean air". Other lakes in the area are mainly volcanic craters, with high surround hills, which create swirling wind patterns. These create their own challenges but are generally quite terrible for windsurfing.

In the Management Plan, I fail to understand the logic of allowing motorised vessels but not passive watercraft. Wind powered craft are less environmentally damaging than powered craft and have very little affect on the waterway. Under the proposed Plan, motorised boating (including Jet Ski's) will be permitted; with a 5-knot speed limit within 200m from shore. The Lough is 700m wide and 1800m long, that means that in some places there will be a 400m "speed strip" where motorised vessels can noisily travel in close proximity to each other at over 100 kmh....and yet passive windcraft are banned...would someone in Parks Victoria please explain that logic to me???

The nature of windsurfing and the people that windsurf should be taken into consideration. In general, windsurfing people are environmentally conscious- since we depend on certain environmental conditions to pursue our passion. We are connected to the places that we sail, and we leave very little footprints on the areas that we sail. Many of us are experienced water men and women- we have been on the water all of our lives, and have a broad understanding of wind and environment conditions.

Most of the time, our sport is "invisible". We venture out in conditions where the wind is howling, sometimes it's raining, cold- most people are bunkered down inside!! Most importantly, I have found that the majority of windsurfers have a healthy respect for other water users and tend to keep to themselves and not obstruct/ interfere with other water activities.

March 2018

## Submission template for Draft Belfast Coastal Reserve Management Plan

### About you:

Your name;

Your Organisation (if relevant): \_\_\_\_\_

Postcode:

\_\_\_\_ 3280 \_\_\_\_\_

Email or Postal address:

3280 \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**THIS SUBMISSION IS:**    **CONFIDENTIAL**    **NOT CONFIDENTIAL**   Date: 5/2/18 \_\_\_\_\_

### 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?

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

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

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







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

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

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

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

I am writing this as a submission to the Belfast Management Draft Plan. I am very concerned and do not agree that the section of beach from Killarney to Big Baldy should be deemed to exclude dogs.

I am a beach user on a regular basis and walk my dog which was leash free until recently when the signs were changed.

I understand the need for environmental conservation. However, there is a large area of beach to be considered and a small area that needs conservation mainly the Hooded Plover in this area.

When I walked this beach this morning, I was the only user on the beach at the far end of the Gorman's Lane carpark, which is often the case anytime I use this area. I walked West one kilometre up the beach. In this area there is one 70m x 10m picket star fenced off area with signs for the Hooded Plover. A few bits of rope attached to some pickets. My questions are; Why close the entire part of the beach to dogs for small pockets of conservation area? (The conservation effort to these plovers looks very haphazard with only star pickets and a few signs, there is no protection between these pickets.) Why if they are so important to protect is the effort to protect them so minimal? Why does the beach need to be closed to dogs for the entire year when the birds breed from August to March as stated in the plan?

I would like to see data that explains the number of users to the area, how many of them are dog users, and how many and what type of damage do dogs do to this environment. What is the exact number of birds in the past compared to now? To me, it seems that a very small percentage of incidences does not warrant the closure of the area to dogs. In the draft plan, it describes dog behaviour as; leaving excrement, uncontrolled roaming and aggressive behaviour, these behaviours can occur in any environment not just at this location. I believe most dog owners are responsible and control their dogs, it may be a few rogue owners that set a bad example for the rest of us.

I disagree with the Belfast Management Draft Plan to exclude dogs from Killarney to Big Baldy. I believe careful consideration is needed in regard to the small conservation requirement and the recreation use for dogs on this part of the beach. I believe a balance can be met for that of conservation and for a leash free beach for dogs.

(I had submitted this as a letter and then I found this template.)

### 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





## 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:**  **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)*

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Recreation and use: **Windsurfing, Kitesurfing, surfing**

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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 or 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): windsurfing Kitesurfing ,surfing |   |  |

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

### **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

### **Key management theme #2: Healthy Country**

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

Very unsupportive

### **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 the Conservation area (dark green) in the draft plan.**

#### **The Belfast coastal reserve should be designated as Conservation and Recreation zone (light green on Parks Vic map.**

This plan has an underlying presumption that conservation can only be successfully carried out if an area is locked up and regulated. i.e. close it up, throw away the key, stop peoples' recreational activities and fine people who dare trespass. This notion of conservation suggests only Parks Vic can be trusted to conserve our environment and people who want to use the reserve cannot be trusted. Parks Vic has very limited human and financial resources. There is a waste of additional resources when people who live in the area, who care and use the environment are sidelined from the conservation process.

The group \_\_\_\_\_, Southwest Windsurfers and Kitesurfers fulfil the role of friends to the Belfast Lock and Rutledges Cutting. We collect and dispose of rubbish, both in the waterway and the surrounds. We would inform appropriate authorities if inappropriate or illegal activities are carried out. We are a free resource that provides continuous and effective environmental oversight.

I \_\_\_\_\_ support the right for others to responsibly enjoy their animals in the Reserve. The presence of recreational horses and responsible dog walkers in the reserve has an effective conservation purpose. They collect rubbish and ensure other users are responsibly using

and caring for “their backyard”. Inappropriate use or illegal activity in the reserve is challenged or reported and their coverage of the reserve is continuous and covers the breadth of the reserve. This is a much greater and more sustained environment protection than can be carried out by Parks Vic. The idea of locking up vast areas of the reserve seem contrary to good environmental management. These locked up areas become sanctuaries for vermin i.e. feral cats and foxes. Effective control of these pests becomes almost impossible. Baiting is generally ineffective and cannot be responsibly carried out near areas of population. Shooting has too many dangers and does not seem acceptable to the public.

The locking up of a major part (dark green conservation zone) of the Belfast Coastal Reserve necessitates that dogs and recreational horses must use the small, designated recreation area between Killarney beach boat ramp and Golfies beach, This will causes massive problems. Parks vic has now put different user groups in direct conflict with each other.

Many families with young children use Killarney beach because it has flat water and is safe. Under Parks Vic plan, this small beach now can have dogs off leash during summer before 9am and after 6 pm. On hot days, many families will be on the beach at this time. After Easter and until Christmas dogs can be off leash at any time.

The area west of Killarney beach boat ramp carpark to Golfies beach will now have a markedly increased presence of dogs on leash all year round, a concentration of recreational horses and large numbers of beach walkers. This is in addition to the racehorses being exercised on the beach at Golfies in big numbers between dawn and 10am. This is an accident or conflict just waiting to happen. It seems Parks Vic has also tried to save bird habitat in the dark green conservation zone but at the expenses of bird habitat in the Recreation Zone.

Data has been provided to Parks Vic in the document “Managing the Hooded Plover in Victoria: A site by site assessment of threats and prioritisation of management investment on Parks Victoria managed land. Dr Grainne Maguire, Dr Meghan Cullen and Renee Mead”.

This data states that hooded Plover breeding in the area from Warrnambool to Yambuk is double that of breeding in isolated areas such as Discovery Bay where there is little human contact.

The major threats to the Hooded Plovers are sea, wind, foredune alteration, gulls, ravens, foxes etc. comprising around 85% of the total threat to the Hooded Plover. The overall horse threat is measured at 0.77% of all threats and dogs 3.6% compared with Foxes at 6.9%. Natural threats are not reduced by changing the Belfast Reserve to a Conservation zone (dark green on Map)

This plan seems to have been formulated from elsewhere by people who have little idea of the Belfast coastal reserve and its user groups. The data suggests that the current arrangements for Belfast reserve are successful and do not need to change.

To me the obvious solution to the problem is to make the entire Belfast Coastal Reserve a Conservation and Recreation zone (light green colour). This utilises the local user groups as trusted assets and partners to assist in the conservation and maintenance of the reserve. This spreads out user groups with much a lower density and avoids possible conflict. Any environmental impact of recreational horse or dogs are minimised due to being spread out over a large area. Having people use all areas of the reserve assists in discouraging vermin to remain in close proximity to nesting birds and other native species.

25/2/2018

#### **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):

Postcode: 3280

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)*

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Recreation and use: **Windsurfing , Kitesurfing, surfing**

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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 or 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                                   |
- Other (please specify): **windsurfing Kitesurfing ,surfing**

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

It has been a mainstay of my physical and mental wellbeing.

We are a

diverse group of people of all ages who have chosen to live in the Port Fairy/Warrnambool area because of its proximity and access to the ocean. Many of us meet on a daily basis to participate in many water activities in the Belfast Coastal Reserve. We surf mainly at Golfies and the Cutting; we windsurf and kitesurf in the ocean, the Belfast Lough and Rutledges Cutting (saltwater swamp). We

snorkel and scuba dive at the Basin (access from Towilla Way and Gormans Lane) and the Long Reef (called Pelicans on Parks Vic. map) with access via a marked primary track from the Basin road to Pelicans.

The current draft management plan seeks to create a conservation zone all along the Armstrong Bay beaches in South West Victoria. This conservation zone will have a huge, detrimental impact on our recreational choices, now and into the future, due to restriction of access to waterways.

These beach accesses are primary tracks that should remain open. These give access to the ocean and consequently support our recreational activities of snorkelling and Scuba diving.

Access to Pelicans (Long reef) has always been available from a primary track accessed from a small carpark located off the Basin road. This path is still reasonably well defined with some parts having duckboards covering sandy areas. The car park used to have approximately five parks that was generally sufficient for the usage. This carpark has now been partially overgrown with coastal wattle, not native to this area, and marram grass. This has reduced parking capacity. This path is important to Scuba Divers, Snorkelers with heavy equipment to carry, as it is the closest direct path to the Long Reef. Access along the beach from the Basin carpark or Killarney boat ramp carpark is a considerably longer distance.

This is an existing primary track. It does not have high usage but its continued existence does provide support for the goal stated above. Having a single defined track does reduce impact on the environment. Our group are also Scuba Divers. We are happy to assist Parks Vic. to clear vegetation that has grown over the carpark area.

The access tracks to the beach from Gormans Lane and Towilla Way also provide access to the ocean for snorkelling and scuba diving. This access is vital as we often have heavy gear to carry. These tracks have limited use from people participating in diving activities but have greater usage from recreational horse and dog walkers. **These primary access tracks should be maintained.**

**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): \_\_\_\_\_

Postcode:

Email or Postal address:

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**THIS SUBMISSION IS:**  NOT CONFIDENTIAL    Date: 5/3/2018

### 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)*

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Recreation and use: **Windsurfing , Kitesurfing, surfing**

---

How often do you or your organisation use the reserve?

Weekly

How do you or your organisation mainly use the reserve?

Other (please specify): **windsurfing Kitesurfing ,surfing**

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

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).*

**Put your submission here and upload to park Vic site at  
<https://engage.vic.gov.au/belfast>**

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**I've been Windsurfing in the Port fairy area and the Lough provides us with the only safe spot to teach and encourage learners as well as sail in strong northerlies where the alternative would be to risk being blown out to sea.**

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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).*

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

Name: .....

Signature .....

Email Address: ..

Post Code: 3280

Age Range: 50-55

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 & WALK

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)

WALK THE DOGS, FISHING (SURF)

REGULAR EXERCISE, HORSE HIRE

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

OF GREAT LIFESTYLE IMPORTANCE

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, TRAINING, LIFESTYLE, POSITIVE EXPERIENCES

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

YES, CHANGE DARK GREEN CONSERVATION ZONE BACK TO LIGHT GREEN; SHARPO CONSERVATION RECREATION ZONE

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

IT IS OF IMPORTANCE

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

IT IS IMPORTANT TO FIND A FAIR BALANCE

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, GENERAL FITNESS AND POSITIVE LIFESTYLE

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).

ALLOWED THROUGH WHOLE RESERVE EXCEPT KILLARNEY BASIN

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

KILLARNEY SWIMMING BEACH / SUMMER

Do you wish to add any further comments:

From:  
Sent: Tuesday, 6 March 2018 2:08 PM  
To: ParkPlanMailbox;  
Cc: @wv.org.au  
Subject: Belfast CR Enquiry

Categories: Red Category

Dear

Thanks for your response and comments.

We do understand from previous experience plus the research we have already undertaken that this plan is in draft, and that all comments and feedback will be considered in reviewing and preparing the final management plan.

Prior to the draft proposal submission date we seek specific confirmation re:

- a) Is it correct that Parks Vic (as per Draft proposal) proposes the banning of windsurf activity on the Belfast Lough ?
- b) Is it correct that Parks Vic (as per Draft proposal) proposes the use of powerboats/jetski/PWC on the Belfast Lough ?

If both of these are correct (as indicated by the draft planning proposal) this would seem clearly illogical, and at apparent odds to a number of Parks Vic objectives, as well as the interests of our windsurf community.

Obviously, in this case, and to ensure our position is not taken lightly, we would prepare a more extensive submission etc ahead of the draft response deadline 16 March. (now less than 10 days away)

Should it be simply an oversight in planning proposal documentation, descriptive terminology or similar (which, considering the apparent illogicality of this proposal we have grounds to believe it may be ??), then we would be pleased to have confirmation so that we can all relax and make more efficient use of everyone's valuable time and resources.

I understand potentially affected users have already sought the involvement of Victorian Government MPs etc, in this matter - perfect if required, but potentially embarrassing should it turn out to be not as Parks Vic intended.

Unusual though this request may be, we hope the logic in resolving this promptly is reasonable and apparent.

Alternatively, should you or any of your staff wish to discuss this situation or any aspect of the draft, I would be pleased to hear from them by email or phone .

With Thanks and Best Regards

Australian Windsurfing Association  
[www.windsurfing.org](http://www.windsurfing.org)

From: @parks.vic.gov.au] On Behalf Of ParkPlanMailbox  
Sent: Tuesday, 6 March 2018 12:59 PM  
To: @wv.org.au  
Subject: RE: Belfast CR Enquiry

Dear

Apologies for the late response. The plan is currently in draft and your comments in regards to how the surfing community uses the Lough will be taken into consideration in reviewing and preparing the final management plan.

regards

Park Planning Team | Parks Victoria  
Phone 13 1963  
Email: parkplan@parks.vic.gov.au  
Level 10, 535 Bourke Street, Melbourne VIC 3000  
www.parks.vic.gov.au

From:  
Sent: Friday, 2 March 2018 1:47 PM  
To: ParkPlanMailbox <ParkPlan@parks.vic.gov.au>  
Cc: @wv.org.au  
Subject: RE: Belfast CR Enquiry

Dear Parks Victoria,

Understanding it may take some moderate amount of time to investigate and clarify as per below, however as would be normal commercial good practice, it would be appreciated if receipt of the below email, together with an estimate of reply time, could be provided. Thank you.

With Best Regards

Australian Windsurfing Association  
www.windsurfing.org

From:  
Sent: Tuesday, 27 February 2018 1:48 PM  
To: 'parkplan@parks.vic.gov.au'  
Cc: @wv.org.au'  
Subject: Belfast CR Enquiry

Re : Parks Victoria Belfast Coastal Reserve Draft Management Plan

Dear Planning Committee,

Having reviewed the Draft Coastal Reserve Draft Management Plan as per the details and downloads

available via [engage.vic.gov.au/Belfast](http://engage.vic.gov.au/Belfast),  
it has come to our attention that it would appear Parks Victoria would propose to restrict windsurfing as an approved activity within Belfast Lough.

On behalf of our members, Australian Windsurfing Association, Inc and Windsurfing Victoria Inc seek initial clarification of this matter,  
as the possibility exists that it may simply be a planning or draft oversight or omission.

Belfast Lough has been a frequently used safe haven for local and visiting windsurfers seeking alternative water access in prevailing, strong offshore Northerly winds for over 30 years, with no known incidents, accidents or environmental impact attributed to this usage.

Whilst we appreciate the basics of environmental protection, conservation and user safety, any restriction being proposed or introduced restricting windsurf access to this waterway would seem at logical odds to the apparent draft approval of the use of the area for powered boating, including jetski/PWC use(??)

Please kindly confirm promptly if the Draft Management Plan intention is to restrict future or ongoing windsurf access to Belfast Lough.

With Best Regards

Australian Windsurfing Association  
[www.windsurfing.org](http://www.windsurfing.org)

DISCLAIMER

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This message and any files transmitted with it are intended only for the addressee. This message may contain confidential or privileged information. If you are not the addressee of this message you must not read, copy, distribute this information or take an action in reliance on it. If you have received this message in error you are requested to immediately contact the sender or Parks Victoria at [postmaster@parks.vic.gov.au](mailto:postmaster@parks.vic.gov.au) and delete the original and any copies of this message and any files transmitted with it. The views expressed in this message are those of the individual sender, except where the sender has the authority and specifically states them to be the views of Parks Victoria. Parks Victoria accepts no liability for any damage caused in the transmission, receipt or opening of this message and any files transmitted with it.

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Belfast Coastal Reserve  
Draft Management Plan

The Victorian National Parks Association has prepared this submission guide and provided dot points (in blue text) for each of the chapters to help with your submission. As for the ticks, we'll leave that to you should you wish to use them.

## Draft Belfast Coastal Reserve Management Plan

### About you:

Your name:

Your Organisation (if relevant):

Postcode:

Email or Postal address:

**THIS SUBMISSION IS:**  **CONFIDENTIAL**  **NOT CONFIDENTIAL** Date: 10/3/2018

### Your Comments:

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

Main reason for interest:

I am submitting feedback to the plan because I have an environmental interest in the area and the conservation of the threatened hooded plover population. I am also fundamentally opposed to horse and dog racing. A decision to allow horse racing on these beaches would be to put money before the environment - I hope the department makes the right decision and gives the hooded plover population a fighting chance at survival. Please see detailed feedback below:

- There are many good elements in the draft coastal management plan that I wholeheartedly support: cultural heritage protection; joint management; education and interpretation; monitoring and research; rationalisation and closure of inappropriate beach access; dog control. But it remains deeply flawed because of its complicity in entrenching and expanding the use of the reserve by commercial racehorse trainers.
- Under the plan, commercial racehorse training would rapidly expand to multiple beaches and in sand dunes, with devastating effects for the nationally threatened hooded plovers—the reserve is its most important breeding area in the state according to the plan—other coastal wildlife and the safety and enjoyment of mum, dad and the kids, anglers, surfers and other beachgoers.
- The length of beaches available to racehorse training would, under the plan, be increased by 250% (from 2 km to 5 km) and the number of horses by 400% (from 65 to 256 each day). That represents 25% of the reserve's beaches, with nothing in the plan to stop future expansion.
- The draft plan would allow racehorses back into 750 metres of fragile dunes behind Levy's Beach and at Hoon Hill, where in the past they have caused severe dune erosion. The plan even recommends racehorse training within the Conservation Zone at Rutledge's Cutting. That is inexcusable.
- Many times, the draft plan refers to damage caused by racehorses but fails to explain how increasing the area available to them by 250% will mitigate these impacts. Worse still, the plan's risk assessment reveals that management won't make any difference. Before management, the risk to

coastal dune vegetation, cultural heritage, resident and migratory shorebirds from racehorse training is rated 'Extreme'. After management is introduced? The rating remains—Extreme!

- Ever since the uninvited invasion by racehorses in 2015, their training has been mismanaged, with numerous breaches of licensing conditions, public safety put at risk and taxpayers footing the bill for costly Parks Victoria surveillance and infrastructure upgrades. Expanding the number of training beaches will simply make that worse.
- By entrenching and expanding commercial horse training the plan is a relic of past coastal mismanagement and inappropriate use.

### Executive summary (pages v-viii)

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

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

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

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

Comments:

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

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

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

- Very supportive     Supportive     Not sure/Don't know

- Unsupportive       Very Unsupportive

Comments:

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

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

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

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

Comments:

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

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

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

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

Comments:

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

partnerships, marketing and promotion. But without the removal of commercial racehorse training, these goals will not be achieved.

- A far more honest heading for this chapter would be 'Recreational and commercial use'. Too often the plan seeks to confuse recreational riding and commercial racehorse training or to downplay the intensity and impacts of the commercial activity, continually referring to the training as a 'licensed' or 'authorised' use to convey that it is not negotiable, it cannot be restricted or removed. By including it within a chapter mainly on 'recreation', it again tries to downplay the highly commercial and intensive nature of racehorse training.
- The draft plan recommends strict controls on where and how recreational uses are to be managed in the future, whereas commercial racehorse training will be expanded. That doesn't make sense.
- In the introduction to this chapter, the draft plan states, with my underlining: Riding of horses for recreational or commercial purposes was viewed as a threat to dune health, cultural heritage, shorebirds and public safety, especially if riders did not comply with regulations, codes of conduct or licence conditions. This suggests that the community is mainly concerned about impacts that occur when commercial racehorse training doesn't follow the rules. But as the risk assessment table reveals on page 29, even with rules, management will not mitigate the extreme risk from commercial racehorse training.
- Jet skis should not be allowed in reserve waters, including Belfast Lough, because of their disturbance to wildlife and other recreational users, and damage to shallow water habitats.
- Dogs should not be allowed off-leash from 1 August to 30 November at Killarney Beach, coinciding with the first part of the hooded plover breeding season.
- It is ludicrous to consider renaming Hoon Hill to 'improve expectations on visitor behaviour' when those same visitors will witness racehorses and their riders 'hooning' up and down the dunes of the hill.
- Section 6.5 of this chapter is titled 'Authorised uses', code for commercial racehorse training. Much of the emphasis in this section is the regional economic importance of the racing industry as justification for the damage that it is causing and will continue to cause if it remains in the Belfast Coastal Reserve. But in a September 2013 report prepared for the Victorian racing industry by consultants IER, it was revealed that the racing industry generates \$75 million gross value added in the Western District, which includes Warrnambool but also a number of other racing clubs at Casterton, Coleraine, Hamilton, Terang, Camperdown Mortlake, 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.
- I strongly condemn the goal under this section of the chapter—Authorised uses of the Reserve are managed to minimise the effect on values and visitors—with regards to commercial racehorse training as it is incompatible with the goals of the plan and the purposes of the reserve.

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

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

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

Comments:

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

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

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

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

Comments:

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

**Addressed to specific issues.**

**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 uses 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 has two safe venues to windsurf. The physical exercise of Windsurfing is great for his flexibility and mobility. It also improves Brian's 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 is not. This doesn't make 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 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.

09<sup>th</sup> March 2018

## Submission template for Draft Belfast Coastal Reserve Management Plan

### About you:

Your name: \_\_\_\_\_

Your Organisation (if relevant): \_\_\_\_\_

Postcode: \_\_\_\_\_

Email or Postal address: \_\_\_\_\_

**THIS SUBMISSION IS:**  **NOT CONFIDENTIAL** Date: 5/3/2018

### 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: **Windsurfing , Kitesurfing, surfing**

How often do you or your organisation use the reserve?

Daily  Weekly **Which ever is appropriate for you**

How do you or your organisation mainly use the reserve?

- |   |   |  |
|---|---|--|
| <input type="checkbox"/> Walking or 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): windsurfing Kitesurfing ,surfing |   |  |

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

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).*

**Put your submission here and upload to park Vic site at <https://engage.vic.gov.au/belfast>**

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*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).*

## Belfast Coast Management Plan: - Individual Survey Submission

Name: .....

Email Address: .....

Post Code: **3280**.....

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

**By car or by car with float attached.**.....

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)

- walking with dogs
- recreational horse riding
- socialising
- family walks
- photographing the scenery
- swimming
- snorkelling

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

**This is very important to me, I have been using the Reserve me healthy and happy and gives me a good sense of balance.**

**My leisurely visits to the Reserve keeps**

Which part of the Reserve do you use most frequently:

**Killarney Beach** **No. 3**  
.....

**West of Killarney Beach to Port Fairy** **No. 4**  
.....

**East of Killarney Beach to The Cutting** **No. 1**  
.....

**West of The Cutting towards Warrnambool** **No. 2**  
.....

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

My main interest is riding my horse leisurely and walking my dog with friends who bring theirs as well, so it is for both personal fitness and the fitness and happiness of my horse and dog, when friends come with me, it becomes a social outing, a very important outlet to ensure good mental health in the community.

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

Yes. I would like to see the green zone that is marked for a conservation zone to be changed to a light green zone to be a recreational conservation area.

This proposed area for conservation (east of the Cutting to the boat ramp at Killarney) is where I usually walk or ride, being banned from this area is discriminatory and an unnecessary move. I put my dogs on a leash when we are approaching a fenced off plover nesting area and I walk at the water's edge so I am very conscious of not disturbing the wildlife especially the nesting plovers. I also do keep an eye open on wandering plover babies as naturally they do not stay within the roped areas, I keep my dogs on the leash if I see baby chicks wandering away.

This is not a highly visited area and usually it is deserted. However when I do come across other dog walkers, they usually follow my example and also leash their dogs during plover breeding season.

I think dogs should not be banned but I do agree that during plover season, they should be on a leash when nearing plover nesting areas.

I also do not wish to see recreational horses banned from this area. Once again, when I ride it is usually deserted, even in high summer. When I do meet others on foot, I ensure that I am mindful that I approach at a walk and do not go into trot until a good distance away from them. I halt if necessary.

I am educated as far as plover breeding habits and feeding habits and am extremely careful to always ride below the high water mark and access the beach at designated tracks. I do not ride in the deep sand at the bottom of the dunes to ensure that I do not disturb any wildlife or cause any erosion.

The plan is not a well thought out. One cannot go on a long ride as there is no alternate access to ride on past the conservation zone. The only option is to ride from Warrnambool to Baldy Hill and return. You cannot ride on as there are no tracks or roads other than the Princess Highway to Killarney.

According to the plan, there will be congestion and over-use of the areas where recreational riders would be allowed. There will also be increased risks with likely accidents due to the recreational horses becoming unruly and over excited when thrown in with racehorses being worked.

Also carparks are presently very small, with more car parks set to be closed off, this will increase the burden on the existing car parks. This will also add to frustration and potential personal blow ups amongst BCR users.

**There will also be increased incidents involving dogs and horses.**

**There will also be discord due to the frustration of the congestion between all the beach goers who have different hobbies and needs, these would come to a head at times unbalancing harmony.**

**There have been people against horses on the beach for a very long time even before the controversial big-name trainers started training their racehorses. Unfortunately some people seem to confuse recreational horses with racehorses, the two sports are vastly different.**

**This discord is not the vision of Parks Victoria, the slogan “Healthy Parks Healthy People” would be inflammatory and contradictory.**

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

**I think it is important to acknowledge the culture of the first Australians and respect their heritage sites.**

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

**This is very important to me. It is a great privilege to witness first hand all the different and numbers of birds and be a good caretaker of this environment to make sure it stays pristine for everyone to enjoy, not only for us but for those yet to come. I always stop and pick up plastic and other rubbish and remove it from the beach when I walk. When I ride I am very much in awe of the nature around me and am fortunate to be able to be part of nature, more so when I am riding than walking, the birds at times do not even take off when you approach, some walk and form half a circle around us while I go past slowly by, the birds seem to trust you more when you are sitting on a horse. Eagles seem to accompany me flying above me and my horse, not bothered at all by our presence.**

**When I leave the car park, I ensure that I have picked up any manure and leave the car park in the way I found it, or in a better state than I found it as I usually pick up any rubbish left behind by others.**

*How important is the ability to enjoy recreation activities to you?*

**Very important.**

**We are fortunate to be able to drive only a short distance to find ourselves walking on a quiet deserted beach, such as The Cutting or The Basin, even in the middle of Summer.**

a favourite track of mine was blocked off by Parks Victoria. This track runs through the sand dunes the whole length of the area from The Cutting to the Basin. This track has a long history and has been in use for over 100 years with little change. This is an important track as at times storms throw logs and big rocks blocking the access from Gormans Lane, but the track enabled me to walk or ride on towards my destination towards Killarney. The other direction at times in winter the tides are so high, they lap the bottom of the dunes, so the track going east enabled me to keep riding towards my destination towards Levy's Beach in Warrnambool. I also liked to walk with my dogs on this tracks as well.

I object strongly to the fencing off of this much loved track by the local community and all those who come to walk, ride, cycle, fish and so on.

A discussion with a respected traditional owner when I asked him if he objected to my using the track, commented that blocking it was unnecessary and he did not object to my riding on it. He thought that a common sense approach would be to create a detour around an area if it was "getting down a bit".

Can Parks please take this advice from this well-known respected traditional owner and reinstate our right of passage and take the fences down?

Also I would have thought it sensible to leave it open as it is a way of by passing the beach where the plover nesting areas during breeding season.

I think that with less human presence and with the track getting overgrown, would encourage the population growth of animals that would not be welcome in the Reserve so close to important shore bird nesting areas such as foxes, wild cats, snakes and other undesirable predators. Surely in time these predators will make a significant impact on reducing the plover numbers. Eagles and other predatory flight birds will also not be able to find their prey as easily with the thick growth, I think this would also increase the population of any pests and snakes too.

Back to recreation, with the blocking of this important track and now the proposed ban of horses and dogs on the beach

Walking and riding in this area is very special to me.  
this.

I would like to keep on doing

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

Yes, walking and riding (and photographing the landscape and wildlife) brings me great joy and satisfaction. It gives me a feeling that all is well in my world. It is relaxing and calming while keeping the body fit. Good for mental health as well as keeping physical fit and healthy.

I enjoy the remoteness and feeling of being away from it all

**I also enjoy my encounters with other users of the Reserve, if I am riding, people usually smile and wave and at times people especially with children, want to stop and pat my horse.**

**If I am walking with my dog and meet other dog walkers, it is the same, usually a stop and a chat and let the dogs socialise before we keep going.**

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

**Yes I do.**

*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 think everything should continue the way it is. It has already been made a reserve to look after flora and fauna, aboriginal sites and promote recreational activities.**

**I think recreational activities should continue throughout the WHOLE reserve, I think directing certain activities and lumping everyone in a smaller area will be problematic for the environment, the wildlife and also cause friction between users which will end up deterring some people from continuing doing what they love.**

**By allowing horses and dogs throughout the whole reserve , the impact will be spread thinner which will be much better for the Reserve's health, conservation and recovery.**

**I have ridden in the company of the local hobby trainers as well. We have a good relationship with each other and we show respect for one another too. They have always been courteous to myself and to my friends when riding out together.**

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

**I DO NOT think that horses and dogs should be banned at all from anywhere.**

**I think that education is key in preventing damage to the Reserve's environment and wildlife. Educating the horse riding community to stay on the designated paths and beach access points, riding below the high water mark and approaching bird nesting areas at a walk and to halt if necessary and not increase speed until the rider is at a safe distance away. Also to approach other beach users with the same courtesy.**

**As far as dogs are concerned, educating the public about dog control and keeping dogs on leashes when nearing plover nesting areas during plover breeding season is sensible.**

This education can be via social media, television ads, visiting schools and kindergartens, pony clubs and horse riding clubs, dog clubs and also having an information booth at key beach access points with give-aways of leashes and brochures.

Do you wish to add any further comments? Yes.

- Closing tracks and car parks will not be in line with the Draft Submission visionary slogan “Healthy parks healthy people”. These tracks have been in use for over 100 years and are important for the users to keep doing what they do to keep healthy. Closing access and carparks would make it difficult for the users to get out and enjoy what they do.
- Pollution in the shape of plastics, ropes, broken bottles and other materials washed in to the beaches are picked up and taken away by the users of the beaches, especially by the residents who live here. This ensures the beaches remain in a clean and pristine condition and avoid potential mishaps with the wildlife being entrapped or consuming the rubbish.
- In 2012 WTHRC put in a submission to Parks Victoria (DSE) to be allowed to organise club rides in National Parks and Reserves in south west Victoria. Permission was formally given to the club to do so.

An example of a club ride:

Members and day guest riders would usually meet at Killarney where we park out floats and ride out, either to the east or to the west depending on the tide and beach conditions. We did this at peak summer times with many regular beach goers on the beach and also during and near plover breeding sites. We did this under the guidance of Parks officers during the ride organisation and at times a Parks officer would attend our musters on the day if they wished.

At the end of our ride, we would return to Killarney and enjoy a social bbq lunch with our members and friends of the club. At times other park users would join in, either for a chat or to meet the horses. This always generated a feeling of goodwill not just for our club members but for the whole community at the camping grounds and on the beach.

Club rides are organised well ahead of time, with permissions sought from the land owners/managers, in this case from Moyne Shire and Parks Victoria. The guidelines and Athra's code of conduct is strictly adhered to both during the planning phase and the riding phase.

As per the regulations, there is always a pre-ride done to have an approximate expected time of the ride, track and beach conditions, lunch spots and any hazards that might be encountered on the day, plover nesting sites noted too. Members are notified of the ride with a formal Ride Notice and members rsvp to register their attendance with the ride planner. On the day, there is a muster which is an on-site meeting between the ride planner, trail boss, stewards (1 steward appointed to 10 riders), first aid, ride leader and drag rider. The planner, trail boss and stewards are all accredited with Athra and all ride personnel carry walkie talkies, mobile phones and a light first aid kit for both humans and horses. For extra visibility, these personnel also wear a high visibility vest.

At the end of the ride, the ride personnel and riders meet again for a post ride meeting where any incidents are noted, recorded and signed.

All members of WTHRC pledge to obey the club's code of conduct on their membership form. Every member has a membership card with their name and membership number which they must present if they are asked to provide identification. The code of conduct expects members to take care and respect the environment at all times. It also stipulates rules to ensure the ride is as safe as possible. Groups are kept to a manageable 20 riders at a time.

Both the landowner and hosts are covered by Athra's insurer and members enjoy 24/7 insurance whether they are riding with the club or not.

Despite riding in high season with many people enjoying the beach at Killarney and riding past plover nesting sites, we never had an issue. We showed respect to one and all at all times.

On behalf of WTHRC, I respectfully ask Parks to include WTHRC as a historic user of the BCR . We have been granted permission formally to hold club rides in the BCR and other national parks and areas under the control of Parks since 2012.

(I can provide documentation of our initial submission in 2012 and a letter from Parks giving us approval to use the BCR for our club rides.) We would like the same privileges as those given to the historical local trainers.

Our club is a small and friendly group that welcomes new members and day members at all times.

It is important for horse recreation that we retain as many tracks and beach as possible. It would be a travesty to many horse owners if this privilege is taken away from them. Recreation riding (pleasure riding/trail riding) is a very pleasurable way to enjoy exercise both for the horse and for the rider. Riding is good for both the mind and the body, enjoying nature from the back of a horse is a very special recreational activity especially when you are surrounded by the sounds of the sea, the wind and the birds. Riding keeps people active, fit and healthy.

Impact on the environment is very low due to the mainly slow pace therefore hoof impact is light, especially when walking below the high water mark.

For a read of the Athra Code of Conduct please go to <http://www.athra.com.au/2014-03-29-07-34-49/athra-code-of-conduct.html>

"The ATHRA Code of Conduct, specifically the Environmental Rules, has evolved and grown since the Code was first drafted. The Environmental Rules have been formulated after consultation with staff from Park Victoria, and other experts in the environmental field, and after research on many of the topics.

I am personally aware of the introduction of ATHRA's Guide to Combatting Phytophthora, prepared by

ATHRA."

and

ATHRA

I would like Parks to replace the area painted with the dark green with the light green for zoning as "conservational recreation" to ensure that flora and fauna is protected, aboriginal sights are protected and recreational activities for all can continue. (See Map 5, Recreational Horse Access).

I would like Parks to replace the area with the dark green with the light green for zoning as "conservational recreation" and put in the following text:

"Dogs on leash during plover breeding season when approaching plover nesting sites".

Referring to seasons in Victoria is unfair and unreasonable due to the changeable weather conditions from day to day in a Victorian summer. (See Map 4, Dog Access).

Page 7, para 2 Vision Healthy Parks Healthy People –

This draft plan is a contradiction to the slogan "Healthy Parks Healthy People". If the plan goes ahead, many BCR users would be detrimentally affected, potentially resulting in the opposite to the slogan.

- "Healthy Parks" there is no proof or science to warrant the notion that if horses and dogs are removed from the area marked as dark green, that the park will be any healthier. Given that plover numbers are

the strongest in the state and given that there is a large number of other shore birds on the beaches despite having dogs and horses in the reserve, suggests that it is quite healthy now.

In fact, if the reserve is turned into a park, I would question as to how healthy it would be with an increased number of foxes, feral cats, roaming lone dogs from the neighbourhood, increased snake population and the forever increase of the marram grass would point to the reverse.

- “Healthy People” slashing access points, closing car parks, banning outings that families have with their dogs and their horses, will deter people from taking part in recreational activities.

### Vii Summary page

“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...”

I have gone into discussion in the submission already and I reiterate that as long as horse riding is done in a responsible and conscientious way does not have any impact whatsoever. In my experience and in my observation of those whom I ride with and also see riding, stick to the main access tracks to get to the beach from the designated car parks, do not come across cultural heritage on these tracks or on the beach, always approach the public in a walking pace or stop our horses if necessary to let others go by, certainly do not go anywhere near nesting areas as the nesting places are roped off and in the dry deep sand under the dunes so it is an incorrect accusation and assumption that recreational riding causes an impact.

The same goes with dogs, dog owners including myself stick to the main beach access from the carparks therefore not affecting dune health, do not come across cultural heritage sites on these tracks or on the beach, my dogs and those of others’ I have met have never been a menace to anything let alone humans, and importantly do not go near nesting areas as they are not allowed to and are leashed when approaching nesting areas. Therefore this statement is discriminatory from all points. It is like saying everyone who will drive a car will speed, cause damage on purpose, be a menace to everyone, will disobey the rules. It is like saying everyone who will have a drink will be a drunkard, a nuisance, a menace, a danger to society. People are people, most will do the right thing and it is wrong to assume that everyone riding their horse on the beach and walking their dog on the beach will do the wrong thing. It is terrible form and terribly ignorant and arrogant to attack paint all people with this slur.

### Vii Recreation and Use

“Other key directions include creating a more inviting visitor experience by providing sustainable, rationalised access and facilities; developing on-site interpretation on the Reserve’s values and risks to enhance visitor experience and safety; and improving promotion of the values of the Belfast Coastal Reserve and the recreational opportunities it offers.”

The point here I would like to make is that this sentiment is faulty in that the change will not make a more inviting visitor experience at all. It has already sustainable rationalised access points that have been in place with not much marked change in well over 100 years as noted and informed by the original land holder who subdivided. Regarding visitor experiences and risks, the plan will actually be putting more visitors at risk by condensing the area of the Reserve into sectioned zones of recreational and conservation, and conservation. The light green zones showing recreation and conservation zones will have the added pressure of more usage by different users, so you have a smaller area with an increased number of people, this in itself will make the zone an unsafe place to be at times. This will surely change the habits of people and the areas will not be as open and friendly and inviting as they are now.

Page 3, para 1.6 “A range of community engagement opportunities took place from March 2017 through to September 2017 with an online project page including interactive map, surveys, public events, semi-structured interviews, targeted stakeholder workshops and site visits, consultation with Gunditjmara and Eastern Maar Traditional Owners. In total more than 230 people were engaged. The website received approximately 800 views, with 77 online surveys submitted and 54 comments added to the interactive map. Participants were dispersed across the south west region, with the majority from Port Fairy and Warrnambool.”

In my view, a total of 77 submitted surveys and a time line of 6 months obviously was not an adequate basis for the present draft to be drawn on.

With a population of Warrnambool standing at about 35,000, Koroit 1380, Port Fairy 2560, plus a large scattered population of Killarney and surrounding smaller towns and many farmers in the shire within a short drive of the BCR, a total of only 230 people engaged is not an adequate number to draw on for such a life changing law to be playing with. With recreational riders in the district being represented by Warrnambool Trail Horse Riders Club (WTHRC), Casterton & District Trail Horse Riders Club, Smythesdale Trail Horse Riders Club, Forrest Horse Riding Club, Mount Leura Riding Club and Limestone Coast Club, how many members of these clubs were involved in your survey and engaged? Outside these clubs, there are many pony clubs in the district as well as other adult riding clubs who often go to the beaches for a ride (maybe a yearly occurrence) and also many individual horse riders who go riding who are not affiliated with a club go to the beach.

I personally attended one of the information sessions in 2017 and also submitted and I was told at all times by Parks and others that recreational riders will not be affected in the decision to ban horses, that only race horses were targeted. Also there was never any mention of dog bans.

How many of the 230 people engaged were recreational riders? On what basis and whose opinion was the assumption made in the summary that recreational riders damage dunes, aboriginal sites, threaten people’s safety and disturb nests? Surely these were either theories or assumptions made by people with a bias.

Also recreational riders were not adequately engaged as the draft was not targeting recreational riders but it was aimed at horse racing only so there was a false sense of security for recreational riders.

### 3.1 Conservation Zone

“This usually involves ensuring recreation is low key and dispersed with small-scale or no facilities.”

**Unfortunately this zone chosen includes the township of Killarney, which is smack in the middle.**

**Its residents have purchased their properties here exactly for the lifestyle choices that were on offer to them. They access the beach via Towilla Way which was included in the subdivision especially for them to access the beach. It also includes important access points for everyone, fishermen, beach goers, recreational riders and others to access the beach on tracks that have been used over 100 years with minimal change other than the change that the sea itself would cause. This includes the access and carparks of Gorman Lane and the access to the Basin, two very important areas for recreational purposes for everyone in the south west.**

#### **Page 41, Chp 5 Health Country**

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

**The BCR has one of the most significant numbers of the hooded plover in the State, this is despite horses and dogs on the beach. The threat to the plover from horses is 0.77% and the threat from dogs is 3.26%, see Table 1 - Managing the hooded plover in Victoria (2014) Parks Victoria.**

**Reducing these threats will not wipe off the other threats, and given that the natural threats to the plover amount to approx. 85% (including the major threat of tides), banning dogs and horses will not take away the natural threats.**

#### **Page 35 Key Threats to the Hooded Plover Breeding Success**

“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”

**I would suggest that this is pure theory.**

“horses can trample eggs” **But do they? If yes, it would be an extremely rare occurrence with such a low % of maybes that it could not be measured.**

**“horses leave craters in the sand” Yes until the tide comes in and washes the footprint away evening the sand again. The tide comes in every 6 hours and with a breeding pair of about 1 per kilometre, the chance of a chick falling into a horse print is just a theory and could not be measured statistically either. Who made this up? Even a beetle can slowly make its way out of a hole in the sand, it is hard to believe that a plover chick could not.**

**“vehicles” since vehicles, trail bikes and four wheeler bikes are illegal in the BCR yet quite a common occurrence, banning horses and dogs is not going to make any difference to the ecology and to the numbers of fauna. The illegal vehicles, trail bikes and four wheelers will still continue illegally.**

From:  
Sent: Thursday, 15 March 2018 7:09 PM  
To: ParkPlanMailbox  
Subject: Belfast CR Enquiry

Good Evening.

I submitted on behalf of Warrnambool Trail Horse Riders Club already however I neglected to make an important point.

At one of our meetings in around 2012, we invited [redacted] from Parks and [redacted] from a local birdgroup to come and speak at a club meeting. [redacted] educated our members about plovers and their breeding habits and taught us how to identify them on the beach. [redacted] and [redacted] also told us to be mindful and to ride as close to the water's edge as possible to avoid disturbing the birds.

We have always done so and we slow to a walk when we are nearing a plover nesting site.

[redacted] also talked about keeping dogs on leashes when approaching plover nesting sites to ensure that dogs do not disturb the birds.

We acknowledged our thanks with a donation on behalf of the club to the bird group to help them buy materials needed for roping off nesting sites. We also offered our assistance on the beach to help out.

As a club, we are always mindful that we do the right thing. We appreciated [redacted] and [redacted] coming to the meeting to educate us to ensure we were all on the same page.

Thank you. I hope this can be added to my comments in the WTHRC submission.

WTHRC

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

Name: \_\_\_\_\_

Signature \_\_\_\_\_

Email Address: \_\_\_\_\_

Post Code : \_\_\_\_\_

Age Range : 44

Gender : female

Is this submission to be treated as Confidential : \_\_\_\_\_

How often do you use the Reserve : fortnightly

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)

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

Very important it is an amazing place and have been using this section for years and would like to continue to do so

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 - horseriding ar, family & dogs

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

to see the whole reserve classed as recreational and stay 'light Green'

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

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

also very important they are also part of the reserve

How important is the ability to enjoy recreation activities to you

very important, there are few areas that are safe for horseriding and dog walking.

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

its an extremely peaceful place to be

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

definitely

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 I do

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

I dont

Do you wish to add any further comments:

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

the Beach/Ocean environment has been vital for their fitness and well being.

the Therapeutic benefits of the Ocean are immeasurable. These benefits have also been enjoyed by our and many others horses over the years whether it be treating Back, Joint, Muscle or feet issues.

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

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

Regards,

**Addressed to specific issues.**

**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. 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 has two safe venues to windsurf. The physical exercise of Windsurfing is great for his flexibility and mobility. It also improves 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 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 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.

Date 4/3/2018

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

Name: .....

Signature: .....

Email Address: .....

Post Code : .....

Age Range : 75 .....

Gender : Male .....

Is this submission to be treated as Confidential:

**Not confidential** .....

How often do you use the Reserve :

**Mostly in winter, about every 3 weeks.** .....

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

**Drive, as I need to carry windsurfing gear.**

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)

**windsurfing**

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

**Paramount**

.....  
Which part of the Reserve do you use most frequently?

**West Killarney Beach (Belfast Lough)**

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)

**Recreation - windsurfing**

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

**Dark green to the light green proposal.**

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

**It is important If there is any cultural heritage to the Belfast Lough.**

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

**Important.**

.....  
.....  
How important is the ability to enjoy recreation activities to you?

**I value my recreational activity as it my only form of exercise and valuable to my self-esteem and I wish to maintain my windsurfing for a long time to come. The lough is my only chance to do so as the only other venues that are safe for me are drive to Lake George or to Geelong (Point Henry) which are prohibitive as it would be a return journey with no time for enjoyment.**

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



I am very conscious of keeping a distance from any birdlife and maintaining and safe guarding the area. It would be on record that I have reported to the Moyne Shire, debris such as animal carcasses and building rubble dumped at the landing strip entrance at the lough. When walking around the town and the environs I am continually picking up rubbish.

I do question the amount of thought and wisdom that has gone into this proposal as it apparently allows jet skis at any speed and other craft capable of doing much greater damage and disturbance than a very small windsurfing and kite surfing craft. If this proposal is passed then number of us will be forced to travel (lake George or Geelong /Point Henry) to pursue our much-loved sport. I would have to cease windsurfing as it is too dangerous to travel a day return and to have time to enjoy the purpose of the trip.

When I was investigating the area where is there a place to windsurf? The lough was the recommendation. As with many others I have spoken to also have been attracted to this part of the world which, with the departments plan, will seriously disrupt and massively (without any exaggeration) effect their lifestyle.

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

Dear Sir/Madam,

**SUBMISSION - BELFAST COASTAL DRAFT MANAGEMENT PLAN**

I wish to submit opinion on a number of key items outlined in the management plan.

We enjoy recreation in this reserve and have a respect and love of the natural environment.

1. **Dogs on beaches.** – I generally support the recommendations with respect to dogs. It is of upmost importance to protect the bird and animal life in this area. In particular the hooded plover nesting sites need protection. Volunteers put in countless hours to protect this bird only to see dog owners allow dogs to run through these areas. I frequent the beach area a lot, maybe every second day. Each time I am there I see this happening. On many occasions I see a particular dog owner that has 4 or 5 large hunting dogs, they get let off lead at the basin and they charge around, through fenced areas. Many of the dog owners are well intentioned, however totally oblivious to what their dogs are doing, despite the signs. Accordingly I believe the recommendations are fairly sound, and you need to stick to your guns despite the pressure that will inevitable come to bare from disgruntled dog owners as they become aware of the proposal. Education and signage alone **will not work.**
2. **Recreational horses** – Within the allowable conservation and recreation zones this activity should be tightly controlled via a permit system with a slew of conditions. Walking only, hard sand only, etc etc. I have seen horsemen charging about bareback riding, horses riding at speed up through the soft sand where the plovers nest, the list goes on . Without tight restrictions the danger and destructive impact is too great.
3. **Local trainers-** I do not agree with local trainers continuing to use these areas. When incorrect practices are occurring it is prudent to terminate them as soon as possible. If local historical trainers are to be allowed it is important that it be defined carefully to prevent bigger operators slipping in through a loop hole. Walking and swimming only, no cantering/galloping. There should also be provision to phase out this activity in say 2 or 3 years to give these trainers time to accept this as a reality of the modern world, and make alternative arrangements.
4. **Killarney beach** – Allowing any horse training speed work is madness at this location. This is an extremely popular family beach totally incompatible with galloping/cantering horses in every respect. The valid arguments have all been presented numerous times already.

5. **Basin boat ramp** – This standard of this facility is quite in line with its usage. It is a difficult access which limits its usage to small craft ( tinnies and kayaks) which are appropriate for this site. Upgrading access will see larger craft trying to launch and the associated problems, getting bogged etc on the beach etc.
  
6. **Commercial Race Horse Training** – I think it is obvious to 90% of people in the community that this activity is totally incompatible with the reserve in all respects, all valid arguments have been presented. I suspect the authors of the report also are well aware of this and are making these proposals under sufferance. It seems obvious that political pressure from the racing industry, via the racing minister are the reason for this ridiculous situation. I expect that the general consensus is that the “consultation” in this area is a complete farce as the decisions have been made behind closed doors, made by the environment minister to appease the racing minister. I expect that the consultation process showed an overwhelming support for the ceasing of this damaging commercial activity within the fragile reserve. I would like to see the statistics around this item collated and openly presented to prove the transparency of the process. I think the mishandling of this item, which is the catalyst for the management plan casts a bad light on the whole process and leaves people with a feeling of helplessness and betrayal. It must be recognised that many local people have put in countless hours revegetating this area, protecting birds, looking after the environment. To these people the proposal to allow commercial horse training in the reserve is a slap in the face, and a cause for them to lose faith and give up these activities.

Yours Sincerely,

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

Name: .....

Signature .....

Email Address: .....

Post Code: .....

Age Range: Adult.....

Gender: Female.....

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)

Horse riding.....

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

Very important it is a great relaxation activity for me and my family.....

Which part of the Reserve do you use most frequently:

Killarney Beach We use all areas.....

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)

With animals - horses.....

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

Leave the access as it is – let us continue to enjoy our beautiful beach as we have been doing.....

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

Protection of any cultural heritage is important but not at the deferment of the local community and beach users  
.....  
.....

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

What's the point of having some great natural environment if no one can use or access it???  
.....  
.....

**How important is the ability to enjoy recreation activities to you**

We consider riding on the beach a privilege and a unique experience. We share our great resource with international visitors, and greatly value the family time we have riding at the beach  
.....  
.....

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

I consider riding at the beach a very relaxing active which enhances our family time and well being  
.....  
.....

**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).**

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:**

None  
.....  
.....

**Do you wish to add any further comments:** .....

Leave us and our beach alone  
.....  
.....

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

Name: .....

Signature .....

Email Address: .....

Post Code : 3280.....

Age Range : 35-40.....

Gender : female.....

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

How often do you use the Reserve : every fortnight.....

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

Drive or ride my horse.....

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)

recreational horse riding, dog walking,  
fishing.....

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.....

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

East of Killarney Beach to The Cutting : This area mainly.....

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 & dog walking

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

I would like to see all areas of the reserve changed to light green (conservation/recreation)

How important is the Cultural Heritage of the Reserve to you? It's significant to the area & should be recognised

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

its very important as its part of the eco-system

How important is the ability to enjoy recreation activities to you

Extremely important as it is an area I enjoy being active in (physical activity away from work)

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

it is much safer for me riding in the reserve than riding on roads and dealing with traffic & public places

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).

yes. i believe where cultural significant sights are should be preserved and marked as a conservation area.

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

I do not believe they should be banned.

Do you wish to add any further comments:

when riding, abide by the ATHRA code of ~~conduct~~ conduct and when riding in the reserve I am always vigilant of other beach users and ~~my~~ environmental impact.

Parks Victoria  
Level 10,  
535 Bourke Street  
**Melbourne** Victoria 3000.

Dear

#### **BELFAST COASTAL RESERVE – MANAGEMENT PLAN**

This is a further submission from ATHRA, the Australian Trail Horse Riders Association, regarding a draft management plan for the Belfast Coastal Reserve, (BCR). ATHRA is the peak body representing recreational trail horse riders in Australia. ATHRA advocates for recreational horse riding at all levels of government. While a large proportion of leisure horse riders do not belong to clubs or organisations such as ATHRA, as a national body we have over 100 affiliated clubs Australia wide. Our philosophy regarding riding on public lands, is based on environmental respect, user group co-operation and compromise.

Cultural heritage and the natural environment contribute to the pleasure of horse riding activities. Indeed, being quietly and safely on a recreational riding outing lends itself to observing and enjoying these aspects of public lands. Recreational horse riding is not intense in pace or volume, as the draft plan implies. Indeed, it is compatible with environmental protection. This is especially so when riders comply with regulations and codes of conduct.

Trail horses' presence is passive, relatively non-damaging and environmentally aware, (there are 16 environmental rules in our ATHRA Code of Conduct). Such activity needs space, it is not contained within a small paddock or arena, like some riding activities, but uses open trails and bushland, sandy stretches and beach.

You would already have received submissions about the health and social benefits of leisure horse riding, a much-needed recreational activity for many Victorians whose lower exercise levels have been identified as a Victorian Government health priority. As ATHRA stated in its first submission, the numbers of trail horses, the pace at which they are ridden, and the mindful attitudes of their riders, in general cannot be compared with the commercial 'drive' of race horse activities.

Yet, according to the draft plan, commercial horse riding tour operators and race horse trainers will be allowed into areas where recreational horses will not be allowed, on the basis that there will be licence conditions imposed on the first two groups. Surely, with recreational riders being in much smaller numbers, and riding there at lesser frequencies, the same conditions can be imposed on trail riders as well?

Yes, we understand that there can be vocal, strident opposition to horses in fragile areas, but why are recreational users being treated as 'sacrificial lambs' while those horse activities which have a commercial rather than recreational basis are granted privilege?

ATHRA urges ParksVic to amend the draft plan, acknowledging a strong difference between commercial race horse training and leisurely, recreational horse riding. That there is not a commercial or political drive behind trail horse riding does not mean that these horse riders' interests should be sacrificed. Timing and number restrictions proposed for race horse trainers in certain zones which propose to exclude trail riders, could apply equally to those riders.

At a minimum and in the spirit of compromise and justice, ATHRA suggests that ParksVic consider a trial period which treats recreational riders equally with commercial horse operations. We are confident that there are articulate, informed and committed recreational riders in the area who can advise on such a trial in the BCR.

Yours sincerely

8 March 2018.

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

Name:

.....

Signature

.....

Email Address:

.....

Post Code :3280

.....

Age Range : 39

.....

Gender : female

.....

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)

Horse riding and dog walking

.....

.....

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

Very important... It's a safe place to take

horse riding without worrying about traffic etc

.....

.....

Which part of the Reserve do you use most frequently:

Killarney Beach

.....

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

.....

East of Killarney Beach to The Cutting yes

.....

**West of The Cutting towards Warrnambool** yes.....

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

Horse riding and dog walking.....

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

I would like horse riding and dog walking to continue to be allowed.....

**How important is the Cultural Heritage of the Reserve to you? Very important** .....

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

Very important.....

**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.**

Horse riding is a very important weekly part of my life and it's so peaceful and safe to ride in the Reserve. If it's banned myself and a lot of other Recreational horse riders will be very disappointed and it will be sadly missed.....

**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).**

I believe Recreational use should be allowed in the whole Reserve.....

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

**Do you wish to add any further comments:** .....

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**Submission to Parks Victoria regarding the *Belfast Coastal Reserve Draft Coastal Management Plan January 2018* by**

Thanks for the opportunity to make this submission and thanks for the work that has gone into the Draft Management Plan.

and consider the natural settings and landscapes as one of the best things about living in the South West. frequent the Belfast Coastal Reserve on a regular basis throughout the year. We love to walk on the beaches and

So you could say that I am pre-disposed to attributing very high value to the 'scenic beauty, biodiversity and cultural heritage' of the Reserve. At the same time I am aware that the competing uses and users of the Reserve must be considered and that is ultimately the point of this consulting exercise and submission process.

It is great to see that a comprehensive plan for the ongoing management of the Reserve will soon be in place and it is clear to me that the contents of the Draft Plan provides all the information that one needs to decide how we should allow the Reserve to be used. Of course the opposing groups that we see today lobbying for support of their view feeds into the whole mix. I will try to present my view in a rational and coherent manner.

I think it is true to say that a management plan specific to the Reserve in this current day is very timely. The Reserve has been accessed by all those wanting to in the manner they generally wish to over many years and this has effectively resulted in a sense of entitlement within the many different users of the Reserve. There exists a local culture (and perhaps this is a national phenomenon) if you like that does not necessarily equate to the general population attributing value to what remains of our natural 'wild' places, ecosystems and landscapes. And this situation has and continues to lead to the degrading of what is described as the 'significant values' of the Reserve.

The question we need to ask ourselves is, if a proportion of a community doesn't value biodiversity above its own wants and needs and therefore sanctions activities that damage what we see as a place's 'significant values' then is that a reason to actually sanction those activities within a management plan? Governing bodies and authorities presumably have as part of their duty of care, or governance remit, a responsibility to adopt a plan that does truly focus "...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."

As 'very little land in the Reserve retains its original vegetation....' it is even more important to retain and enhance what is left by adopting management practices that exclude incompatible recreational and commercial activities from the reserve.

Too often the generation of any given day looks at the natural world within the context of the new, known or experienced baseline. What I mean by the 'new baseline' is that the attributes of a natural space before any significant human impact occurred is not even known or recognised. That is, what has already been lost is not considered. This is a dangerous approach or position to be in because the community is at risk of believing that the remaining or existing natural world can be further exploited with minimal impact.

I believe that the risk of negative impacts on already diminished and degraded environments and ecosystems should preclude activities that are not low impact or passive. I have a sense of unease that a commercial activity such as horse training could be allowed in essentially what is or what should be considered a conservation area. This unease exists because horse training on the beaches of the Belfast Coastal Reserve does pose risk to the significant values of the Reserve.

Any management plan adopted for the Belfast Coastal Reserve needs to adhere to the main purpose of the Reserve's existence in the first place which is conservation and relatively passive recreation. The draft plan looks like it could make a significant improvement to the Reserve in terms of its significant values, however this will entail ongoing community education and engagement. This will involve a greater presence of Parks Victoria staff and others on the ground.

In short I say, keep the draft plan minus the horse training.

Kind Regards,

6 March 2018

Belfast Coastal Reserve  
Draft Management Plan  
Invited Feedback  
Manager Parks Planning  
Parks Victoria  
Level 10, 535 Bourke Street  
MELBOURNE VIC 3000

Dear Sir,

In the last I have seen Warrnambool expand as a training centre to the vast industry it is today for one reason – Warrnambool's beach access.

Warrnambool trained horses have a superior record to those trained elsewhere. That is generally credited to their access to training on the sand and in the salt water.

If you want to kill an industry, deny them the access. What has been built up over decades can be wiped out overnight.

You should listen long and hard to industry participants... not professional agitators.

I remain,  
Yours faithfully,

## 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: 5<sup>th</sup> March 2018 \_\_\_\_\_

### Your Comments:

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

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

Local resident, lives in Warrnambool

How often do you or your organisation use the reserve?

Daily    Weekly    Monthly    A couple of times a year    Rarely    Never

How do you or your organisation mainly use the reserve?

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

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

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















**Belfast Coastal Reserve  
Draft Management Plan  
Submission**

## 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: 5 March 2018

### Your Comments:

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

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

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): Cycling along the Rail Trail adjacent to Kellys Swamp and occasionally walking to the beach from there.

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

## General comments

- There are many good elements in the draft coastal management plan that I wholeheartedly support: cultural heritage protection; joint management; education and interpretation; monitoring and research; rationalisation and closure of inappropriate beach access; dog control. But it remains deeply flawed because of its complicity in entrenching and expanding the use of the reserve by commercial racehorse trainers.
- Under the plan, commercial racehorse training would rapidly expand to multiple beaches and in sand dunes, with devastating effects for the nationally threatened hooded plovers—the reserve is its most important breeding area in the state according to the plan—other coastal wildlife and the safety and enjoyment of families, anglers, surfers and other beachgoers.
- The length of beaches available to racehorse training would, under the plan, be increased by 250% (from 2 km to 5 km) and the number of horses by 400% (from 65 to 256 each day). That represents 25% of the reserve’s beaches, with nothing in the plan to stop future expansion.
- The draft plan would allow racehorses back into 750 metres of fragile dunes behind Levy’s Beach and at Hoon Hill, where in the past they have caused severe dune erosion. The plan even recommends racehorse training within the Conservation Zone at Rutledge’s Cutting. That is environmental vandalism writ large.
- Many times, the draft plan refers to damage caused by racehorses but fails to explain how increasing the area available to them by 250% will mitigate these impacts. Worse still, the plan’s risk assessment reveals that management won’t make any difference. Before management, the risk to coastal dune vegetation, cultural heritage, resident and migratory shorebirds from racehorse training is rated ‘Extreme’. After management is introduced? The rating remains—Extreme!
- Ever since the uninvited invasion by racehorses in 2015, their training has been mismanaged, with numerous breaches of licensing conditions, public safety put at risk and taxpayers footing the bill for costly Parks Victoria surveillance and infrastructure upgrades. Expanding the number of training beaches will simply make that worse.
- By entrenching and expanding commercial horse training the plan is a relic of past coastal mismanagement and inappropriate use.

## Executive summary (pages v-viii)

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

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

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

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

### Comments about the vision for Belfast Coastal Reserve

The vision encapsulates much of what I wish to see in the future for the Belfast Coastal Reserve except for the reference to 'horse riding': "The location, timing and intensity of activities such as horse riding has been managed to avoid conflicts between uses, and to reduce the risk of damage to the environment and cultural sites". The softer term of 'horse riding' deflects from the extreme risk and existing damage to wildlife, culture and passive recreation from commercial racehorse training in the reserve.

The term 'horse riding' should be removed from this statement and commercial racehorse training removed from the Belfast Coastal Reserve. Throughout the rest of the plan there are 24 references to the impacts that horses have on the reserve's natural, cultural and recreational values. More on this under Key Management Theme #2 Healthy Country.

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

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

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

### Comments:

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

However, one of the strategies—'Work with users and community groups to reduce impacts from both authorised and illegal access on the fragile coastal dune systems'—is expecting too much from community groups to act as delivery partners when those groups will witness daily the extreme damage to sand dunes and beach habitats from commercial racehorse training which, under the plan, will have 'authorised access'. The goals and strategies also ignore the extreme risk to cultural heritage from commercial racehorse training.

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

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

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

### Comments:

- This chapter reveals the draft plan's underlying contradictions regarding commercial racehorse training. On page 29, the draft plan admits that the extreme risk to coastal habitats, cultural heritage and resident and migratory wildlife from commercial racehorse training will remain so even following management action. This fundamental contradiction in the draft plan will undermine the achievement

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

- It is very pleasing to see one of the strategies under this goal including water management of the Belfast Lough, which until now was not considered as part of the Belfast Coastal Reserve. But the strategy is vague, only referring to maintaining its aquatic values. This needs to be more articulate and refer to water quality, water levels and habitat protection, especially the strong management of motor boats and jet skis, which in the shallow waters can significantly impact on shallow-water habitats and birdlife. Jet skis should be banned from the lough and broader reserve.
- Reducing threats and impacts are a commonly used measure to build resilience to climate change within natural systems. Horses have the most impact in the reserve, especially with regard to dune vegetation and stability. Sea-level rise may reduce the width of beaches and intensify the impacts of racehorses on that habitat. The best way to build resilience is to get the racehorses out.

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

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

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

#### Comments:

- I strongly support many of the goals and strategies that relate to the recreational use of the Belfast Coastal Reserve in this chapter including increased enforcement, better management of vehicular use, dog walking and recreational horse riding, bans on dune boarding, hunting and off-road vehicles, reducing risks and improving safety, improving information, interpretation and education, and developing tourism partnerships, marketing and promotion. But without the removal of commercial racehorse training, these goals will not be achieved.
- A far more honest heading for this chapter would be 'Recreational and commercial use'. Too often the plan seeks to confuse recreational riding and commercial racehorse training or to downplay the intensity and impacts of the commercial activity, continually referring to the training as a 'licensed' or 'authorised' use to convey that it is not negotiable, it cannot be restricted or removed. By including it within a chapter mainly on 'recreation', it again tries to downplay the highly commercial and intensive nature of racehorse training.
- The draft plan recommends strict controls on where and how recreational uses are to be managed in the future, whereas commercial racehorse training will be expanded. That doesn't make sense.
- In the introduction to this chapter, the draft plan states, with my underlining: Riding of horses for recreational or commercial purposes was viewed as a threat to dune health, cultural heritage, shorebirds and public safety, especially if riders did not comply with regulations, codes of conduct or licence conditions. This suggests that the community is mainly concerned about impacts that occur when commercial racehorse training doesn't follow the rules. But as the risk assessment table reveals on page 29, even with rules, management will not mitigate the extreme risk from commercial racehorse training.

- Jet skis should not be allowed in reserve waters, including Belfast Lough, because of their disturbance to wildlife and other recreational users, and damage to shallow water habitats.
- Dogs should not be allowed off-leash from 1 August to 30 November at Killarney Beach, coinciding with the first part of the hooded plover breeding season.
- It is ludicrous to consider renaming Hoon Hill to ‘improve expectations on visitor behaviour’ when those same visitors will witness racehorses and their riders ‘hooning’ up and down the dunes of the hill.
- Section 6.5 of this chapter is titled ‘Authorised uses’, code for commercial racehorse training. Much of the emphasis in this section is the regional economic importance of the racing industry as justification for the damage that it is causing and will continue to cause if it remains in the Belfast Coastal Reserve. But in a September 2013 report prepared for the Victorian racing industry by consultants IER, it was revealed that the racing industry generates \$75 million gross value added in the Western District, which includes Warrnambool but also a number of other racing clubs at Casterton, Coleraine, Hamilton, Terang, Camperdown Mortlake, 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.
- I strongly condemn the goal under this section of the chapter—Authorised uses of the Reserve are managed to minimise the effect on values and visitors—with regards to commercial racehorse training as it is incompatible with the goals of the plan and the purposes of the reserve.

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

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

- Very supportive     **Supportive** +  **Unsupportive** =  **Partially Supportive**  
 Not sure/Don’t know     Very Unsupportive

#### Comments:

- I strongly support the first goal in this chapter: Coordinated management of the Reserve enables efficiencies in program delivery and is supported by consistent land status and regulations. But I cannot support the strategies that aim to achieve it. The plan recommends retaining the fragmented management across the City of Warrnambool, Moyne Shire Council and Parks Victoria and leaving the

reserve under the Crown Lands (Reserves) Act. The reserve should become a park under the National Parks Act.

- I also strongly support goals to ensure that Traditional Owners caring for their Country is an integral part of the reserve's management and that community skills, knowledge and assistance provide stewardship and help in that management. However, if commercial racehorse training is retained inside the reserve, all of their efforts would be to nought.

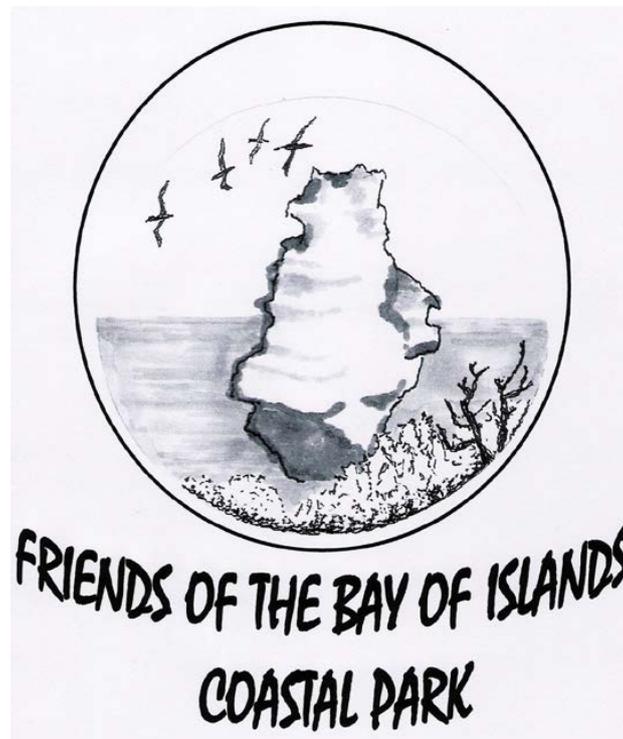
### **Key management theme #5: Research and monitoring (page 77-79)**

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

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

#### **Comments:**

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



### **Friends of the Bay of Islands Coastal Park response to the Belfast Coastal Reserve Draft Coastal Management Plan 2018**

#### **conservation zone**

We have been participating in the recovery of the endangered beach bird, the Hooded Plover, since our formation in 1994. This bird lives only on the beaches, and South Western Victoria beaches are well documented in being critical sites. Belfast Coastal Reserve contains 12 % of the Victorian breeding population. This is a significant number for their survival. “There are 28 breeding sites within the proposed conservation zone”, (Birdlife data personal communication). We have supported the B.C.R.A.G., sharing ideas and will continue to work towards the recovery of this species.

We wish to support the proposed conservation zone to be dog and horse free, to lift the pressure on all birds, plants and invertebrates who live and breed only on this section of beach.

#### **conservation and recreation zone**

Commercial horse training is **NOT** recreational horse riding.

With regard to the conservation and recreation zone area deemed we are adamant that commercial horse training is not compatible with conservation and/or recreation.

Horses will cause/do cause erosion “significant impacts occur after only low levels of horse use”(Phillips and Newsome, 2001) <sup>1</sup>.

The Licence Racehorse Access map fails to point to Killarney main beach being used as a commercial training facility. As in the Managing Belfast Coastal Reserve Draft

Management Plan summary activities P6 within the purposed zone allows horse training at Killarney Beach but on map 6 it is shown as historical. This is very confusing to whether horse training is proposed or not for this area.

Commercial horse training is a multi million dollar industry and has no right to ignore and destroy the coastal conservation values. It is not compatible and the racing industry can afford other facilities ie. the new sand track at Warrnambool built in 2017. We believe that this industry will survive handsomely with out training on beaches within Belfast Coastal Reserve.

The photo of a horse and the Double Banded Plovers on page 8 of the Belfast Coastal Reserve Draft Coastal Reserve Management Plan is very deceiving as it shows the race horse walking on wet hard sand but in reality the horses (personal observation have been training on the soft and hard sand plus the sand dunes, which is destroying the Hooded Plovers nesting sites and causing erosion.

As your draft plan has stated of commercial horse training “horse riding can impact dune health, cultural heritage, public safety and disturb beach nesting birds”(page vii executive summary Belfast Coastal Reserve Draft Coastal Management Plan) and therefore it follows that it is not compatible with the conservation values of the Reserve.

As a Friends group of a local park, we know how underfunded Parks Victoria are and have no confidence that this plan will be managed adequately.

1.N.Phillips & D. Newstone, 2001 Pacific Conservation Biology 7(4) 256-273.  
Understanding the impacts of recreationa in Australia protected areaa: Quantifying damage caused by horse riding in D’Entrcaste- CSRIO publishing.

Friends of the Bay of Islands Coastal Park.  
Peterborough. 3270. Victoria.

## Submission template for Draft Belfast Coastal Reserve Management Plan

### About you:

Your name:

Your Organisation (if relevant):

group \_\_\_\_\_

Postcode:

\_\_\_\_3280\_\_\_\_\_

Email or Postal address:

\_\_\_\_\_

\_\_\_\_\_

**THIS SUBMISSION IS:**    **NOT CONFIDENTIAL**   Date: 5/3/2018

### 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: **Windsurfing , Kitesurfing, surfing**

How often do you or your organisation use the reserve?

Daily    Weekly

**Which ever is appropriate for you**

How do you or your organisation mainly use the reserve?

- |   |   |  |
|---|---|--|
| <input type="checkbox"/> Walking or 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 checked="" type="checkbox"/> Socialising                        |
- Other (please specify): windsurfing Kitesurfing ,surfing

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

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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Reserve have been using the Belfast Coastal Reserve primarily to be close to the water and windsurfing/surfing opportunities. of the "South West Windsurfers and Kitters", I and many others are very regular users of the Belfast Loch, East Beach, Mills Reef and the Cutting. We also scuba dive and snorkel the Basin and Long Reef. As it stands at the moment, the current proposed plan will mean that I and others will be

restricted severely in my choice of recreational activities.

In relation to the banning of Windsurfing and Kite Surfing on the Belfast Lough and the cutting, I fail to see any data available to show that the above activities will have a negative impact in the Belfast reserve. (I also fail to see how it is possible to surf on flat water.) Windsurfing on the Lough is a pollution free, quiet passive activity, requiring no fuel or possibility of spillage and no noise. On windy days there are a small group of enthusiasts enjoying wind/kite surfing and generally stay in the middle part of the Lough where it is deepest away from the muddy edges. Birds are not disturbed as they always move to the edges or completely away when the wind gets up. When the wind dies down the wind and kite surfers do not use the water. Birdlife can be seen in all parts of the Lough during calm conditions so there is no impact.

In terms of conflict with the public, it is zero. Both the Lough and Cutting are rarely used by any other user groups because we are out there on the water in windy conditions which are generally unappealing to other users.

It is interesting that in **table 6.1 Page 54**, motorised boating, which includes jet skis, is permitted in the Belfast Loch, yet windsurfing and kitesurfing are not. Non-motorised boating (canoes, kayaks rowing skulls, paddleboards etc. are permitted. On Rutledges Cutting, non-motorised boating is permitted. Kite surfing and Windsurfing are non-motorised sports yet are subject to prohibition in **Section 6**. This means that I can ride my loud fuel dependant jet ski at 100 kmh across the Lough yet I cannot ride my wind surfer or kite board. I hope this is merely an oversight.

Both the Cutting and the Lough are very valuable locations in terms of providing a space for learners and older people who are interested in these water sports to experience them in a safe and satisfactory way. Wind conditions at times do not make ocean sailing an appropriate option so the Lough and Cutting are opted for. The closest locations that would have the same conditions would be Geelong

It should also be noted that the users of these waterways help keep the environment clean. We often pick up rubbish from the water, around the entrance to the Lough and near the airstrip because we care about the area and collectively do our bit for conservation.

The Southwest Windsurfers and Kitters also believe that the Belfast Lough and Rutledge's Cutting are environmentally different to Kelly's swamp. The Lough and The Cutting are brackish and highly modified. Kelly's swamp is fresh water and heavily reeded, consequently is not suitable for windsurfing and kitesurfing.

In summary, windsurfers and kite-surfers are opposed to the Belfast Reserve Plan and do not believe it is not appropriate to treat all wetlands and estuaries the same under the plan. Windsurfers and kite-surfers cannot see Parks Victoria's justification to change from the current permitted use of the Lough as we have zero environmental impact.

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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 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).*

## Belfast Coast Management Plan: - Individual Submission by

Name:

Email Address:

Post Code:

Age Range: 24

Gender: Female

**Is this submission to be treated as Confidential: NO**

I am down at the beach (between Gormans Road and the Basin) at least 4 times a week.

I mainly walk, ride a bike, or ride my horse to the beach.

I enjoy the following recreational pursuits – riding my horse, paddle boarding, swimming, running, snorkelling.

It is extremely important to be able to continue to use the beach with my horse. I have ridden my horse on the beach As I am older I believe it is important to have healthy passive recreation activities and the beach allow me to do just that. Going for long rides on the beach is extremely important. I will often ride from the Basin over to near Levies. I always ride along the water's edge where the sand is a lot harder. I am extremely respectful of the environment.

I believe that it is extremely important for everyone around here to be able to continue doing the same activities with their dogs and also the horse riders that ride along the beach.

I mainly frequent the following parts of the area:

I rarely go to Killarney Beach. I usually go from the Basin over to past the Cutting (past Gormans Road)

My main area of interest is recreational horse riding and paddleboarding.

**I disagree with the conservation zone as it will prevent me from participating in the recreation activity that I love – riding my horse.**

**It make sense to me to remove the Dark Green – Conservation Zone and Replace it with a Light Green Conservation Zone**

I see the cultural heritage as important, however most of the burial sites and middens have been covered by the sand.

The birdlife is important to me; however I believe that the current situation of management is appropriate.

I have seen a few foxes on the beach early in the morning and towards the evening. They are disturbed when they see me. The birds do not seem to worry about me – mostly because I walk along the water's edge.

There is a lot of erosion on the beach – I have noticed the sand dunes. I believe the beaches however are much cleaner; this is because the people usually pick up the rubbish and take it home with them.

The Beach is extremely important to me for recreation. It is extremely important for me to be able to ride my horse along the beach. It is extremely important for my health and wellbeing.

Most of the people I see down the beach walk their dogs. A few, mainly women ride horses.

I believe that the current use of the reserve that allows for both Recreation and Conservation should continue.

I believe that Recreational Activities should be allowed throughout the Whole Reserve. Dogs and Horses should be allowed in all areas of the beaches – from Port Fairy to Warrnambool. I believe it is very important for the local community to be able to walk their dog and ride their horse along the beaches from Port Fairy through to Warrnambool.

Belfast Coastal Reserve  
Draft Coastal Management Plan  
Submission

I am grateful for the opportunity to make a submission on the draft plan which, in my view, represents a pivotal moment in the history of this reserve and its preservation for generations to come. While this reserve has been in place since 1870 and falls under the protection of several pieces of federal and state legislation, the reality is that much of it has long suffered from neglect, wilful damage through illegal trail-bike riding, four-wheel driving and rubbish dumping, and commercial activities that would not be considered appropriate today, such as the sand mining operation and nearby rendering plant.

This plan gives us an opportunity to set things right and to – again - prioritise the preservation of the remote and wild parts of this reserve; to protect the vulnerable ecology; to acknowledge and protect its rich indigenous heritage; and to permit soft recreational activities in those areas that have been classed as suitable for recreational use.

I strongly support the majority of the plan, as it clearly identifies the damage that has been done in the past, acknowledges the ecological and cultural significance of this area and sets out meaningful and practical steps for it to be further protected.

But then we come to the proposal for large-scale, commercial racehorse training.

This proposal, within the context of the overall report that emphasises further protection, stands out like the proverbial sore thumb. Indeed it is so at odds with the aims of the draft management plan that I can almost see the anxious author/s trying to work out how to incorporate the words “commercial racehorse training” into a plan that has two very clear zones: recreational and conservation.

On any measure, commercial racehorse training is not recreational. It is also not an act of conservation.

**Put simply, there is no place for commercial racehorse training in a reserve that is designated for recreation and conservation.**

For the sake of brevity, I have condensed my strong opposition to allow the reserve to be used for commercial racehorse training into 10 main points that are detailed below:

1. At least 54 species of "conservation significance" live there, including five listed as critically endangered, 10 listed as endangered, 20 as vulnerable, and 16 listed as threatened. (p86-87). In particular, the area is a feeding area for the critically endangered Orange Bellied Parrot that is now on the verge of extinction in the wild and the area, as I am sure will be explored in other submissions, is one of two major breeding sites for the Hooded Plover.
2. According to the draft report's own risk assessment (p29), there **will** be a negative impact on these species. Not "perhaps" or "maybe": there will be a negative impact that reduces their chances of thriving or even surviving. Of the six areas included in the risk assessment, the impact of horses on habitat degradation is listed as **extreme** in three of the six categories.
3. The draft report makes it clear that the traditional owners of this country do not support racehorse training in the reserve. (p22, p64) Further, the report acknowledges the cultural surveys in the area are either incomplete or out of date (p20). These two facts alone should see a ban on all commercial racehorse training in the reserve.
4. The Cultural Heritage Management Plan prepared for Racing Victoria concluded that racehorse training at Levy's Beach **will** cause erosion and damage to Aboriginal cultural heritage in this area and that any artefacts will have to be removed and stored before it begins\* (p64). Again, this fact alone should see a ban on all commercial racehorse training at Levy's Beach. To even contemplate such a move in contemporary times is incomprehensible to me and, in my view, offensive to indigenous owners.
5. Horse training **will** cause erosion. Not perhaps or maybe: it will. There has been limited research into the impact of horse training on beaches in Australia, but three research papers that focus on this aspect and are referred to in the 'Reference' section of the draft report all conclude that horses contribute to erosion.\*

6. Every coastal plan for this area in the past 40 years has emphasised the need for *more* protection, not less. This includes the Warrnambool City Council's own Warrnambool Coastal Management Plan, signed off just four years ago in 2013, that identifies Levy's Beach as part of a 'Wild Coast Precinct' and a "wildlife corridor and biological hotspot". As such, it recommends passive and nature based recreational opportunities. In this report, there is no mention of commercial racehorse training in this zone.\*\*

7. It ignores the Land Conservation Council framework that was set down for this area in 1978 in anticipation of the reserve coming under increased pressures. As a result of the LCC, the majority of public land in the area was officially set aside in 1979 as a conservation reserve. As outlined in the draft report, the LCC emphasises low-impact recreation, conservation and protection. (p83)

8. There are no numbers on exactly how many racehorses would use the most sensitive areas of Levy's Point, Golfies and Rutledge's Cutting (p63-64), but the Warrnambool Racing Club has indicated up to 260 a week in the Levy's Beach dune area and 120 a day at so-called "Hoon Hill". Such numbers confirm the intention to pursue commercial racehorse training on an industrial scale.

9. Local action groups have recorded numerous breaches by those using this reserve in the recent past for commercial racehorse training, despite assurances that it would be carefully monitored. The expectation that Parks Victoria officers will rigorously monitor commercial racehorse training (p62) into the future is therefore not met with great confidence. The question also remains as to why Parks Victoria staff and resources should be allocated to monitoring a commercial venture and not toward the further protection of this reserve.

10. There is no doubt about the economic importance of the racehorse industry to Warrnambool and beyond, but the figures contained in the draft report confirm that the local racing industry was thriving *before* the influx of racehorses on to local beaches. The **2014** figures (p63) reveal the industry generated \$97 million for the local economy and employed more than 950 people fulltime. The huge increase in the number of commercial racehorses on local beaches followed the **2015** Melbourne Cup and the success of Pirates of Penzance, trained by Darren Weir. It is my understanding that  
is responsible for the majority of horses that now train on the local beaches and there is a fear that if this activity is no longer permitted, he will withdraw from Warrnambool. My response is that the racehorse industry has been robust in

Warrnambool for many years and its future should not depend on the decisions of a single trainer who is already expanding his operations elsewhere; that a \$1.2 million sand track, half-funded by taxpayers, has been built at the Warrnambool Racecourse to accommodate sand training; and that no single industry – be it racehorse training, rendering, or sand mining – should be given access to what is one of the last remaining vestiges of wild, yet accessible, coastline in south-west Victoria, for commercial gain.

Notes:

\* Part of the summary from the 2001 study of horse riding in D'Entrecasteaux National Park, WA (Phillips, N., Newsome, D):

“Horse riding altered plant species composition, increased the area of bare ground and decreased height and cover of vegetation. Significant impacts occurred after only low levels of horse use. The findings indicate the need for a database on horse riding impact in Australia so that, where horse riding is allowed, impacts can be properly assessed and effectively managed.”

<http://www.publish.csiro.au/pc/PC020256>

\*\*

[https://www.warrnambool.vic.gov.au/sites/warrnambool.vic.gov.au/files/documents/committee/plans\\_strategies/coastal%20plan.pdf](https://www.warrnambool.vic.gov.au/sites/warrnambool.vic.gov.au/files/documents/committee/plans_strategies/coastal%20plan.pdf) (p20)

This ends my submission.

## Belfast Coast Management Plan: - Individual Survey Submission

Name: .....

Email Address:

Post Code: 3283

Age Range: 22

Gender: Male

Is this submission to be treated as Confidential: No

How often do you use the Reserve: 2 - 3 x per week – and more if the surf is working

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

Ride a bike, Walk, Drive a car.

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)

I mainly surf. I have surfed at The Cutting, Front Porch, Pelicans, Golfies, East Beach.

I snorkel at The Basin, and Paddleboard out to Front Porch.

I enjoy riding the horse along the beach, and I used to take the dogs down to Gormans Road.

I do sprint training on the beach for football training.

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

Extremely important - It is the way of life down here. A lot of people mainly use the beach for these type of activities (maybe not sprint training). A lot of my friends may bring their dog down to the beach – mainly in the summer months. For most of the year though, the weather is pretty rough and the tides are up – so you have to know the beach to know when you can walk along it ok.

I believe that it is extremely important for everyone around here to be able to continue doing the same activities with their dogs and also the horse riders that ride along the beach.

Which part of the Reserve do you use most frequently:

Killarney Beach – Hardly Ever – no need to add to the numbers of the holiday makers.

West of Killarney Beach to Port Fairy – Mainly for - Surfing at East Beach and Golfies

East of Killarney Beach to The Cutting – Mainly for - Horse Riding, Surfing, Paddle boarding, walking my dog, snorkelling, fishing

West of The Cutting towards Warrnambool Hardly ever – no need .....

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

I like to surf. And I like to be able to take my dog down to the beach.

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

Yes; I don't like not being able to take my dog or my family to take our horse down to the beach. I want the Dark Green Zone – Conservation Zone to be deleted and replaced with a Recreation-Conservation (light green zone).

**How important is the Cultural Heritage of the Reserve to you? - Ok – I like the idea of having middens down at the beach.**

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

The beach environment has improved over the years. There used to be a lot of rubbish around – but now because we pick the rubbish up there is hardly any. The sand dunes have been washed away a fair bit. There are heaps of birds around – and I like to see the plovers. (now that I know what to look for). I don't like the tracks in the sand dunes being closed off – there is no reason for it. The marram grass is ridiculous. It has taken over. I see a few foxes down there in the evenings – they are usually just hunting on the sand at the base of the sand dunes. – I don't think the bait is working – because I have seen more this year than ever.

**How important is the ability to enjoy recreation activities to you**

Really important. I see the need for passive recreation to be an important part of society.

The health and fitness of the society is extremely important. People need to be motivated to exercise, and therefore lifestyle activities such as walking with a dog, or riding a horse is extremely important.

This is what happens on the Killarney beaches – most people walk their dogs down at the beaches. I also see a few people ride their horses. It is a fantastic resource for the community and should not be taken away from them.

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

Absolutely. It is really important to me. I am down there a lot. I love it – it relaxes me and keeps me fit.

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

YES absolutely it needs to allow for all the activities that are now down there. Especially dogs and horses.

**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).**

Dogs and Horses should be allowed in all areas of the beaches – from Port Fairy to Warrnambool.

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

I do not believe they should be banned.

**Do you wish to add any further comments:** I think the beach should stay as they are. I think dogs and horses should be allowed at the beaches at all times. I think the commercial race horses should be controlled to ensure they don't break the rules. I think that the car park at golfies needs to be better organised, because the horse trucks in the car park take up most of the room.

## 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:**  **NOT CONFIDENTIAL**    Date: 1 march 2018

### Your Comments:

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

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

**Local Resident: Recreation use- Windsurfing, Kitesurfing ,surfing Scuba diving, walking on beach**

---

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 or 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): <u>Windsurfing, Kitesurfing ,surfing Scuba diving, walking</u> |   |  |
- 

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**

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 to Belfast Coastal Reserve Draft Management plan by**

I have been using the Belfast Coastal Reserve for . It has been a mainstay of my physical and mental wellbeing.

We are a diverse group of people of all ages who have chosen to live in the Port Fairy/Warrnambool area because of its proximity and access to the ocean. Many of us meet on a daily basis to participate in many water activities in the Belfast Coastal Reserve. We surf mainly at Golfies and the Cutting; we windsurf and kitesurf in the ocean, the Belfast Lough and Rutledges Cutting (saltwater swamp). We snorkel and scuba dive at the Basin (access from Towilla Way and Gormans Lane) and the Long Reef (called Pelicans on Parks Vic. map) with access via a marked primary track from the Basin road to Pelicans.

The current draft management plan seeks to create a conservation zone all along the Armstrong Bay beaches in South West Victoria. This conservation zone will have a huge, detrimental impact on our recreational choices, now and into the future, due to restriction of access to waterways.

This conservation zone will exclude me, the members of our group and the vast majority of people in the South West of Victoria from a historical recreational reserve, which has served as the life blood of the society and community groups in the municipality.

**Addressed to specific issues.**

**Prohibition of Windsurfing Kitesurfing and Surfing on the Belfast Lough and Rutledges Cutting (saltwater swamp).**

**I have not included surfing here as it is not possible to surf on flat water.**

In the draft plan under **Section 6 Recreation and Use**, there is no mention or data on Windsurfing or Kitesurfing as having any negative influence in the Belfast Reserve, yet these groups are prohibited from the Belfast Lough and Rutledges Cutting (saltwater swamp).

In **table 6.1 Page 54**, motorised boating, which includes jet skis, is permitted in the Belfast Lough, yet windsurfing and kitesurfing are not. Non-motorised boating (canoes, kayaks rowing skulls, paddleboards etc. are permitted. On Rutledges Cutting, non-motorised boating is permitted.

Where is the data to support the prohibition of Windsurfing and Kitesurfing, that in reality are non- motorised sports?

Windsurfing and Kitesurfing on the Belfast Lough and Rutledges Cutting are very passive activities with zero ecological effect. The Lough and the Cutting are not used frequently and then only by a small number of enthusiasts.

We access the Belfast Lough (**see Map 1**) from the 20-metre wide public right of way that serves as access to the Port Fairy airport.

The Belfast Lough and the Rutledges Cutting are geographically special places for windsurfers and kitesurfers. Both are shallow. The surrounds are flat without any tall vegetation. This gives a “clean” constant wind. The closest places that replicate these conditions are Point Henry, Geelong (200 km East) and Lake George, Beachport (300km west)

The Belfast Lough is used as it is a place of safety. We teach learners in the shallow water away from Ocean waves. The Lough and Rutledges Cutting are occasionally used when the wind is northerly and sailing on the Ocean is too dangerous due, to offshore winds.

They sail infrequently

and this is a safe place for them to sail.

Due to the length of the fin on a windsurf board we can only sail in a small area in the middle of the Lough and cannot access the shallow mud flats. This means that we do not affect any birds or nesting places.

**Some other points to note under the draft plan:**

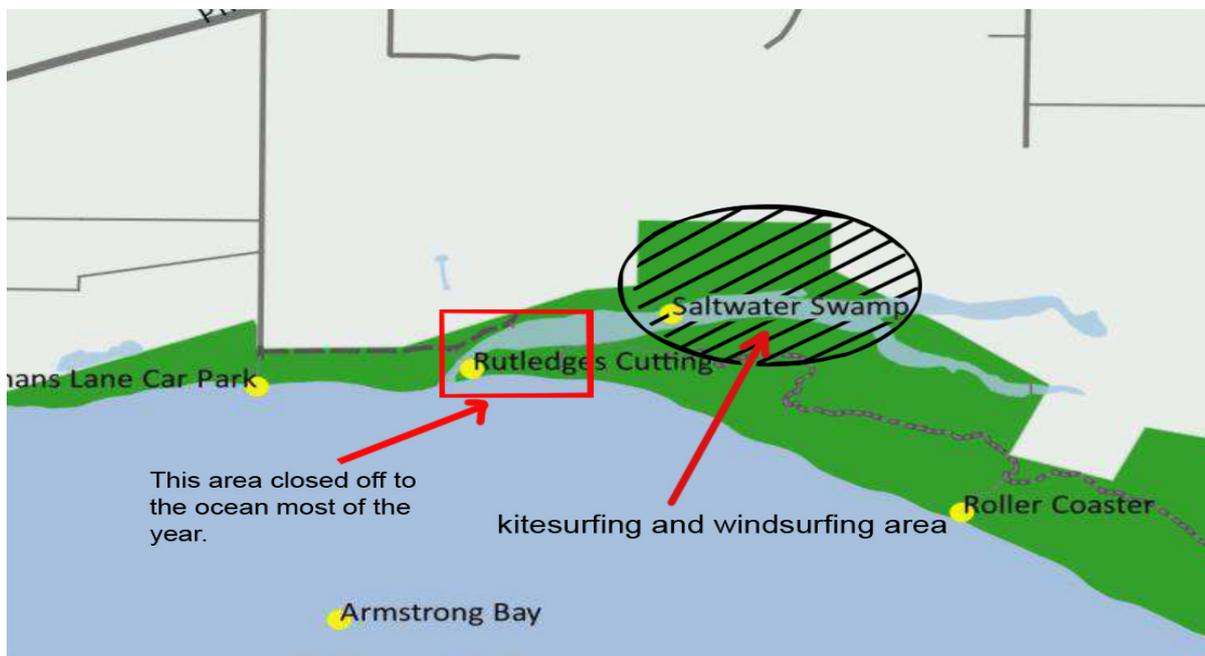
- The Lough and the Cutting are not undisturbed pristine areas. They have been highly modified over the years. Both have old fencing in parts and are very muddy. The biggest environmental impact on the Belfast Lough and Rutledges Cutting is the nutrient inflow and rubbish from agricultural activities further up in the Moyne river catchment. Windsurfers and Kitesurfers have no detrimental effect on these places.
- The Lough is approximately 700m wide and 1800m long. Under the draft plan it is permissible to ride up and down the middle of the Lough on a jet ski at 90 km/hr, as it would be over 200m from shore. In comparison, a windsurfer is an engine free, noise-free, relatively slow craft.
- There is an airport runway adjacent to the shore that is approximately 1 km long. There are frequent fixed wing and helicopter scenic flights operating from this airport over summer. No mention has been made of stopping this. Yet this has a much greater impact on the environment than a kitesurfer or windsurfer.
- Boating (non-motorised) is permitted. Rowing skulls, canoes, kayaks, paddleboards, all with a low draft, could disturb the shallow waters at the Lough’s edge. However, due to the length of a windsurf board fin windsurfers can only sail in a small area in

the middle of the Lough and cannot access the shallow mud flats. This causes zero disturbance.

- A great deal of rubbish floats down the Moyne River and into the Lough. Our group pulls this to shore and responsibly disposes of it. We often pick up rubbish that is dumped on the road access beside the airport. We care for the Lough and do not leave an ecological footprint. Under the new plan, who will be responsible for cleaning up rubbish in the Lough if we are excluded? As friends of the Lough, we fulfil a very useful conservation purpose.
- Both the Lough and Cutting are rarely used by any other user groups, especially when our usage is during windy conditions that is generally unappealing to other users. Consequently, our usage has zero conflict with other users or the public.
- **Rutledges Cutting and saltwater swamp (see Map 2)** is a body of water usually closed off from the Ocean and generally containing little water. It is a highly modified area. It has been dredged, graded, and modified for agricultural means. During times of flood (winter mainly) much of the water flows out onto private agricultural land and is beyond the boundaries of the Belfast coastal reserve. It is subject to considerable nutrient inflow and rubbish from surrounding farmland. On page 59, the draft plan for Rutledges Cutting mistakenly assumes it has a similar ecology to Kellys Swamp, is always open to the sea and, consequently, is a nursery area for fish and a refuge for birds. This is not the case. Rutledges Cutting is landlocked, brackish and closer in ecology to that of Belfast Lough.  
Occasionally, Kitesurfers and Windsurfers use this area when a northerly wind blows and the area is in flood. The water then spreads way out beyond the Belfast coastal reserves boundary over flat agricultural land. This means this area can only be used infrequently. The ecological impact on the reserve is zero, especially when compared to the permitted agricultural activities. Currently, the draft plan permits non-motorised craft in the Rutledges Cutting. I would propose that windsurfing and kitesurfing are included in the permitted activities on Rutledges Cutting.
- Kellys swamp should be considered as environmentally different to the Belfast Lough and Rutledges Cutting. Kellys swamp is a fresh water, heavily reeded bird habitat. Consequently, it is not appropriate for windsurfing and kitesurfing to be allowed on Kellys swamp.
- we are willing to engage with Parks Victoria on any issue related to use and management of the Belfast Lough and the Cutting.



Map 1: Showing the approximate small area of Belfast Lough used for Kitesurfing and Windsurfing.



Map 2: Showing approximate small area of Rutledges Cutting used for Kitesurfing and Windsurfing. Notice red box showing area of Rutledges Cutting mostly closed off to ocean.

### Summary

Windsurfing and Kitesurfing have zero ecological impact on Belfast Lough and Rutledges Cutting and are ecologically sustainable recreational activities. They do not have any documented, detrimental environmental impact on these waterways.

These recreational activities are determined solely by prevailing wind and weather conditions. This means infrequent use. The safety and long term health implications of

removing such places of recreational activity will have an impact on the safety of inexperienced, novice and **elderly** users.

These activities should be supported for many reasons, including the health and well-being of the people who engage in them. I hope the prohibition of these outdoor recreations in the Belfast Lough and Rutledges Cutting is an oversight in the plan, otherwise it cannot be justified.

**Proposal**

I would propose that windsurfing and kitesurfing are included in the permitted activities on the Belfast Lough and Rutledges Cutting

Regards

**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).*

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 is excellent to be able to be involved in local horses as we get more opportunities to see them train and run in the region. If the use of beaches were restricted, this might not be the case.

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

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

Regards,

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

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

it would be sad to see the cessation of beach training for these wonderful race horses. Not being able to work on the soft sandy surface could affect the stability of some horses that need a softer surface to train on and swimming is an excellent form of exercise for horses.

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

Regards,

**Drainage:**

Since the completion of the Pt Fairy to Warrnambool Rail Trail in 2012 Kelly's Swamp & the neighbouring wet lands have increasingly retained water for longer periods of time in fact still holding water today, which in years prior to the permanent causeway being constructed would be dry by mid February unless there had been very heavy summer rains which has not been the case this year.

This we believe this is being caused by the height of the Rail Trail causeway. There has for many years been a sand track across what is know as "Rooney's Swamp" ( the causeway) which would wash away every year in high floods when the banks of the Merri River burst & flowed onto the wetlands. The causeway was built by the Moyne Shire to allow Rundells Trail Rides & other horse riders access to the now "The Belfast Coastal Reserve" It was constructed with heavy limestone with only 6 culverts in 1 section & completely blocking the government drain (featured on the Parks Victoria Map date 1 September 2016) Map attached. Which I have noticed doesn't feature on the maps in the draft plan information booklet.

The 6 culverts have completely silted over in 6 yrs & the drain is now barely visible in sections which is preventing any water to escape back into the river from beyond that section of Swamp. In turn every year our wetlands are becoming increasingly flooded & less productive as farm land and "Kelly's Swamp" in increasing in size [redacted]

[redacted]

We are seeking to have the causeway & drain cleared to allow the flow of water to return to prior 2012 when the Rail Trail was constructed.

**Weed Control:**

[redacted]  
[redacted]  
[redacted]

[redacted] Sadly it was the NRE employees in the early 90's whom placed the boxthorn on tracks to prohibit 4x4 vehicles & motorbikes.

**Vermin:**

[redacted] We realise there has for several years been programs to bait foxes but unfortunately the program has not been a success as the numbers would still be at a high if I ceased level. Rabbits [redacted] when burrowing close or under the fences.

**4x4 Vehicles & Motor Bikes:**

4x4 vehicles are causing a great deal of damage to the vegetation in the reserve [redacted]  
[redacted] We have witnessed first hand large 4x4 vehicles purposely driving into wet areas on the reserve [redacted] With their only intention being to bog the vehicle. There are usually several vehicle preforming this exercise at a time with the winner being the vehicle that can achieve the great depth. The bolards place on the Mahogany Walking Track have stopped the vehicle in some areas but have pushed the 4x4 [redacted]

[redacted]  
[redacted]  
[redacted]

**Submission template for  
Draft Belfast Coastal Reserve Management Plan**

**About you:**

Your name:

Your Organisation (if relevant): \_\_\_\_\_

Postcode:

Email or Postal address:

THIS SUBMISSION IS:  CONFIDENTIAL  NOT CONFIDENTIAL

Date: 27/02/18

**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)

Environmental interest

How often do you or your organisation use the reserve?

Daily  Weekly  Monthly  A couple of times a year  Rarely  Never

How do you or your organisation mainly use the reserve?

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

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

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

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

## 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". 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.

## 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 support the right of Traditional Owners to protect their cultural heritage and to be directly involved in guiding the management of this Reserve.

## Key management theme #2: Healthy Country

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

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

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

- I strongly support a Conservation Zone and believe it should be required and prohibit dogs, horses and vehicles. The reserve is home to over 50 species listed as threatened and has been identified as a Key Biodiversity Area. A conservation zone will reduce the impact of dogs and horses on Hooded Plover and key migratory shorebird sites.
- 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 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.
- I strongly oppose a conservation zone that allows commercial racehorse training

## 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       mainly 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 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.

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### 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. 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, Rutledges 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.

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.

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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                      x mostly 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.

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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                      X 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.

## **Belfast Coastal Reserve Draft Management Plan**

### **Community Feedback**

**From –**

**27/02/2018**

**Submission below is Not Confidential (my private details above are Confidential)**

#### **Key Management Theme #2: Healthy Country**

- I strongly support a Conservation Zone and believe it should be required and prohibit dogs, horses and vehicles. The reserve is home to over 50 species listed as threatened and has been identified as a Key Biodiversity Area. A conservation zone will reduce the impact of dogs and horses on Hooded Plover and key migratory shorebird sites.
- 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 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**

- I strongly support many of the goals and strategies that relate to the recreational use of the Belfast Coastal Reserve 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.

### **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. 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, Rutledges 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.
- 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.

Thank you

Sincerely,

27/02/2018

**Submission on Belfast Coastal Reserve Draft Coastal Management Plan Jan 2018**

Thank you for the opportunity to comment on this plan .

have spent

many hours at Killarney Beach and surrounds fishing ,snorkelling and walking my dog .

I have great concerns about the impact of the plan on recreation in this area .

The main concern of this plan seems to focus on the shore bird life which is quite appropriate but disproportionate to the other recreational pursuits in this area .

I wish to address two main areas in the report — dogs and their control and horses .

1.Horse riding

Rundells' riding school has been doing day treks at the Eastern end of the reserve for some years under a strict management system with no riding above the high tide mark except at designated access points. Having experienced these rides myself I know they stick by the rules and have a limited impact on the shore .

Racing thoroughbreds on the beaches is another matter . The report talks about “historic” horse training on the beaches but I have only noticed the huge increase of racehorse activity .over the last 6 years. Prior to that the occasional racehorse came to the beach mainly to wade to treat injuries for which there is good medical evidence . More recent experience has been of flat out galloping ABOVE the high water mark chopping up and compacting sand and destroying habitat as well as being a danger to other beach goers .The beach is now used as a de facto race track which of course is cheaper than the all weather Warrnambool track . This is akin to allowing formula 1 cars to practise on the freeway while other traffic is around.

The car parks are unsuitable for the horse floats and although trainers are required to pick up manure the car park ends up smelling of horse shit and urine giving the flies a field day

The racing industry is said to bring so much money in to the city —perhaps allow the council to pay for a sand track to be built at the race course and let's see how the ratepayers value that . I doubt if council would be in favour but the beach seems to be fair game but not for other users .The concerns expressed for the birdlife do not seem too apparent when racehorses are mentioned and state and local vested interest must be behind this .

I am not against racing and training of horses but NOT ON THE BEACH.

As regards riding on the beach for recreation rather than professional training I think it is appropriate providing reasonable control and behaviour and riding below the high water mark as in Rundell's guidelines

## 2. Dogs

A lot is written in the report concerning dogs .As the report notes there is VERY limited access to the beach for dog owners in Warrnambool .Further limitation of access to the beach I believe is detrimental to tourism and to local people who exercise their dogs and improve their own health in doing so .

The proposed access for dogs on leads is limited by the summer closure and dog walkers are likely to be run over by racehorses in the two areas .Not exactly relaxing !!.If it is decided dogs must be on leads this will greatly reduce the impact on birdlife so why the green zone ??

## Conclusion

A very disappointing document for recreation and possibly the thin end of the wedge reducing access to the beach .The green zone may be up graded in future to NO access to the public in the name of conservation of the hooded plover . This was not the original vision for the coastal reserve

Signed



## Submission template for Draft Belfast Coastal Reserve Management Plan

### About you:

Your name: \_\_\_\_\_

Your Organisation (if relevant): \_\_\_\_\_

Postcode: \_\_\_\_\_

Email or Postal address: \_\_\_\_\_

**THIS SUBMISSION IS:**    **CONFIDENTIAL**    **NOT CONFIDENTIAL**   Date: \_\_\_\_\_

### 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)*

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













