

From:  
Sent: Wednesday, 14 March 2018 12:14 PM  
To: ParkPlanMailbox  
Subject: Re; Warrnambool Beach Training Support submission

Categories: Red Category

To whom it May Concern,

I am an owner of horses trained at Warrnambool and some of the reasons I was attracted to having these horses trained there was (1) the ideal rural setting with spacious yards, (2) the proximity of the beach for horses who may have leg issues, and the standard of the training provided.

Undoubtedly the high standard of the training is related to 1 and 2 above, in particular the variety provided by exercising and swimming at the beach, and as exemplified by the success in recent years of Warrnambool based trainers, with the flow-on economic effects to the community.

Should the opportunity for trainers to utilise Levy's Beach and the dunes be taken away, I have no doubt that the racing opportunities of a vast number of horses would be removed and these horses would be forced into involuntary retirement, with dramatic reduction in horse numbers, and resultant impact on the Warrnambool community.

In conclusion, I wholeheartedly support retention of the existing training arrangements at Levy's Beach and the dunes, and trust that these will be retained.

Wednesday, 14 March 2018

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

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

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

Regards,

Tuesday, 13 March 2018

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

As an owner of 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.

I truly believe the current environment that is available in Warrnambool gives them the best opportunity to show their ability.

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.

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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 that 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.

whose soundness and ability to continue to compete directly relates to the opportunities to be trained in the water and on the beach.

This would also 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.

Yours Sincerely,

Monday, 5 March 2018

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

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

I have enjoyed watching the horses train on the beach when I have been visiting Warrnambool.

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,

## Belfast Coast Draft Management Plan

### Submission by

I have read the Belfast Coastal Reserve Draft Management Plan January 2018 and make the following comments for consideration in the preparation of the Final Management Plan.

My comments are specific to particular sections of the plan. Where appropriate I have lifted sections or words from the plan with the section number and heading and added my comments below the quote.

#### 1.1 About the draft management plan

*The Belfast Coastal Reserve Draft Coastal Management Plan is a strategic guide to the management....*

The document is inappropriately named – it is not a management plan, it is a strategic guide as stated. While the document does set the overall directions for management it does very little to direct management responses to specific issues.

What needs to be asked is: could I manage the reserve based on the instructions in the document?

I do not think the answer is yes.

I understand that “management plans” are a requirement for areas managed by Parks Victoria but to refer to the current document as a management plan is misleading. I further understand that there is a composite management arrangement for the planning area, which is a problem in itself but probably beyond the scope of the plan to address, so those groups may have other requirements for the document but a management plan should specify management actions – ie what will be done. Not what will be considered, thought about, consulted about or gathered from others if they just happen to do any investigations. As an example in Section 4.4 strategies: *Build capacity for the conservation of Aboriginal cultural heritage, site protection and restoration*. What is that actually telling the land manager to do? How is that measured? How do you or the public know if that has been achieved (whatever it means).

Good planning should be S.M.A.R.T.

S – Specific

M – measurable

A – attainable

R – Relevant

T – Timely

The plan does not pass this test.

Solution: Call it a strategy and have the strategy require that specific plans, with aims and actions, be developed for each of the strategies.

## 2.1 Vision

Para 5:

*The natural values of the coastal landscape have been maintained and enhanced.*

If this is part of the Vision I see no evidence within the document of any attempt to identify and understand the natural values of the planning area. All that seems to be planned is to *sort-of* manage the stuff that we know about and gather information serendipitously from others, but only if they think of it first.

Where is the leadership in this? What does PV or the other managers want to know about the planning area to ensure it is managed appropriately? As the plan says later in Section 5.2 *Marine Ecosystem: Marine habitat mapping has not been conducted for the planning area.....* but there no strategy to indicate that you actually want to know what is being managed? Merely supporting a volunteer group does not cut it and is an abrogation of responsibilities.

## 3.1 Management zones

I am generally in support of the management zones, and their locations, as proposed with two exceptions:

- Racehorse training is a commercial operation and if it is to be retained (more of that later) it should be within a commercial (or development) zone. Call a spade a spade. It is not recreational.
- I think the southern shore of Belfast Lough should be within the Conservation Zone. It is an important samphire area potentially important for Orange-bellied Parrot and is better placed in the Conservation Zone to ensure that potential recreation activities do not encroach on this area

## 4 Cultural landscape and living heritage

Generally in agreement but again wishy-washy goals with no solid actions.

### 5.1 Managing coastal ecosystems

We could argue all day about the risk matrix and what sits where but it seems to provide a reasonable basis for management decision making. The problem is that the plan has not responded to the risks as set out. If, as the table indicates, horses provide an extreme risk to coastal dunes and resident and migratory shorebirds even following remedial management actions, why is the plan even considering these uses as appropriate?

While it is noble to have a goal of undertaking invasive weed management through:

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

What is the specific, measurable and attainable goal? Reducing infestations by 20%, 50%? Containing Marram Grass – really? Has the infestation been mapped so we know what it will be contained to? How will it be “contained”?

What is the staged control of wattle based on? Zoning; specific sites; roadsides?

There is no direction or even broad guidelines for management as to how to prioritise control measures. Will Warrnambool Council prioritise similar areas to Moyne?

## 5.2 Managing marine ecosystems

Why is this section even in the plan? The preamble talks about everything except what is happening within the planning area and the goals provide no instruction to find out what is happening within the marine environment other than the establishment of a volunteer group. This is unsatisfactory and no basis for management.

And I have no idea what the following goal means:

- *Support an integrated, catchment based approach to improve water quality and reduce both aquatic and marine pest plants and animals, including marine and aquatic mapping, monitoring and research activities to inform management decisions e.g. EstuaryWatch*

Not bad when it is not even known what the marine pest plants and animals are or where they are in the planning area.

## 5.3 Water management

Again, largely waffle except for the reference to the existing Merri Estuary Management Plan. But why not make it a goal or strategy (or whatever) to ensure the existing plan is implemented. At least that would be something concrete for management actions.

Strangely the single goal states:

*Water levels in the Lower Merri are managed to maintain resilience and aquatic values in the wetlands and estuary.*

Good, and feeding off the existing plan, but no mention of the Belfast Lough except as a strategy to maintain its water quality. Why is this not a goal or broaden the goal to include all waterways?

And, how exactly will the water quality in the lough be maintained when it is completely outside the scope of the plan to have any influence on water coming down the Moyne River?

## 5.4 Fire management

What might be the aim of a planned ecological burn? What is being targeted for both reduction and enhancement? It seems that fuel reduction burns are not proposed (at least it is not stated that they are). So, if ecological burns are a possibility then managers need to know what ecological feature might be targeted and how it could benefit to make any sense of a possible ecological burn. Surely this was discussed and canvassed during the preparation of the draft plan?

And what of the risks? A management burn could end up with Coast Wattles germinating all over the place and therefore (presumably) a more intense and costly weed control program following a burn. This has not been included or addressed in the risk matrix, and it should be, to highlight to managers the risks associated with the action.

## 5.5 Climate change

Great to see it has been thought of but there is nothing in the plan for the management of this issue. The bottom line is that nothing can be done within the reserve for climate change except for the protection of infrastructure, and it seems that that only means car parks and tracks for this reserve.

The goal should just be to protect facilities, the rest is wasted verbage.

## 6 Recreation and use

Generally pretty happy with this section of the plan. I would suggest however that “Bush walking” includes beach walking which should be added to the “only on designated tracks or on the beach”.

Regarding recreational horses (identified as an extreme risk in the risk matrix even after management), personally I would remove them but I understand that this may not be possible in the current climate. But it would be nice to know, and have it explicitly stated in the plan, that if resident and migratory shore birds are being adversely impacted then recreational horse riding will be banned. The plan needs to take a position – what is more important: shore birds and international agreements (JAMBA, CAMBA) or horses?

The saving grace for recreational riding at this stage would seem to be the low numbers and sporadic impacts as compared with commercial racehorse training. I have further addressed this in Section 6.5 below.

A few comments to consider:

- Why is commercial horse training included in *Table 6.1* and mentioned under *6.4 Site Strategies for Golfies; Killarney Beach; Levys beach access; Kellys Swamp Track between Big Baldy and Spookys beach access; and, Rutledges Cutting, Gormans Road carparks number 1, 2 and 3.*
  - It is an Authorised Use (Section 6.5) and not a recreational use.
- Rutledges Cutting, Gormans Road carparks number 1, 2 and 3: *Permit small numbers of horses training under license at Ruteledges Cutting to provide for local trainers that have historically used the reserve.*
  - What is a small number? This must be specified – it is a management plan for heaven’s sake.
  - “History” has nothing to do with good management. The fact that things have been done historically does not mean that is appropriate or suited to the current reserve.
- *Kellys Swamp Track between Big Baldy and Spookys beach access: Licence horse training at Hoon Hill - conditional upon adequate risk management and compliance. Monitor compliance and periodically review conditions of use.*
  - Do I assume this is a typo and it is supposed to refer to recreational horse riding?
  - What is adequate?
  - How will adequate be judged or measured?

- Compliance with what?
- What period for review? This must be specified otherwise it will not be undertaken. I suggest annually.
- What are the conditions of use and on what basis would they be altered?

## 6.5 Authorised uses

### Beach training of racehorses

I quote from the plan:

Paragraph 3: *The racing industry contributes to the local economy through employment and support to local businesses. Thoroughbred racing in the south west region brings benefit to the local economy. A size and scope study from 2014 revealed that the racing industry generates more than \$97 million in the area, employs more than 950 people full time with almost 4,500 involved as employees, volunteers or participants (Warrnambool Racing Club 2016). The 2017 Warrnambool May Carnival injected over \$10 million into the local economy, attracting over 30,000 people, of which 68% were attendees from outside the Warrnambool region (Warrnambool Racing Club 2017).*

Sophistry at its best! The plan is supposed to be about the proper management of the Belfast Coastal Reserve, not about the grand economic claims of the Warrnambool Racing Club (WRC). The WRC claims are completely irrelevant to the development of a reserve management plan and should be removed from the final plan.

The only purpose I can see in incorporating such specious information is as an attempt to sway readers into supporting a ridiculous proposition. It is a non-sequitur to attempt to link the dollar value of an industry to the management of a coastal reserve. Who do you think is being fooled by these types of statements?

I may be a bit equivocal about recreational horse riding in the reserve but I am completely unequivocal regarding commercial horse training.

**Commercial race horse training should not be permitted at any location within the reserve or on any other beaches or dunes in the region. It is a commercial operation that has no place within a public reserve.**

There is no requirement for a phase out period – they should just go. Given the value of the industry to SW Victoria it would seem they should have no problem in providing purpose built training facilities in a place where there are no conflicts with ecological processes or the “visitor experience”.

### A little bit on shore birds as it relates to commercial racehorses

A range of wading birds, including the Hooded Plover, use the beaches within the reserve. However, it seems that the complete emphasis has been placed on the nest location of Hooded Plovers with little or no regard to the other components of their habitat or other shore bird species. The birds, including Dotterels, Sanderlings, Sandpipers as well as the Hooded Plover and others gather food from the sandy beaches right down to the low water mark. The area between high-water mark and the ocean is not dead sand with no use other than for horse riding. The Plan pays no heed to the macro-fauna, meio-fauna or micro-fauna that inhabit the sand and, amongst other important ecological functions, provide

the food for wading birds. To countenance or encourage the ploughing of the beach daily by commercial racehorses is ecological vandalism and an abrogation of responsibilities under our international bird treaties such as JAMBA and CAMBA.

It is a relatively simple process to record nest locations, put up temporary fences and count eggs and breeding success but this should not be the end of our attempt to protect the species that either permanently or periodically use the beaches. There is no point in providing great protection for a nest when we condemn the hatchlings to starvation due to destruction of their feeding habitat.

That is why I am totally opposed to commercial racehorse riding on the beaches and within the reserve. I do not object to horseracing or those who are involved with it but I do object strongly to a public resource being used for commercial purposes particularly where there is such a demonstrable deleterious impact and risk. The plan recognizes the risk (at least in part) to the shore birds but then does not apply management actions to adequately avoid the risk.

Back to the plan statements....

Goal: *Authorised uses of the Reserve are managed to minimise the effect on values and visitors.*

The goal should be amended to:

- Authorised uses of the Reserve are managed to avoid or minimise the effect on values and visitors.

Strategies:

- *Permit horse training under license at Golfies beach (as shown on Map 6) from dawn to 10am Monday to Friday, with a maximum of 50 horses per day December 1st to March 1st and a maximum of 20 horses per day March 2nd to November 30th.*
  - Delete as totally unacceptable. But at least some numbers were provided.
- *Permit small numbers of horse training under license at Rutledge's Cutting and Killarney Beach to provide local trainers that have historically used the reserve.*
  - How many is small numbers?
  - History has absolutely nothing to do with proper management.
  - Strategy should be deleted.
- *Permit horse training under license at Levys beach and Hoon Hill as shown on Map 6.*
  - How many?
  - What conditions?
  - Strategy should be deleted.
- *Licence conditions for racehorse trainers and tour operators to include comprehensive protections for cultural values, natural values and other beach users. Revoke licence for continual levels of non-compliance.*
  - The plan offers nothing to show there is a "comprehensive", or even a good, understanding of the values so how can comprehensive protection be provided? Empty words.
  - Revocation of licences for continual levels of non-compliance is not required. One strike and you are out. And what is a continual level?

- *Review beach nesting bird monitoring results to inform licence conditions e.g. Hooded Plover density and fledgling success as an indicator species.*
  - Good, but where is this going? What are the triggers. If one nest gets stomped is that enough? What happens if no fledglings are recorded?
  - How often is it reviewed? I assume annually but need to specify.
  - Indicator of what? It is a resident bird – how does that indicate what is occurring with migratory species?
- *Close the beach to horse training and riding groups when Hooded Plover nests extend onto narrow sections of beach used for training, or when climatic conditions or tidal conditions make access unsuitable.*
  - So, every high tide rangers will be down at the beach directing horses. Really? Do we really think PV or other managers will be available to suitably manage this?

This last point really summarises the tangles that have been inflicted on management through keeping horses on the beaches. Get rid of the horses and it becomes that much easier – and better – to manage.

## **6.7 Information, interpretation and education**

- *Ensure facilities are maintained and 'fit for use' and that any new assets comply with Australian standards, Industry standards and building codes and regulations. Upgrade, replace or withdraw from public use those that do not.*
  - What new “assets”? The only “assets” specified in the plan are car parks roads and tracks. If that is what is meant then say it. This would allay fears of other development within the reserve that has not been flagged in the management plan.
- *Support citizen science programs and increased active use of the Reserve by educational institutions to develop knowledge on the area and inform the education and interpretation program.*
  - What about PV *et al* actually finding out about the reserve they are managing rather than rely on “citizen science”.

## **6.8 Tourism partnerships, marketing and promotion**

- *Provide for tour operator licences in the Reserve that utilise the range of available activities, subject to the protection of native flora, native fauna, built assets, natural features and cultural heritage places.*
  - It is assumed that this would be an Authorised Use and should therefore be included in Section 6.5.

## **7.1 Coordinated management**

- Undertake a 5-year review of implementation of the plan – with reporting against high priority strategies provided by responsible agencies.
  - There are no **high** priority strategies in the plan. There are immediate, medium, long-term and as required strategies. Is it assumed that Immediate is the same as high? If not, it needs clarification.
- Explore opportunities for consolidation of land management arrangements as they arise.
  - This should be a High (or immediate) priority. Mixed responsibilities leads to mixed results.

## 8.1 Research and monitoring

*Goal: Monitoring and evaluation improves management decisions and techniques through enhanced ecological, cultural and visitor use knowledge.*

I do not see a goal here. What I see is a questionable statement. The right things need to be monitored in the right way and then acted upon with the express aim of minimizing adverse impacts and enhancing good outcomes for the identified issue.

- Develop monitoring criteria for key ecological measures, informed by conservation planning and State of the Parks.
  - Good – but what are the key ecological measures for this reserve? These should not be defined by State of the Parks or other high level governmental reporting instruments but by local conditions and what is happening in Belfast Coastal Reserve.
  - All the supporting, encouraging, facilitating – why cant the managers lead this and do it?
- Use knowledge gained from research to refine management practices e.g. investigations into the effectiveness of invasive species control programs and techniques.
  - How many times do we need to research weed control and what works? It has been done. It is now time to get on with it. The plan should identify the weeds that are a threat; instruct that they be mapped and priority control areas be defined based on some defensible reasoning (ecological, recreational, whatever) and then measure how effective it was. This is not hard, it just requires taking a position.
- Support research into the impacts of climate change on coastal areas and mitigation measures that could be applied in the Reserve.
  - I really look forward to seeing how this is implemented in the reserve.

### Summary

In summary, the management plan fails to provide a clear, cohesive and defensible set of management actions. Broad statements do not constitute a management plan. I sincerely hope the final management plan will consider my comments and observations and incorporate specific, measurable, attainable, relevant and timely actions.

The plan should be a working document that identifies the problem/issue, what is known about it issue, what needs to be known about it, the aim of management, specific actions that will be undertaken to achieve the aim and how to know if the aim has been met.

Remove the waffle. It is not judged by the eloquence of the prose but rather the appropriateness of the management aim and the likely effectiveness of the actions in achieving the aim.

Remove the sophistry. This is pretty easy – just talk about the planning area.

Most importantly for this planning area: Remove commercial horse training from the reserve immediately to protect the ecology of the reserve and comply with our international agreements.

I would be happy to discuss my comments with the planning team should that be desired.

Manager Parks Planning,  
Parks Victoria Level 10,  
535 Bourke St  
Melbourne VIC 3000  
11March 2018

Dear Sir/Madam,

**Re: Belfast Reserve Draft Management Plan**

*1. I believe it is essential to clearly delineate areas for dog activity and support the Plan's designated areas as either no dog, dog on leash or off leash*

For several years now I have walked the section of coast from Killarney Beach to Port Fairy organised by Birdlife Australia. This has made me very aware of the importance of this coast for many species of migratory and resident bird species. I have also witnessed first hand the careless attitude of many dog owners toward the roped off hooded plover nesting sites along this section of beach( see below).



Dog running through Hooded Plover nest site on East Beach Port Fairy photo).

*2. I do not support the use of the Reserve for commercial horse training.*

The Victorian Coastal Strategy 2014 makes some important points about commercial activity and infrastructure on the coast:

- P27 Key Issues; Desired Outcomes, point 7. New development, reuse and redevelopment on the coast (a) has a demonstrated need to be located on the coast (b) protects environmentally and culturally significant places
- P27 Key Issues; Desired Outcomes, point 9. New private structures that provide no public benefit are not permitted.
- P65 Section 3.1 Desired Outcomes point 3. Coastal Crown land is not used for structures unless they provide significant community benefit, and their functionality depends on them being near the water.
- P65 Section 3.1 Table. Coastal Crown land location not necessary.....eg Function Centre, community hall, non-maritime industrial plant and storage, non-water based sporting facility

In my view the proposed activity, with its associated tracks is not consistent with these outcomes. The financial viability of Victoria's racing industry is not affected in any way by banning race horse training in the Reserve. Trainers in many other locations successfully train race horses without access to a beach. As the Plan points out (p63) Warrnambool Race Course has recently (2017) built a sand track for trainers and this is appropriate. The Club could also consider other facilities to aid horse training.

*3. I agree with points made by Birdlife Australia about the Draft Plan.*

include the following points made by that organisation as part of my submission.

- This Reserve has **local, statewide, national and international significance to several species and groups of birds.**
- High support for actions taken to mitigate threats and to improve the protection of birds and their habitat within the Reserve.
- High support for 43% of the onshore area to be protected in a CONSERVATION ZONE. This encompasses the area used by the Orange-bellied Parrot, 28 Hooded Plover breeding sites (of 44 sites in total within the Reserve), the largest known winter flocking site for Hooded Plovers, at least 24 red-capped plover breeding sites, 2 pied oystercatcher breeding sites, and major roost and foraging sites for migratory shorebirds including internationally significant sites for Sanderling and Sharp-tailed Sandpiper, nationally significant sites for Ruddy Turnstone and Double-banded Plovers (New Zealand migrant, visits in our autumn/winter months). Rutledges Cutting for example is one of five priority sites in Victoria for the Orange-bellied Parrot (Adams & Purnell 2016). The plan states (page 10), "the conservation zone covers the areas where the highest cultural and environmental values are found. The intention of this zone is to ensure a very strong management emphasis on protection of the environment and identified values. Recreation and nature-based tourism are permitted when managed in a way that is sensitive to the identified values."
- High support for the proposed CONSERVATION ZONE to be free of high impact threats including hunting, off-road vehicles, dogs, horses, camping, and dune boarding.

- High support for:
  - Cultural Heritage protection;
  - Joint management;
  - Education and interpretation;
  - Monitoring and research;
  - Rationalisation and closure of inappropriate beach access;
  - Dog control;
  - A permit system for recreational horse riding (in areas where this is sustainable);
  - Pest animal and weed control.
  
- No support for commercial race horse training within the Reserve, including permitting this activity within the CONSERVATION ZONE. Under the draft management plan, the length of beaches available to racehorse training would be increased by 250% (from 2 km to 5 km) and the number of horses by 400% (from 65 to 256 each day). That represents 25% of the Reserve's beaches, with nothing in the plan to stop future expansion or to review compliance and impacts of the commercial horse training on the Reserve's natural and visitor values. The draft plan is allowing racehorses in to 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. THIS IS INEXCUSABLE AND IT IS INCONGRUENT WITH THE RECOMMENDATIONS OF THE CONSERVATION ZONE.

Throughout the draft plan, damage caused by racehorses is referred to but the plan fails to address how increasing the area available to them by 250% will mitigate these impacts. Worse still, the plan's risk assessment (page 29) reveals that the current proposed management plan won't reduce the threat of this commercial activity. Before management plan implementation, the risk to coastal dune vegetation, cultural heritage, resident and migratory shorebirds from racehorse training is rated EXTREME. After the management plan is put in place, the rating remains EXTREME. In other words, no effort has been made to address the threat commercial race horse training poses to multiple values of the Reserve, including visitor safety, and instead, it has been expanded within the Reserve.

Since the Minister of Environment granted access to commercial race horse trainers in 2016, there have been numerous breaches of licensing conditions, high risks to public safety and the channeling of limited resources and state government staff in to surveillance and infrastructure. This has stretched local Parks Victoria and DELWP capacity and taken already limited support and resources away from environment and visitor services. Expanding the number of training beaches will make conditions even harder to monitor and be costly to the local economy and values of the Reserve.

Yours sincerely



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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

there is no doubt that his horses racing career has been significantly prolonged because of the beach environment that Warrnambool provides. Most significantly the ability to take weight off the front knees and fetlocks with dune work, the instant anti-inflammatory benefit provided from the cooling of the ocean immediately following work on the beach.

If this opportunity was not available, the opportunities for 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 horses training in Warrnambool, which I am fully supportive of.

Regards,

15<sup>th</sup> March 2018

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

I am somewhat concerned of the intended restrictions proposed in relation to the ongoing training opportunities within the Warrnambool region.

I refer specifically to the proposed restriction or elimination of beach training on Levy's beach and its surrounds.

I believe that the relaxed country environment the district has to offer and the current training facilities are the key reason why the area has such success within the industry and contributes so much to the local economy.

In the event of beach training being reduced or eliminated I would seriously consider the value of continuing in the current situation. This I believe would be of great detriment to not only the industry in the local community but also the local economy as I believe many owners will relocate their horses.

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

Regards.

From:  
Sent: Tuesday, 13 March 2018 1:34 PM  
To: ParkPlanMailbox  
Subject: Warrnambool Beach training

Categories: Red Category

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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.

over the yrs  
have appreciated the beach training. Beach training is beneficial to most horses, particularly those in recovery from any injuries.

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

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

Regards,

---

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

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

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

Regards,

From:  
Sent: Friday, 9 March 2018 12:14 PM  
To: ParkPlanMailbox  
Subject: Submission

Categories: Red Category

I am strongly opposed to the use of Belfast Coastal Reserve for the use of training horses. This is a major threat to numerous endangered bird species that rely on the site. If I want to see horse racing I go to the races. I go to Belfast to see amazing coastal landscapes and intact native ecosystems.

Regards,

From:  
Sent: Thursday, 15 March 2018 10:05 AM  
To: ParkPlanMailbox  
Subject: horse beach use

Categories: Red Category

To who it may concern.

As an owner of a horse trained in Warrnambool,I fully  
Support the beach training of horses in the area.

I have observed horses on the beach and in the water,and they seem to love it.,and cannot  
See that they are doing any damage to the environment.

Yours truly,

OWNER

Sent from Mail for Windows 10

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, one of the main reasons I support training in this area is the availability of the beach to help with the welfare of the horses

the beach as not only a valuable training resource, it enable horses less than sound to fulfil their potential they otherwise may not reach having

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. In turn I suspect this would affect employment in and around your area.

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

Regards,

From:  
Sent: Tuesday, 13 March 2018 9:33 PM  
To: ParkPlanMailbox  
Subject: Warrnambool Beach Training Support Submission

Categories: Red Category

Tuesday 13th March 2018

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

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

I am the owner of a racehorse now trained in Warrnambool for 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.

There are many horses who have limited opportunities and because of beach training have become very successful.

The retirement of these horses would have a huge effect on local 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,

Tuesday, 13 March 2018

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

I would quite often walk down to the beach to watch the horses being trained there. I noticed that all the horses using the beach were very happy and healthy so I decided that any horse that I part own will only be trained from the Warrnambool area using these facilities of the beach. I have also noticed that the horses that I am involved in are very sound, fit and healthy.

however, if these beach facilities we no longer available I would look elsewhere to have my horses trained.

It is very hard to attract people into the country towns like Warrnambool so it would be a real shame if this was to happen as other towns are attracting the racing community with great facilities for their horses.

**In Summary**

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 or to find new trainers with beach facilities. This would have huge effect on the local horse trainers, horse numbers would decrease as well as the effect this would have on the local business community, taking away the opportunity for any return to continue to fund future horses to be trained in the region.

The opportunity to train horses on Levy's Beach and the dunes is critical for the ongoing success of horse training in Warrnambool which I am fully supportive of. I would look elsewhere for my enjoyment and involvement in horse racing if the beaches were not available for use.

Kind Regards,

From:  
Sent: Wednesday, 14 March 2018 4:03 PM  
To: ParkPlanMailbox  
Cc:

Categories: Red Category

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

Re: Warrnambool Beach Training Support Submission.

Dear Sir/ Madam

I forward you this email as an owner of horses which currently use the Warrnambool beach as part of their training programme. It is clearly my understanding that the beach, as a training facility, is essential for the effective preparation of the horses in order to perform at their optimum. The beach, to my knowledge, not only enhances performance but also assists in the horses general well being.

It is also my belief that the withdrawal of this training facility will have quite a devastating effect on horse trainers who have heavily invested in the area along with diminishing employment opportunities for those working within the stables.

number of times people mentioned the  
"must do" of visiting the beach in the morning to watch the horses work. We did make the early "trek" to Levy's Beach and thoroughly enjoyed the activity that was taking place. For us both we considered it quite a "tourist attraction" and an experience we shared with our friends and family

In conclusion I ask you to continue giving the many horse trainers of Warrnambool the opportunity to utilise Levy's Beach and the dunes as a training facility. Without this opportunity I believe many training businesses would suffer greatly and this would put their viability in grave doubt.

Thank you for your consideration of this submission.

Yours sincerely

Tuesday, 13 March 2018

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

As a part owner of horse/s trained in Warrnambool I have noticed, the opportunities beach training presents to our horses. We continue to support trainers in the area due to multiple venue training & results flowing from this, at the various race days (especially Warrnambool Carnival) which I would have thought would be advantageous to the economy of the region.

Having watched the beach training I could not see any adverse impacts to landscape or any impact on beach users rather it enhanced the experience of the visit!

If this opportunity was not available, the opportunities for our horses would become limited, thus there may be a need to reaccess future investment. Further 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,

Sunday, 4 March 2018

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

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

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

Regards,

# Belfast Coastal Reserve Draft Management Plan Submission guide

prepared by the  
Victorian National Parks Association



## Draft Belfast Coastal Reserve Management Plan

from:

Postcode: 3054

Email or Postal address:

**THIS SUBMISSION IS NOT CONFIDENTIAL**    Date: 13/03/18

### My Comments:

- I support many elements of the draft coastal management plan such as cultural heritage protection monitoring and research and dog control.
- However the use of beaches for commercial racehorse training is environmentally obscene. It will be especially devastating for the nationally threatened hooded plovers the reserve is their most important breeding area. These poor birds are so vulnerable to any disturbance - as I have seen elsewhere.
- The draft plan refers to damage caused by racehorses but fails to explain how increasing the area available for racehorse training by 250% will mitigate these impacts. And 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 it must become extremely Extreme!
- 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.
- Commercial racehorse training should never be allowed on public land especially beaches where the vulnerable hooded plovers are trying to survive.

Wednesday, 14 March 2018

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

we decided to use the better facilities and being close to the close to the water, felt there would be greater benefits.

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 a huge effect on the local horse trainers. Horse numbers would decrease as well as taking away the opportunity to continue to fund future horses to be trained in the region.

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

Regards,

Thursday, 15 March 2018

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

I am extremely keen to keep supporting the racing industry from Warrnambool as we feel that our horses are getting great treatment there. If the beach work was removed we feel that we would be so distressed that we may take the horses to another trainer on the Mornington Peninsula where they will receive the beach work required.

We have also taken many of our friends, relatives and connections down to the beach on an early morning excursion as we feel that it is such a "touristy" thing to do and is a magnificent experience for non racing people to experience.

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**

I write in support of continued opportunity for training horses on Levy's Beach and the dunes.

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 are the key reasons why I will continue to support the continuation of horse training in the region.

Having been involved with race horses now for several years, investing in their training, upkeep and racing pursuits, I have seen the positive benefits of the beach training.

There have been many others of which I am aware that have benefited from the beach training in their race preparations.

If this opportunity was not available, the options for these horses would become limited, thus there would be potential for them to retire from racing all together, causing loss of financial input and community benefit from the local industry. There would be huge effect on the local horse trainers, horse numbers would decrease as well as impacting adversely on the opportunity for any return to continue to fund future horses to be trained in the region.

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

Regards,

---

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

<<WRC or Owner to add additional examples of horses that have been transferred to Warrnambool and excelled due to beach training>>

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,

<<Owners Full Name>>

<INSERT OWNERS LETTER HEAD  
AND/OR LOGO>

---

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

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

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

Regards,

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

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

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

Regards,

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

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

I use the Warrnambool Beach and sand dunes very regularly for walking, usually 5-6 Kims on 4 times a week and I can assure you that the Trainers Staff are very careful not to impact on other beach users. Seeing the Horses is indeed a pleasure and I notice that a lot of visitors to our city are fascinated by the training facility offered.

What we have is very 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,

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

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

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

Regards,

## Belfast Coastal Reserve Draft Coastal Management Plan

### Submission –

Thank you for the opportunity to provide comment on the Belfast Coastal Reserve Coastal Management Plan of January 2018.

#### Overall response

I support the general direction of the draft plan with the exception of the inclusion of commercial horse training<sup>1</sup> within the reserve. The proposed management zones and their location are a good response to the need to provide for current and future visitor uses, and the requirements of the protection of the area's natural and cultural values.

#### Specific comments

- *The draft plan document*

The draft plan provides descriptions of the values of the Reserve and highlights the fact that the Belfast Coastal Reserve contains highly significant cultural and natural values, as well as high scenic and recreation values. This generally provides the basis and rationale for the subsequent proposals for the use and management of the area. The draft plan does this but on the way fails at two key points:

- The document is presented as a management plan but generally doesn't actually contain management actions. The title of the document says it is a management plan and it regularly refers to itself as a management plan but then (s1.1) it says it is a 'strategic guide'. And so it turns out to be. The document proposes many 'strategies' related to the future of the Reserve but these statements are relatively vague and do not contain specificity and quantification that would enable and guide the actual management of the area.

Apart from confusing the reader about the intent of the document, the critical question left by the document in its current form is 'how in practice will the Reserve be managed?'

*The final plan should provide more specific guidance for the management of the Reserve.*

- The use of the Reserve for commercial horse training suddenly appears in s6.5 without any prior reference or justification. While there are whole chapters devoted to the unique cultural, natural and recreational values of the Reserve, there is no explanation presented of its use for horse training. The reader would expect that the question of commercial horse training would be considered in the draft plan using the same professional approach applied to other prospective uses. While the draft plan acknowledges the extreme risk to the values of the Reserve

<sup>1</sup> I include so-called 'historic' horse training under the term 'commercial horse training'. There is nothing historic about horse training in the Reserve – even I can remember when it did not occur.

inherent in commercial horse training (Table 5.1) it fails to properly address a number of critical issues concerning including:

1. The use of the Reserve for commercial activities generally is fundamentally incompatible with the recognized values of the Reserve. In particular the use of the Reserve for commercial horse training is clearly contrary to the Recommendations of the Land Conservation Council (LCC) Corangamite 1978 Study, which provided only for low-intensity public recreation and the protection of cultural and natural values. These Recommendations were accepted by the Government and given legal force by Orders in Council in 1979.
2. In stark contrast to the other proposed uses, the draft plan does not make a case as to why the Reserve should be used for commercial horse training. The importance of the racing industry to the regional economy is acknowledged, but this in itself is not relevant to the question of the use of the Reserve. The dairy industry is also very important to the regional economy but no one would consider that this fact on its own justifies the running of cows through the Reserve.
3. Furthermore there is no evidence presented that the Reserve contains some unique attributes that are not, or could not, be available within the commercial facilities of the racing industry. Use of the Reserve for commercial horse training is unsupported in the draft plan by any discussion or evidence of the benefits that are uniquely provided by the Reserve.

*Given the acknowledged extreme risks posed by commercial horse training to the values of the Reserve and the lack of any supporting case for its inclusion, commercial horse training should be a prohibited use of the Reserve.*

- *Beyond the management plan*

The release of the draft plan has brought into focus several critical shortcomings in the current approach to the planning and management of the Reserve. In particular these are:

- The ad hoc response to the original unauthorised use of the Reserve for commercial horse training
- The ongoing lack of information and analysis of the social and economic costs and benefits of the use of the Reserve for commercial horse training
- The appropriate level of reservation for the area, given the contemporary appreciation of its outstanding natural and cultural values
- The need for more unified management responsibility over the whole area.

*The Minister for the Environment and Climate Change should consider making a reference to the Victorian Environmental Assessment Council*

*for a special investigation into the future use, protection and management of Belfast Coastal Reserve.*

- *Lessons on compliance*

The draft plan defines a conservation zone where dog walking and recreational horse riding are not permitted. It is sometimes argued that these provisions are unnecessarily restrictive and that responsible dog and horse owners will self-regulate their activities. While this sounds good in theory, in practice it doesn't work. My long observation of dogs and horses using the beaches in the reserve is that dogs are not kept on-leash or under the owner's control, and the horses do not keep to any particular part of the beach or track. The evidence in the draft plan about this issue in the Mornington Peninsula National Park confirms this view.

*The provisions excluding dogs and horses from the conservation zone must be maintained.*

- *The notion of balance*

The notion of 'balance' is often invoked to make an argument that all recreational uses should be allowed across the whole Reserve. This proposition may have some validity if all uses had equal impact, if all values were equally robust and if some values were not already severely depleted due to a long history of past compromises. However none of these provisos are true, as is clearly described in the early chapters of the draft plan. The draft plan identifies many species found in the Reserve that are already rare or threatened, uses whose impacts pose substantial risks, and habitats and species that are extremely fragile. In this context the application of the notion of 'balance' is a pathway to further degradation and eventually extinction.

*The provisions in the draft plan for the extent of and activities in the proposed zones should be maintained (with the exception of commercial horse training).*

## **Summary**

In summary I submit the following matters for consideration in finalizing the management plan for the Belfast Coastal Reserve:

- *The final plan should provide more specific guidance for the management of the Reserve.*
- *Given the extreme risks posed by commercial horse training to the values of the Reserve (Table 5.1) and the lack of any supporting case for its inclusion, commercial horse training should be a prohibited use of the Reserve.*
- *The Minister for the Environment and Climate Change should consider making a reference to the Victorian Environmental Assessment Council for a special investigation into the future use, protection and management of Belfast Coastal Reserve.*

- *The provisions excluding dogs and horses from the conservation zone must be maintained.*
- *The provisions in the draft plan for the extent of and activities in the proposed zones should be maintained (with the exception of commercial horse training).*

Tuesday, 13 March 2018

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

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

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

Regards,

---

From:  
Sent: Thursday, 15 March 2018 10:24 AM  
To: ParkPlanMailbox  
Subject: Submission -Belfast Coastal Reserve Management Plan

Categories: Red Category

May the Belfast Coastal Reserve Management Plan be changed so that the area between the Killarney Boat Ramp and Big Baldy be a Conservation AND RECREATIONAL ZONE, not a Conservation Zone only.

I am a local resident.

The current proposed plan makes a mockery of your motto, "Healthy Parks, Healthy People".

From the Park Victoria Website, Healthy Parks Healthy People:

Growing scientific evidence and generations of traditional knowledge show that spending time in nature is good for our mind, body and soul.

Contact with nature is critical for our physical, mental, social and spiritual health. It has positive effects on our ability to concentrate, learn, solve problems and be creative. It boosts our immune system and helps us relax.

obesity, diabetes, heart disease and mental illness that are modern lifestyle diseases. "Nature Deficit Disorder" is now a diagnosis. It is essential that we have inviting places in nature to exercise and de-stress.

The Belfast coast is certainly such place, providing a wonderful restorative dose of nature to humans and animals. It is my favourite place.

Many people only access the Belfast Coast with a dog or horse. The desolation, beautiful and magical as it is, can be daunting and less enjoyable without company and purpose.

We will not travel with our animals to second rate alternatives.

The Hooded Plover is vulnerable to many factors, most naturally occurring on this high energy beach. The horse is way down on the list of factors contributing to Plover's demise. How can such harsh community exclusion from this coast be justified when, under the current usage, it reportedly has one of the highest concentration of Hooded Plovers ? Does there need to be a dedicated Hooded Plover breeding program before it

is too late rather than harshly penalising a community to lessen factors which may have very little impact on Plover survival?

Our love for this special place makes us want to protect it. Educate and advise. Do not remove us.

Please allow us the freedom to know, that if we want to or need to come to this stretch of coast, we can, with or without a dog or horse. Healthy People. No less, Healthy Park!

I also request that the extended fence, placed without consultation, that blocks our access to the beach via the dunes, be removed. The sign saying closed for regeneration suggests native plants have been trampled or new planting is taking place. This is certainly not the case. It is a long standing single file track mainly through introduced Marram grass. It has been proposed that Marram grass artificially holds the dunes and limits blow out areas available to the Hooded Plover for nesting. Steel pickets and mesh insult the natural environment and our senses and our spiritual connection to the land. Lack of trust does not foster a pleasant internal feeling. We have the support of local aborigines to use this access who have repeatedly asked if the fence has been removed. Is it not also beneficial for occupational health and safety to maintain some other potential access points on this isolated coast?

Sent from my iPad

Sent from my iPad  
Sent from my iPad

13/3/201

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

To whom it may concern,

Re: Warrnambool Beach Training Support Submission,

As an owner of horses trained in Warrnambool

The only reason I sent horses there in the first instance was because of the success in training horses with leg problems on the beach and in the sand dunes. I am sure that if it wasn't for this environment then some of my horses would not have been able to race and return a dividend which has been put back into horses trained in this area. It is critical that the trainers are allowed to keep access to these areas.

The retaining of these facilities means that people are still employed in the Warrnambool area

This is revenue that will be lost to the town.

Regards.

---

Thursday, 8 March 2018

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

To whom it may concern,

---

**Re: Warrnambool Beach Training Support Submission**

As Chairman of the Warrnambool Racing Club I am writing to strongly support the continuation of Beach Training on the Warrnambool beaches in the restricted manner proposed in your draft report.

As an owner, I have imported several European horses to be trained in Warrnambool. These horses would not have been purchased or brought to Warrnambool without access to the beach. These horses love to work in soft ground which the beaches can provide.

The industry in Warrnambool provides considerable economic benefit. It is critical that ongoing beach access continues to ensure this industry remains strong.

I am fully supportive of the opportunity to train horses on Levy's Beach and the dunes

Regards,

Warrnambool Racing Club  
Chairman

---

Wednesday, 14 March 2018

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

Our horse has been sent to the Warrnambool district because it has stifle problems with both back legs and unless our trainer has access to the beach ( water and sand ) this horse will be unable to race and therefore it will be retired.

I am sure there are many other owners with horses that have a similar story to ours and it would be a shame if all these horses are lost to the industry because of a decision to close access to the beach is reached. I also believe this would cause a severe impact on employment in the Warrnambool district and many stables would be forced to close.

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

Regards,

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

Over the years I have seen what the beach training can do for horses with tendon issues  
We had the opportunity to continue to race him post his rehab work along the beach at Warrnambool.

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

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

Regards,

Wednesday, 14 March 2018

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

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,



Tuesday, 13 March  
2018

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

To whom it may concern,

**Warrnambool Beach Training Support Submission**

I am writing to provide my undivided support, of the Warrnambool Racing Club, for the continuation of horse training on beaches in Warrnambool and the Belfast Coastal Reserve.

The use of horse training on beaches in Warrnambool and its surrounding areas is vital for local horse trainers, of whom are local residents of our regional shires, and this practice has been imperative to their businesses and our local economy for many years. The importance of beach access to locally based trainers is the same level of importance for the Warrnambool Racing Club, and follows on to all regional racing clubs in South West Victoria.

Beach access in Warrnambool and the Belfast Coastal Reserve is a major competitive advantage for local horse trainers and a standout feature that sets Warrnambool apart from other major training centres and is the only attribute preventing trainers from relocating their operations closer to metropolitan hubs such as Ballarat, Bendigo and Pakenham. The local horse population has a profound impact on our Racing Club and the regions ability to generate income to continue the successful operations of the racecourse. Warrnambool's horse population has a direct impact on our ability as a Racing Club to successfully attain industry funding to assist with much needed upgrades and improved training facilities, maintain revenue streams through track use and uphold the number of race meetings allocated at our historic venue.

Not only are Racing Clubs dependent on the continuation of horse training on local beaches, the racing industry is an important provider for employment in the South West Region, during a time that regional employment is experiencing significantly poor trends in a number of industries. An Economic Impact Study released by IER in May 2014, revealed that "the thoroughbred racing industry generates \$97.2 million of value added impact and engages almost 4,400 people as an employee, volunteer or participant in the Western Districts and Wimmera region, with full time employment for nearly 950 people".

The draft Belfast Coastal Reserve Management Plan has been received positively by the Racing Club and we believe that it has taken the interests of all parties into consideration. Importantly, the draft plan ensures the ongoing survival of the industry and supports the management of beach access for horses in Levy's Beach. To ensure its success and in the best interests for the local racing industry for horse trainers large and small, the numbers of horses outlined in the document, released through the Cultural Heritage Management Plan, supporting 120 horses on the beach a day, with a maximum of 40 horses in the dunes is essential. Additionally, the times of access will be key; to ensure harmonious use of the area for all beach users and minimal impact on parking facilities. The times of access being considered should be from sunrise until midday, 7 days per week.

The use of our Warrnambool coastline is unique and something our community is very proud of, and therefore, I am fully supportive of the continuation of horse training on our local beaches.

Regards,

---

P

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.

Proof of the success of training at Warrnambool was shown in the Melbourne Cup Victory of Prince of Penzance.

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,

From:  
Sent: Wednesday, 14 March 2018 12:11 PM  
To: ParkPlanMailbox  
Subject: Warrnambool Beach Training Support Submission

Importance: High

Categories: Red Category

March 14, 2018

Manger  
Parks Planning  
Level 10, 535 Bourke St,  
Melbourne. Vic 3000

To whom it May Concern,

Re: Warrnambool Beach Training Support submission

I am an owner of horses trained at Warrnambool and some of the reasons I was attracted to having these horses trained there was (1) the ideal rural setting with spacious yards, (2) the proximity of the beach for horses who may have leg issues, and the standard of the training provided.

Undoubtedly the high standard of the training is related to 1 and 2 above, in particular the variety provided by exercising and swimming at the beach, and as exemplified by the success in recent years of Warrnambool based trainers, with the flow-on economic effects to the community.

Should the opportunity for trainers to utilise Levy's Beach and the dunes be taken away, I have no doubt that the racing opportunities of a vast number of horses would be removed and these horses would be forced into involuntary retirement, with dramatic reduction in horse numbers, and resultant impact on the Warrnambool community.

In conclusion, I wholeheartedly support retention of the existing training arrangements at Levy's Beach and the dunes, and trust that these will be retained.

Tuesday, 13 March 2018

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

I/we have raced horses and know the value of beach use, but also know the extreme care taken by all responsible when using the beach and surrounding areas.

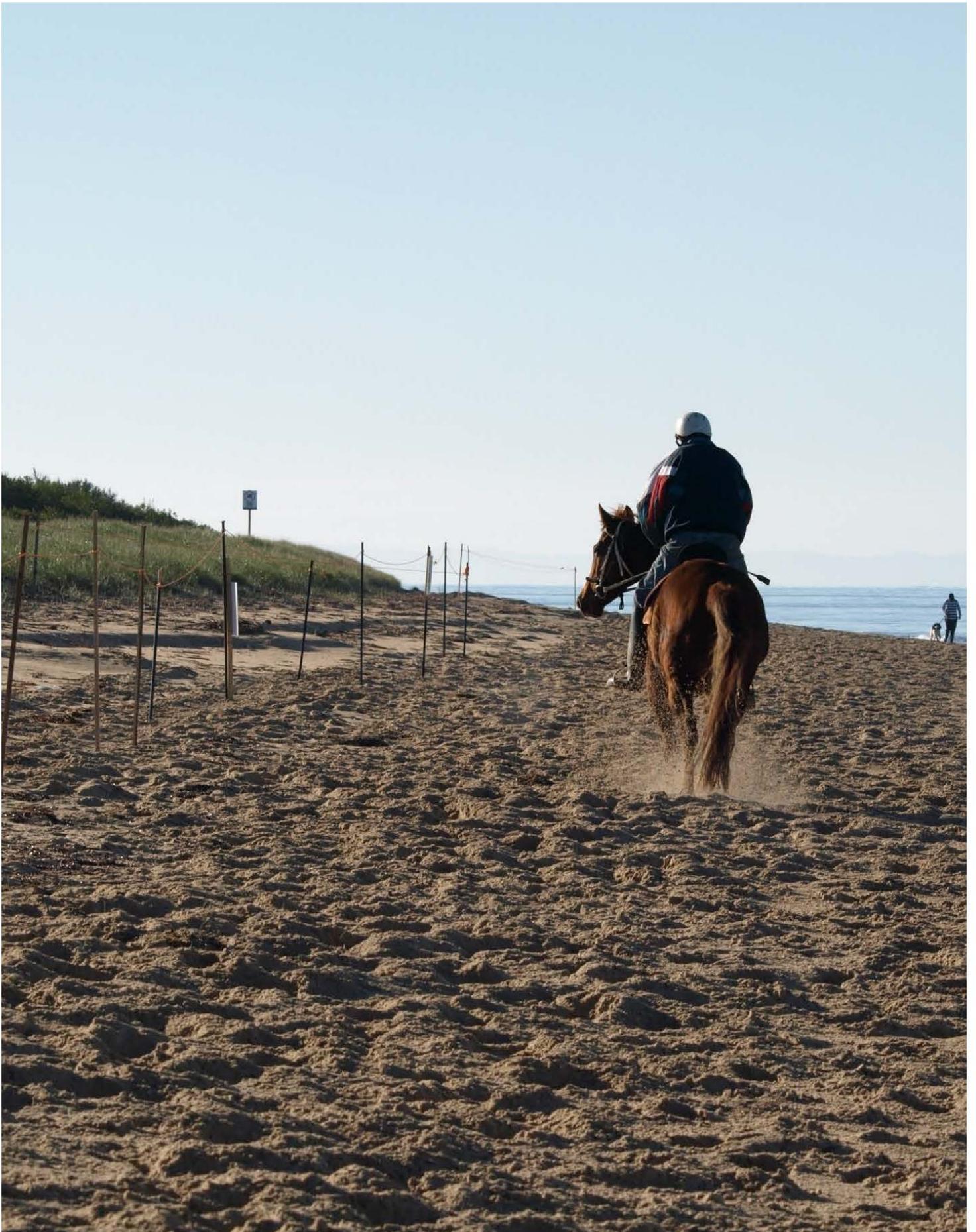
If the beach was not available, the opportunities for these horses would become limited, thus there would be potential for them to retire from racing all together. This would have a huge effect on the local horse trainers, horse numbers would decrease as well as taking away the opportunity for any return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

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

Regulating the use would be far more constructive than closing the area to training altogether.

Livelihoods are at stake while the financial downturn to associated businesses across the region will be dramatic should trainers choose to relocate, downsize or close down.

Regards,



## Draft Belfast Coastal Reserve Management Plan

### About me:

My name:

Postcode:

Email address:

**THIS SUBMISSION IS: X NOT CONFIDENTIAL    DATE: 9/3/18**

**My main reasons for interest in the future of the Belfast Coastal Reserve are the following:**

### Introduction

My submission is based on a good knowledge of horses, a good knowledge of the environment, a good knowledge of beaches and beach living wildlife and of working with biosecurity problems in Australia.

### Submission Points

- 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.
- There are many other 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 ***who have had purpose built sand training areas built for them elsewhere.***

- 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. These horses will include young and highly strung horses that should not be allowed in close proximity to other beachgoers who are most likely quite unaware of the risks they potentially face.
- 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. ***This amounts to very intensive use of the beach in the areas planned to be used.***
- 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 but increased significantly in both area affected and the likelihood of incidents with endangered wildlife and with any other users of the beach.***
- Ever since the uninvited invasion by racehorses in 2015, their training taxpayers footing the bill for costly Parks Victoria surveillance and infrastructure upgrades. Expanding the number of training beaches will simply make that worse. has been mismanaged, with numerous breaches of licensing conditions, public safety put at risk and environmental damage increasing substantially.
- By entrenching and expanding commercial horse training the plan is a relic of past coastal mismanagement and inappropriate use.
- ***Introduction of large amounts of horse manure to the beaches will increase the normal nutrient content of the sand and the adjacent water with changes to the environment certain to occur. Introduction of numerous weed species is almost inevitable.***

### **Serious Misrepresentations in the 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. Commercial racehorse training is incompatible with passive recreational uses.
  - 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**

### 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, except for the authorised access by commercial racehorse users**     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. ***The bans on off road vehicles and dune boarding would do less damage than the intensive horse training planned.***
- 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. ***Less impacting uses are banned while highly damaging commercial training is expanded***
- 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 a tiny 1.4% 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, Moyne Shire Council and Parks Victoria and leaving the reserve under the Crown Lands (Reserves) Act. The reserve should become a park under the National Parks Act.
- I also strongly support goals to ensure that Traditional Owners caring for their Country is an integral part of the reserve’s management and that community skills, knowledge and assistance provide stewardship and help in that management. However, if commercial racehorse training is retained inside the reserve, all of their efforts would be to nought.

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

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

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

#### Comments:

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

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.

Warrnambool to  
take advantage of the surrounding facilities and perform to their full potential.

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

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

Regards,

## Submission template for Draft Belfast Coastal Reserve Management Plan

### About you:

Your name:

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

Postcode:

\_\_\_\_\_

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)*

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













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.

An example of the horses that I have transferred to and raced at Warrnambool and have excelled due to the beach training are as follows:

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.

Unfortunately the withdrawal of Levy's Beach and the dunes would no longer make it necessary for me to send horses to Warrnambool, which would be a great loss to the industry and the local community.

Regards,



## **PORT FAIRY GOLF CLUB**

PO Box 88, PORT FAIRY VIC 3280

Ph: 03 5568 1654 Pro Shop: 03 5568 2866

*Email: [info@portfairygolf.com.au](mailto:info@portfairygolf.com.au)*

*Web: [www.portfairygolf.com.au](http://www.portfairygolf.com.au)*

### **Submission to the Belfast Coastal Reserve Draft Management Plan**

#### **For the Port Fairy Golf Club**

I wish to make a submission regarding the Belfast Coastal Reserve Draft Management Plan on behalf of the Port Fairy Golf Club.

The Port Fairy Golf Course provides recreation for over 600 members and attracts visitation of up to 7000 visitors per year. It is consistently voted one of the top 50 public golf courses in Australia and is a huge tourism drawcard for the area.

While the Golf Club itself is not included in the scope of the plan, it is believed that the plan has the ability to impact on the operations and future of the Port Fairy Golf Club.

Moyne Shire Council has been assisting the club in facilitating the construction of a rock wall to protect the 15<sup>th</sup> green and 16<sup>th</sup> fairway at the Port Fairy Golf Course.

Council have advised that they have sought landowner consent from Parks Victoria prior to applying for coastal consent for works to occur. They have been advised that the application has been referred for assessment. Council also advises that representatives of Parks Victoria have informally indicated concerns over the construction of a rock wall at that location because the beach at that location is narrow and may be impacted.

This advice appears in conflict with the intent of the key goals in the draft management plan i.e.:

Page 12:

Goal: Geological features and functioning dune systems are maintained and protected from avoidable damage.

It is noted that the Draft plan also seeks to support tourism. Again, the Golf Club itself is not included in the plan but it should be acknowledged that of the 7000

visitors to the club each year, most come to play because of the fantastic coastal scenery enjoyed from the course.

The Port Fairy Golf Club wish to stress to Parks Victoria that without some form of protection it is inevitable that the Golf course will be subject to inundation, together with roadway, private housing and farm land. The protection of the area is consistent with the objectives of the draft Belfast Coastal Reserve Management Plan.

Surely with many kilometres of beach available across the Belfast Coastal Reserve, it is considered more important to protect vital recreational and private infrastructure than to avoid impacting 450 metres of beach?

The Port Fairy Golf Club wish to stress to the importance of protecting the golf course and both public and private infrastructure and urge you to include protection of the golf course as part of the management plan.

regarding this matter so please contact him on further clarification regarding this matter. has offered to be the liaison should you require

Regards

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

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.

I am sure we can reach an agreeable compromise between both parties. I have walked the beach from Port Fairy to Warrnambool and was surprised by the amount of beach with no access, to protect the hooded plovers. I saw numerous dogs being walked along the beach without restraint, until approached by fellow beach walkers. All beach users have a responsibility to be mindful of the breeding and fostering of our native birds.

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, \_\_\_\_\_, Warrnambool Racing Club Member,

Tuesday, 13 March 2018

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

As an owner of 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.

One of my horses is the perfect example of an animal that has specifically benefited from beach training.

has excelled in the conditions afforded by training at the beach.

If this opportunity was not available, I'm sure she would have retired from racing entirely. I know this is not an isolated example and the impact of potential beach restrictions would no doubt negatively impact trainers and horses alike, as well as taking away the opportunity for any return to continue to fund future horses to be trained in the region.

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

Regards,

Thursday, 15 March 2018

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

One of the horses we owned had an injury that could have been career ending, but the ability to recuperate in the Warrnambool area including the beach training have allowed him to return to racing. Though not a veterinarian, I truly believe that the horses having the ability to train on the beach, gives them a much better physique and makes them stronger as a result.

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

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

Regards.

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

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

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

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**

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

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

Regards,

Wednesday, 14 March 2018

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

As an owner of 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.

to be able to utilise the beach and sand dunes for rehabilitation and then to continue with their racing career.

If this opportunity had not been available to us and other horses in a similar situation there would be potential for them to retire from racing all together. This would have huge effect on the local horse trainers, horse numbers would decrease as well as taking away the opportunity for any return to continue to fund future horses to be trained in the region.

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

Regards,

## **Belfast Coastal Reserve, draft Coastal Management Plan (the Draft Plan)**

### **Submission**

#### **Submitted by:**

Contact details:

Email

Telephone

#### **Summary**

This submission focuses on the impact of licensed horse training activities, across the Reserve but particularly at the eastern end of the Reserve (from Levy's Beach to Hoon's Hill), on the rights and interests of the Traditional Owners of the Country and the sites, artefacts, customs and culture they continue to protect.

It asks how it is possible to properly protect these things while allowing horse training activities and submits that this activity should not be allowed – not in my name.

#### **Acknowledgements**

I acknowledge the Traditional Owners of the Country – the Dhauwurd Wurrung and Kirrae Whurrung people of the Gundijmarra and Maar nations – and their elders, past and present, and their children who are the elders of the future. I acknowledge that these Traditional Owners can speak for themselves and that I do not and cannot speak for them. My observations and questions offered in this submission are not made by me on their behalf. They are observations and questions from me offered on behalf of myself, and others in my community who may think and feel like me.

I also acknowledge the work put into the Draft Plan by the plan's authors, Parks Victoria and the stakeholders involved in the consultation process that contributed to and support the plan.

#### **Submission**

On p64 of the Draft Plan, reference is made to a 2017 Warrnambool Racing Club-sponsored Cultural Heritage Management Plan (approved by the Office of Aboriginal Victoria) and a proposal within that CHMP for 'salvage and storage' of culturally-important artefacts from the area before licensed horse training activities commence. The Draft Plan also reports that the CHMP 'determined that the proposed activity (horse training activities) *cannot be conducted* in a way that minimises harm to the Aboriginal Cultural Heritage' of the area. (my emphasis)

The Draft Plan proceeds to then report that one of two Aboriginal organisations representing the Traditional Owners of the Country 'do not support commercial racehorse training occurring within the reserve at this time.'

I have one rhetorical question to draw these two reported facts together and into focus:

***Do the Traditional Owners of the Country support the proposal to ‘salvage and store’ culturally-important artefacts from the Country?***

Originally, I had intended making a submission that just asked that one question. However, having now read the full Draft Plan, I have other, associated questions and some firm proposals to put.

I referred to my over-arching question as rhetorical because the remainder of my submission is based on an assumption that the answer to that over-arching question is ‘no’.

My associated questions are:

- By ‘salvage and store’, I assume that the Draft Plan’s authors (and/or the authors and approvers of the CHMP) mean *removal* of known, identifiable artefacts from the site and storage away from the site. Is this correct?
- Is it possible to remove/relocate cultural artefacts from their cultural and physical context without destroying or degrading their cultural integrity, meaning, utility and purpose?
- Is it possible to later reinstall removed artefacts in a way that restores their cultural integrity, meaning, utility and purpose, and – if yes – to what degree is this possible?
- I assume that the artefacts referred to on p64 of the Draft Plan are artefacts that have already been located and are known. What is the plan for any artefacts – and, for that matter, sites of cultural importance that may not include or be predominantly characterised by artefact – that may be identified *after* the ‘activity commences’; perhaps even identified by disturbance of the Country *by* the activity after it commences? The Draft Plan appears to be silent (or at least sotto voce) on that question.
- How is the ‘salvage and store’ proposal (admittedly made in the CHMP rather than the Draft Plan) consistent and compatible with other aspects of the Draft Plan that seek to respect the Traditional Owners and their relationship to the Country and protect the cultural integrity and value of the Country?
- Does the Draft Plan support the proposal for ‘salvage and storage’ of known cultural artefacts? The Draft Plan does not seem to explicitly state this but, in its recommended strategies on pp64 and 65, proposes allowing horse training activities in the reserve (ie on the Country), after having referred to the CHMP finding that this ‘proposed activity cannot be conducted in a way that minimises harm to Aboriginal Cultural Heritage’. By definition, this means that the Draft Plan has contemplated the risks to the Country’s cultural value posed by horse training on the Country and has, at best, contemplated and endorsed the proposed ‘salvage and store’ strategy or, at worst, accepted that cultural sites and artefacts will be damaged and has favoured supporting commercial racehorse training over the preservation of those culturally-important sites and artefacts.

I ask these questions with the following parts of the Draft Plan front-of-mind:

What part of the report?	What does it say?
pp14 &15	The Country requires and deserves holistic respect and management because it is part of one continuous cultural landscape and because it is still in active use by the Traditional Owners in that context of one continuous landscape of contiguous sites of significance and importance.

<p>“For Traditional Owners the Belfast Coastal Reserve is considered part of one ‘cultural landscape’ stretching from Moyjil (Point Ritchie) at the mouth of the Hopkins river at Warrnambool to the mouth of the Moyne River in Port Fairy. This cultural landscape captures significant features within and beyond the Reserve including Tower Hill, the Hopkins and Merri rivers, Kellys Swamp and Moyjil. This landscape was a known travelling path of Aboriginal people. The groups that inhabited the area shared and traded natural resources, travelled through country together, followed the same law, practiced the same culture and customs, and spoke the same or similar language. For this reason, the entire cultural landscape attains a relative and interdependent significance that requires a holistic management strategy encompassing both the natural and cultural values. The waterways are linked to the artefact scatters, the burial sites, the shell middens, and patterns of resource use and habitation that have facilitated a long term relationship between the Eastern Maar and Gundijmarra peoples and the land that their ancestors have inhabited for generations.</p> <p>Belfast Coastal Reserve is an area that Traditional Owners use to connect with the cultural practices of their ancestors. Whether to fish, hunt, or simply sit and feel the sand on bare skin, it is a place that Aboriginal people use to assert cultural identity, and reimagine and reinterpret a culture practiced by their ancestors, in a contemporary context.</p> <p>It is a place that Aboriginal people bring their children to display how their ancestors lived by showing them the vast shell middens, the shellfish on the rocks, the bird life or the locations where people would have fished for eels in the creeks and rivers. It is a source of pride to have maintained knowledge of the local area, in particular traditional ecological knowledge of the flora and fauna including knowledge of natural resources, hunting and fishing methods [and] stone and wooden tool construction. It is also a place that people heard referred to in stories told by their grandparents and great grandparents about when European colonisers first came to this place and inflicted a deliberate and horrific genocide on local Aboriginal populations. Traditional Owners suggest that the landscape, resources and environment that their ancestors utilised and inhabited is the medium through which they are connected to their ancestors, heritage and, thus, identity.’</p>	
P19	Substantial sites of cultural heritage are already known, across the Country.
<p>“A total of 86 Aboriginal heritage places are recorded within the Belfast Coastal Reserve on Aboriginal Victoria’s Cultural Heritage Information System. <i>These sites extend across the entire Reserve (east to west).</i>” (my emphasis)</p>	
P20	There is likely to be more, as yet uncovered.
<p>“Survey data is in many instances outdated and it is likely that <i>the known Aboriginal heritage places are not a true and sum reflection of the archaeological values of the area.</i> Although archaeological investigations within the Reserve are limited, the few that have been conducted have shown that there is a high potential subsurface cultural material to be present.” (my emphasis)</p>	
P21	The removal of artefacts from the Country – for their protection – may be illegal, or at least has ‘the potential to impact’.
<p>“Damage to Aboriginal cultural heritage is an offence under the Aboriginal Heritage Act (2006) with significant penalties for the knowing destruction of Aboriginal heritage sites and objects. Management activities including the formal establishment of access and facilities, weed and pest management or infrastructure established by other authorities [including ‘salvage and storage’ activities?] has the potential to impact or harm Aboriginal cultural heritage.”</p>	
P22	We already know where, how and why damage is being done to Aboriginal cultural heritage sites on the Country
<p>“There are several areas of the Belfast Coastal Reserve where Aboriginal cultural heritage is being negatively impacted by visitors, particularly related to dune access. This impact ranges from relatively low (foot traffic) through to extremely high (four-wheel drive traffic and repeated horse traffic.”</p>	

P22	The Traditional Owners know this and oppose racehorse training on the Country
<p>“There are currently potential risks and impacts to Aboriginal cultural heritage from existing authorised activities including recreational horse riding, licensed horse riding tours and licensed commercial racehorse training which are being undertaken in the Reserve under a range of varying conditions. Each activity is currently undertaken in different ways and may pose different risks to Aboriginal cultural heritage and values on Country. Due to this, Gundijmarra Traditional Owners are not supportive of racehorse training at this time.”</p>	
Pp23 &24	There are some strategies missing from the goal for this section of the Draft Plan; strategies that might add detail to and provide direction to the strategy regarding an Aboriginal Cultural Heritage Land Management Agreement
<p>I propose two additional directive strategies:</p> <ul style="list-style-type: none"> <li>• Prohibit the use of the Country by racehorses until all of the research referred to in the Draft Plan under ‘Researching Aboriginal cultural heritage’ is completed to the satisfaction of the Traditional Owners of the Country, and until adequate (according to those Traditional Owners) plans are in place and being enacted to preserve and protect all of the cultural heritage of the Country.</li> <li>• If licensed commercial racehorse training is to be allowed, include provisions in the licenses that require the licensee(s) to become fully informed about sites of cultural significance in the area in which they are licensed to operate and to ensure that all persons or corporations (sub-licensees, staff or contractors) are similarly informed and conduct their racehorse training activities in accordance with the expectations and requirements expressed in the cultural awareness training they would have to undertake to achieve this adequately informed state and that these licence conditions are proactively policed and enforced, with irrevocable (and permanent) cancellation of licenses upon a minimum of second breach. This strategy should provide direction, detail and support to strategy #4 on page 64 under the Goal regarding management of authorised uses of the Reserve.</li> </ul>	
P24	The needs of the Country come first, but these needs are indivisible from the needs of the Traditional Owners to respect and protect the Country as the crucible of their cultural heritage and identity. In short, the priorities are: 1. Environment 2. The rights and wishes of the Traditional Owners 3. The rights and wishes of the broader community. Commercial interests are well down any list of priorities; perhaps just inside the top ten.
<p>“Ours is a cultural landscape, currently hidden to the broader community but alive and vibrant for us. Our identity is tied to the lava flows and wet forests, our sea and hill country, Gariwerd, the heathlands and dry bush. We have looked after these places for thousands of years and they have sustained us physically and spiritually” (Meerreengeeye ngakeepoorryeeyt, EMAC, 2015)</p>	

With all of this in mind, I ask rhetorically again: how is possible to allow racehorse training activities on this Country at this time, or at all? Why would we do that in the face of the evidence reported in the Draft Plan? These are rhetorical questions, but I’d be happy to receive a considered response to them and this submission.

**My main submission is:**

Given

- what we know about the destruction of Aboriginal community and culture at the hands of the European invaders and the social and economic systems they imposed – and continue to impose – on this Country (all or which provided me with my social and economic advantages by virtue of my heritage from them),
- that we know that the Country in question is part of one continuous cultural landscape and that there are at least 86 sites of cultural significance in the Country in question (and likely many more) that all work together as a cultural system,
- that we know that the preservation and use of these cultural sites is important to the Traditional Owners for the maintenance and regeneration of their community, and
- that we know that racehorse training activities will damage cultural sites (known and /or as yet unidentified),

it would be an act of conscious recalcitrance to allow racehorse training on this Country; an act that echoes the genocide of the past, that shows contemptuous disrespect for the Traditional Owners of this Country and their views and that condemns their children, grandchildren and future generations to continued 'second-class' status (worse: worth less than the horse racing industry) through sending the message to them that – at this time, with all this knowledge – we chose the racing industry and its lure of money over the rights and needs of the Country and her People, and I say:

**not in my name;  
this Country, and nor should the Government.**

**I do not choose horses over**

To lighten this a little (risking cheapening my submission to a ridiculous degree with a ridiculous statement), it occurs to me that allowing racehorse training on this Country would be like allowing racehorses to be trained on Reid Oval and in the aisles of St Joseph's church. Would we do that?

If the proposal to allow racehorse training in the Reserve is to be pursued, I reiterate my proposed strategies:

1. Do not allow it until a full audit of the Country's cultural heritage is completed, and
2. Require licensees to undertake site-specific cultural awareness training and to adhere to conditions about their use of the land in respect of the cultural integrity of the area, at pains of permanent cancellation of their right to use the area should they breach those conditions.

Finally, I cannot let the strategy on p61 to rename Hoon Hill to 'improve expectations of visitor behaviour' go by. Hats off to the Plan's authors. That is genuinely hilarious; comedy gold. LOL.

---

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.

Warrnambool has allowed horses that would otherwise have had careers finished to blossom and race on. The diversity of the training opportunities, centred around beach access, extends careers and aids in recovery and rehabilitation. The economic impact for Warrnambool is significant as are employment opportunities.

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,

Tuesday, 27 February 2018

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

There are many examples of the past 10-20 Years of Melbourne trained horses extending their racing career due to the environment that is offered by Warrnambool based trainers to these horses.

It would be a shame if a compromise could not be achieved with the well thought out plan created for sharing the environment and facilities.

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,

Tuesday, 13 March 2018

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

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

I, \_\_\_\_\_ want to add additional examples of horses that have been transferred to Warrnambool and excelled due to beach training due to the therapeutic action for these magnificent animals.

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

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

Regards,

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

Dear Sir / Madam,

**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.

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

Regards,

From:  
Sent: Wednesday, 14 March 2018 8:23 PM  
To: ParkPlanMailbox  
Subject: Belfast Coastal Reserve Management Plan

Categories: Red Category

I write to comment on the above plan and in particular on the issue of allowing horses on the beach.

I fully support our local racing industry and believe that horses should be allowed to train early in the morning on the beach. I do not believe that 24 hour access is required or even requested and I understand an agreement with Industry on numbers is in place.

Access to the reserve should also be available to recreational users of all sorts. The reserve should be available to all who wish to use it providing they are respectful of the environment.

Happy to answer any queries you may have

Sent from my iPad

From:  
Sent: Tuesday, 13 March 2018 10:34 PM  
To: ParkPlanMailbox  
Subject: Belfast Reserve submission

Categories: Red Category

Draft Belfast Coastal Reserve Management Plan

About you:

Your name:

Your Organisation (if relevant):

Postcode: 3280

Email or Postal address:

THIS SUBMISSION IS: ? CONFIDENTIAL x NOT CONFIDENTIAL Date: 13-03-18

Your Comments:

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

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

My interest in the reserve is the environmental significance, particularly the birdlife. Its significance as a key Hooded Plover breeding area is of particular interest. I visit the Killarney and Levys Beach areas at least once a week to observe birds.

The draft plan is a reasonable compromise for the various interest groups, although I do not agree with racehorse training being allowed between Big Baldy and Levys Point.

The proposed environmental area between Killarney boat ramp and Big Baldy is the minimum needed to give the birdlife a chance. I would like to see more but I recognise that there are many interest groups to accommodate and the draft plan strikes a reasonable compromise. Dog walkers have convenient access from near the Killarney recreation reserve and Levys Point. I know there is pressure from residents of Towilla Way to have access for dogs on leads but I am not sympathetic to this proposal.

There's an element of dog walkers who allow their animals off lead in spite of the present regulations and I cannot see their behaviour changing. The best solution is to keep dogs out of this area, providing a reasonable length of continuous environmental area.

I don't believe commercial racehorse training has any place within the reserve but if it must continue I would like it confined to the existing arrangement at Golfies. The area between Big Baldy and Levys beach should be used for the few recreational riders that use the area. Large numbers of racehorses disrupt birdlife by frequently interrupting their feeding. They also walk horses high on the sand when the tide is high.

From:  
Sent: Thursday, 8 March 2018 1:30 PM  
To: ParkPlanMailbox  
Subject: Warrnambool Beach Training Support Submission

Categories: Red Category

To whom it may concern,

Re: Warrnambool Beach Training Support Submission

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

Warrnambool and  
excelled due to the beach training.

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

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

Regards,

---

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

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

To whom it may concern,

**Re: Belfast Coastal Reserve Draft Management Plan Support**

I write to express my support for the continuation of use of local beaches for horse training within Warrnambool and the surrounding Belfast Coast.

I am heavily involved in the local community and understand fully the contribution that horse training in the region adds to our region's economy.

The WRC, with support from Racing Victoria and the Government through the Victorian Racing Industry Fund, has invested heavily in training infrastructure in recent times to assist in reducing horse traffic on the beaches. WRC members. Without doubt, I know they support the continued use of local beaches for horse training purposes.

This initiative was supported by Government and in partnership with local racing clubs. Along with strong initial enrolments, this provides an indication of a strong community of industry participants.

It is my strong belief that without access for training purposes to our expansive beaches, including the dunes at Levy's Beach, the thoroughbred racing industry would incur irreparable damage in the south-west region of Victoria. The flow on effect to the broader economic and social aspects of the region should this occur is also a concern.

I will continue to support the continuation of horse training in the region. I will also continue to work within the local community to ensure that the region's economy, local jobs, education opportunities, the horse population and is continually enhanced. The implementation of the proposed management directions in *The Belfast Coastal Reserve Draft Management Plan* would enhance these outcomes.

Regards,

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

To whom it may concern,

**Re: Warrnambool Beach Training**

As an owner of horses trained in Warrnambool I think it's imperative that beach training opportunities continue on Levy's beach and dunes. The consequences of restricting or preventing such training would be far reaching and detrimental to the region and businesses within it.

My experience with trainers in the area has been excellent. Horses that have niggling injuries thrive in the country atmosphere and benefit immensely from beach work. I really believe that some would never have raced again if not for the opportunities Warrnambool has to offer.

It would be disasterous to change policy, not only threatening the wellbeing of the horses trained there but the livelihood of many.

Please give this submission urgent consideration.

From:  
Sent: Tuesday, 13 March 2018 6:09 PM  
To: ParkPlanMailbox  
Subject: Horse training Warrnambool

Categories: Red Category

Tuesday, 13 March 2018  
ParkPlan@parks.vic.gov.au

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 owners 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 we will continue to support the continuation of horse training in the region.

I believe the beach should be a public area  
for all sports and to be able to pass it all on to the next generation.  
Please leave these simple pleasures for us all to enjoy and to pass on to our future generations. We live  
in such a beautiful part of the world it would be such a shame to close it all off and not to allow any  
horse training at all.

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

Regards,

<INSERT OWNERS LETTER HEAD  
AND/OR LOGO>

---

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.

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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.

I believe Warrnambool Tourism should promote the training of horses on our beach by providing a viewing platform. Many visitors would go to the beach early morning to see the horses being trained on the sand and swimming behind the rowboat. Any hoof marks made by horses is quickly removed by the first incoming tide.

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,

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

To whom it may concern,

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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.

As a owner, we endeavour to place our horses with locally based trainers because of the training advantage available for our horses, particularly those with leg and hoof issues, in having access to beach areas for training.

and have seen the massive growth of the town and industry as a result of heavier participation in the thoroughbred industry. I hope this new plan doesn't interrupt this wonderful local industry by giving those in the industry options to move elsewhere, as I'm sure there will be other coastal venues seeking to establish a fluent and influential industry to their shores?

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,

Warrnambool Raceclub Member

Tuesday, 13 March 2018

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

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Wednesday, 14 March 2018

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Parks Victoria  
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Melbourne VIC 3000

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**Re: Warrnambool Beach Training Support Submission**

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

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.

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,

Tuesday, 13 March 2018

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

As an owner of 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 horse training in the region.

Not only do my horses benefit from the swim and beach work, the dune work is vital for their soundness and fitness. I love my horses, but the lack of such facilities would mean I have some very difficult decisions to make. Closure of this aspect would mean that either my horses are retired, or I move them somewhere where such training is an option. Further, my investment would be lost to the local area, affecting my trainer, his staff, our racing club, and the horses well being entirely.

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,



30-38 Little Malop Street  
PO BOX 103  
Geelong, Victoria 3220  
Telephone: 03 5226 4667  
DX 216048  
wcb.vic.gov.au

Our ref: CO907

13 March 2018

Manager, Parks Planning  
Parks Victoria  
Level 10, 535 Bourke Street  
MELBOURNE VIC 3000  
Email: parkplan@parks.vic.gov.au

Dear Sir / Madam

### **BELFAST COASTAL RESERVE DRAFT COASTAL MANAGEMENT PLAN**

Thank you for the opportunity to provide feedback on the Belfast Coastal Reserve Draft Coastal Management Plan.

The Western Coastal Board is aware that the development of the draft plan has undergone a significant collaborative and consultative planning process, and we commend you on this. This process included presentations from Parks Victoria to the Board at its November 2017 and February 2018 meetings, and we trust the comments provided by the Board at these meetings were helpful.

I am pleased to provide further feedback from the Board below.

There are some strategies proposed in the draft plan that contradict the *Coastal Management Act 1995*, which provides that a management plan must be consistent with:

- the Victorian Coastal Strategy 2014 (VCS)
- any Coastal Action Plan applying to the area (including the Western Regional Coastal Plan 2015-2020)
- any relevant Victorian Environment Assessment Council, Land Conservation Council or *Coastal Management Act 1995* recommendation. For example, the Land Conservation Council (LCC) Corangamite Area Final Recommendations 1978.

It was our understanding that this coastal management plan would place environmental and cultural values above all, with recreational opportunities provided where feasible, in accordance with the VCS Hierarchy of Principles.

It was also our understanding that the aim of applying the two management zones to the Belfast Coastal Reserve (the Reserve) was to make it as easy as possible for users to identify where recreational activities and authorised uses could occur, to protect the Reserve's significant environmental and cultural values.

Reflecting on the proposed conditions for a range of recreational activities and uses in Table 6.1 of Chapter 6 - Recreation and Use, the Board considers that there are inconsistencies that 'blur the line' between the Conservation Zone and the Conservation and Recreation Zone.

For example, the plan proposes to permit licensed commercial horse training within the Conservation Zone at Rutledges Cutting to provide access for local trainers that have historically used the Reserve.

Allowing this form of activity within the Conservation Zone would appear to be inconsistent with the Zone's objectives, and sends a confusing and contradictory message to Reserve users (including dog owners, who may have 'historically' walked their dogs in this area). The Board notes that there is a well-established precedent within land use planning and law that historical use of public land does not create an automatic right to ongoing use of that land. Given the draft plan proposes opening an entirely new area of the Belfast Coastal Reserve to commercial horse training, the Board considers there is no requirement to allow ongoing use of beach areas within the proposed Conservation Zone for this purpose.

We emphasise that presenting a clear and consistent message about the Conservation Zone and keeping rules concerning its use as simple as possible will assist with compliance and its associated costs.

The Board also suggests that in the Conservation and Recreation Zone, more consideration needs to be given to a compromise approach by way of seasonal recreational use. For example, Levys Beach provides for a variety of uses in the draft plan, however there is no mention of protecting wildlife by restricting certain uses at particular times of year.

We are also concerned about horse training taking place in the dunes at Hoon Hill with respect to Aboriginal cultural heritage. We note that Gunditj Mirring Traditional Owners Aboriginal Corporation have expressed that they do not support commercial racehorse training occurring within the Reserve at this time (p.64), and believe this needs to be more strongly considered in the plan. In addition, best practice of coastal management is to try and control movement of people across dunes by corralling them into fenced pathways. This protects flora and fauna, and limits erosion which can lead to dune blowouts. Allowing horses to exercise on dunes would seem to contradict established management techniques elsewhere along similar areas of coastline.

Thank you again for the opportunity to provide feedback on the Belfast Coastal Reserve Draft Coastal Management Plan.

Yours sincerely

Western Coastal Board

---

From:  
Sent: Wednesday, 17 January 2018 11:30 AM  
To: Lily D'Ambrosio  
Subject: Belfast Coastal Reserve Draft Management Plan January 2018

Hello Minister D'Ambrosio

Birdlife SouthWest Victoria - Warrnambool I have been concerned for some time regarding the significant use of the beaches in this area used by commercial horse trainers. I have read the plan for allowance of future use and remain significantly concerned. The gap between a plan and it's implementation and future monitoring of this activity is quite likely to be problematic. Funds are rarely allocated for monitoring/policing especially as these areas are not visited by others at times usually frequented by the horse trainers.

Please note that yes, the endangered Hooded Plover has now a greater number of designated breeding areas, but minimised is the use of the shoreline by the other very small wading birds, many of which are known as vagrants from northern climes. Sometimes we see these birds on one beach section and sometimes on another. The significant level of disturbance by horse use will most definitely impact as these birds don't understand designated areas.

I appreciate advocacy for birds is miniscule relative to the wealth behind the advocacy for the horse racing industry. We are a few individuals with concerns.

I would think it is very possible to purpose build a sand and water race for training and rehabilitation for these horses as an alternative.

Of course I would presume that loud outrage would occur from this industry if beach use was banned. Perhaps if licences were issued (with fees commensurate with the high cost of high level monitoring), allowance of very restrictive numbers, restrictive time allowed on the beach, and funds allocated for bird monitoring may go a lot further in the shorter term in management of this activity. Hopefully one day we may actually ban it!

Sincerely

Birdlife Warrnambool

---

**From:**  
**Sent:** Friday, 9 March 2018 12:27 PM  
**To:** Lily D'Ambrosio  
**Subject:** Fwd: Andrews Government backs racehorses over threatened species.

Dear Ms D' Ambrosio  
Why is your government obsessed with destroying Victorian wildlife?  
Yours

----- Original Message -----

**From:** Victorian National Parks Association" <vnpa@vnpa.org.au>

**To:**

**Sent:**  
Fri, 09 Mar 2018 12:03:51 +1100

**Subject:**  
Andrews Government backs racehorses over threatened species.

No Images? [Click here](#)

[www.vnpa.org.au](http://www.vnpa.org.au)

**Andrews Government backs  
racehorses over threatened  
species!**



Dear

**A fragile coastal reserve in south-west Victoria has been invaded by racehorse trainers using it as a 'race track'. They're tearing up the beaches and dunes and jeopardising the future of threatened birds such as hooded plovers.**

**What's worse, the Andrews Government is letting them!**

Highly-strung racehorses are currently pounding up and down the beaches between Port Fairy and Warrnambool. Belfast Coastal Reserve is one of the most significant sites for threatened hooded plovers, critically endangered orange-bellied parrots, and numerous migratory shorebirds.

The horses are intimidating local beachgoers, risking the

safety of the general public, and **putting our vulnerable wildlife at risk.**

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.**

But the Andrews 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 thundering along the beach!**

In January 2018, Parks Victoria released the draft coastal management plan for the Belfast Coastal Reserve, which reversed 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.**

Community concerns continue to mount about the impacts of commercial racehorse training on the reserve's natural, cultural and recreational values; the protection of which was the reason for the reserve being created in the first place during the 1980s. **This is essentially an act of privatisation of our public beaches.**

### **You can help!**

**Make a submission:** Submissions are open until **next Friday 16 March**. We have produced a [submission guide to help you](#).

**Lend a hand:** We are also ramping up our community campaign to save our hoodies. [Can you spare a few hours to letterbox or take part in a stall to get as many signatures as we can on Save our Hoodies postcards?](#)

Yours truly,

image

**Donate to save our hooded plovers**

Find out all the ways you can help protect  
nature in Victoria by supporting us.

twi  
tte

fi  
n

**[vnpa.org.au](http://vnpa.org.au)**

Authorised by  
Victorian National Parks Association  
Level 3, 60 Leicester Street Carlton VIC 3053  
(03) 9341 6500 | [vnpa@vnpa.org.au](mailto:vnpa@vnpa.org.au)

Thank you for caring about Victoria's nature.



[Preferences](#) | [Unsubscribe](#)

Tuesday, 13 March 2018

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

As an owner closing the beaches around Warrnambool would be detrimental to the future of racing and would lead to less people employed in the industry .

Not only it would have an effect on tourism and people visiting the City not only would it be racing loss .But also the cities loss

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

8<sup>th</sup> March 2018

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

As 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.

we often visit the beach and it is great to see the horses cantering along the beach front and swimming in the water. If it's not broken don't fix it and why give in to the minority?

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

Regards,

Hamilton Racing Club  
PO Box 227 Hamilton Vic 3300



Tuesday, 6 March 2018

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

On behalf of the Hamilton Racing Club, this letter is written to provide our support to the continuation of Beach training in Warrnambool.

We are a close neighbour of Warrnambool and are proud of the fact our district has 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.

The Hamilton Racing Club understands that if training is no longer allowed to occur at the beaches in Warrnambool this will mean that the district will lose horse trainers and in turn our whole industry will suffer, including the Hamilton Racing Club. This will mean less horses participating in racing within our district and in turn less economic benefits to our community.

What Warrnambool has is unique and something the Western District is proud of, as a result The Hamilton Racing Club is fully supportive of the continuation of horse training on Warrnambool beaches.

Regards.

Hamilton Racing Club

Hamilton Racing Club

9 March 2018

Friday, 9 March 2018

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

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

Monday, 5 March 2018

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

As 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.

one of the treats is to get up early and walk along the path to watch the horses being trained on the beach and in the water near the breakwater. I have never seen the horses go anywhere near the dunes; they always stay on the hard sand near the sea, so I can't see what harm they could possibly be doing.

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

To whom it may concern,

This is our submission to The Belfast Coastal Reserve Draft Plan in reference to the proposed changes and how it effects our business as local landholders.

Drainage:

Since the completion of the Port Fairy to Warrnambool Rail Trail in 2012 Kelly's Swamp and the neighbouring wet lands have increasingly retained water for longer periods of time; in fact it is still holding water today. In years prior to the permanent causeway being constructed the swamp would be dry by mid February unless there had been very heavy summer rains. Which, has not been the case over the last couple of years.

This we believe 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 its banks and flowed onto the wetlands. The causeway was built by the Moyne Shire to allow Rundells Trail Rides and other horse riders access to the now "The Belfast Coastal Reserve." It was constructed with heavy limestone with only six culverts in one section and the causeway completely blocks the government drain (featured on the Parks Victoria Map date 1 September 2016) Map attached. I have also noticed he government drain does not feature on the maps in the draft plan information booklet. The six culverts have completely silted over in six years and the drain is now barely visible in sections, which is preventing water in its previous amounts to flow back into the river from beyond that section of Swamp.

This is a man

made problem.  
drained by mid December

In years past the Swamp would

by not restoring the  
balanced that has been successfully existing with the beautiful part of The Belfast Coastal Reserve  
since 1886.

Weed Control:

Sadly

it was the NRE employees in the early 90's whom placed the boxthorn on tracks to prohibit 4x4  
vehicles and motorbikes.

Vermin:

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 similar or at an increased level.

4x4 Vehicles & Motor Bikes:

4x4 vehicles are causing a great deal of damage to the vegetation in the reserve

We have witnessed first hand large 4x4 vehicles purposely driving into wet areas on the  
reserve, with is their only intention being to bog their vehicle. There are usually  
several vehicles preforming this exercise at a time with the winner being the vehicle that can achieve  
the greatest depth. The bollards placed on the Mahogany Walking Track have stopped these vehicle  
in some areas

Recreational Horse Riding:

We have seen very  
little impact on the greater part of the reserve. It will of course be necessary for the car parks to be  
undated to accommodate the larger number of people, dogs and horses now using them and  
perhaps zone keeping in mind congestion is the great problem the reserve management is facing.  
Our solution would be to increase the size of Levy's Point Carpark to accommodate the race horse  
and recreational riders so they can access the beach and Port Fairy Rail Trail whilst allowing dogs and  
their owns Port Fairy end of Killarney beach and walks and bird watch's Gormans Lane end. From  
what I have heard and read the major issue people have is the congestion. To restrict such a huge  
part of the reserve will only increase the congestion and compound the problems that all ready  
exist.

We would like to thank Parks Victoria for this opportunity to participate in putting our thoughts and  
points of view in the draft plan of the The Belfast Coastal Reserve.

Yours Sincerely,

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

Parcels Rutledge's Cutting and Kelly's Swamp



PARCEL INFORMATION	WATERCOURSES
<input type="checkbox"/> PARCELS	Government Owned
<input type="checkbox"/> CROWN PARCELS	State Owned
<input type="checkbox"/> Conveyed	Non-Consolidated
<input type="checkbox"/> Yield Land	Watercourse
<input type="checkbox"/> Non-Consolidated	Watercourse
<input type="checkbox"/> ROAD	Watercourse
<input type="checkbox"/> Fences	Watercourse
<input type="checkbox"/> Railways	Watercourse
<input type="checkbox"/> Main Road	Watercourse
<input type="checkbox"/> Main Road (Municipal)	Watercourse
<input type="checkbox"/> Collector (Municipal)	Watercourse
<input type="checkbox"/> Canal	Watercourse
<input type="checkbox"/> Proposed	Watercourse

DRAIN  
MARKER  
IN RED

This map is a simplified representation of Victorian Government data. This map may be of assistance to you but the State of Victoria does not guarantee that the publication is without error or is wholly appropriate for all purposes and therefore disclaims all liability for errors, omissions or damages which may arise from reliance upon it. All persons accessing this information should make appropriate enquiries to address the complexity of the data.



MOYNE  
SHIRE

17 April, 2012

Dear Sir/Madam ,

I write to you regarding the recent works at the Kelly's Swamp rail trail crossing and concerns raised

As you may be aware, an additional 6 box culverts have been installed under the new causeway to facilitate the flow of water from one side of the boardwalk to the other. The works were delayed for some time in an effort to minimise disruption to the Rundell's horseriding business. .

A hydraulic modelling study has also recently been completed that details that the boardwalk and causeway works will have little affect on future water flow and flooding issues in the Kelly's Swamp area. Council's legal advisers have reviewed this information and agree that there is no reason not to continue the works as originally planned.

This information was presented to a Council workshop on 10 April 2012. In response, Council reaffirmed its decision to continue with the approach works to the South of the boardwalk. It is expected that these works will take place in the near future.

The hydraulic modelling information can be provided on request.

In closing, I wish to thank all involved for their patience and co-operation in addressing what turned out to be a very complex issue.

Yours Sincerely,

*your*shire

Wednesday, 28 February 2018

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

The beach is a perfect relaxed environment to train my horses, that is also very therapeutic. Utilising the beach has given many of my horses the opportunity to pro long their racing careers and broaden their opportunity for other equestrian sports pursuits after racing.

I occasionally encounter members of the general public including surf fishermen, surfers, social equestrian riders and dog walkers. We exchange polite greetings and seem to connect with the appreciation of the beauty of the surrounding environment.

I enjoy observing the local birdlife but never go anywhere near their nesting areas.

I use the Warrnambool Beach when Rutledge's Cutting is closed.

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

Regards,

March 14/3/2018.

Manager.

Parks Planning

Parks Victoria

Level 10. 535 Bourke ST  
Melbourne 3000.

Dear Officer,

I being an owner of a Victorian bred horse trained at Warrnambool I feel relieved that my horse can enjoy the benefits of salt water.

The 2015 Melbourne Cup was won by Prince of Penzance who also enjoyed the salt water and soft sand of Warrnambool beaches. I am sure this holistic training enabled him to beat the internationals at their game.

Please the opportunity to train horses on Levy's beach and the dunes keeps the horses happy Victorian country racing needs the sand and beaches  
I support the trainers work

Yours Sincerely

Thursday, 8 March 2018

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

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

If this opportunity was not available, the options 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 racing industry is one of the major industries in the region and any restrictions placed on it would have a major impact on employment and economic growth within this industry and indeed the wider region.

Whilst the annual May Racing Carnival is recognised as one of Regional Victoria's Hallmark Events for its major impact on the regional economy, the year round impact of the racing industry should not be overlooked. Annually the industry generates jobs and economic growth which could be seriously impacted if horse numbers were to decrease, and decrease they will if one of the region's major horse racing competitive strengths is removed.

The opportunity to train horses on Levy's Beach and the dunes is critical for the ongoing success of horse training in Warrnambool region which I am fully supportive of and urge Parks Victoria to consider the wider economic issue, balanced with the environmental issues, when making any decision.

Regards,

3/14/2018

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

To whom it may concern,

**Re: Belfast Coastal Reserve  
Warrnambool Beach Training Support Submission**

I have been advised that the training of racehorses on the beaches at Warrnambool may be prohibited.

I would like  
you to consider the impact of such a drastic move.

The horses I'm involved with are trained at Warrnambool specifically because of the unique environment this region provides, namely access to the sand dunes and healthy sea water of the beach. Horses can experience these outstanding natural conditions and so avoid the harsh and sometimes unforgiving surfaces of many city training tracks while enjoying the proven recuperative benefits of the beach waters. As we know Warrnambool has a proven record now of superior training conditions highlighted of course by the successful preparation of the Darren Weir trained Prince of Penzance, winner of the 2015 Melbourne Cup whilst trained off the Warrnambool beach. In fact I believe a major motion picture about Michelle Payne - Prince of Penances rider, is currently in production.

I would like to mention the benefits to the local community of horses trained at Warrnambool with beach work central to getting them fit for racing.

If the beaches are closed to racehorse training our horses would most likely be transferred to city trainers thus ending the relationship of us which in turn impacts on the livelihoods of many Warrnambool residents. I have visited early morning work of horses on the beach and have to say I have found the handlers to be 100% professional in their attitude to safety and regard for the environment.

I am sure the trainers know it is a privilege to have this beautiful natural environment, not just for now, but for future generations to enjoy.

All I can do is beg your favourable consideration of the trainers request to use the beaches - I must say I am also a bird lover and have visited many spots around the 'bool to view the local wildlife. I love a walk around nearby Griffiths Island with my family to see the plovers nests and wallabies. I think if you look at wildlife in totality - the daily routine of the horses on

the beaches and other animals - they can certainly continue to work harmoniously and enjoy a sustainable future for all.

From a racing perspective there is one undeniable fact. Warrnambool is actually leading the country in the area of racehorse training. An industry that employs many thousands of people while being central to the recreational culture of many Australians. The annual Warrnambool racing carnival is simply outstanding from a tourist and economic viewpoint.

I do hope a common sense result can be found to the beach situation - horses at the beach are as important to me as a tourist as the magnificent whales are to so many.

Yours sincerely,

222 Exhibition Street Melbourne VIC 3000  
GPO Box 4306 Melbourne VIC 3001  
Tel/ 03 9641 1555 Fax/ 03 9641 1222  
[worksafe.vic.gov.au](http://worksafe.vic.gov.au)



22 February 2018

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

Dear Manager,

**Belfast Coastal Reserve Draft Management Plan**

I refer to a request for feedback regarding the Belfast Coastal Reserve Management Plan ('the Plan')

As the regulator of occupational health and safety in Victoria, the Victorian WorkCover Authority ('WorkSafe') has now reviewed the proposed plan and provides the following observations and feedback.

WorkSafe understands from the contents of the Plan that the Belfast Coast Reserve ('the Reserve') is under the management and control of Parks Victoria. WorkSafe is also aware that, amongst other potential employment activities, professional horse training is conducted by employers from time-to-time at the Reserve.

It is WorkSafe's view that the area where employment activities, such as horse training, occur at the Reserve, that area becomes a workplace for the purposes of the *Occupational Health and Safety Act 2004* ('the Act'). Consequently, Parks Victoria and employers engaging in employment activities may owe occupational health and safety duties to their employees and persons other than employees, including the general public, under the OHS Act and associated *Occupational Health and Safety Regulations 2017* ('Regulations').

In light of the above, WorkSafe considers that the Plan should include legislative references to the OHS Act and Regulations, together with any relevant occupational health and safety considerations or obligations owed to employees or other persons, arising from the OHS Act and Regulations.

Should you have any further queries, please do not hesitate to contact the writer on the number below.

Yours sincerely,

**Victorian WorkCover Authority**  
**Ph:**  
**Email:**

Tuesday, 13 March 2018

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

As an owner of several horses currently 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 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 depriving not only Warrnambool but many regional towns of economic and employment opportunities.

The training of 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,

---

Tuesday, 13 March 2018

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

To whom it may concern,

**Re: Warrnambool Beach Training Support Submission**

As an owner of a horse currently 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.

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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,