



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



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

BCRAG Objective:

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

BCRAG Aims:

To protect BCR for future generations.

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

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

To protect native wildlife, shorebird and migratory birdlife.

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

To protect BCR from non-conforming and incompatible activities.

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

To rehabilitate BCR and adjacent public land – biodiversity links.

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

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

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

GENERAL STATEMENT:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

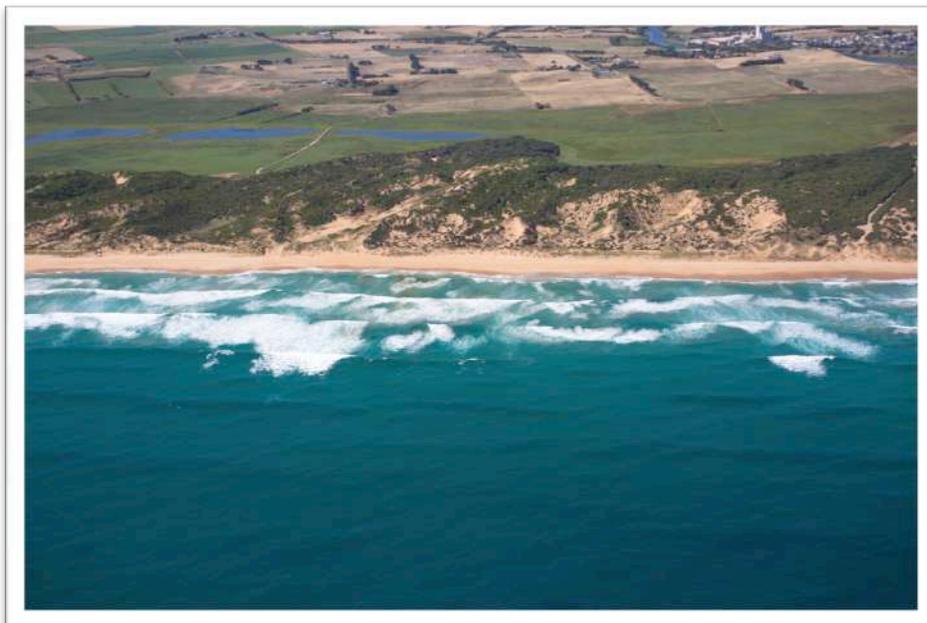
This sounds like a plan from the 1960's. Does this mean a new CHMP would have to be implemented if a training area was relocated? Who would be responsible for the rehabilitation of any damaged area caused by training activities and the associated cost?

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

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

Many times, the draft plan refers to damage caused by racehorses but fails to explain how increasing the area available to them by 250% will reduce the impact. Worse still, the plan's risk assessment reveals that management of this will not make any difference.

Before management, the risk to coastal dune vegetation, cultural heritage, resident and migratory shorebirds from racehorse training is rated 'Extreme'. After management Plan is introduced the rating still remains Extreme.



KEY POINTS NOT ADDRESSED IN THE DRAFT MANAGEMENT PLAN

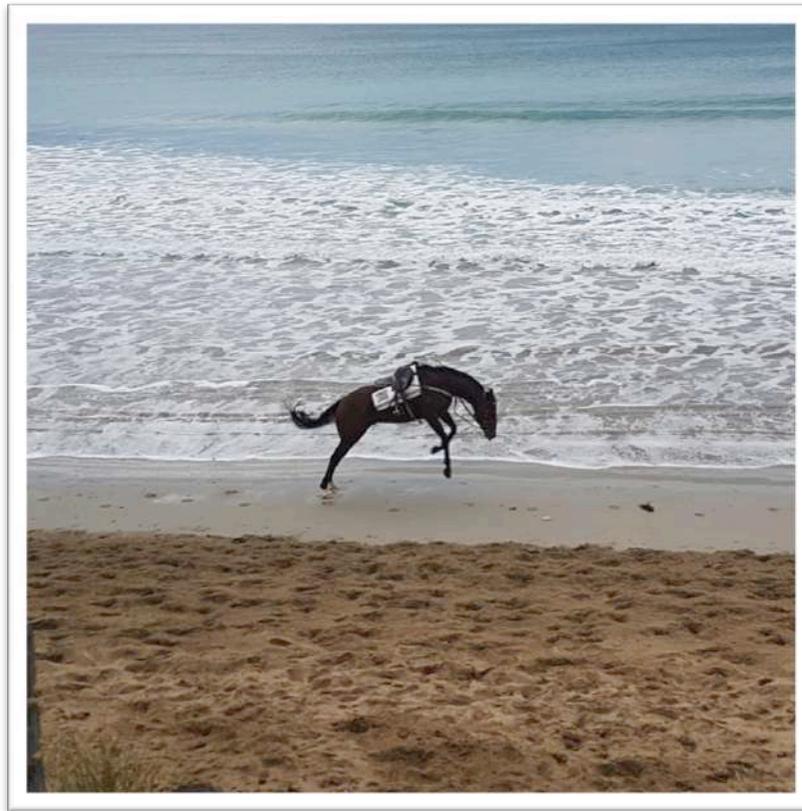


COMPLIANCE WITH REGULATIONS:

Belfast Coastal Reserve Action Group conducted a community monitoring program at two locations within the reserve, Golfies East beach and Rutledge Cutting, that were allocated for commercial horse training purposes during a period of 2016 - 17. Trainers were operating under an interim licence agreement during this time. A total of 32 breaches of that agreement were recorded in this period. State Environment Minister, Lily D'Ambrosio and Wildlife officers were witness to one such incident. This involved a senior member of South West Owners and Trainers Association operating in a restricted and at the time, off limits area.

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

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



WORKSAFE/Occupational ,Health & Safety:

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

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

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

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

DOCUMENT LINK :

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



ZONING:

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

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

DOCUMENT LINK: PCRZ ZONING INFORMATION

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



ECONOMIC BENEFITS:

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

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

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

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

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

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

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

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

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

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



RESPONSES TO POINTS IN BELFAST COASTAL RESERVE DRAFT PLAN

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

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

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

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

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

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

Healthy Country 27

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

Other goals and strategies are broadly supported.

Recreation and use..... 45

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8. 6.8 Tourism partnerships, marketing and promotion 68

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

Table 6.1 : Summary of activities

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

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

Goal #2 access and infrastructure are strongly supported.

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

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

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

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

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

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

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

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

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

Goal #11 Beach training of racehorses.

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

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

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

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

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

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

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

Goal # 15 : Coordinated management. This goal is supported but some of the strategies to achieve it take the reserve's management in the wrong direction.

The BCRCMP recommends retaining the fragmented management across the Warrnambool City Council, Moyne Shire Council and Parks Victoria for the land but there is no clarity on the marine area. It also recommends leaving the reserve under the Crown Lands (Reserves) Act. The reserve should become a park under the National Parks Act to provide greater protection and a stronger sense of purpose.

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

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

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

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

Managing in partnership..... 71

7.1 Coordinated management

7.2 Managing with Traditional Owners

7.3 Working with community

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

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

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

FINAL STATEMENT and CONCLUSION:

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

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

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

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

THE SOLUTION:

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

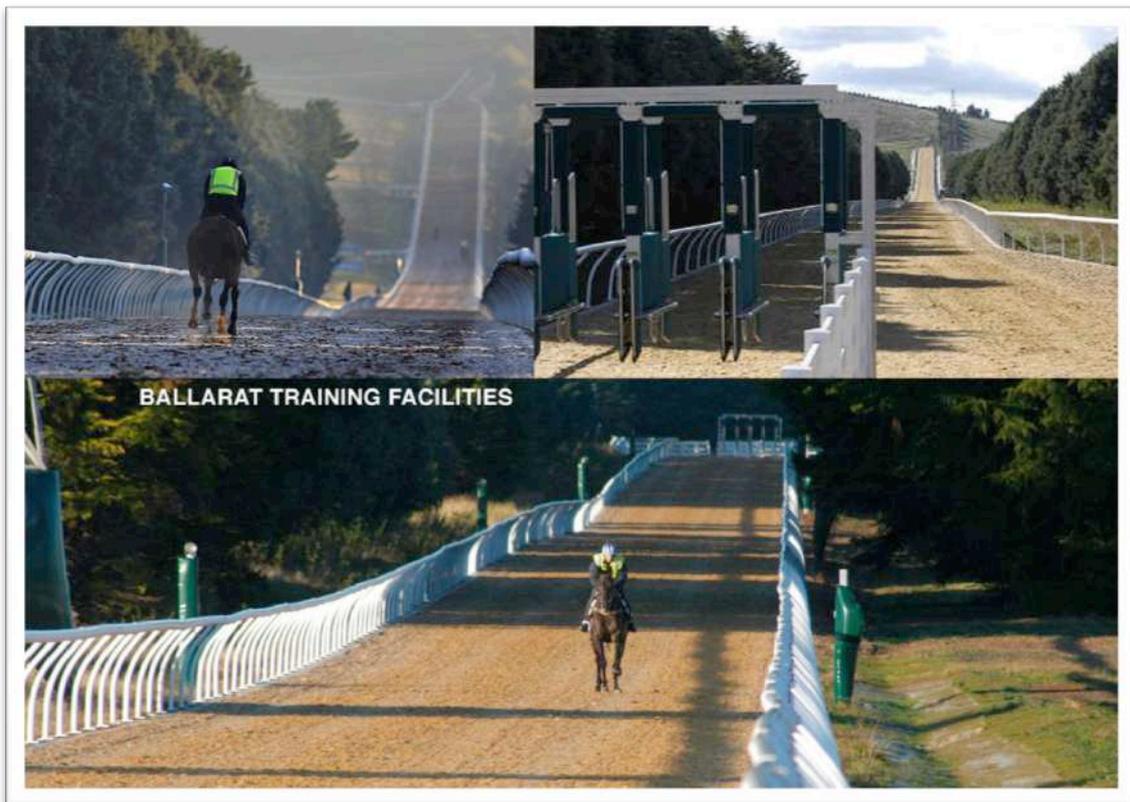
Ballarat Turf Club have built and now, Darren Weir (Forrest Lodge) is building and developing training facilities at his property at Maldon that replicate beach and dune training, including an uphill sand track and swimming pools.

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

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

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

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



Regards,

Bill Yates
Spokesperson
Belfast Coastal Reserve Action Group

END OF STATEMENT