

Equine Strategy Consultation Report and Response to Submissions



February 2023

Purpose

The purpose of this report is to outline consultation undertaken, submissions received and proposed responses to submissions on the draft Equine Strategy and Background Paper.

Consultation

A plan for consultation was prepared which outlined the goals of consultation, relevant stakeholders, and the methods to be used.

The goals of consultation were to:

- obtain information to refine the Strategy and the Background Paper to be brought back to Council for consideration for adoption
- inform future work packages, which may be scopes for more detailed studies, grant applications or advocacy.
- foster relationships between horse clubs, business, residents and council.

Stakeholders included other levels of government, State wide peak horse bodies, local horse and resident groups (see Stakeholders for Equine Strategy)

The methods used included:

- draft Equine Strategy and Background Paper on Website
- Public Notices in Echo and Plains Producer
- a Submission Form with a range of questions to prompt responses
- inviting comments of State level stakeholders, local horse clubs and known horse businesses via direct email
- seek discussions 1 on 1.

A workshop was planned to enable stakeholders opportunity to discuss the proposals in the strategy. Due to the approach to council elections caretaker period, this workshop was not able to be conducted. People who had expressed interest in attending were offered the opportunity for 1 on 1 discussion.

Consultation commenced 20 July and with submissions requested by 23 August 2022. Recognising reporting back would occur after the Council elections, and the complex and high-level nature of the strategy, stakeholders were advised via email of the opportunity to take more time to make a submission if they needed.

Stakeholders for Equine Strategy (submissions in bold; discussions in italics)	
Peak Horse Bodies and State Agencies	APC Local
<ul style="list-style-type: none">• Equestrian SA• Horse SA• Harness Racing SA• SA Dressage	<ul style="list-style-type: none">• Adelaide Plains Equestrian Club• Mallala Equestrian Centre• Mallala Showjumping Club• Reeves Plains Arena

<ul style="list-style-type: none"> • RSPCA • Animal Welfare League • Office of Recreation, Sport & Racing • Planning & Land Use Services • Australian Rail Track Corporation • Primary Industries SA • Department of Environment & Water • Department of Infrastructure & Transport 	<ul style="list-style-type: none"> • Two Wells Equestrian & Pony Club • Two Wells Trotters Association • Gawler River Pony Club • PhEVA • Various Horse Businesses • Adelaide University Roseworthy • Barossa Horse Rides • North and Yorke Landscape Board • Friends of Adelaide International Bird Sanctuary • Defence Port Wakefield Proof Range • Dublin History • Mallala Museum • Two Wells Regional Action Team
<p>APC Regional</p> <ul style="list-style-type: none"> • National Parks & Wildlife Service re Adelaide International Bird Sanctuary • Gawler River Flood Management Authority • RDA Barossa • Northern Yorke Landscape Board • City of Playford • Light Regional Council • Wakefield Regional Council • Town of Gawler • Coalition of Coastal Communities • Defence re Proof Range 	



PUBLIC CONSULTATION Equine Strategy

Council is inviting submissions in relation to its draft Equine Strategy.

The Equine Strategy proposes actions to foster:

- the role of horses in the Adelaide Plains economy and community
- valued horse places such as Lewiston's Animal Husbandry Area
- opportunities to create a network of off-road shared paths and calm country roads able to be used by horses and riders.

The draft Equine Strategy, Background Paper and Submission Form are available on Council's website apc.sa.gov.au. Hard copies may be obtained, at no cost, from Council's Principal Office, 2a Wasleys Road, Mallala or the Two Wells Service Centre, 69 Old Port Wakefield Road, Two Wells.

A workshop will be held at the Two Wells Council Chamber, 65 Old Port Wakefield Road, on Wednesday 12 October from 3 – 5pm. Please RSVP to info@apc.sa.gov.au by 5pm, Monday 10 October.

Written submissions – preferably using the Submissions Form – must be received by **9am, Tuesday 1 November 2022** and addressed to:

Adelaide Plains Council
Submission – Equine Strategy
By email: info@apc.sa.gov.au
Or by post: PO Box 18, MALLALA SA 5502

A report to Council to consider submissions will be prepared upon the conclusion of public consultation. Please indicate in your submission if you wish your correspondence to remain anonymous for the purposes of a report to Council.

Enquiries may be directed to David Bailey, Strategic Projects Officer at info@apc.sa.gov.au or (08) 8527 0200.

James Miller
Chief Executive Officer
Adelaide Plains Council

Public Notice

SUBMISSION FORM



Equine Strategy & Background Paper Consultation – September 2022

Using this form is requested but not mandatory. Feel free to answer whichever questions are of relevance to you. If you prefer to email or send a letter, that is appropriate too.

If you need more information, refer to the Equine Strategy and Background Paper under consultation on apc.sa.gov.au/

If you want to discuss the strategy, more information, or assistance making a submission, please contact David Bailey, Strategic Projects Officer, via info@apc.sa.gov.au or 85270200.

Please return this form by **9am Tuesday 1 November** to info@apc.sa.gov.au or to **PO Box 18, MALLALA SA 5502**.

Name

Address

Email

Mobile

A report to Council to consider submissions will be prepared upon the conclusion of public consultation. If you wish your correspondence to remain anonymous for the purposes of a report to Council, UNDERLINE YES ANONYMOUS

Economic and Social

1. What are your ideas about how Council could best work with local horse clubs and equine related businesses to enable their future?
2. Informal engagement flagged the **lack of a local after-hours vet** added costs and was a barrier to residents seeking after hours vet servicing. Any comments?
3. The statutory planning system is the **rules by which land can be used and buildings developed regarding horses**. Do you think any changes are needed?
4. A proposed strategy is to increase awareness about **planning for horses in emergencies**. Any comments?

5. Many residents keep horses on their **Rural Living allotments, with some lots being dusty and with loss of greenery and biodiversity**. A proposed strategy is to increase awareness about responsible land management of Rural Living allotments. Any ideas on the best ways to achieve this?
6. The strategy proposes to establish a horse management policy to guide Council in **enabling horse activities balanced with conservation and residential living and tourism**. What challenges do you think a policy should consider?

Destinations and Trails

7. Council proposes to **work with Regional Development Australia in supporting the proposed International Equine Centre** at Roseworthy Campus. What do you think the benefits of an international equine centre for Adelaide Plains could be?
8. Council proposes to foster horse activity in the **Lewiston and Two Wells Rural Living/Animal Husbandry area**. This could be through more trail experiences, an extended trail network, and further horse related attractors, such as horse adventure parks and horse based public art. Any comments?
9. How do you think equine activity can be fostered within Adelaide Plain's towns and settlements?
10. The strategy proposes to progress opportunities to **create a network of off-road trails and calm country roads able to be used for horses**. What opportunities can you think of for off road trails and calm country roads?
11. The strategy proposes to progress opportunities – as they arise - to create **regional trails along the Gawler River including able to be used by horses**. This recognises proximity to Lewiston's Animal Husbandry as well as more residents at Riverlea and Virginia. Any comments?

Coastal Destinations and Trails

12. Council proposes to work with the Department of Environment and Water (who are responsible for the Adelaide International Bird Sanctuary) in order **to foster opportunities**

for horse-based experiences in coastal areas. Any comments? What are your ideas for what these could be?

13. Council proposes to work with Department of Environment and Water and local horse clubs in educating riders about **appropriate behaviour in coastal areas**. A Rider Information Sheet was recently consulted about at Parham. Any comments? What are the best communication methods?
14. A proposed strategy is to provide suitable horse infrastructure, such as float parking, signage, and wayfinding in coastal areas. Any comments?
15. Are there obvious facts or information missing in the Strategy or Background Paper?
16. Any other comments?
17. If you want to be advised of the outcome of consultation, please write YES

Are you registered in the online business and community directory?

Horse based business and horse clubs are invited to register on Council's online business and community directory. The directory provides a guide community groups and businesses located in the District.

apc.sa.gov.au/our-council/business-and-community-directory

Response to Submissions

Submitter	Submission	Comment	Amendment to Strategy or Background Paper
Office of Recreation, Sport and Racing (ORSR)	<p>ORSR assists clubs to adapt their operations for the community now and into the future.</p> <p>ORSR's Club of the Future Guide supports clubs, including pony, equestrian and horse clubs, to explore innovative ways to deliver quality experiences, share resources, services and facilities, increase affordability and promote contemporary approaches to volunteering.</p> <p>It is through ORSR's Club of the Future (COTF) initiative that Councils can best work with local horse clubs and equine related businesses to enable their future.</p> <p>COTF initiatives provide tools for clubs, such as innovative case studies and educational resources, to better support them to evolve alongside changing community needs.</p> <p>ORSR's ongoing involvement in the broader racing industry is as a result of an initiative of government that supports strategic governance recommendations.</p> <p>ORSR's involvement with the racing industry extends only to providing policy advice to the Minister and the</p>	<p>ORSR's Club of the Future initiative offering support for clubs – including horse clubs – is acknowledged. It is appropriate to reference this initiative in the Equine Strategy and the Background Paper.</p>	<p>Refine Equine Strategy and Background Paper to reference ORSR's Club of the Future initiative</p>

	<p>administration of a stimulus package through the Racing Industry Fund.</p> <p>ORSR has reviewed the draft Strategy.</p>		
Submitter	Submission	Comment	Amendment to Strategy or Background Paper
Australian Rail Track Corporation	<p>ARTC own, maintain and control train movements in the existing rail corridor. This includes;</p> <ul style="list-style-type: none"> commercial freight trains up to 1.8 kms long and can be double stacked in height with containers. passenger trains The Ghan & The Indian Pacific. <p>Rail activities and train movements can occur at any time of the day or night.</p> <p>The above established activities do generate noise from time to time. ARTC uncertain of the impact if equestrian activities occur in the vicinity of the rail corridor.</p>	<p>The draft Equine Strategy section on Destinations and Trails states: ‘Further investigations should consider:</p> <ul style="list-style-type: none"> An extended trail network able to be shared by walkers, cyclists and horse riders connecting north, east, west to Two Wells and south to Gawler River’ <p>This should be amended to include reference to ARTC train crossings.</p> <p>The Background Paper discusses opportunities for further shared trails – including for horses - and is silent on matters associated with ARTC train crossings and land.</p>	<p>Refine Equine Strategy and Background Paper on trails to reference matters associated with ARTC train crossings and land.</p>
	<p>Access into the rail corridor is prohibited and restricted via ARTC’s 3rd Party Access process. Generally, this involves application processes (including fees), rail industry worker accreditation and dedicated protection officers being present.</p>	Noted.	Continue with Strategy.

	ARTC is not obliged to contribute to fencing or upgrading of any existing fencing along the rail corridor pursuant to Section 15 of the <i>Railways (Operation and Access) Act 1997</i> . Any fencing improvements adjacent to the rail corridor would be the responsibility of the land owner.		
	Whilst it is only applicable in the rail corridor, any high visibility safety clothing worn must be orange in colour and not red or green that may interfere with rail signalling.	Council's Infrastructure and Environment Team has been advised	Continue with Strategy.
Submitter	Submission	Comment	Amendment to Strategy or Background Paper
Gawler River Flood Management Authority	The Gawler River is subject to major flooding, on average once every 10 years. "Planning for horses in emergencies" should include development of flood management and action plans for properties that are within known flood inundation areas.	<p>Council works with a range of State Government and Australian Government authorities on emergency management. This includes the National Emergency Management Agency, the State SES, and the Barossa Zone Emergency Management Committee.</p> <p>The Equine Strategy proposes a strategy 'Increase awareness about planning for horses in emergencies' and a range of communication activities.</p> <p>The Gawler River flood hazard impacts the Lewiston and Two Wells Rural Living/Animal Husbandry Area.</p>	Continue with the Equine Strategy proposing a strategy 'Increase awareness about planning for horses in emergencies' and a range of communication activities.

		Emergencies also include heat events, coastal flood, and fire.	
	<p>The Gawler River water course is predominantly held in private ownership. Land access agreements, or perhaps longer-term establishment of a contiguous linear reserve to the coast, will be required to facilitate proposed trails – including for horses - along the river.</p>	<p>The draft Equine Strategy section on Destinations and Trails states: ‘Further investigations should consider:</p> <ul style="list-style-type: none"> • An extended trail network able to be shared by walkers, cyclists and horse riders connecting north, east, west to Two Wells and south to Gawler River’ <p>Further trails will need to have regard to relevant standards, including Austroads Guide Part 6A: Pedestrian and Cycle Paths. Based on ongoing discussions with ARTC, Council officer’s awareness of relevant ARTC guidelines is increasing.</p> <p>Acknowledging numerous hazard planning, funding and land tenure challenges with Gawler River, a longer-term vision for recreation outcomes – including for horses - in light of northern plains population growth and proximity to the Animal Husbandry Area makes sense. This is the main rationale for the proposed strategy.</p> <p>Acknowledging coastal horse activity is limited to continuing the historic level of activity rather than looking to grow activity, the hypothetical horse trail map should be refined to remove the hypothetical ‘horse’ trail idea immediately east of AIBSNP-WP and to envisage horse trails principally east of Port</p>	<p>Refine Equine Strategy and Background Paper to reference relevant guidelines, and to envisage horse trails generally east of Port Wakefield Highway.</p>

		Wakefield Highway. This acknowledges the practical and legal challenges with horses crossing Port Wakefield Highway.	
Submitter	Submission	Comment	Amendment to Strategy or Background Paper
Department of Environment and Water (DEW)	<p>Council's 'Tourism & Economic Strategy' combined with its 'Growth Strategy' and the predicted population growth forecast for the Northern Adelaide area, provides many challenges and questions around the long-term suitability and sustainability of horse riding within the coastal zone.</p> <p>Council's Tourism and Economic Strategy identified the coast and its natural assets as a 'Tourism and Economic Advantage.' Fishing, crabbing and habitat for shorebirds all rely on healthy ecosystems, with critical areas being managed for conservation under the <i>National Parks and Wildlife Act 1972</i> and <i>Marine Parks Act 2007</i>.</p> <p>If Council is looking to leverage these advantages and maintain the ecosystems that support them, a successful horse management policy will require a comprehensive understanding of the impact of both horse riding, and cumulative visitor use on migratory and resident shorebirds, targeted fish species and their habitat.</p>	Noted	Continue with Strategy

	<p>For example, successful Migratory Shorebird Management requires disturbance minimisation, healthy invertebrate populations and mudflat condition, safe roosting and feeding sites and healthy mangrove, saltmarsh, clay pan and coastal dunes systems. Combined with predicted sea level rise, adequate retreat areas are required for these systems to migrate to. The predicted population growth and increased usage of the coast is going to place further pressure on these systems identified as ‘Tourism and Economic advantages.</p>		
	<p>Current horse-riding activity along this stretch of coast could be considered low level and isn’t actively promoted. Whilst the <i>Adelaide International Bird Sanctuary National Park – Winaityinaityi Pangkara Management Plan 2020</i> allows for horse riding at certain locations within the park, the management plan also provides the ability to reduce disturbance impacts by ‘regulating access’ if the need arises.</p> <p>The tipping point for this hasn’t been identified but shorebird disturbance impacting migration combined with further population declines would likely be the driver in implementing such management strategies.</p> <p>While current horse-riding activity is low, active promotion of horse riding and facilitating horse riding growth along the coast in the short term has a high likelihood of creating visitor use issues and negative impacts on Council’s Tourism and Economic Advantage</p>	<p>The following influences coastal horse experiences:</p> <ul style="list-style-type: none"> • Shorebirds are a matter of national significance under the Australian Government <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC) • The Flyway site includes the coastal settlements • The Flyway is under an Australian Government Partnership for the Conservation of Migratory Waterbirds and the Sustainable Use of their Habitats. This is a Ramsar convention regional initiative. The Partnership is a voluntary collaboration of effort focusing on protecting migratory waterbirds, their habitat and the 	<p>Update the Strategy and Background Paper to envisage continuing the historic level of horse activity at Parham and Pt Gawler and to work with DEW should other opportunities arise.</p> <p>Update the Equine Background Paper to reference the EAAF.</p>

	<p>over the medium to long term as the population in Northern Adelaide increases.</p> <p>There are several opportunities further inland for well managed and sustainable horse-riding activities and trails. From a ‘Marketing and Branding’ perspective, focusing on these areas for horse riding trail development will help to promote the rural living aspects of the Adelaide Plains Council (APC) area while maintaining the natural systems along the coast which APC residents and visitors enjoy.</p> <p>Although AIBSNP-WP allows for limited horse riding, promoting and encouraging growth of equine activity proposes multiple considerations for DEW. The management plan states that the ‘Adelaide International Bird Sanctuary National Park – Winaityinaityi Pangkara will be managed to minimise disturbance to the natural ecological processes that support life in the Park, to protect natural and cultural values, to improve integrity of important ecological communities, and to enable people to enjoy the park’.</p> <p>As the area’s use increases, adaptive management actions will be required to ensure the long-term success of the National Park, particularly to ensure that shorebird habitat requirements are maintained.</p>	<p>livelihoods of people dependant on them</p> <ul style="list-style-type: none"> • The Flyway Site Network is a non-binding, collaborative “project” and is not a legal entity. The Australian Government is signatory to the partnership¹ • The Flyway site is not legally constituted under the EPBC • The Australian Government Wildlife Conservation Plan for Migratory Shorebirds² has four objectives: <ul style="list-style-type: none"> ○ Protection of important habitats for migratory birds ○ Wetland habitats on which migratory shorebirds depend are protected and conserved ○ human activity threats to migratory shorebirds are minimised or, where possible, eliminated ○ Knowledge gaps are addressed. <p>Current horse activity – principally at Parham/Webb Beach and Pt Gawler - can be described as ‘low level’. Introducing measures to ‘grow’ horse activity is likely be at odds with the Australian Government EAAF agreement. Depending on the level of horse</p>	
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¹ [Implementation Strategy for the East Asian–Australasian Flyway Partnership: 2007-2011 - DCCEEW](#)

² [Wildlife Conservation Plan for Migratory Shorebirds \(dcceew.gov.au\)](#)

	<p>Cumulative disturbance impacts from park users are of real concern with current visitor usage. Soil compaction and erosion, vegetation loss and increased nutrient loads are also factors front of mind for future visitor use planning.</p> <p>Further promotion and facilitating an increased equine presence within the Park have potential for detrimental impacts to the Park’s environmental assets. Consideration to the purpose of the National Park and how any proposed developments could complement or coexist sustainably need to be considered at the outset of discussions.</p>	<p>growth planned, it may be at odds with the EPBC.</p> <p>It is suggested to change ‘Foster opportunities for horse-based experience in coastal areas.’ and the associated rationale and action to explicitly envisage continuing the historic level of horse activity at Parham and Pt Gawler, and to work with DEW should other opportunities arise.</p> <p>Based on experience, Council and DEW officers have a reasonable understanding of what is the historical level of use. At Parham for example, an annual club visit with 15 – 20 floats is typical, and acknowledging various circumstances, 2 – 3 floats per day. Ongoing monitoring increases officers understanding of club visits, with clubs being asked to apply for a permit where bringing more than six floats. The Thompson Beach Progress Association recognise the Equine Strategy envisages continuing the absence of horse activity at Thompson Beach. The Chairperson of Middle Beach Inc has conveyed a similar position. These were canvassed in informal discussions in early 2023.</p> <p>Incorporating an explicit approach to historic level of use reflects the intent to ‘minimise’ the threat to migratory shorebirds from horse activity. This aligns with the goals of the Australian Government Wildlife Conservation Plan for Migratory Shorebirds.</p>	
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	<p>Regarding the Lewiston and Two Wells Rural Living/Animal Husbandry area, a focused area that attracts riding has many benefits for both council residents and coastal habitats. As the population increases there will be greater demand for recreational amenity leading to greater user group conflict, which already exists in the coastal zone.</p> <p>Focusing horse riding in one area, with well-planned long riding trails or horse facilities originating from this location provides a destination to attracting further horse related activities. Co-benefits to such a proposal include reducing or eliminating current and future user group conflict along the coast and improve coastal management in what is an international significant area.</p> <p>Consideration around the long-term suitability and sustainability of equine activity at each individual township should be carefully considered to achieve APC's strategic direction. Unfortunately, the impact of different recreational pursuits changes as an area's population increases.</p> <p>Supporting 'rural lifestyles' and promoting 'coastal experiences' that rely on a healthy coast and marine ecosystems does have its challenges and raises questions on the need or suitability of equine activity within the coastal zone over the medium to longer term.</p>	<p>The DEW submission aligns with the Equine Strategy: 'Lewiston and Two Wells Rural Living Areas - Foster horse activity destination appeal through augmenting trail experiences and further horse related attractors.' The rationale underpinning this strategy explains the benefit of this strategy: 'This large area is established for the purpose of rural living and animal husbandry. Many residents have horses, numerous horse-based businesses are established as well as the Two Wells Pony Club and Adelaide Plains Equestrian Club. Two Wells Trotters have moved to Hams Park. The Lewiston Trails are used by horse riders. Augmenting horse-based experiences offer lifestyle opportunities for residents, clubs and local businesses, and reinforces the animal related purpose. Further investigations should consider:</p> <ul style="list-style-type: none"> • An extended trail network able to be shared by walkers, cyclists and horse riders connecting north, east, west to Two Wells and south to Gawler River • A horse adventure park providing opportunities for riders and horses to learn different skills and to have 'adventure' experiences 	<p>Continue with strategy 'Lewiston and Two Wells Rural Living Areas - Foster horse activity destination appeal through augmenting trail experiences and further horse related attractors.'</p>
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	<p>Horses do have an environmental impact, but at what point this becomes problematic and has detrimental impact on migratory shorebirds is not well understood.</p> <p>What is known is that disturbance has detrimental impacts to resident and migratory shorebirds and disturbance increases as coastal areas are developed.</p> <p>The animal husbandry area provides a solution for Council to maintain and support the ‘rural lifestyle’ residents enjoy, by providing a focus area where equine recreation can be embraced.</p>	<ul style="list-style-type: none"> • Horse themed public art to share the horse story for visitors and residents, and to reinforce the animal husbandry role. • Events, such as an annual ride and fun day along the trails.’ 	
	<p>Enabling coastal access for public use and enjoyment in a way that shares the beaches with shorebirds and minimises disturbance is a challenge. The rider information sheet is important in promoting a ‘tread lightly’ approach to park visitation and improves visitor understanding of the importance of the area that they are entering.</p> <p>An information sheet will assist Park Rangers in their liaisons with horse riders in the park, to ensure that they ride responsibly and are aware of the impact that they have whilst they are riding within the park.</p> <p>Regarding communication methods, Rangers do speak with riders whilst out on patrol and the information sheet will form the backbone of future discussions moving forward. Riders educating riders also plays a critical role in responsible use. Horse riding in a</p>	<p>A draft Rider Information Sheet is under preparation associated with horse riding and discussions around appropriate siting of float parking at Parham.</p> <p>The draft Equine Strategy has a strategy to ‘Educate riders about appropriate behaviour in coastal areas.’</p>	<p>Continue with Equine Strategy seeking to ‘Educate riders about appropriate behaviour in coastal areas.’</p>

	<p>National Park is a privilege not afforded in many other parks. Responsible, educated, and respectful use of the Park by horse riders will help to reduce visitor use conflict and decrease their impact.</p>		
	<p>The AIBSNP-WP management plan identifies maintaining access is a key theme, horses may be authorised to ride in designated areas and horse float parking is identified as an issue needing to be addressed. However, understanding what is considered 'suitable horse infrastructure' does vary between interest groups, individuals, and organisations.</p> <p>The primary purpose for the AIBSNP-WP is to protect migratory shorebirds. The Park Management Plan states 'the level of visitor use and any impact of recreational activities on the park will continue to be monitored. Should environmental impacts, safety concerns, or conflicts between recreational activities arise, it may be necessary to modify access arrangements within the park. Visitor access may be reviewed and altered on a temporary, seasonal, or permanent basis in consultation with the community if this is necessary for public safety or the protection of birds and their habitat'.</p> <p>Considering habitat requirements and the threats faced by shorebirds locally and internationally, 'suitable horse infrastructure' will likely look to limit growth of equine activities in and surrounding critical habitats or</p>	<p>Noted</p>	<p>Continue with Strategy</p>

	<p>during key periods with an eye to the medium to long term. How this is planned for requires serious consideration and advice by experts in shorebird management.</p>		
	<p>AIBSNP-WP and its purpose along with identifying that horse riding does impact on coastal environment has been identified at the higher level, but there are also many complexities to shorebird and disturbance management that require expert advice on to manage these environments sustainably into the future.</p> <p>The tourism and economic potential of APC relies heavily on healthy marine and coastal ecosystems. Whilst coastal horse riding is undertaken at historically low levels and currently occurs, the background document and strategy didn't seem to address location suitability or sustainability when looking at the long-term population growth predictions and sea level rise.</p> <p>The AIBSNP-WP is now subject to co-management arrangements with the State Government signing a co-management with the Kaurua Nation and establishing the Kaurua Parks Advisory Committee. This means the park management plan will be reviewed in the context of co-management and the Government will be paying particular attention to the advice from the Kaurua Parks Advisory Committee. This may impact on the horse activity permitted in the current park management plan and needs to be considered in any</p>	Noted	Update Strategy and Background to acknowledge co-management

	strategy dependent on access to the AIBSNP-WP the Council may be considering.		
Submitter	Submission	Comment	Amendment to Strategy or Background Paper
Duncan MacKenzie Chairman, AIBS Partnership Group	<p>The comments set out by Jeff Groves apply to (I believe) all members of the Partnership Group and volunteers who 'work' on the AIBS.</p> <p>Allowing the entry of horses to the AIBS beaches is seen as a potential 'disaster'.</p> <p>Article from Bird Life Australia regarding death of 20 Red-necked stints, a fairly common occurrence.</p> <p>Recalls early birding days around the beaches in Victoria and finding dead waders 'run-over' by horses (pleasure riding and in training) cars, motorbikes etc.</p> <p>Finding the remains of smashed eggs in the nest was also common as was the remains of birds taken by foxes, cats and dogs.</p>	<p>The following influences coastal horse experiences:</p> <ul style="list-style-type: none"> • Shorebirds are a matter of national significance under the Australian Government <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC) • The Flyway site includes the coastal settlements • The Flyway is under an Australian Government Partnership for the Conservation of Migratory Waterbirds and the Sustainable Use of their Habitats. This is a Ramsar convention regional initiative. The Partnership is a voluntary collaboration of effort focusing on protecting migratory waterbirds, their habitat and the livelihoods of people dependant on them • The Flyway Site Network is a non-binding, collaborative “project” and is not a legal entity. The Australian 	<p>Update the Strategy and Background Paper to envisage continuing the historic level of horse activity at Parham and Pt Gawler and to work with DEW should other opportunities arise.</p> <p>Update the Equine Background Paper to reference the EAAF.</p>

		<p>Government is signatory to the partnership³</p> <ul style="list-style-type: none"> • The Flyway site is not legally constituted under the EPBC • The Australian Government Wildlife Conservation Plan for Migratory Shorebirds⁴ has four objectives: <ul style="list-style-type: none"> ○ Protection of important habitats for migratory birds ○ Wetland habitats on which migratory shorebirds depend are protected and conserved ○ human activity threats to migratory shorebirds are minimised or, where possible, eliminated ○ Knowledge gaps are addressed. <p>Current horse activity – principally at Parham/Webb Beach and Pt Gawler - can be described as ‘low level’. Introducing measures to ‘grow’ horse activity is likely be at odds with the Australian Government EAAF agreement. Depending on the level of horse growth planned, it may be at odds with the EPBC.</p> <p>It is suggested to change ‘Foster opportunities for horse-based experience in coastal areas.’ and the associated rationale and action to explicitly envisage continuing the historic</p>	
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³ [Implementation Strategy for the East Asian–Australasian Flyway Partnership: 2007-2011 - DCCEEW](#)

⁴ [Wildlife Conservation Plan for Migratory Shorebirds \(dcceew.gov.au\)](#)

		<p>level of horse activity at Parham and Pt Gawler, and to work with DEW should other opportunities arise.</p> <p>Based on experience, Council and DEW officers have a reasonable understanding of what is the historical level of use. At Parham for example, an annual club visit with 15 – 20 floats is typical, and acknowledging various circumstances, 2 – 3 floats per day. Ongoing monitoring increases officers understanding of club visits, with clubs being asked to apply for a permit where bringing more than six floats. The Thompson Beach Progress Association recognise the Equine Strategy envisages continuing the absence of horse activity at Thompson Beach. The Chairperson of Middle Beach Inc has conveyed a similar position. These were canvassed in informal discussions in early 2023.</p> <p>Incorporating an explicit approach to historic level of use reflects the intent to ‘minimise’ the threat to migratory shorebirds from horse activity. This aligns with the goals of the Australian Government Wildlife Conservation Plan for Migratory Shorebirds.</p>	
Submitter	Submission	Comment	Amendment to Strategy or Background Paper
Birds SA	Horse riding on beaches in the AIBS is incompatible with the role of AIBS as a vitally important sanctuary	APC manage Council controlled land within the coastal settlements (Parham, Webb Beach, Thompson Beach, Middle Beach) that	Continue with Equine Strategy

<p>Jeff Groves, Vice President</p>	<p>for shorebirds. Birds SA has never supported horses, dogs or vehicles on beaches in the AIBS. Horse-riding on beaches will have a detrimental impact on at least 10 migratory shorebirds including threatened species covered by the EPBC Act and international agreements. The impact on listed migratory bird species by an expansion of horse related activities in the AIBS is highly likely to require a referral to the Commonwealth under the EPBC Act. International agreements on migratory shorebirds call for their protection. Any proposed expansion of horse related activities in the AIBS will need to address the impact upon these agreements. Expansion of horse related activity in coastal areas in the AIBS will have a negative impact upon the feeding, roosting and nesting of a number of beach-nesting birds commonly encountered. Resources to police regulations and by-laws in the AIBS are grossly insufficient to manage existing threats. Increase in staffing level will be required should an increase in horse related activity be pursued.</p>	<p>are in effect enveloped spatially by AIBS. DEW manage the land that comprises the AIBS. Council’s monitoring and enforcement is via Community Safety staff who currently work Monday to Friday with one Authorised Officer ‘on call’ after hours and weekends. On-call means for emergency call outs e.g. dog attacks and does not provide for beach patrols. In relation to weekends, Council has a resource sharing arrangement with Light Regional Council. A single officer covers weekend call outs for both Councils on an alternating roster arrangement. After hours service has traditionally been limited to responding to animal related emergencies only. Extending the service to conduct beach patrols and associated compliance enforcement after hours and on weekends (likely a community expectation and when most non-compliance e.g. Council itself is continuing to vehicles access to the beach would occur) would require additional resourcing. Long term visitor use problems aren’t a quick fix and require persistence and consistency.</p>	
	<p>Likelihood of pressure from the horse training industry to open up the beaches to horse training activities.</p>	<p>This will need monitoring.</p>	<p>Continue with Equine Strategy</p>
	<p>Opposes recreational vehicles in coastal areas and vehicles on dunes and other fragile habitats. Supports public education and community engagement, primacy of beachgoers on foot and the amenity of beaches, and</p>	<p>Council manages land in and near to coastal settlements of Parham, Webb Beach, Thompson Beach and Middle Beach. The majority of coastal land is managed by DEW or</p>	<p>Continue with Equine Strategy</p>

	<p>regulations and policy that minimise disturbance by recreational vehicles.</p>	<p>by the Department of Defence within the Port Wakefield Proof Range. This means Council's role is limited to land under its care and control.</p> <p>Council has received reports about recreation vehicles on Council managed foreshore land. Currently Council has limited measures in place to control vehicle/bike access to the foreshore from the coastal settlements.</p> <p>Council's Dogs By-Law expects dogs to be 'on-leash' when on Council managed foreshore and within the coastal settlements. This arises from these being within a wetland of national importance. 'On Leash' is a higher level of dog control than under 'effective control' which applies generally across SA.</p> <p>Regarding trail bike impacts within AIBSNP-WP, DEW informally advise that working with Crown lands, Off Road Park operators, Adelaide University, Council, and shell grit miners, significant fencing has been put in place and compliance patrols are undertaken regularly. Cameras in place from the salt mining company is slowing vandalism. A decline in activity has been seen over the past two years. This is ongoing and will take time but the trajectory is in a positive direction.</p>	
	<p>Two media articles on migratory birds</p>	<p>Noted.</p>	<p>Continue with Equine Strategy</p>

<p>BirdLife Australia</p>	<p>BirdLife Australia has particular interest in the equine strategy due to the significant impacts of people and their recreational activities on Australia’s native resident shorebirds, and the internationally important migratory shorebirds in Gulf of St Vincent coastal areas and on beaches.</p> <p>BirdLife and others monitor shorebird populations within upper Gulf St Vincent. This provides data to advocate for the area to be designated as a shorebird sanctuary.</p> <p>A number of species are listed directly as ‘threatened’ species under this Act.</p> <p>All other migratory shorebird, not listed as threatened, which visit Australia, come under the EPBC ‘umbrella’ of the Wildlife Conservation Plan (WCP) for Migratory Shorebirds (Commonwealth of Australia 2015).</p> <p>Important habitat areas, for the purposes of the EPBC Act have been identified in a National Directory of Important Migratory Shorebird Habitat, and includes the Gulf St Vincent Important Shorebird Habitat (area 254). (Weller, et al 2020).</p> <p>Under the EPBC Act, an action will require approval from the federal environment minister if the action has, will have, or is likely to have a significant impact on a matter of national environmental significance.</p>	<p>Noted</p>	<p>Continue with Strategy</p>
	<p>Management Planning should also align with priorities identified in the Federally endorsed Conservation Action Plan for Migratory Shorebirds (MSCAP). The MSCAP is being implemented on a state scale by The South Australian Shorebird Alliance.</p>	<p>The following influences coastal horse experiences:</p> <ul style="list-style-type: none"> • Shorebirds are a matter of national significance under the Australian Government <i>Environment Protection</i> 	<p>Update the Strategy and Background Paper to envisage continuing the historic level of horse activity at</p>

	<p>The Shorebird Alliance working group should be consulted when formulating regional planning for AIBS-WP.</p> <p>Given shorebird habitat in the gulf extends beyond the boundaries of AIBS-WP an ecosystem scale approach should be applied to planning ensuring consistent management across NRM borders.</p> <p>Research suggests that disturbance from human activities has a high energetic cost to shorebirds and may compromise their capacity to build sufficient energy reserves to undertake migration.</p> <p>Disturbance which renders an area unusable is equivalent to habitat loss and can exacerbate population declines.</p> <p>Disturbance is greatest where increasing human populations and development pressures may have an impact on important habitats.</p> <p>Migratory shorebirds are most susceptible to disturbance during daytime roosting and foraging periods (Weller and Warren, 2017).</p> <p>Additionally, the impacts to habitat quality also needs to be considered by increased access of recreational activities such as vehicles and horses.</p> <p>Direct threats to shorebirds include trampling, and disturbance of nesting resident shorebirds.</p> <p>Horse Management Policy – flag Council needs to have regard to shorebirds as protected via the EPBC Act.</p>	<p><i>and Biodiversity Conservation Act 1999 (EPBC)</i></p> <ul style="list-style-type: none"> • The Flyway site includes the coastal settlements • The Flyway is under an Australian Government Partnership for the Conservation of Migratory Waterbirds and the Sustainable Use of their Habitats. This is a Ramsar convention regional initiative. The Partnership is a voluntary collaboration of effort focusing on protecting migratory waterbirds, their habitat and the livelihoods of people dependant on them • The Flyway Site Network is a non-binding, collaborative “project” and is not a legal entity. The Australian Government is signatory to the partnership⁵ • The Flyway site is not legally constituted under the EPBC • The Australian Government Wildlife Conservation Plan for Migratory Shorebirds⁶ has four objectives: <ul style="list-style-type: none"> ○ Protection of important habitats for migratory birds 	<p>Parham and Pt Gawler and to work with DEW should other opportunities arise.</p> <p>Update the Equine Background Paper to reference the EAAF.</p>
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⁵ [Implementation Strategy for the East Asian–Australasian Flyway Partnership: 2007-2011 - DCCEEW](#)

⁶ [Wildlife Conservation Plan for Migratory Shorebirds \(dcceew.gov.au\)](#)

		<ul style="list-style-type: none"> ○ Wetland habitats on which migratory shorebirds depend are protected and conserved ○ human activity threats to migratory shorebirds are minimised or, where possible, eliminated ○ Knowledge gaps are addressed. <p>Current horse activity – principally at Parham/Webb Beach and Pt Gawler - can be described as ‘low level’. Introducing measures to ‘grow’ horse activity is likely be at odds with the Australian Government EAAF agreement. Depending on the level of horse growth planned, it may be at odds with the EPBC.</p> <p>It is suggested to change ‘Foster opportunities for horse-based experience in coastal areas.’ and the associated rationale and action to explicitly envisage continuing the historic level of horse activity at Parham and Pt Gawler, and to work with DEW should other opportunities arise.</p> <p>Based on experience, Council and DEW officers have a reasonable understanding of what is the historical level of use. At Parham for example, an annual club visit with 15 – 20 floats is typical, and acknowledging various circumstances, 2 – 3 floats per day. Ongoing monitoring increases officers understanding of club visits, with clubs being asked to apply for a permit where bringing more than six floats.</p>	
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		<p>The Thompson Beach Progress Association recognise the Equine Strategy envisages continuing the absence of horse activity at Thompson Beach. The Chairperson of Middle Beach Inc has conveyed a similar position. These were canvassed in informal discussions in early 2023.</p> <p>Incorporating an explicit approach to historic level of use reflects the intent to ‘minimise’ the threat to migratory shorebirds from horse activity. This aligns with the goals of the Australian Government Wildlife Conservation Plan for Migratory Shorebirds.</p>	
	<p>Ways to mitigate threats to Migratory Shorebirds include:</p> <ul style="list-style-type: none"> • Limiting access to defined and formal access tracks • Installing horse rider targeted signage at rider height and with messaging to encourage environmentally friendly behaviours • Advice to riders to limit disturbance to flocks of shorebirds, reducing speed and giving a wide berth to reduce birds having to take flight and relocate • Recommend avoiding direct overlap of critical shorebird roost and foraging areas by creating alternate non-beach access • Avoid vegetation and riding in dunes • Monitor horse use of shoreline over time, with a condition to review impacts or reassess access conditions if usage increases beyond historical 	<p>The draft equine strategy envisages horse use at Parham and Pt Gawler, and not for instance at Middle Beach and Thompson Beach. Detailed work is ongoing at Parham to primarily determine where horse floats should park. This work has to consider where horses should be allowed to ride, the level of horse use, and the expectations of horse riders. Part of this involves a rider information sheet and considering signage.</p>	<p>Continue with Strategy</p>

	<p>rate of use, noting that compaction of sand can occur altering the invertebrate communities and thus food web of the beach. Recommend monitoring shorebird numbers, area of use by birds at sites and if possible biannual invertebrate sampling, as part of monitoring of impacts.</p>		
	<p>Fostering Equine Activity in Coastal Settlements – flag particular impact of commercial horse training and impact of recreational training.</p>	<p>The draft rider information sheet is to be updated about the shorebird role of coastal areas in order to increase horse riders understanding. Riders are also to be asked to keep a respectful distance from feeding birds and to ride in ways that minimise compression of the foreshore surface, such as by riding at walking pace and with faster pace minimised.</p>	<p>Continue with Equine Strategy seeking to ‘Educate riders about appropriate behaviour in coastal areas.’</p>
	<p>Create Network of Off-Road Trails – flags importance of trails being physically suited for their purpose, being aware of legal and illegal trail bike and horse riding in the district, competence of trail users, and Work Health and Safety Guidelines for working with horses. Regional Trail on Gawler River – flag various guidelines to have regard to in horses near waterways.</p>	<p>The draft Equine Strategy section on Destinations and Trails states: ‘Further investigations should consider:</p> <ul style="list-style-type: none"> • An extended trail network able to be shared by walkers, cyclists and horse riders connecting north, east, west to Two Wells and south to Gawler River’ <p>Further trails will need to have regard to relevant standards, including Austroads Guide Part 6A: Pedestrian and Cycle Paths. Based on ongoing discussions with ARTC, Council officer’s awareness of relevant ARTC guidelines is increasing. Acknowledging numerous hazard planning, funding and land tenure challenges with</p>	<p>Refine Equine Strategy and Background Paper to reference relevant guidelines, and to envisage horse trails generally east of Port Wakefield Highway</p>

		<p>Gawler River, a longer-term vision for recreation outcomes – including for horses - in light of northern plains population growth and proximity to the Animal Husbandry Area makes sense. This is the main rationale for the proposed strategy.</p> <p>Acknowledging coastal horse activity is limited to continuing the historic level of activity rather than looking to grow activity, the hypothetical horse trail map should be refined to remove the hypothetical ‘horse’ trail idea immediately east of AIBSNP-WP and to envisage horse trails principally east of Port Wakefield Highway. This acknowledges the practical and legal challenges with horses crossing Port Wakefield Highway.</p>	
	<p>Working with DEW on Opportunities for Horse-Based Experiences in Coastal Areas – outlined:</p> <ul style="list-style-type: none"> • research findings about horse trails and horses as weed vectors • importance of enforceable mechanisms for management, compliance and reporting • potential role of installing signage and temporary fencing with approval at a low level as means to protect shorebird areas and with ready community communication to enable ready understanding of the purpose. 	<p>Noted. Underscores importance of education about shorebirds</p>	<p>Continue with Strategy</p>
	<p>Rider Education – Hooded Plover two decades of work on Fleurieu and Adelaide Metro highlights learnings as well as need for resources.</p>	<p>Ongoing education for riders about shorebirds is important.</p>	<p>Continue with Strategy</p>

	<p>Suitable Horse Infrastructure – need to be careful infrastructure won't exacerbate management and conservation processes already occurring on Council land and within AIBS</p>	<p>Acknowledging the intent to foster horse activity in the Animal Husbandry Area, and less so in coastal areas, the strategy should seek appropriate infrastructure.</p>	<p>Refine Equine Strategy to seek suitable horse infrastructure, such as float parking, signage, and wayfinding informed by relevant guidelines</p>
	<p>Missing Information – the Strategy or Background Paper should refer to:</p> <ul style="list-style-type: none"> • Shorebird Population Monitoring within Gulf St Vincent: 2021/2022 Annual Report (Lees & Bartley 2022), • Metropolitan Adelaide and Northern Coastal Action Plan (Caton et al 2009) • Shorebird Conservation Management Plan (Coleman, 2009) • the Natural History of Gulf St Vincent (Shepherd et al 2008) • the EAA Flyway Partnership site nomination (2017) • Hooves on the Beach; Horses Disrupt the Sand Matrix and Might Alter Invertebrate Assemblages on Beaches (Evans-Clay et al 2021) • Horse riding in urban conservation areas: Reviewing scientific evidence to guide management (Lansberg et al 2001) • Industry guidelines for avoiding, assessing and mitigating impacts on EPBC Act listed migratory 	<p>Noted</p>	<p>Add to Background Paper</p>

	<p>shorebird species (Commonwealth of Australia 2001)</p> <ul style="list-style-type: none"> • EAAFP Information Brochure (2017) • Directory of Important Habitat for Migratory Shorebirds in Australia (Weller et al 2020), 		
<p>Friends of Adelaide International Bird Sanctuary</p>	<p>Support the AIBS as a horse free area. The AIBS provides essential feeding and roosting habitat for significant migratory shorebirds and resident breeding shorebirds. This coastal habitat is not an optional site for these birds to visit but one that is essential and integral to their survival. Australia has three bilateral migratory bird agreements, with Japan (JAMBA), China (CAMBA) and the Republic of Korea (ROKAMBA). Council should ensure that they uphold these worldwide agreements and <i>EPBC Act</i> requirements and not compromise these essential habitats for the migratory shorebirds. Friends of Adelaide International Bird Sanctuary would like to see equine based activities to be considered only in areas which do not impact on the Adelaide International Bird Sanctuary. Oppose any use and promotion of coastal AIBS areas for recreational or commercial horse activities.</p>	<p>The following influences coastal horse experiences:</p> <ul style="list-style-type: none"> • Shorebirds are a matter of national significance under the Australian Government <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC) • The Flyway site includes the coastal settlements • The Flyway is under an Australian Government Partnership for the Conservation of Migratory Waterbirds and the Sustainable Use of their Habitats. This is a Ramsar convention regional initiative. The Partnership is a voluntary collaboration of effort focusing on protecting migratory waterbirds, their habitat and the livelihoods of people dependant on them • The Flyway Site Network is a non-binding, collaborative “project” and is not a legal entity. The Australian 	<p>Update the Strategy and Background Paper to envisage continuing the historic level of horse activity at Parham and Pt Gawler and to work with DEW should other opportunities arise. Update the Equine Background Paper to reference the EAAF.</p>

		<p>Government is signatory to the partnership⁷</p> <ul style="list-style-type: none"> • The Flyway site is not legally constituted under the EPBC • The Australian Government Wildlife Conservation Plan for Migratory Shorebirds⁸ has four objectives: <ul style="list-style-type: none"> ○ Protection of important habitats for migratory birds ○ Wetland habitats on which migratory shorebirds depend are protected and conserved ○ human activity threats to migratory shorebirds are minimised or, where possible, eliminated ○ Knowledge gaps are addressed. <p>Current horse activity – principally at Parham/Webb Beach and Pt Gawler - can be described as ‘low level’. Introducing measures to ‘grow’ horse activity is likely be at odds with the Australian Government EAAF agreement. Depending on the level of horse growth planned, it may be at odds with the EPBC.</p> <p>It is suggested to change ‘Foster opportunities for horse-based experience in coastal areas.’ and the associated rationale and action to explicitly envisage continuing the historic</p>	
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⁷ [Implementation Strategy for the East Asian–Australasian Flyway Partnership: 2007-2011 - DCCEEW](#)

⁸ [Wildlife Conservation Plan for Migratory Shorebirds \(dcceew.gov.au\)](#)

		<p>level of horse activity at Parham and Pt Gawler, and to work with DEW should other opportunities arise.</p> <p>Based on experience, Council and DEW officers have a reasonable understanding of what is the historical level of use. At Parham for example, an annual club visit with 15 – 20 floats is typical, and acknowledging various circumstances, 2 – 3 floats per day. Ongoing monitoring increases officers understanding of club visits, with clubs being asked to apply for a permit where bringing more than six floats. The Thompson Beach Progress Association recognise the Equine Strategy envisages continuing the absence of horse activity at Thompson Beach. The Chairperson of Middle Beach Inc has conveyed a similar position. These were canvassed in informal discussions in early 2023.</p> <p>Incorporating an explicit approach to historic level of use reflects the intent to ‘minimise’ the threat to migratory shorebirds from horse activity. This aligns with the goals of the Australian Government Wildlife Conservation Plan for Migratory Shorebirds.</p>	
	<p>The food of the shorebirds consists of various molluscs and invertebrates which inhabit the sandy substrate. The pounding of heavy hooves compounds the substrate and impacts the viability of the benthic floor where the food sources lives.</p>	<p>The draft rider information sheet is to be updated about the shorebird role of coastal areas in order to increase horse riders understanding. Riders are also to be asked to keep a respectful distance from feeding birds and to ride in ways that minimise compression</p>	<p>Continue with Equine Strategy seeking to ‘Educate riders about appropriate behaviour in coastal areas.’</p>

	<p>Horse riders with little appreciation of bird could easily overlook birds. Best option is to not permit horses in AIBS.</p> <p>Providing detailed awareness of the significant negative impact of horse riding activities in the AIBS would hopefully result in prospective riders to seek alternative spaces for their activity.</p>	<p>of the foreshore surface, such as by riding at walking pace and with faster pace minimised.</p>	
	<p>Background Paper should include information on:</p> <ul style="list-style-type: none"> • Cognisance of the importance of the AIBS and the reasons for the establishment of a Sanctuary for visiting international shorebirds. • Adelaide International Bird Sanctuary National Park – Winaityinaityi Pangkara Management Plan 2020 • Environment Protection and Biodiversity Conservation Act considerations. Listed migratory species are a matter of national environmental significance. • Birdlife Australia Migratory Shorebird Conservation Action Plan 2017. 	<p>Noted</p>	<p>Add to Background Paper</p>
	<p>The historic use by horse on the shores within APC does no longer align with the documented environmental significance of the area as a declared International Bird Sanctuary.</p> <ul style="list-style-type: none"> • Alternative options are available and should be sought for discretionary horse activities. • Discretionary use of this environmentally significant area should be banned and discouraged and not promoted or supported for activities which accumulatively will result in severe detriment to the important, visiting 	<p>In addition to the comments about historical level of horse activity at Parham and Pt Gawler, the equine strategy seeks to grow the level of horse activity through the Lewiston Two Wells Rural Living Animal Husbandry Area.</p> <p>The DEW submission supports growth at Lewiston whilst constraining to historic levels coastal horse activity.</p>	<p>Continue with strategy ‘Lewiston and Two Wells Rural Living Areas - Foster horse activity destination appeal through augmenting trail experiences and further horse related attractors.’</p>

	<p>migratory shorebirds and breeding resident shorebirds.</p> <ul style="list-style-type: none"> • The true cost of promotion of such activities will negatively impact many threatened species and will have a global impact. • To promote the use of horses in the sensitive coastal environment undermines the establishment of the AIBS and all efforts on a global and Australia-wide scale to protect and promote awareness of this significant and very special environment for migratory shorebirds, many species which are already in decline. 		
Coalition of Coastal Communities	<p>Careful consideration needs to be given to horse activities in coastal areas and particularly in proximity to the Adelaide International Bird Sanctuary National Park. Concerns are the destruction of habitat due to the actions of horses hooves, grazing on sensitive vegetation, and the spreading of weeds through the deposit of manure, and the potential of destruction of nesting areas.</p>	<p>The following influences coastal horse experiences:</p> <ul style="list-style-type: none"> • Shorebirds are a matter of national significance under the Australian Government <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC) • The Flyway site includes the coastal settlements • The Flyway is under an Australian Government Partnership for the Conservation of Migratory Waterbirds and the Sustainable Use of their Habitats. This is a Ramsar convention regional initiative. The Partnership is a voluntary collaboration of effort focusing on protecting migratory waterbirds, their habitat and the 	<p>Update the Strategy and Background Paper to envisage continuing the historic level of horse activity at Parham and Pt Gawler and to work with DEW should other opportunities arise.</p> <p>Update the Equine Background Paper to reference the EAAF.</p>

		<p>livelihoods of people dependant on them</p> <ul style="list-style-type: none"> • The Flyway Site Network is a non-binding, collaborative “project” and is not a legal entity. The Australian Government is signatory to the partnership⁹ • The Flyway site is not legally constituted under the EPBC • The Australian Government Wildlife Conservation Plan for Migratory Shorebirds¹⁰ has four objectives: <ul style="list-style-type: none"> ○ Protection of important habitats for migratory birds ○ Wetland habitats on which migratory shorebirds depend are protected and conserved ○ human activity threats to migratory shorebirds are minimised or, where possible, eliminated ○ Knowledge gaps are addressed. <p>Current horse activity – principally at Parham/Webb Beach and Pt Gawler - can be described as ‘low level’. Introducing measures to ‘grow’ horse activity is likely be at odds with the Australian Government EAAF agreement. Depending on the level of horse</p>	
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⁹ [Implementation Strategy for the East Asian–Australasian Flyway Partnership: 2007-2011 - DCCEEW](#)

¹⁰ [Wildlife Conservation Plan for Migratory Shorebirds \(dcceew.gov.au\)](#)

		<p>growth planned, it may be at odds with the EPBC.</p> <p>It is suggested to change ‘Foster opportunities for horse-based experience in coastal areas.’ and the associated rationale and action to explicitly envisage continuing the historic level of horse activity at Parham and Pt Gawler, and to work with DEW should other opportunities arise.</p> <p>Based on experience, Council and DEW officers have a reasonable understanding of what is the historical level of use. At Parham for example, an annual club visit with 15 – 20 floats is typical, and acknowledging various circumstances, 2 – 3 floats per day. Ongoing monitoring increases officers understanding of club visits, with clubs being asked to apply for a permit where bringing more than six floats. The Thompson Beach Progress Association recognise the Equine Strategy envisages continuing the absence of horse activity at Thompson Beach. The Chairperson of Middle Beach Inc has conveyed a similar position. These were canvassed in informal discussions in early 2023.</p> <p>Incorporating an explicit approach to historic level of use reflects the intent to ‘minimise’ the threat to migratory shorebirds from horse activity. This aligns with the goals of the Australian Government Wildlife Conservation Plan for Migratory Shorebirds.</p>	
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	<p>No activity within coastal settlements apart from exercising on the mud flats of Port Gawler and Port Parham.</p> <p>Where possible, horses should be kept out of the township of Port Parham, although they would be acceptable in the rural blocks to the north</p>	<p>Acknowledging historic horse use and advice from DEW, the Equine Strategy envisages horse activity limited to Parham and Pt Gawler.</p> <p>On the question of horses in smaller residential lots within Parham, under the SA planning system, keeping a horse on residential allotments less than 3HA in size is ‘development’ and requires a development application to be lodged.</p> <p>This enables the impact of keeping a horse on small lot to be assessed. If impact on for example residential amenity is too great, such horse keeping could be refused.</p> <p>Within Adelaide Plains, opportunity for keeping of horses on private land presents more readily in rural living areas.</p>	<p>Continue with Strategy</p>
	<p>The Coalition is proposing walking and cycling trails from Port Gawler to Port Parham through and near AIBS-WP</p> <p>Coalition discussions with DEW have included potential for such trails to be shared with horses as indicated in the background paper (trail 4).</p> <p>DEW are adamant that horses are not acceptable on such trails due to:</p> <ul style="list-style-type: none"> • Erosion impacts of horses hooves • Uncontrolled grazing on sensitive vegetation • Potential for damage to nesting areas • High potential of spreading of weeds through manure deposited 	<p>The draft Equine Strategy section on Destinations and Trails states: ‘Further investigations should consider:</p> <ul style="list-style-type: none"> • An extended trail network able to be shared by walkers, cyclists and horse riders connecting north, east, west to Two Wells and south to Gawler River’ <p>Further trails will need to have regard to relevant standards, including Austroads Guide Part 6A: Pedestrian and Cycle Paths. Based on ongoing discussions with ARTC, Council officer’s awareness of relevant ARTC guidelines is increasing.</p>	<p>Refine Equine Strategy and Background Paper to reference relevant guidelines, and to envisage horse trails generally east of Port Wakefield Highway.</p>

	<ul style="list-style-type: none"> Horse riders rarely clean up the horse manure, which then poses accessibility hazards for cyclists and walkers alike <p>We expect that DEW will respond to this consultation confirming their views.</p> <p>Further, unless suitable float parking areas can be established, horse access to the communities of Webb Beach, Thompson Beach, and Middle Beach should be restricted. The close proximity of AIBS-WP makes it difficult to ensure compliance with the rules relating to the use of horses in AIBS-WP, and therefore horses in these areas should be discouraged.</p>	<p>Acknowledging numerous hazard planning, funding and land tenure challenges with Gawler River, a longer-term vision for recreation outcomes – including for horses - in light of northern plains population growth and proximity to the Animal Husbandry Area makes sense. This is the main rationale for the proposed strategy.</p> <p>Acknowledging coastal horse activity is limited to continuing the historic level of activity rather than looking to grow activity, the hypothetical horse trail map should be refined to remove the hypothetical ‘horse’ trail idea immediately east of AIBSNP-WP and to envisage horse trails principally east of Port Wakefield Highway. This acknowledges the practical and legal challenges with horses crossing Port Wakefield Highway.</p>	
	<p>The rider information sheet is good step in the right direction. A cynical comment could be: horses can’t read, but can their handlers?. A small minority do not have common sense, and they make it hard for the majority of good handlers.</p>	<p>The draft rider information sheet is to be updated about the shorebird role of coastal areas in order to increase horse riders understanding. Riders are also to be asked to keep a respectful distance from feeding birds and to ride in ways that minimise compression of the foreshore surface, such as by riding at walking pace and with faster pace minimised.</p>	<p>Continue with Equine Strategy seeking to ‘Educate riders about appropriate behaviour in coastal areas.’</p>
Kate Buckley	<p>Council could display their planned future land clearance for housing development, so that horse clubs and related business could be better informed for their own future planning processes.</p>	<p>Part of the purpose of the Equine Strategy is to affirm the importance of land being zoned and a suitable statutory planning system for horse interests.</p>	<p>Continue with the Equine Strategy</p>

		<p>Council having an equine strategy enables Council to both seek funding to enhance trails for horses and so on in the Lewiston Animal Husbandry Sub Zone and to also advocate to other spheres of government.</p> <p>The State Government’s Planning and Design Code – visually expressed through the SA Property and Planning Atlas (SAPPA the South Australian Property and Planning Atlas) – show spatial areas intend for new housing. You can also look up the zoning of land via SAPPA.</p> <p>Council’s Growth Strategy under preparation flags new areas for housing north of Sharpe Road, east of the Trail Line at Two Wells, and around Dublin.</p>	
	<p>The greatest challenge is the complete lack of ensuring that guidelines or bylaws are obeyed. “The Adelaide International Bird Sanctuary” is an absolute gem for the Adelaide Plains Council, as far as “tourism” is concerned.</p> <p>The CONSERVATION of the “Adelaide International Bird Sanctuary” by the Council, is LIMITED at best.</p> <p>The protection of the beaches from marauding crabbers is only brought to the attention of PIRSA by local residents or people undertaking bird-surveys.</p> <p>That is, PIRSA responds if somebody makes a phone call – there is no regular “presence” of authority to deter the destruction of this beautiful coastline. Yes, there is signage about vehicles on the beach, about the legal size of crab catch – but without a regular,</p>	<ul style="list-style-type: none"> • Council manages land in and near to coastal settlements of Parham, Webb Beach, Thompson Beach and Middle Beach. The majority of coastal land is managed by DEW or by the Department of Defence within the Port Wakefield Proof Range. This means Council’s role is limited to land under its care and control. • Council has received reports about recreation vehicles on Council managed foreshore land. Currently Council has limited measures in place to control vehicle/bike access to the 	<p>Continue with Strategy</p>

	<p>unexpected “authority presence” these are ignored daily!</p> <p>Education is a fine thing, as well as “Information Sheets”, but if no authoritative presence is regularly, on weekends, on these beaches, humans being what they are, will not abide by any guidelines – this is proven every weekend at Thompson Beach with the marauding, visiting, crabbers – in most cases not the local folk, they respect the sensitivity of the environment they have chosen to live in.</p> <p>There is no mention of how “Guidelines” would be enforced. Will the Council have staff rostered on weekends to “police” and protect the beaches along Gulf St Vincent if you permit horse trails in this area??</p>	<p>foreshore from the coastal settlements.</p> <ul style="list-style-type: none"> • Council’s Dogs By-Law expects dogs to be ‘on-leash’ when on Council managed foreshore and within the coastal settlements. This arises from these being within a wetland of national importance. ‘On Leash’ is a higher level of dog control than under ‘effective control’ which applies generally across SA. • Regarding trail bike impacts within AIBSNP-WP, DEW informally advise that working with Crown lands, Off Road Park operators, Adelaide University, Council, and shell grit miners, significant fencing has been put in place and compliance patrols are undertaken regularly. Cameras in place from the salt mining company is slowing vandalism. A decline in activity has been seen over the past two years. This is ongoing and will take time but the trajectory is in a positive direction. <p>Council’s monitoring and enforcement is via Community Safety staff who currently work Monday to Friday with one Authorised Officer ‘on call’ after hours and weekends. On-call means for emergency call outs e.g. dog</p>	
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		<p>attacks and does not provide for beach patrols. In relation to weekends, Council has a resource sharing arrangement with Light Regional Council. A single officer covers weekend call outs for both Councils on an alternating roster arrangement.</p> <p>After hours service has traditionally been limited to responding to animal related emergencies only. Extending the service to conduct beach patrols and associated compliance enforcement after hours and on weekends (likely a community expectation and when most non-compliance e.g. Council itself is continuing to vehicles access to the beach would occur) would require additional resourcing.</p> <p>Long term visitor use problems aren't a quick fix and require persistence and consistency.</p>	
	<p>The “Adelaide International Bird Sanctuary” could be well promoted for overseas tourists to see the amazing Migratory Wader birds that over summer on the coast of Gulf St.</p> <p>Adelaide Plains Council could gain the support of our learning institutions, that is, the Universities, with respect to “educating” fee paying International Students on the conservation issues related to crab size and crab catch.</p>	<p>Noted. Visitation by tourists for bird purposes that involves, for instance, walking of AIBSNP-WP is provided for by DEW.</p> <p>Council’s long term intent is improved facilities for visitors along the coast, acknowledging DEW (and not Council) manage the AIBSNP-WP.</p>	Continue with Equine Strategy
	<p>With discussion and careful planning, an “off road” riding trail could be developed around Two Wells and from Two Wells to Virginia, Mallala and other settlements, however, I do not believe that Equine</p>	<p>The draft Equine Strategy section on Destinations and Trails states: ‘Further investigations should consider:</p>	Refine Equine Strategy and Background Paper to reference relevant

	<p>activity should be permitted along Gulf St Vincent given the already lack of protection of the “Adelaide International Bird Sanctuary”.</p> <p>I am aware that horses are permitted on part of the Thompson Beach area as part of the original “Management Plan” for this area – however, as no “controls” have been put in place to ensure that the Equine Community respect the limitations of their access- and given the decimation of this area for the feeding of Migratory Wader birds, I believe that horse riding along this coast should not occur.</p> <p>There could be a series of “out and back” trails fanning out from places like Mallala or Two Wells. For the reasons given above, I do not think it is appropriate for any of the beaches along Gulf St Vincent to be part of “offroad horse trails”</p>	<ul style="list-style-type: none"> • An extended trail network able to be shared by walkers, cyclists and horse riders connecting north, east, west to Two Wells and south to Gawler River’ <p>Further trails will need to have regard to relevant standards, including Austroads Guide Part 6A: Pedestrian and Cycle Paths. Based on ongoing discussions with ARTC, Council officer’s awareness of relevant ARTC guidelines is increasing.</p> <p>Acknowledging numerous hazard planning, funding and land tenure challenges with Gawler River, a longer-term vision for recreation outcomes – including for horses - in light of northern plains population growth and proximity to the Animal Husbandry Area makes sense. This is the main rationale for the proposed strategy.</p> <p>Acknowledging coastal horse activity is limited to continuing the historic level of activity rather than looking to grow activity, the hypothetical horse trail map should be refined to remove the hypothetical ‘horse’ trail idea immediately east of AIBSNP-WP and to envisage horse trails principally east of Port Wakefield Highway. This acknowledges the practical and legal challenges with horses crossing Port Wakefield Highway.</p>	<p>guidelines, and to envisage horse trails generally east of Port Wakefield Highway.</p>
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	Encourages planting of native trees at Riverlea to provide shade for a riding trail.	Riverlea is within the City of Playford. The City of Playford have a walking and cycling plan with trails and paths for Riverlea.	-
	Birds need to feed undisturbed before their long flight back to the Northern Hemisphere. They need the “soft” mud of Gulf St Vincent, and the beach and sea grass for roosting.	Noted	Continue with Strategy
	Off-road parking in the Thompson Beach area is extremely limited. To make further, safe, off-road space for vehicles towing horse-floats would necessitate the clearing of native vegetation along the levee on The Esplanade. Absolutely not appropriate given the small amount of vegetation that is on that side of The Esplanade. No restraint has been shown with regards native vegetation in the current “total clearance” of blocks for building purposes – seems the Council has placed no restrictions on “block clearance” – every building block can be completely “cleared”!! Therefore, the native vegetation on the levee along The Esplanade is paramount to the survival of bio-diversity in this area, for example, Sleepy Lizards, Skinks and at least 20 “Bush-bird” Species.	Noted. Council is aware of native vegetation in its planning for physical works including at Thompson Beach. Council planning staff continue to educate residents about statutory expectations of native vegetation.	Continue with Strategy
	Thompson Beach has to offer as an international Tourist destination for Bird observation – it is underappreciated by many local folk.	Noted. Council’s work looking at the Dublin districts overall future including fostering tourism and Thompson Beach is	Continue with Strategy