

**Submission in response to *Leeuwin-Naturalist Capes Area Parks and Reserves*  
*Draft Management Plan 2010 – Section 31***

Submitted by:

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under the auspices of the Hang Gliding Federation of Australia  
and the Hang Gliders Association of Western Australia

**1. INTRODUCTION**

The draft Management Plan proposes the near-elimination of hang gliding and paragliding from one of the few locations where they can be enjoyed in Western Australia (see map). This response to the draft MP demonstrates that hang gliding and paragliding activities have been conducted over many years in a responsible way with minimal or no impact on the environment of the region.

For the sport to remain viable in the capes region, there must be several sites suitable to a variety of wind strengths and directions. This is the situation at present. In fact, more sites should be available. However, the draft proposes a ban on flying at two of the three prime sites, Contos and Injidup. The effect of leaving only Yallingup available as a flying site (on a trial basis) is the equivalent of allowing surfers to use only Yallingup.

Rather than implementing the draft MP's proposed actions, and lose an established and socially beneficially recreational pursuit from the South West, it is recommended that site-specific agreements are drawn up that ensure continued access for pilots to sites whilst preserving the local amenity for other users and the environmental values of the region.



*The map shows how the DMP's proposed ban on flying sites will considerably reduce the already limited flyable locations in southern Western Australia*

## 2. BACKGROUND

With the expiry of the previous management for the Cape to Cape region parks (1999), CALM called for submissions to be considered for a revised management plan with a deadline set in late 2006. In response, the Hang Gliders Association of WA (HGAWA) officially submitted draft Environmental Management Plans for selected sites that have been used for paraglider and hang glider launching in the Cape to Cape region since the 1970s. The EMPs addressed all issues that were raised by CALM at the time. Recommendations were made together with alternatives for where the recommendations were not acceptable to CALM. These EMPs were submitted prior to the deadline and, although several phone calls were made to CALM office in 2007, DEC has not contacted the author or HGAWA to discuss the documents prior to the publication of the Cape to Cape DMP.

Section 31 of the DMP 2010 contains no acknowledgement of these EMPs nor discussion of their contents and recommendations. Moreover, it contains no reference to the suggested solutions to the issues for which DEC proposes to ban the sport in all but one minor location. All issues that have been raised by the DMP were addressed in the HGAWA EMPs.

The DMP therefore makes fundamental errors of fact and logic in relation to these issues.

The full EMP documents that were originally submitted are herewith attached for review by DEC prior to finalisation of the Cape to Cape MP. Failure by DEC to consider the EMPs before introducing widespread bans of an established recreational activity may amount to a denial of natural justice. The membership of HGAWA therefore request that DEC take the attached documents into consideration in the drafting of the final MP for Cape to Cape reserves.

**It is recommended** that for the three proposed launching sites, that the submitted EMPs be modified in consultation with DEC parks management to form the basis of approved EMPs for these locations. It will be incumbent on all HGAWA members to observe the approved EMPs. Any pilots not observing all aspects of the EMPs would be subject to prosecution.

In addition to the above recommendation, the Hang Gliding Federation of Australia (HGFA) and HAGWA would be pleased to follow up the proposal in the draft MP relating to the development of additional sites: *“With continued interest and input from the Hang Gliding Association of WA, paragliding and hang gliding will be considered in other locations as long as they meet sustainability criteria for site use.”* (p. 112)

## DISCUSSION OF INDIVIDUAL LOCATIONS

### 3. CONTOS

#### DMP discussion (p. 112)

*The main issue at the site is the lack of suitable parking and assembly areas close to the take-off zone, and as such informal vehicle pullover bays have been established along Conto Road. This does not permit adequate lines of sight for vehicle egress and pedestrians crossing the road, thus creating a safety hazard with visitors milling around vehicles to load/unload gear and crossing Conto Road. To address this issue, parking and formalised paths would need to be provided.*

*Additionally, erosion and devegetation is occurring on the take-off area and it has been noted that gliders land on the road. Furthermore, there are no toilet facilities at this site.*

*Cars cannot be parked on adjoining tracks from Conto Campground because of the need to maintain emergency access to the coast and because of safety issues crossing the road. (p. 112)*

#### Response

The above statement fails to properly address the following:

- There is an existing bay sufficient for two or three cars a few metres south of the intersection of the camp ground path and the Contos roadway.
- It is untrue that safety is an issue of significance at this location, because the speed limit on unsealed roads in DEC managed parks is 30 km/h and the existing line of sight is adequate for this speed. The slightness of this issue is out of proportion to the proposed solution, which is to ban the activity totally.
- There are two existing road crossings at the same location – the Contos campground walkway and the Bibbulmun Track. The DPM makes no mention of these as a matter of concern regarding line of sight, etc, suggesting that paragliding and hang gliding are receiving discriminatory attention.
- The statement *with visitors milling around vehicles to load/unload gear and crossing Conto Road* is a pejorative statement for readers who have not inspected the site. It suggests crowds of people endangering themselves on a busy road, which is untrue. This site receives infrequent use by generally 2-3 people only.
- In addition, the statement fails to canvas the EMP recommendation that the Contos Campground could be used by HG and PG pilots for access to the launch site.
- The short-cut to the beach from the Contos Campground clearly shows signs of erosion below the launch access track on steeper slopes due to heavy use by campers. However, an inspection of the site would show that the launch site and its access path have been sustainably used for thirty years or more. There is no sign of erosion on the path to the launch and the launch site itself shows no sign of erosion (see photo in HGAWA EMP). This evidence strongly supports the conclusion that HG and PG use is not an environmental concern, and certainly not to the degree of a total ban.

- That there is “devegetation” appears to be a pejorative statement for readers who have not inspected the site. It goes without the need to say so, that any launch site requires a stable area of about 10X10 metres without scrub that is vegetated by low ground cover or artificial stabilisation. The photograph in the EMP shows that the launch site is clearly stable.
- The statement *there are no toilet facilities at this site* applies to the far greater number of other users of this pathway, Contos Campground users and Bibbulmun track users. However, there are toilet facilities in the camp ground and on the beach. These would be used by pilots either prior to launching (camp ground) or after landing (beach).
- The HGAWA EMP states that landing should be on the beach. Should a HGAWA EMP be approved by CALM – this would require all pilots to observe the requirements of the management plan. We have not received any information of pilots landing on the road. If this did happen, it would have been done with safety in mind. Any pilot having sufficient height to land on the road would have had a clear view of the road for some kilometres on either side of the potential landing site. However, this practice has not been, and is not, encouraged or allowed by HGAWA.
- The safety issue of crossing the road, presumably in regard to pilots, is repeatedly raised. This does not make sense in regard to the multiple pedestrian road crossings that have been provided elsewhere on DEC-managed roads. For example, there are warning signs on the Shelley Beach Road where the walking track intersects. It is illogical that DEC proposes to ban HG and PG while taking no action to protect all those who put themselves in the same danger when crossing the road. This action suggests paragliding and hang gliding are receiving discriminatory attention.

Features discussed in the dot points above are exhibited in Figure 1. This is a dated satellite photograph that shows the old parking area on the west side of the Contos Road that was closed off by CALM and remains there today.

### **Site-Specific Recommendations**

It appears that the old parking area on the path to the beach was closed off to discourage people from using the adjacent pathway down to the beach. However, this has not had the desired effect. Campers continue to use the pathway and this has caused further erosion on the steeper cliff-side slopes. It is recommended here that a more appropriate approach would be to keep this existing parking bay open and provide an authorised pathway to the beach with appropriate stabilisation. This would achieve three objectives:

- i. provide parking for those who would like to stop and look at the view from the cliff top,
- ii. provide a stable pathway to the beach for those who will continue to do so regardless of DEC wishes, and
- iii. provide parking for occasional pilots who would wish to use the Contos launch.

However, HGAWA EMP does state that an alternative to a prohibition of parking on or adjacent to the Contos Road is for pilots to use the Contos campground for access to the launch site.

Figure 1. Satellite photo from Google Earth indicating key items discussed in text



#### 4. INJIDUP

##### DMP discussion

*Severe dune erosion and loss of vegetative cover at the point have been exacerbated by sandboarding and gliding activities and the department is attempting to rehabilitate the site. Permitting gliding would further compromise the natural values of this sensitive area. Gliding using a beach launch may encourage use of the dune during less favourable winds and is therefore prohibited. (p. 112)*

##### Response

- The statement *exacerbated by sandboarding and gliding activities* is untrue and unsupported in the DMP document. The dunes at the southern end of the bay are a natural feature caused by sand carried along the beach during northerly wind conditions into the entrapment formed by the southerly coastal spur. These dunes will remain there for generations to come, regardless of any prohibition on human activities. Such is the case at several locations on the WA coastline where an embayment naturally traps windblown sand that collects on a beach due to deposition by ocean currents. A good example are the dunes to the south of the Horrocks cliff faces where natural dune movement exists due to the accumulation of sand that continually overpowers natural regrowth stands of vegetation. At this remote site there are neither sandboarders or paragliders that can be blamed. Other example locations can be cited if required.
- Paragliding at this site has been at very low levels of activity for as long as the sport has existed. Sandboarding cannot under any circumstances be equated with paragliding. Sandboarding required repeated climbing and descending of dunes. Paragliding requires a single launch from the beach without the need to ascend the dune or to use the dune for landing. The low level of paragliding activity at this location has had no impact on the local vegetation or dune.

## 5. YALLINGUP

### DMP discussion

*The most suitable gliding site in the planning area is in the development node around Yallingup, just north of Rabbit Hill car park. This site is however, sensitive to high use and there is concern over the impacts at set-up areas. Consequently, gliding will be approved on a trial basis subject to environmental impacts. Gliding codes of practice will be adopted to limit the number of visitors at the site. The trial and monitoring of this site will determine more infrastructure requirements. Events or commercial use will not be permitted. (p. 112)*

### Response

- This site is not subject to heavy use by pilots. Such statements are clearly misleading to those who are unfamiliar with the site. The site is subject to heavy use by surfers and walkers.
- The site has been used for a generation now on a totally sustainable basis and there is absolutely no reason for a further “trial” use. It is quite clear that if a site inspection were to be carried out today that the impacts of thirty years of launch could be easily assessed.
- The statement *This site is however, sensitive to high use and there is concern over the impacts at set-up areas* is grossly misleading in coalescing the issue of heavy use by other groups with the concern about impacts at gliding set-up areas.
- The logic of the DMP’s discussion is that surfers and walkers should be subject to a trial and that HG and PG pilots should continue to have sustainable access.
- The statement *Events or commercial use will not be permitted* without discussion or supporting information. There is no information about what “events” means, for example. To the knowledge of HGAWA members, this site has never been used for either “events” or commercial gain by the paragliding or hang gliding community.

## 6. ATTACHMENTS

*Environmental Management Plan for Flying Sites within CALM-Managed Lands* (Hang Gliders Association of Western Australia November 2006)

*Environmental Management Plan for Flying Sites: Leeuwin-Naturalist National Park* (Hang Gliders Association of Western Australia November 2006)