



PHILLIP ISLAND CONSERVATION SOCIETY INC  
PO BOX 548 COWES 3922

Email: [phillipislandconservation@gmail.com](mailto:phillipislandconservation@gmail.com)

18 April 2023

**Phillip Island Conservation Society Submission re:  
Distinctive Areas and Landscape Standing Advisory Committee  
Referral 3—Draft Bass Coast Statement of Planning Policy**

## **1. Introduction**

Phillip Island Conservation Society (PICS) was formed in 1968—one of the first grassroots conservation societies in the nation—with the mantra “save wildlife today for tomorrow”. Since then, Phillip Island conservationists have devoted countless volunteer hours to defend, preserve, and protect the marine and terrestrial environments that underpin Phillip Island’s nature-based economy.

This submission will augment key points from our April 2022 submission, with focus on Phillip Island and the Western Port Woodlands. Sections 2 and 3 provide context for our recommendations, which are summarised in section 4.

## **2. Phillip Island**

Phillip Island is a nature-based tourism destination of national significance. The Phillip Island and San Remo economy is the second-most tourism dependent in Australia after Uluru, so sensitive landscapes, biodiversity, and marine and coastal environments must be protected.

Phillip Island has a finite carrying capacity for further expansion of human population, urban settlement boundaries, and development within green breaks between settlements.

Reasons for this include:

- All infrastructure passes through a narrow neck of land near Surf Beach, which is of high environmental and landscape significance.
- The island supports nationally significant wildlife populations in its marine and coastal habitat. Unlike the mainland, Phillip Island's habitat is fox-free.

Phillip Island has undergone substantial urban development and population growth in recent years, placing increasing pressure on its distinctive environmental and landscape attributes.

For example:

- Loss of remnant indigenous and mature native trees in urban areas, exacerbated by infrastructure expansion, housing development, and bushfire rules.
- Human disturbance to significant wildlife populations, including Short-tailed Shearwaters and Hooded Plovers.
- Tourism developments and proposals that degrade natural landscape values with excessive earthworks and consume non-urban land with large footprints.
- Proposals to widen Phillip Island Road from San Remo to Back Beach Road.
- Pressure to expand urban settlements beyond their existing extent in environmentally sensitive areas.

PICS submits that Phillip Island has reached its carrying capacity. Therefore, we support:

- a. The Bass Coast DAL Statement of Planning Policy (SPP) protected settlement boundaries for all settlements on Phillip Island.
- b. The proposed SLO2 and SLO3 landscape planning controls, with some refinements to the planning controls outlined in our recommendations below.

We provide further context to support this position below.

## **2.1 Phillip Island environmental constraints**

Phillip Island is an area of outstanding biodiversity significance, including internationally significant Western Port Ramsar wetland habitats, the largest colony of Little Penguins, 25 percent of the total population of Australian Fur Seals, 1.4 million migratory Short-tailed Shearwaters, and recovering populations of threatened species, such as the vulnerable Hooded Plover and endangered Eastern Barred Bandicoot.

### **2.1.1 Eastern Barred Bandicoot**

Preservation of rural land on Phillip Island is important to the national recovery of the endangered mainland Eastern Barred Bandicoot—see letter from the Eastern Barred Bandicoot National Recovery Team at Appendix 3.

This species was listed as extinct in the wild under the Victorian FFG Act until 2021, when it was recategorised as endangered following a species recovery effort supported by the Victorian Government with more than \$5.5 million. It is the first time in Australian history that a species classified as extinct in the wild has been brought back from the brink of extinction.

Phillip Island is of high priority to the national recovery effort for this species because of its large area of fox-free habitat. Eastern Barred Bandicoots typically nest under vegetation during the day and forage at night in open habitats. However, in the absence of foxes, they are known to use more open habitats. On fox-free Churchill Island, they use open farmland extensively to forage at night and can nest there during the day. Open farmland comprises 60 percent of the habitat suitable for Eastern Barred Bandicoots on Phillip Island, so it is important for securing the species and meeting the long-term objectives of the National Recovery Plan for the species.<sup>1</sup>

Eastern Barred Bandicoots were released in a successful trial on Churchill Island in 2015, followed by release on Phillip Island's Summerland Peninsula in 2017. Since then, the populations have grown and dispersed across a significant area of Phillip Island, including

---

<sup>1</sup> Personal communication via letter from Dr Duncan Sutherland, Chair Eastern Barred Bandicoot National Recovery Team, 6 April 2023. Letter attached at Appendix 3.

Fishers Wetland, Newhaven, Cape Woolamai, Surf Beach, and Ventnor—see Figure 1 at Appendix 1.

### **2.1.2 Little Penguin**

The Summerland Peninsula is home to the world's largest colony of Little Penguins. Under cross-examination during the hearing, ecology expert Brett Lane offered the Phillip Island Penguin Parade as an example of a substantial tourism development that has high human visitation and has benefited the conservation of a species on Phillip Island. However, we wish to point out that this colony was declining toward extinction until urban development was removed from the Summerland Peninsula by compulsory acquisition (Summerland Peninsula buyback) and dusk closures of the peninsula began. It is possibly the only example of a town being removed for species conservation in the world. The Penguin Parade infrastructure necessary to enable the colony to thrive despite high human visitation has cost millions of dollars to build, maintain, and operate. Lighting is carefully controlled, and there is no overnight accommodation. PICS suggests that Mr Lane's argument that urban and tourism development can be a trigger for improving biodiversity conservation outcomes should be regarded with caution.

### **2.1.3 Hooded Plover**

The vulnerable Hooded Plover has increased in population since active management began 25 years ago from 20 individuals to approximately 20 breeding pairs.<sup>2</sup> Although the population now produces some fledglings that disperse to other areas and is potentially sustainable, it is still highly vulnerable to human impacts such as trampling of camouflaged nests and chicks, constant disturbance to chick foraging, and chick predation by domestic animals.<sup>3</sup> The management effort required is substantial, involving Phillip Island Nature Parks staff, university student interns, and volunteer time in the order of 750 hours per annum. It is a difficult role for volunteers, who are often subjected to verbal abuse when attempting to educate beach users about the threat posed by off-leash dogs. Management strategies

---

<sup>2</sup> Phillip Island Nesting Shorebird Breeding Season 2020-21: End of Season Report, <https://www.penguins.org.au/assets/Conservation/Environment/PDF/PI-HP-EOS-Report-20-21.pdf>

<sup>3</sup> Phillip Island Nature Parks Threatened Species Update 2020-21, <https://penguins.org.au/assets/Conservation/Environment/PDF/Threatened-Species-AR-2021.pdf>

include nest monitoring, placement of nest refuges and signage, compliance operations, closure of informal tracks, eradication of foxes, control of cats, provision of beach shelters for chicks, management of coastal weeds, and community engagement.

Figure 2 at Appendix 1 maps Hooded plover nesting sites on Phillip Island during the 2021-2022 breeding season. The species would be impacted by human disturbance from urban expansion at Cape Woolamai, Smiths Beach, and Ventnor, or tourism accommodation developments on Phillip Island's north-western and southern coastlines.

#### **2.1.4 Short-tailed Shearwater**

Phillip Island supports a significant percentage of the global population of the migratory Short-tailed Shearwater. Threats to this species include artificial light pollution, trampling of burrows in dunes, and predation of chicks by domestic animals. The species would be affected by human disturbance from urban expansion at Cape Woolamai, Smiths Beach, and Ventnor, or tourism accommodation developments on Phillip Island's north-western and southern coastlines.

Figure 3 at Appendix 1 maps shearwater colonies and artificial light levels associated with urban development and street lighting on Phillip Island. During the chick fledging period, fledglings are disoriented by artificial light and find themselves grounded, often on roads, and many birds are killed during this period. Intensive rescue patrols are necessary, traffic is managed, and Phillip Island bridge lights are turned off. Thousands of birds have been rescued since 1999.<sup>4</sup>

With care and effort, it is possible to light roads and buildings in a shearwater-sensitive manner—see the National Light Pollution Guidelines for Wildlife<sup>5</sup>—but this is difficult in an urban settlement or tourism development where many people are accommodated at night and travelling in private vehicles. When there are multiple settlements and developments

---

<sup>4</sup> Lights off as shearwater chicks take off after bumper breeding season, Phillip Island Nature Parks, 13/4/2023. <https://penguins.org.au/about/media/latest-news/new-news-page-71/>

<sup>5</sup> National Light Pollution Guidelines for Wildlife Including Marine Turtles, Seabirds and Migratory Shorebirds, Commonwealth of Australia, 2020. <https://www.dcceew.gov.au/sites/default/files/documents/national-light-pollution-guidelines-wildlife.pdf>

near shearwater colonies and flight paths, annual community engagement campaigns are necessary to encourage behaviour change—see Figure 4 at Appendix 1.

It is difficult to mitigate disturbance of shearwater colonies in proximity to urban settlements—see further discussion at section 2.3.1 regarding the Ventnor settlement boundary and the “Cadogan land” (block 666 at 34 Bingley Crescent).

#### **2.1.5 Western Port Ramsar Site**

The internationally significant Western Port Ramsar wetland incorporates Phillip Island’s coast from Cowes to Newhaven. Figure 5 at Appendix 1 shows the habitat requirements for waterbirds along this coastline. Urban development east of Coghlan Road, south of Rhyll, or west of Newhaven would impact upon the wetland habitat and increase disturbance to waterbirds.

#### **2.2 Phillip Island infrastructure constraints**

In our introduction, we submitted that Phillip Island’s carrying capacity for population growth is finite because infrastructure is geographically constrained. Upgrades to this infrastructure will come at a cost to distinctive environmental and landscape attributes.

For example, population pressure has led to Regional Roads Victoria proposals to widen Phillip Island Road from San Remo to Back Beach Road. This included a 2017 proposal for a four-lane section between the Cape Woolamai and Back Beach Road roundabouts, which would have required compulsory acquisition of rural land within the proposed SLO3. This project has not been formalised. However, we consider that increased urban development on the island is likely to see it re-emerge.

Projects to widen and duplicate the road at Newhaven and San Remo have progressed, and the San Remo proposal will require some land reclamation and hardening of the new shoreline. Works will need to be carefully managed to mitigate impacts on the FFG-listed San

Remo Marine Community—a biodiverse, intertidal and subtidal community of sea slugs and bryozoans, many of which are considered to be rare.<sup>6</sup>

The two-lane bridge will become a traffic bottleneck between San Remo and Newhaven, leading to pressure to widen the bridge. Bridge works could also affect the San Remo Marine Community. Figure 6 at Appendix 1 shows sea slugs photographed by PICS under the bridge.

### **2.3 Phillip Island protected settlement boundaries and landscape controls**

PICS supports the proposed protected settlement boundaries for all settlements on Phillip Island to protect its distinctive environmental and landscape attributes from further urban pressure. We will make some comments on specific settlements, SLO2, and SLO3 below.

#### **2.3.1 Ventnor**

Ecology expert Aaron Organ stated in Document 82 that future development at 34 Bingley Crescent, Ventnor—labelled as block 666 in the map of proposed protected settlement boundary changes (Document 57a) and also known as the “Cadogan land”—would need to consider indirect impacts to the sensitive coastal and marine environment, including the existing Short-tailed Shearwater nesting site. PICS argues that this cannot be mitigated to an acceptable degree.

The potential impact of urban development on this land was discussed at the 2009 panel hearing regarding planning scheme amendment C88, Cowes, Silverleaves, Ventnor and Wimbledon Heights Structure Plan (Document 29c, section 6.6). Figure 7 at Appendix 1, excerpted from the C88 panel report, shows the proximity of the shearwater colony to the “Cadogan land”.

Phillip Island Nature Parks opposed urban subdivision of this land:

“The PINP objected to the proposed settlement boundary extension on the basis of the impacts on the nearby Shearwater colony that supports 5,300 of the migratory

---

<sup>6</sup> FFG Action Statement 018: San Remo Marine Community, State of Victoria, 1992.  
[https://www.environment.vic.gov.au/\\_data/assets/pdf\\_file/0019/32455/San\\_Remo\\_Marine\\_Community.pdf](https://www.environment.vic.gov.au/_data/assets/pdf_file/0019/32455/San_Remo_Marine_Community.pdf)

species Short-tailed Shearwaters. Phillip Island is home to about 5-8% of the world's Shearwater population and this is the largest colony remaining on the north coast of the island. It noted that threats to the birds come from trampling by humans, lighting and domestic cats and dogs. Beaches to the south (Woolshed Bight and Farm Beach) are the last remaining low use beaches on the north coast and home to 2-3 breeding pairs of Hooded Plover listed as a threatened species under the Flora and Fauna Guarantee Act, 2008.”<sup>7</sup>

Mitigations were proposed to protect the shearwater colony following urban subdivision of the land:

“No links to beach via Cadogan Avenue; lighting designed to reduce light spill; purpose designed fencing; prohibition on keeping cats (and perhaps dogs) via a Section 173 Agreement; areas set aside within the land for off leash dog walking for the whole community.”<sup>8</sup>

However, the panel considered that they would have little impact:

“The introduction of a significant new population (500-600 people) in this area has the potential to exacerbate problems already present and may result in the loss of habitat for the bird species or the loss of the birds from their habitat. A referral may be triggered by the EPBC Act.”<sup>9</sup>

The land was excluded from the Ventnor Strategic Framework Plan, and the shearwater colony is noted in the current planning scheme—see Figure 8 at Appendix 1.

In recent years, Little Penguins have begun recolonising at this location (not noted in ecology assessments presented to the DAL hearing)—see BirdLife Bass Coast letter at Appendix 3.

Former planning minister Matthew Guy controversially attempted to rezone the “Cadogan land” (block 666) for residential development in 2011, shortly before reversing his decision

---

<sup>7</sup> C88 panel report (Document 29c)

<sup>8</sup> Ibid.

<sup>9</sup> Ibid.



and exposing the Victorian Government to litigation. This is a perfect example of why protected settlement boundaries are desirable on Phillip Island. We need long-term planning clarity, stability, and protection for the large shearwater rookery, recolonising penguins, and Hooded Plovers.

There has been some debate during the hearing regarding the most appropriate northern boundary alignment of SLO2 at Ventnor. PICS submits that any technical landscape work to determine the exact boundary of SLO2 should not delay approval of the proposed protected settlement boundary for Ventnor.

### **2.3.2 Cowes/Silverleaves**

Much of the land proposed for removal from the Cowes/Silverleaves boundary under the SPP protected settlement boundary is subject to inundation. It drains to the Western Port Ramsar wetland and is close to waterbird foraging areas—see Figure 5 at Appendix 1. We support the proposed protected settlement boundary to avoid impacts on the wetland habitat and waterbirds.

The proposed protected settlement boundary would exclude block 113, as labelled in the map of proposed protected settlement boundary changes (Document 57a). In 2013, this was the proposed site of an integrated residential golf course development including 120 houses. It was considered as planning scheme amendment C132 and recommended for approval by the planning panel, but not approved by Bass Coast Shire Council. Approximately, 61,000 cubic metres of fill (2,700 B-double truckloads) would have been required to ensure that all the houses were above the required 3.7 metres above sea level. This development, if built, would have drastically altered the landscape values of the upper Rhyll Inlet in a similar way that the huge mound of the former Rhyll landfill has done further east. For more information, see site plan and analysis at Appendix 2, p. 6 (example 4).

As discussed, the vista across the land bounded by Coghlan Road and Cowes-Rhyll Road extends to the Rhyll Inlet. We submit that the boundary of SLO3 should be extended west to Coghlan Road to protect this view of the Rhyll Inlet.

### **2.3.3 Rhyll**

We also support the proposed protected settlement boundary at Rhyll to prevent the impacts of urban expansion on the adjacent Western Port Ramsar wetland and waterbirds.

### **2.3.4 Newhaven**

PICS supports the proposed Newhaven protected settlement boundary and expansion of SLO3. This would help to protect sensitive landscape and habitat values.

The proposed protected settlement boundary would exclude block 353, as labelled in the map of proposed protected settlement boundary changes (Document 57a). This land holds important landscape qualities, particularly within views of Newhaven from Churchill Island. The conservation of this view line is consistent with Marine and Coastal Policy clause 3.2 to “maintain important public visual corridors on public land associated with significant landscapes (including seascapes) in the marine and coastal environment (including views from within the landscapes and views of the landscapes)”.

There is an opportunity here to visually link the landscape on the north side of Phillip Island Road with the landscape of the Newhaven Swamp conservation area on the south side. Currently, the views of the natural landscape are cut off from the Newhaven Swamp side by commercial buildings along Phillip Island Road. During the hearing, experts commented that the landscape outcomes associated with development on the north side of Phillip Island Road are of poor quality. We hope that the proposed expansion of the SLO3 controls will lead to an improved landscape outcome should new or upgraded development occur here in future, including linkage of the landscapes north and south of the road.

On day 10 of the hearing, landscape expert Darren Atkinson presented evidence regarding block 353. PICS queried the location of the northern extent of the existing settlement boundary. Given the importance of the natural coastal vegetation, the proximity of the Churchill Island Marine National Park and the adjoining Western Port Ramsar Site, we consider that this detail is important. Mr Atkinson could not advise the exact position of the boundary line which runs through the saltmarsh. At Appendix 3, pp.7-8, we provide a recent photograph taken from public land north of 64 Boys Home Road to assist the DAL SAC in

understanding where the existing boundaries of the settlement and block 353 are located. The photograph is notated to show the location block 353, the Churchill Island bridge, and a fence line through saltmarsh, which we understand is the existing northern settlement boundary. The view of the landscape in this photograph reveals another aspect of the relationship between block 353 and the significant saltmarsh and mangrove vegetation that was not shown in Mr Atkinson's evidence.

Urban development at block 353 could impact upon saltmarsh and the adjoining Western Port Ramsar habitat, which provides important foraging habitat for waterbirds—see Figure 5 at Appendix 1. Threats include stormwater runoff and pollution, litter, and disturbance by humans and domestic animals.

Figure 1 at Appendix 1 shows records of dispersal of the endangered Eastern Barred Bandicoot across Phillip Island. The species has dispersed from Churchill Island into Fishers Wetland, Newhaven, Cape Woolamai, and beyond. As discussed earlier, Eastern Barred Bandicoots are known to use farmland for foraging and nesting in the fox-free environment of Phillip Island. Given dispersal data shown in Figure 1, the species is likely to be present on the farmland of block 353.

### **2.3.5 Cape Woolamai**

PICS supports the proposed Cape Woolamai protected settlement boundary and expansion of SLO2, which will add landscape controls to the northern part of the former airport site. This would help to protect sensitive landscape and habitat values at and adjoining the site, including fragile dunes and cliffs, Short-tailed Shearwater colonies, Hooded Plovers, Eastern Barred Bandicoots, and significant vegetation.

On day 11 of the hearing, the committee heard evidence from landscape expert Stephen Schutt and ecology expert Brett Lane. Mr. Lane advised that there is ephemeral wetland and remnant swamp scrub in pockets of the northern part of the former airport site. PICS hopes that the additional controls of SLO2, when applied to the northern part of the site, would help to protect this vegetation and encourage regeneration. We asked Mr Schutt, in writing (Document 208) “would this landscape experience, along the road west of the Cape

Woolamai roundabout, be improved if the northern half of the land parcel 258 were to be revegetated with indigenous vegetation?” We received a written reply (Document 209) that “the visual experience of travelling along Phillip Island Road west of the roundabout at its intersection with Woolamai Beach Road would be improved if the northern half of land parcel 258....was revegetated with local indigenous vegetation”. We are encouraged by the advice of these two experts, as it supports our wish to have this land revegetated, while also improving the views of the landscape south from the Phillip Island Road.

### **2.3.6 Smiths Beach**

PICS supports the proposed protected settlement boundary and SLO2 at Smiths Beach. These controls are important for the conservation of the Short-tailed Shearwater colony, Hooded Plovers, and landscape values in the area, including the green breaks between settlements. Extension of the SLO2 to Back Beach Road is important to ensure that any tourist development that occurs outside the town boundaries will be sensitive to the landscape.

## **2.4 Development impacts outside settlement boundaries and landscape controls**

Developments outside settlement boundaries require careful siting and design to protect Phillip Island’s environmental and landscape attributes. In this section, we will discuss concerns regarding excessive earthworks, potential for conserving our dark sky, and Bass Coast Unlocking Rural Tourism Strategy.

### **2.4.1 Excessive earthworks**

Unfortunately, PICS has observed a trend toward inappropriate cut and fill and earthworks associated with commercial developments on Phillip Island over the past decade, with adverse effects upon the landscape.

Appendix 2 discusses four examples—one built and three proposed developments. The built example is the Phillip Island Wellness Project, Phillip Island Road, Newhaven, a council-approved development that sits partly inside the existing SLO between the Phillip Island Road and the south coast dunes system. The development includes underground change

rooms and plant rooms constructed of concrete and covered with earth mounding. This mounding runs approximately 100 metres east-west across the site and approximately 140 metres along the east and west sides. According to the council-endorsed plan, the maximum height of the north side mounding is approximately eight metres, the east side is approximately seven metres, and the west side is approximately three to four metres high. The widths across the base of the mounding vary between 30 and 50 metres. The mounding is intended to enclose the outdoor bathing pools and spas and looks very unnatural. The development has drastically altered the landscape of the site and cut off views south towards the coastal dune system. Previously, the existing Cape Kitchen building next to the dunes was visible from the Phillip Island Road.

We point out that, currently, there are no controls over earthworks in the schedules to the Farming Zone and the Rural Activity Zone, except where they impact on surface drainage. Thus, the Bass Coast Shire Council has very little control over the type, extent, and volume of cut and fill and earthworks.

PICS recommends refinements to the schedules of SLO2, SLO3 and other SLOs across the Bass Coast declared area prevent adverse outcomes caused by inappropriate earthworks.

SLO schedule permit requirements. We note that a permit for earthworks is not listed as being required. We understand that farms need to carry out certain earthworks, and a distinction should be made between earthworks associated with farming and those associated with development projects. We recommend additional wording as follows: “A permit is required for earthworks associated with commercial development”, or words to that effect.

SLO schedule application requirements. We recommend that an additional point be added under the “landscape plan that specifies” requirement: “The location, extent, width and height of all earthworks.”

Decision guidelines. We consider that the guideline relating to cut and fill and other earthworks needs to be qualified more precisely, since the word “excessive” is subjective and open to interpretation.

#### **2.4.2 Conserving our night sky**

Despite the wildlife impacts of light pollution discussed above, Figure 2 of Appendix 1 illustrates that much of Phillip Island and Bass Coast is relatively dark. This is important not only for biodiversity, but for other aspects of our nature-based tourism economy. Over 80 percent of the world's population can no longer see stars due to artificial light pollution, which is growing at two percent per year. Dark skies are becoming increasingly important for tourism because they enable activities such as astronomy, reconnection with the natural environment, and health benefits. Our dark sky is a distinctive attribute that should be protected and conserved with more careful planning and attention to environmentally sensitive lighting. Recently, PICS has observed a trend toward use of floodlighting and very bright LED signs. We recommend that the strategies and planning controls of the SPP are used to encourage environmentally sensitive lighting.

#### **2.4.3 Bass Coast Unlocking Rural Tourism Strategy pre-empts DAL process**

PICS has noted that there have been references to the Bass Coast Unlocking Rural Tourism (BURT) Strategy in various submissions to the hearing. For example, the Combined Community Groups have suggested the inclusion of the BURT Strategy in the state and regional policy context of the SPP. We understand that this is intended to support the submission that more can be made of the Western Port Woodlands as a nature-based gateway to a diversified, sustainable tourism industry within various parts of the Bass Coast, and we support this vision for the woodlands.

However, PICS submits that the BURT Strategy should not be referenced in the Bass Coast DAL SPP. We consider that the BURT Strategy is narrowly business-focussed, inappropriately pre-empts the DAL strategic planning process, and recommends special-use zoning in sensitive parts of Phillip Island that may cause perverse outcomes for the island's distinctive environmental and landscape attributes. We submit that the BURT Strategy will need to be refined once the SPP and landscape controls come into effect.

### **3. Western Port Woodlands**

PICS can attest that the remnant vegetation described throughout this hearing as the Western Port Woodlands is highly valued by the community for its environmental and landscape significance.

The ecology conclave has recognised the Western Port Woodlands as a connected landscape of national ecological significance and agreed that extractive industry is causing irreversible damage to its terrestrial ecology and long-term viability, as well as serious risk of pollution to the internationally significant Western Port Ramsar wetland. The ecology conclave has underscored the need to plan for connectivity for indigenous species and ecological processes in the Western Port Woodlands to ensure long-term conservation of its biodiversity.

The committee has heard that there is potential for cumulative, permanent impacts associated with extractive industries in the region (Minister for Planning submission, Document 160, para 369).

As a community environment group, PICS is often assured by state and federal governments that the legal and regulatory system has adequate safeguards to assess and acceptably mitigate these environmental effects. However, we submit that because the onus is on proponents to refer their projects for assessment under the federal EPBC Act and Victorian Environment Effects Act, referrals are not always submitted when there is potential for a significant effect, such as loss of threatened species habitat or damage to the Western Port Ramsar ecosystem. We are concerned that the cumulative effects of multiple quarries on the Western Port Ramsar wetland have never been adequately assessed or monitored. The committee has heard from Professor Wettenhall that there has been no independent pollutant testing to monitor waterways and groundwater (Document 71), despite his inquiries and advocacy.

The committee also heard from the Combined Environment Groups that the planning scheme also has consistently failed to protect the significant environmental values of the Western Port Woodlands. We are in urgent need of clearer planning guidance to ensure this

pattern is not repeated. PICS submits that protection and conservation of the Western Port Woodlands as a connected landscape of high ecological significance must take precedence over extractive industry in the SPP and planning controls.

We recommend:

- The Western Port Woodlands should be explicitly named by the SPP as both a distinctive environmental and landscape attribute of the Bass Coast DAL declared area.
- The recommendations of the Combined Community Group should be accepted, including:
  - The incorporation of reference to the Western Port Woodlands in the SPP vision statement.
  - The incorporation of more detailed mapping of native vegetation, the Western Port Woodlands, and the biolink corridors required to maintain ecosystem connectivity into the SPP declared area framework plan.
- Changes to the SPP necessary to protect and conserve the Western Port Woodlands should include amendment to binding objectives as well as the non-binding strategies and other text. We suggest:

Objective 6b: To facilitate a diverse, resilient, circular economy that promotes innovation in the productive use of rural land, natural resources and value-adding activities, while prioritising the conservation of biodiversity in the region.



#### **4. Summary of recommendations**

The following recommendations reflect the discussion above and incorporate recommendations from our April 2022 submission:

1. PICS supports the Bass Coast DAL SPP protected settlement boundaries for all settlements on Phillip Island.
2. Refinement of the SLO2 boundary at Ventnor should not delay implementation of the proposed protected settlement boundary at Ventnor.
3. PICS supports the proposed SLO2 and SLO3 landscape planning controls, with some refinements to the planning controls outlined below:
  - a. The boundary of SLO3 should be extended west to Coghlan Road to protect views to the Rhyll Inlet.
  - b. Consideration should be given to extending the boundary of SLO1 from the Bass Highway to the coast and Bass River to protect the vista from the road (see April 2022 submission).
  - c. Permit requirements—add wording as follows: “A permit is required for earthworks associated with commercial development.”
  - d. Application requirements—add point under the “landscape plan that specifies” requirement: “The location, extent, width and height of all earthworks.”
  - e. Decision guidelines—define excessive cut and fill or other earthworks more precisely.
4. The BURT Strategy should not be referenced in the SPP.
5. The SPP and landscape controls should be refined to make it clear that protection and conservation of the Western Port Woodlands as a connected landscape of high ecological significance takes precedence over extractive industry.
6. The Western Port Woodlands should be explicitly named by the SPP as both a distinctive environmental and landscape attribute of the Bass Coast DAL declared area.
7. The recommendations of the Combined Community Group should be accepted, including:

- a. The incorporation of reference to the Western Port Woodlands in the SPP vision statement.
  - b. The incorporation of more detailed mapping of native vegetation, the Western Port Woodlands, and the biolink corridors required to maintain ecosystem connectivity into the SPP declared area framework plan.
8. Changes to the SPP necessary to protect and conserve the Western Port Woodlands should include amendment to binding objectives as well as the non-binding strategies and other text. In particular, the words “while prioritising the conservation of biodiversity in the region” should be added to Objective 6b.
9. The following additional changes to the draft Bass Coast DAL SPP and landscape planning controls were recommended in our April 2022 submission. Recommended changes to the wording of policy objectives and strategies are highlighted in green and words to be removed are struck through.

Objective 3: To protect and enhance the declared area’s significant landscapes and seascapes, including their distinctive characters, physical features, remnant vegetation, and cultural values.

Strategy 3.4: Additional dot point: Avoids excessive earthworks, such as mounding, to preserve natural contours, hydrology, and viewlines.

Strategy 3.6: Additional dot points:

- minimising additional noise and light pollution
- drafting Fly Neighbourly guidelines to protect amenity and biodiversity at relevant locations

Objective 4a: To conserve and enhance the declared area’s biodiversity and associated ecosystem services by retaining and protecting remnant vegetation and connecting biolinks, and increasing the quality and quantity of habitat, particularly for endangered and vulnerable indigenous plant and animal species.

Objective 4b: To protect and enhance the health and function of the declared area's integrated water system, in particular, groundwater, waterways, significant wetlands, and intertidal and marine environs.

Objective 4c: To minimise human impacts and the effects of industrial and urban development on the declared area's environmental and ecological values.

Additional strategy 4c.#: Ensure that sensitive biodiversity and environments are protected from noise and light pollution when assessing proposed developments, including, where applicable, through:

- application of the *National Light Pollution Guidelines for Wildlife Including Marine Turtles, Seabirds and Migratory Shorebirds* (Commonwealth Department of Environment and Energy 2020)
- drafting Fly Neighbourly advice.

Objective 6b: To facilitate a diverse, resilient, circular economy that promotes innovation in the productive use of rural land, natural resources and value-adding activities, while prioritising the conservation of biodiversity in the region.

Strategy 6b.1 Protect and manage extractive resource areas from encroachment by incompatible land uses and inappropriate development, while also protecting remnant vegetation and connecting biolinks from encroachment by extractive industries.

Strategy 6b.2 Ensure proposals to establish extractive industries adhere to best practice measures to avoid and minimise impacts on the declared area's attributes, and ensure locations of lesser environmental and landscape significance are prioritised. extractive industries do not impact upon areas of environmental or landscape significance.

Additional strategy 6b.#: Phase out existing sand extraction from the Western Port Woodlands remnant vegetation and biolinks—no expansion or extension of existing work authorities or planning permits, and no new work authorities or planning permits.

Objective 7: To ensure the integrated and timely provision of transport, essential services and community infrastructure that meets community needs and increases resilience to natural hazard and climate change impacts, while minimising impacts on landscape, environmental and Aboriginal cultural heritage and historic heritage values.

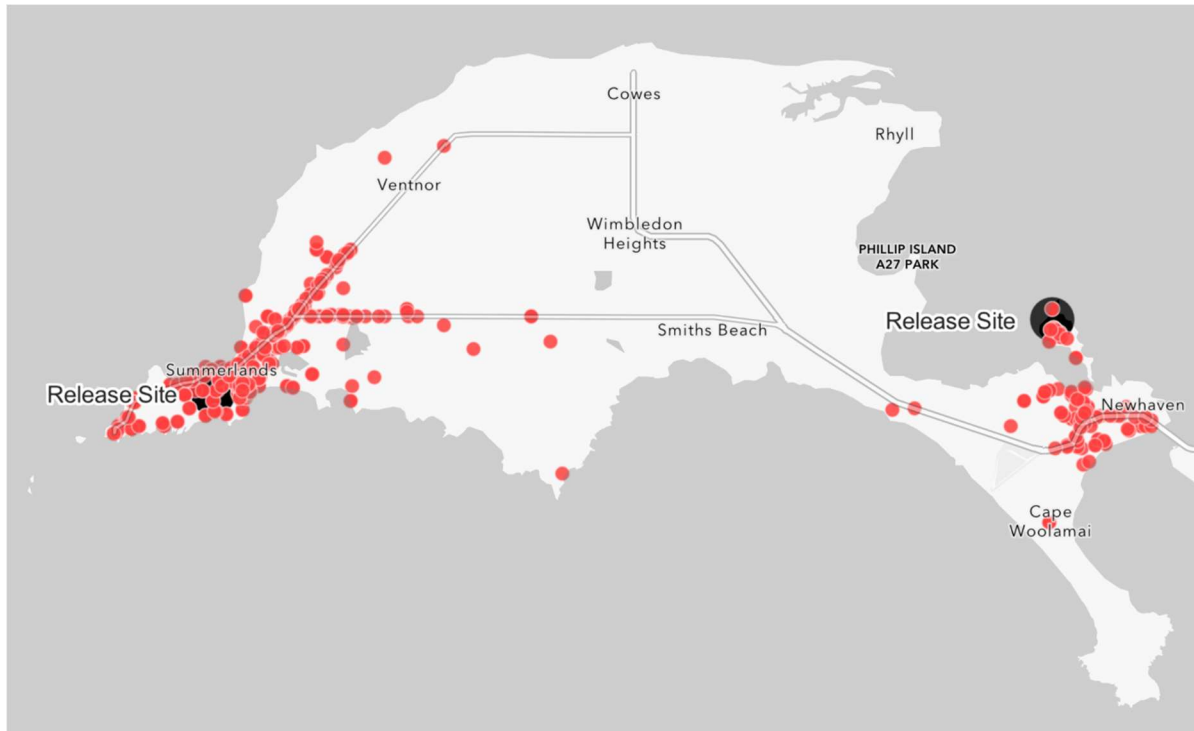
Objective 8: To plan and manage the sustainable development of settlements in the declared area consistent with each settlement's unique character, role and function, and the protection and enhancement of the area's landscape and seascape significance, environmental and biodiversity values, Bunurong cultural heritage and historic heritage values.

Strategy 8.5: Ensure development at the periphery of settlements is designed to transition to the surrounding landscapes, integrating development with its environs, landscape and seascape character and features, subject to addressing bushfire risks.

Strategy 8.6: Ensure development in settlements maintains and enhances views of the rural hinterland, and to and from the coast and foreshore.

## Appendix 1: Maps and photographs

### Eastern Barred Bandicoot



*Figure 1. Map of Eastern Barred Bandicoot observations confirming dispersal across Phillip Island from the original release sites on Churchill Island and the Summerland Peninsula in 2021.<sup>1</sup>*

---

<sup>1</sup> Phillip Island Nature Parks. The Island Haven: The introduction of Eastern Barred Bandicoots to Churchill Island (Moonah'mia) and Phillip Island (Millowl). Downloaded from <https://storymaps.arcgis.com/stories/d9bde84d9a3b4c3399978fa92bfcf55e> on 17/09/21.

## Hooded Plover

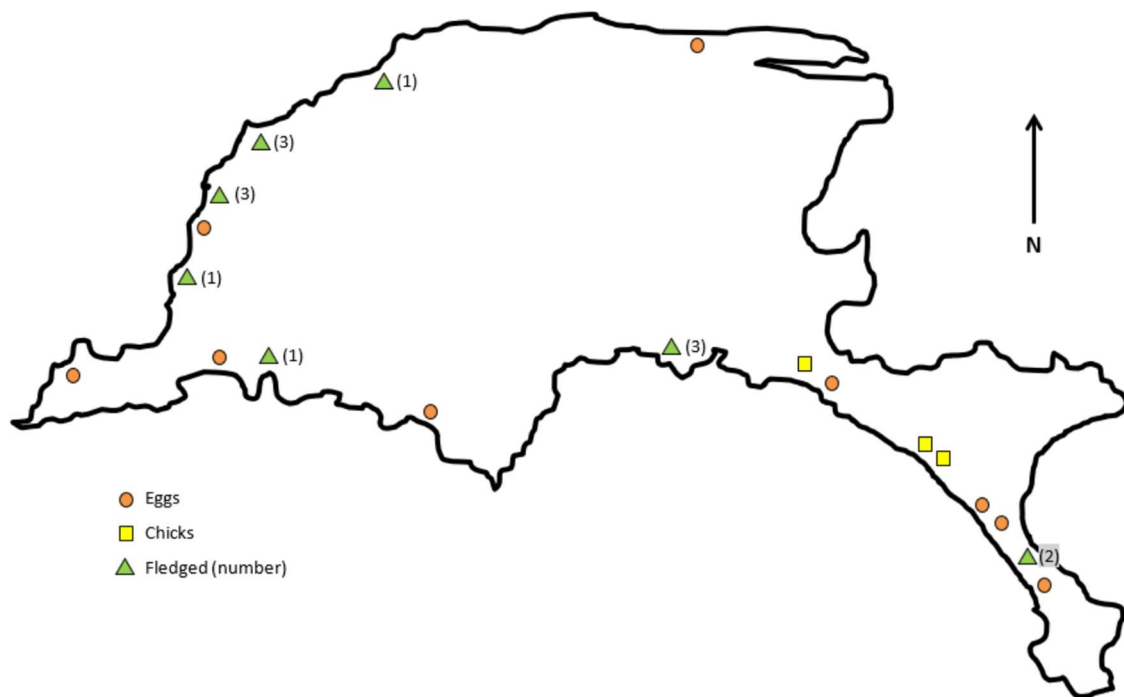


Figure 2. Hooded plover nesting sites on Phillip Island and breeding outcome at each site.<sup>2</sup>

<sup>2</sup> Phillip Island Nesting Shorebird Breeding Season 2021-22: End of Season Report,  
<https://penguins.org.au/assets/Conservation/Environment/PDF/PI-HP-EOS-Report-21-22.pdf>

## Short-tailed Shearwater

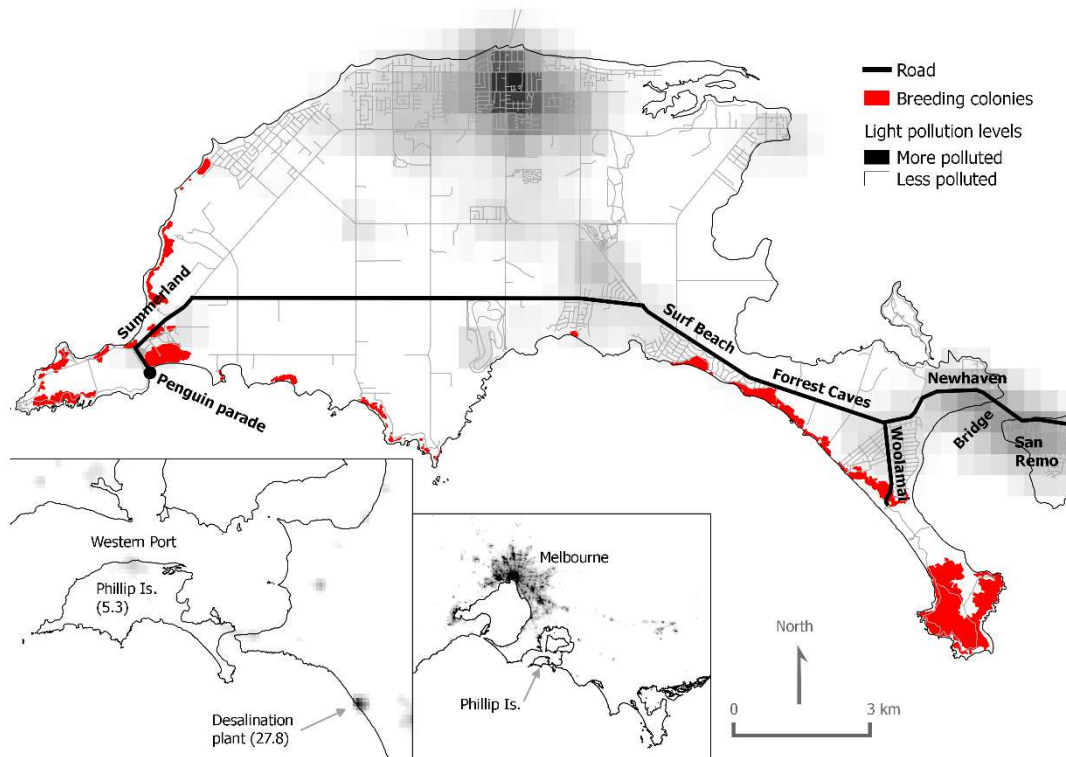


Figure 3. Phillip Island map showing the road where Short-tailed Shearwater rescue patrols are conducted, light pollution levels, and the main shearwater breeding colonies.<sup>3</sup>

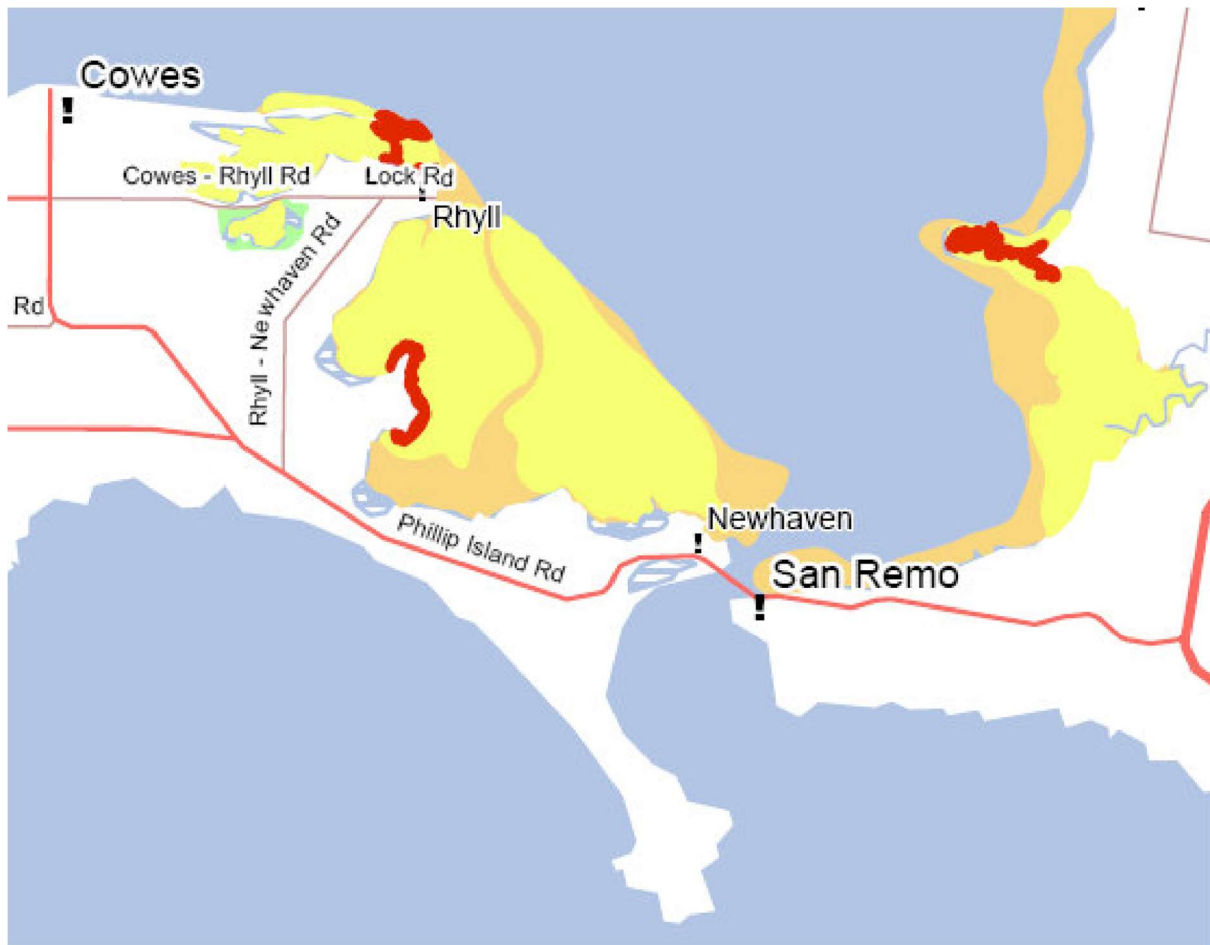
<sup>3</sup> Rodríguez A, Burgan G, Dann P, Jessop R, Negro JJ, Chiaradia A (2014) Fatal Attraction of Short-Tailed Shearwaters to Artificial Lights. PLoS ONE 9(10): e110114. <https://doi.org/10.1371/journal.pone.0110114>



*Figure 4. Dark Sky So Shearwaters Fly community engagement campaign by Phillip Island Nature Parks and partners.*



### Waterbird habitat on Western Port Ramsar coast of Phillip Island



*Figure 5: Map showing habitat for waterbird roosting (red), foraging, or breeding. Primary foraging habitat is yellow, and secondary foraging habitat is orange. Source: Hansen, Menkhorst, and Loyn (2011).<sup>4</sup>*

---

<sup>4</sup> Hansen, B., Menkhorst, P. and Loyn, R. (2011) Western Port Welcomes Waterbirds: waterbird usage of Western Port. Arthur Rylah Institute for Environmental Research Technical Report Series No. 222. Department of Sustainability and Environment, Heidelberg, Victoria. <http://dx.doi.org/10.13140/RG.2.1.4411.6245>

**FFG-listed San Remo Marine Community**



*Figure 6. Sea slugs photographed by PICS in the intertidal zone under Phillip Island bridge—part of the FFG-listed San Remo Marine Community.<sup>5</sup>*

---

<sup>5</sup> FFG Action Statement 018: San Remo Marine Community, State of Victoria, 1992.

[https://www.environment.vic.gov.au/data/assets/pdf\\_file/0019/32455/San\\_Remo\\_Marine\\_Community.pdf](https://www.environment.vic.gov.au/data/assets/pdf_file/0019/32455/San_Remo_Marine_Community.pdf)

### Short-tailed shearwater colony and planning constraints at Ventnor



BASS COAST PLANNING SCHEME AMENDMENT C88  
PANEL REPORT, DECEMBER 2009

*Figure 7. From the C88 panel report—Short-tailed Shearwater colony and proximity to the land at 34 Bingley Crescent, Ventnor. This land is known as the “Cadogan land” in C88 and labelled as block 666 in the map of proposed protected settlement boundary changes Document 57a).*





**Appendix 2: Supporting analysis (settlement boundaries and landscape controls)**

**Appendix to Presentation Submission 18 April, 2023**

**SLO2 Phillip Island Western and Southern Coast**  
**SLO3 Phillip Island Swan Bay Coast and Churchill Island**  
**Proposed Permanent Settlement Boundaries, PSBs, for Newhaven and Cape Woolamai**

PICS is of the opinion that the Schedules of these proposed SLOs do not address the adverse outcomes caused by inappropriate earth works associated with development on land in the proposed SLO2 and SLO3.

Landscape character objectives to be achieved

We generally agree with and support the proposed Landscape Character Objectives as set out in these Schedules.

Permit requirements

We note that under the heading Permit Requirements, a permit for earthworks is not listed as being required. We understand that farms need to carry out certain earthworks such as dam building, driveway embankments and the creation of levelled areas for sheds and equipment. A distinction should be made between earth works associated with farming and agriculture and earthworks associated with development projects.

We ask that additional wording be added as follows:

*A permit is required for earthworks associated with commercial development.....or words to that effect.*

Application requirements

For similar reasons as outlined above, we ask that, under the heading Application Requirements, an additional bullet point sentence be added under the sub-heading:

- A landscape plan that specifies:

This additional sentence:

*The location, extent, width and height of all earthworks.*

Decision guidelines

We consider that the guideline relating to cut and fill and other earthworks needs to be qualified in some manner. In our opinion the proposed wording is too vague. The description of the term “excessive” is subjective and open to interpretation.

**Inappropriate earthworks in development applications**

We have set out below some examples of inappropriate cut and fill and earthworks associated with developments on Phillip Island. One built example, the others proposed. These examples illustrate, in our opinion, how the landscape values are adversely affected.

We point out that currently there are no controls over earthworks in the schedules to the Farming Zone and the Rural Activity Zone except where they impact on surface drainage.

Thus, the Bass Coast Shire Council has very little control over the type, extent and volume of cut and fill and earthworks. The lack of controls has resulted in the granting of planning approvals for major earthworks, associated with commercial developments that have or would adversely impact on the natural landscape.

## Example 1

Proposed earthworks. Proposed Caravan Park, 1285 Phillip Island Road, Newhaven.  
(Farming Zone. Partly inside an SLO. Council refused this permit. VCAT upheld Council's refusal. PICS was a party to this VCAT P381/2021 matter)

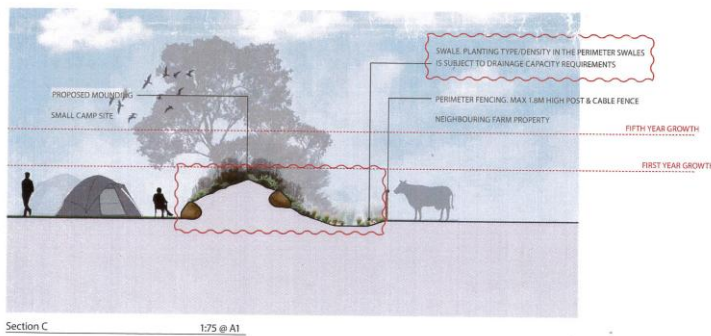
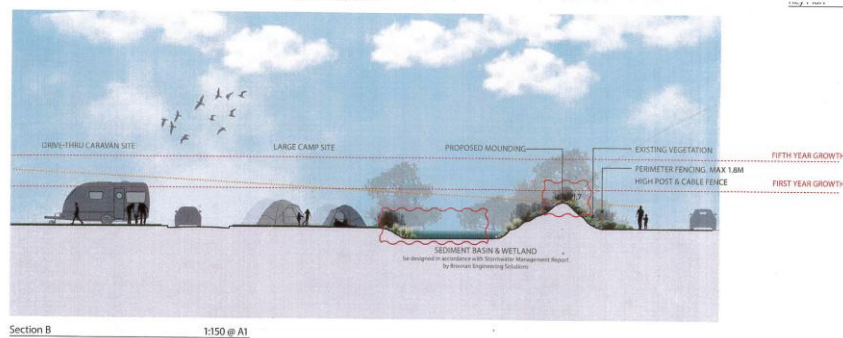
As part of this application for a new caravan park and to address the real threat of seasonal flooding, the permit applicant included earth swales and associated approx. 1.8m high earth berms to both sides of this large site. A sediment basin was proposed at the northern boundary> The excavated material from the basin was to form a 2 metres high mounding running alongside the Phillip Island Road boundary.

Other earth berms were designed to run internally between different camp sites and amenities.  
(Refer to Attachments B and C).

The overall effect of these earthworks would have completely altered the existing landscape between the Phillip Island Road and the South Coast and would have obscured views to the south coast dunes. At the VCAT hearing the Members commented that...." the policy framework in the planning scheme is not about hiding development but protecting and maintaining these scenic landscapes"



Attachment A



NEW HAVEN CARAVAN  
PARK - SECTIONS  
TRACT Rev. 6  
2. 9. 2021

(B)

Attachment B

## Example 2

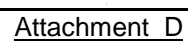
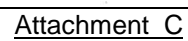
Earthworks. Phillip Island Wellness Project, Phillip Island Road, Newhaven  
(Council approved. Partly inside the existing SLO)

This development, located between the Phillip Island Road and the south coast dunes system is currently under construction. The development includes underground change rooms and plant rooms which have been constructed of concrete and then covered with earth mounding (Attachment D). This mounding runs approximately 100 metres east-west across the site and approximately 140 metres along the east and west sides. According to the Council endorsed plan (Attachment C) dated 18 October, 2021, the maximum height of the north side mounding is approx. 8 metres, the east side is approx. 7 metres and the west side is approx. 3-4 metre high. The widths across the base of the mounding vary between approx. 30 and 50 metres.

This mounding appears to be totally machine made. The purpose of it is to surround and partially enclose the numerous outdoor bathing pools and spas in the centre.

The overall effect of this development has been to drastically alter the landscape of the site and cut off the views south towards the coast sand dunes system. Previously, the existing Cape Kitchen building, sitting next to the dunes was visible from the Phillip Island Road.





### Example 3

#### Proposed earthworks, Museum and Café, 133 Churchill Road, Newhaven

Staged use and development of the land for a museum and café(restaurant), the removal of native vegetation, the installation and display of business identification signage, and the creation of access to a RDZ1 Road, 24 Churchill Road, Newhaven.

(Farming Zone. Situated outside the SLO. Council approved this Application unanimously. Objectors applied for a VCAT review. PICS is not a party to this VCAT P748/2022 matter).

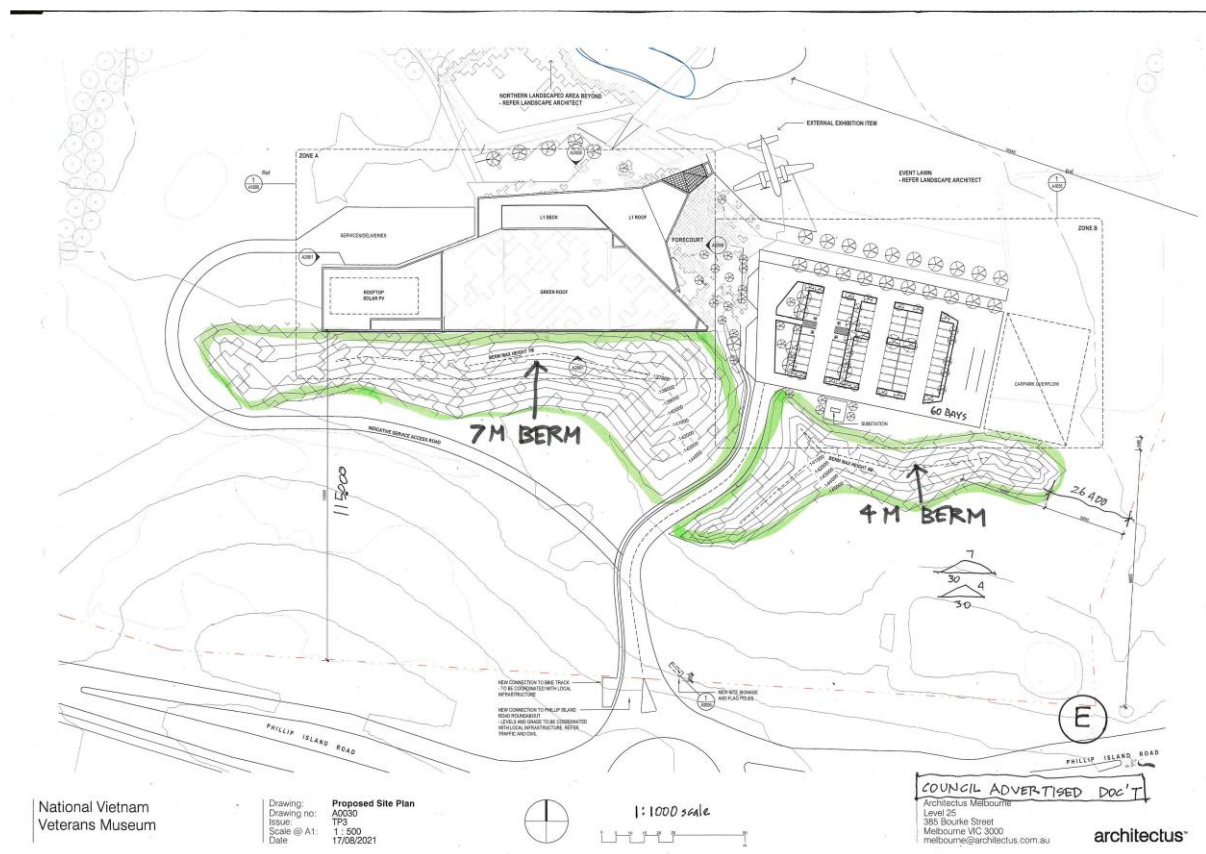
#### Proposed earth berms/fill:

In our objection to this permit application under the headings Earthworks Disturbance and Sustainability issues we raised our concerns about the 4 and 7 metre high earth berms, which were to shield the proposed buildings from view from the Phillip Island Road.

The attached permit application plan shows the extent and the contour heights of the proposed berms. (Refer Attachment E).

We have calculated that the construction of the earth berms will require approximately 54,000 m<sup>3</sup> of fill. We understand that some of this fill material is to be cut from the site, over a large area, after the removal of topsoil. Given what we have learnt from listening to other knowledgeable submitters and from some of the biodiversity experts, about the hazards associated with the disturbance of coastal and rural land, we also have concerns about this aspect of the proposed earthworks.

The heights and bulk of these earthwork berms, together with the required cut on site for material sourcing, will have an adverse effect on the landscape values of this site and the views from the Phillip Island Road.



Attachment E

#### Example 4

Proposed earth works, Integrated Residential Development, Cowes Golf Course. 2013.  
(Amendment C132. Recommended for approval by a Planning Panel but not approved by Council).

This example dates from 2013 but it is still relevant for lessons that have been learnt.  
The C132 Amendment land included that land at the intersection of Cowes Rhyll Road and Coghlan Road. (Attachment F)

This proposal sought a rezoning of the land from the Farming Zone to a Special Use Zone to allow for an Integrated Residential Golf Course Development including 120 houses. These houses were proposed to be built on the elevated land nearest the roads intersection. The remainder of the land was too low to build on due to its proximity to the adjoining Rhyll Inlet wetlands. It was proposed to build up part of the land for the fairways and greens so as to reduce interruptions caused by flooding.

To fit all the proposed houses into the corner of the site it was proposed to fill part of the site, where it drops away, to obtain the required 3.7m height above sea level, a height set by the relevant authority, Melbourne Water, at the time. To achieve this, approx. 61,000 m<sup>3</sup> of fill would have been required. This is approx. 2,700 double bogey truck loads.

This development, if built, would have drastically altered the landscape values of the upper areas of the Rhyll Inlet in a similar way that the huge mound of the former rubbish tip further east along the road, has done.



2013 C132 AMENDMENT  
PHILLIP ISLAND CONSERVATION SOCIETY

Attachment F



### **Newhaven proposed Permanent Settlement Boundary and SLO3**

PICS supports the proposed Newhaven PSB as shown on Map 24, page 109 of the SPP, hard copy document. We also support the proposed Significant Landscape Area, SLO3, which will cover a greater area of land around Swan Bay, Churchill Island and Newhaven, all as shown in Map 5 on pages 32 and 33 of the SPP Proposed Landscape Planning Controls, hard copy document.

The area of land to be retracted from the existing settlement boundary exhibits important landscape qualities with important view lines to and from Newhaven and Churchill Island. Much of this land, which also contains Land Parcels numbered 353, is not built on. PICS sees here an opportunity to visually link the landscape on the north side of Phillip Island Road with the landscape of the Newhaven Swamp Conservation area on the south side.

Currently, the views of the natural landscape of the West Newhaven land are cut off from the Newhaven Swamp side by inappropriate development and commercial buildings along the Phillip Island Road. During the course of this hearing we have heard from experts who have agreed that the landscape outcomes associated with development on the north side of Phillip Island Road are of poor quality.

We hope that the increase in controls of the proposed SLO3 will lead to an improved landscape outcome for future new and upgraded development should it occur in this area. This would lead to an improvement in the linking of the landscape on both sides of the Road.

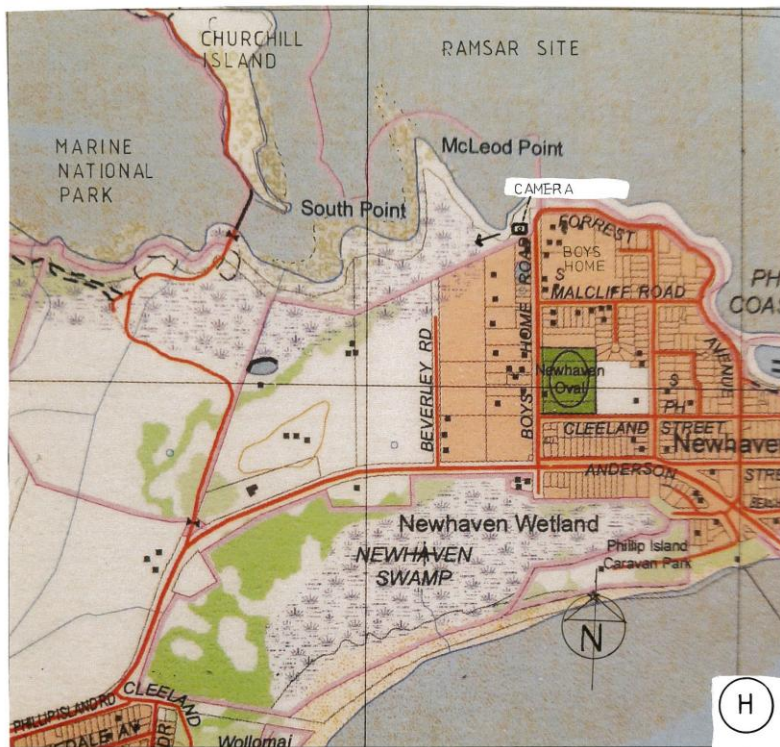
On day 10 of the Hearing, Landscape Expert Darren Atkinson presented his expert evidence, which related to the West Newhaven land and, in particular, to the controls over the Land Parcels numbered 353. At the completion of his evidence we asked a question relating to the position of the northern extent of the existing settlement boundary. Given the importance of the natural coastal vegetation, the proximity of the Churchill Island Marine National park and the adjoining Western Port Ramsar Site, we consider that this is a serious matter. Mr Atkinson could not advise the exact position of the boundary line which runs through the salt marsh.

We have attached a recent photo (Attachment G). This is provided to hopefully assist the Committee in understanding where the existing boundary of the settlement and Parcels 353 are located. In this photo we have notated the Parcels 353, the Churchill Island bridge and a fence line, running through the salt marsh, which we understand is the existing northern settlement boundary. This photo was taken on 1st April, 2023 from public land accessed from the north side of the property at No. 64 Boys Home Road, Newhaven. There is formal access to this location and to the shoreline generally via a ramp and steps on Forrest Avenue opposite the northern entrance to the former Boys Home buildings. From this access point one can walk along the shoreline to view the front of the Parcels 353. (Our Attachment E shows where the photo was taken from).

The view of the landscape in our photo reveals another aspect of the relationship between the Parcels 353 land and the significant natural vegetation of salt marsh and mangroves. A walk along the foreshore, as mentioned above, will be more informative of the significant landscape, east of the bridge, than the photos provided by Mr. Atkinson.



Attachment G



Attachment H

## **Cape Woolamai proposed Permanent Settlement Boundary and SLO2**

PICS supports the proposed Cape Woolamai PSB as shown on Map 14, page 85, of the SPP, hard copy document.

We also support the proposed Significant Landscape Overlay, SLO2, which will add controls to the northern part of the former Airport site, as shown on Map 4, page 27, of the Proposed Landscape Planning Controls, hard copy document.

On day 11 of the Hearing the committee heard evidence from Mr. Schutt on Landscape and from Mr. Lane on biodiversity. Mr. Lane advised that there is ephemeral wetland and remnant swamp scrub in pockets of the northern part of this site. PICS hopes that the additional controls of SLO2 when applied to the northern part of the site would help to protect this vegetation and encourage re-growth.

We asked Mr. Schutt, in writing, (Document 208) a question which in part reads....*Would this landscape experience, along the road west of the Cape Woolamai roundabout, be improved if the northern half of the land Parcel 258 were to be re-vegetated with indigenous vegetation....*

Via the Planning Panels we received a written reply (Document 209) dated 29<sup>th</sup> March. It reads in part....

*The visual experience of travelling along Phillip Island Road west of the roundabout at its intersection with Woolamai Beach Road would be improved if the northern half of Land Parcel 258....was re-vegetated with local indigenous vegetation.*

The full written answer is available in the Document 209.

We are heartened by the advice given by these two experts as it provides support for our wish to have this land re-vegetated whilst also improving the views of the landscape south from the Phillip Island Road.

**PHILLIP ISLAND CONSERVATION SOCIETY Inc.**

18 April, 2023

**Appendix 3: Supporting letters**

To whom it may concern,

RE:

I write to express the importance of open farmland habitat for the recovery of the mainland eastern barred bandicoot on Phillip Island, and more broadly across Victoria.

The mainland eastern barred bandicoot was classified as 'Extinct in the Wild' in Victorian with the last recorded wild individual sighted in 2002. The recovery of the taxon is described in the National Recovery Plan 2021 (Department of the Environment 2021) and in the book chapter by Hill, Coetsee and Sutherland (2018). These illustrate the critical importance of fox-free environments for population persistence and recovery. Populations have only persisted while foxes have been excluded.

The National Recovery Plan 2010 (Hill, Winnard & Watson 2010) proposed establishing eastern barred bandicoots on fox-free islands due to the large potential area of fox-free habitat that is suitable for eastern barred bandicoots. Establishment at large fox-free sites could achieve the rapid expansion of population size that is required to secure the species and halt the continuing decline in genetic diversity.

The overall objective of the National Recovery Plan 2021 is to secure the long-term evolutionary potential of the mainland Eastern Barred Bandicoot by establishing and maintaining a minimum of 4 genetically diverse, spatially independent, self-sustaining reintroduced populations which total no less than 2500 individuals.

Phillip Island was declared fox free in 2017 after the last confirmed sighting of a fox in 2015. Phillip Island is considered to have about 9000 hectares of suitable habitat for eastern barred bandicoots (Department of the Environment 2021), which provides sufficient suitable habitat for a self-sustaining population that does not require ongoing genetic management. Eastern barred bandicoots have successfully established on Phillip Island and have spread at least 10 km from the release sites, now occupying and utilising large areas of reserves and farmland across Phillip Island.

The highest priority populations for the Recovery Plan 2021 are those sites that are largest in suitable habitat area and therefore have the highest ultimate population potential (Department of the Environment 2021). Hence, the Phillip Island populations is one of the highest priority populations for the recovery of the taxon.

Eastern barred bandicoots nest under vegetation during the day and forage at night in open habitats. Eastern barred bandicoots utilise more open habitats in the absence of foxes than in the presence of foxes (Winnard, Di Stefano & Coulson 2013). Data from live trapping (Townsend 2020), digging surveys (Halstead *et al.* 2020) and radio tracking of eastern barred bandicoots on Churchill Island (Rendall, Coetsee & Sutherland 2018) shows that bandicoots use open farmland extensively to forage at night and can nest there during the day. Data from Churchill Island indicates they are at least as abundant in open farmland as woodland habitat when foraging (D. Sutherland unpublished data).



Given that open farmland forms more than 60% of the area of Phillip Island considered suitable for eastern barred bandicoots and that the species occupies and uses open farmland, open farmland habitat on Phillip Island is important for securing the species and meeting the long-term objectives of the National Recovery Plan 2021.

As a consequence of eastern barred bandicoots successfully establishing on fox-free islands with open farmland (Churchill Island, Phillip Island and French Island), the mainland eastern barred bandicoot has seen a recovery and been reclassified of from 'Extinct in the Wild' to 'Endangered'. The Eastern Barred Bandicoot National Recovery Team recognises open farmland habitat on Phillip Island as important for the recovery of this species.

Yours sincerely,

A handwritten signature in black ink, which appears to read 'Duncan R. Sutherland'.

Dr Duncan R. Sutherland

Chair, Eastern Barred Bandicoot National Recovery Team

Date: 6 April 2023

#### References:

- Department of the Environment, L., Water and Planning, (2021) *National Recovery Plan for the Mainland Eastern Barred Bandicoot *Perameles gunnii* (Victorian subspecies)*. Australian Government, Canberra.
- Halstead, L.M., Sutherland, D.R., Valentine, L.E., Coetsee, A.L., Rendall, A.R. & Ritchie, E.G. (2020) Digging up the dirt: quantifying the effects on soil of a translocated ecosystem engineer *Austral Ecology*, **45**, 97-108.
- Hill, R., Coetsee, A. & Sutherland, D.R. (2018) Recovery of the mainland subspecies of Eastern Barred Bandicoot in Victoria. *Recovering Australian Threatened Species: a Book of Hope* (eds S. Garnett, P. Latch, D.B. Lindenmayer & J.C.Z. Woinarski), pp. 249-257. CSIRO Publishing, Collingwood.
- Hill, R., Winnard, A. & Watson, M. (2010) *National Recovery Plan for the Eastern Barred Bandicoot (mainland) *Perameles Gunnii* Unnamed Subspecies*. Department of Sustainability and Environment.
- Rendall, A.R., Coetsee, A.L. & Sutherland, D.R. (2018) Predicting suitable release sites for assisted colonisations: a case study of eastern barred bandicoots. *Endangered Species Research*, **36**, 137-148.
- Townsend, T. (2020) Comparing the population ecology of eastern barred bandicoot island introductions. Bachelor of Environmental Science (Honours) Honours, Deakin University.
- Winnard, A.L., Di Stefano, J. & Coulson, G. (2013) Habitat use of a critically-endangered species in a predator-free but degraded reserve in Australia. *Wildlife Biology*, **19**, 429-438.

## **BirdLife Bass Coast**

### **Little Penguin Sightings at Ventnor**

BirdLife Bass Coast organise outings at the end of Devon Avenue in Ventnor every two years to watch the Short-tailed Shearwaters returning to their nesting burrows at dusk.

On the last two outings, on 25<sup>th</sup> November 2022 and 27<sup>th</sup> November 2020, in addition to the hundreds of Shearwaters, we have also observed Little Penguins coming in to the beach at dusk.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Gil Smith", with a stylized flourish at the end.

Mr Gil Smith  
Convenor, BirdLife Bass Coast