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The Tourism Collective

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Re: Draft Phillip Island and San Remo Tourism Destination Management Plan

Thank you for the opportunity to participate in the development of the Phillip Island and San Remo Tourism Destination Management Plan (DMP).

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”. Over 55 years, Phillip Island conservationists have devoted countless volunteer hours to defend, preserve, and protect the marine, terrestrial, and aquatic environments of Phillip Island and Western Port.

PICS welcomes sustainable tourism and has taken a keen interest in the development of the DMP and its predecessor, the Phillip Island and San Remo Visitor Economy Strategy 2035 (VES2035). Throughout our participation in the development of these strategic tourism documents, we have underscored that “our environment is our economy”, and that tourism success depends upon not only preservation, but regeneration, of our natural environment.

High-level comments

PICS values the natural environments of Phillip Island and Western Port as our greatest tourism assets. We commend the draft DMP’s emphasis on the natural environment as a tourism strength and recognition of the need to preserve and enhance our natural assets through positive-impact and regenerative tourism.

We support the draft DMP’s purpose, values, aspirations, and key principles and strongly agree with the intentions to attract high-value and values-aligned visitors, cultivate positive visitor and community behaviours, and plan integrated destination transport centred on active and public transport. We are pleased to see the DMP’s commitment to First Peoples partnerships and self-determination.

PICS supports the DMP’s stewardship governance model, regenerative and agile mindset, and other enablers of success. We consider it appropriate that the purpose, aspirations, guiding principles, and focus areas will stand over time, while the considerations, possible activations and projects, and annual action plans have the flexibility to adapt as external factors change and new information comes to light. This will be important to avoid potential adverse environmental outcomes. We agree that enabling a community voice in the ongoing governance of the DMP is essential to maintaining social license to activate proposals.

Detailed comments

Current State Synopsis: Sensitive Growth & Development (comment re BURT Strategy and DAL controls)

This section of the DMP states: “The Bass Coast Unlocking Rural Tourism Strategy, and being recognised in 2019 as a Distinctive Area and Landscape under Park 3AAB of the Planning and Environment Act 1987, should assist the community to feel that appropriate safeguards are in place to protect areas that require it and allow for sensitive developments in others.” The DMP also refers to the Bass Coast Unlocking Rural Tourism Strategy (BURT Strategy) as a “Key Guiding Framework” in Focus Area 4.8.

PICS wishes to highlight that the 2023 BURT Strategy requires further refinement to achieve this objective. In its current form, the BURT Strategy recommends broad areas for investigation as Special Use Zones “for tourism land uses within rural areas”, and we have already seen this cause a perverse outcome. The inclusion of Ventnor and Kitty Miller Bay among the tourism SUZ investigation areas recently encouraged an inappropriate and environmentally risky planning permit application to create a large accommodation development on Farming Zone land at 115 Kitty Millers Bay Road, Ventnor. The proposal involved removing vegetated embankments to remodel an existing artificial, highly saline wetland and construct sprawling group accommodation for approximately 100 guests, with significant risk of saline pollution of the Phillip Island Nature Parks Swan Lake ecosystem downstream. This risk, as well as planning incompatibility with the Farming Zone and negative impacts on a sensitive landscape, caused strong community concern and drew 167 objections before being rejected by Bass Coast Shire Council. To avoid encouraging further inappropriate proposals and community angst, PICS recommends that the DMP should not rely on the BURT Strategy as a key guiding framework or strategic document until its recommendations have been refined to better safeguard sensitive areas.

Designation of the Bass Coast Distinctive Area and Landscape (DAL) is also yet to provide the community with appropriate safeguards to ensure sensitive development. At the DAL standing committee hearing, landowners and legal representatives pushed strongly for significant expansion of town boundaries and relaxation of recommended landscape controls. The hearing report has been with the Minister for Planning for some months, and proposed town boundaries and other landscape planning controls are not yet decided.

Current State Synopsis: Brand Positioning & Positive Storytelling (comment re Phillip Island Circuit impacts)

The DMP states: “The destination's core brand positioning is of wildlife, nature and regenerative practices. However, we recognise the destination’s proud history in delivering major motorsport events. While the motorsport opportunity poses a brand positioning challenge, it also provides a global audience to share the stories of the destination. This plan embraces this challenge and opportunity.”

PICS wishes to highlight the noise pollution caused by the Phillip Island Circuit and hopes that the DMP will consider the importance of managing it. Noise emissions from the track have increased in frequency from six days per year to 300 days per year. The bulk of this noise is not from the handful of major event days, but from other circuit usage throughout the year, including for commercial testing of components, such as tyres and mufflers. This is an industrial use that is impacting upon amenity for residents and visitors.

PICS is interested to hear more about how the DMP and the Phillip Island Circuit will embrace this brand positioning challenge through reducing circuit noise and climate impacts, and improving operational sustainability, rather than simply brushing aside the brand incompatibility.

*Focus Area 2.1: Visitor and Community Contribution
(comment re governance and coordination)*

We support the intention of this focus area, including the consideration of potential for “a destination-wide program where visitors can contribute \$ or time to support local conservation and community projects”. We agree that robust governance will be essential here—not only to prevent perceptions of greenwashing and ensure that funds are collected and disbursed appropriately, but also to prevent exploitation and protect the safety of volunteers. This will require a funded coordinator position to ensure that appropriate volunteer management policies and procedures, insurance, and other safeguards are in place. The DPM suggests the Phillip Island Land Alliance (PILA) as a possible community platform for collecting and disbursing funds. PICS is a supportive member of the PILA, but considers that it is currently too early in the organisation’s evolution to take on responsibility for coordination of volunteers or fund collection and disbursement. These roles would need to be resourced and managed by Destination Phillip Island or Bass Coast Shire Council in the interim to ensure robust governance.

*Focus Area 2.2 Positive-Impact Destination Leaders
(comment re dark sky conservation)*

PICS supports the intention for destination stakeholders to “lead the industry with positive impact policies, initiatives and actions”. There is potential for a community-wide effort to conserve Phillip Island’s dark skies. Dark skies are important for wildlife, human health and connection to nature, First Nations cultures, astronomy, and sustainable tourism. Only 20 percent of the global population can see stars, and light pollution is increasing at two percent per annum. Phillip Island is still a relatively dark place, but with increasing development and lack of community awareness, this is changing. There is a need to raise awareness of best lighting practice within the community and potential to work toward International Dark Sky Place certification for Phillip Island. PICS would be happy to collaborate with destination stakeholders to achieve this.

*Focus Area 2.5: Positive Visitor and Community Behaviours
(suggestions)*

We applaud the intention to develop a “communication framework to articulate destination values to mitigate negative behaviours/support positive impact behaviours of both visitors and locals”.

Priority positive-impact behaviours to support include:

- Responsible pet ownership
- Driving safely with abundant wildlife
- Reporting injured wildlife (via a newly streamlined local contact and rescue system)
- Litter prevention (including fishing gear, balloons, plastics, and cigarette butts)
- Responsible fishing to reduce wildlife impacts (including reducing lost gear)
- Responsible coastal and marine recreation to protect wildlife and habitats (including birds and marine mammals)
- Staying on formal tracks to protect vegetation, dunes, wildlife, and human safety (including while whale watching)
- Correct use of the municipal waste separation (three-bin system) and recycling facilities

- Sustainable, wildlife-friendly, and weed-wise gardening (including rabbit control by excluding access under houses)
- Responsible usage of fireworks (including no discharge of fireworks without the required local law permit)

*Principle 3: Sharing our Story with Impact
(comment re pets and wildlife impacts)*

The DMP list of “good news stories” includes “dogs off beaches, and Phillip Island’s off-leash area, to protect native animals”. We would like to clarify that this is a problematic issue that has not yet been resolved. There is only one off-leash area that is not on a beach, while there are four off-leash areas that are on beaches, placing significant pressure on Hooded Plovers and other wildlife. Signage is often unclear, and enforcement is limited, so dogs frequently roam freely on beaches despite restrictions. PICS has been advocating to Bass Coast Shire Council for additional inland off-leash areas, clearer signage, and increased education and enforcement, with no success to date.

Bass Coast Shire Council has recently introduced a requirement for 24-hour cat containment, and Phillip Island Nature Parks is working to remove feral cats from its reserves. This is a good news story that could be shared along with education and assistance to support cat-containment compliance.

*Focus Area 3.3: Markets & Sector Partnerships
(comment re cruise ship impacts)*

Cruise ships can bring negative impacts, such as air, light, and noise pollution, dragging anchors, and tender boat disruption to shorebirds. It is vital to protect the ecology of the Western Port Ramsar Site. PICS supports the attraction of values-aligned cruise companies that are committed to avoiding or appropriately mitigating these impacts. We also recommend that expected environmental practices be communicated to all cruise companies scheduled to visit Western Port.

*Focus Areas 4.1 and 4.2: Experience Development and Quality Accommodation
(comment re need for sensitive development)*

The DMP seeks to support “experiences that are driving demand for the destination in their own right year-round, supporting longer visitor stay or contributing to care and connection with our place”. PICS submits that all such experiences and accommodation should be required to contribute to care and connection with our place in order to be supported by the DMP. Developments need to be sensitively sited and designed to protect the natural environment, landscapes and seascapes, and integrity of Farming Zone land.

The DMP also expresses support and advocacy for the Phillip Island Hot Springs and Vietnam Veterans Museum expansions and the Isle of Wight redevelopment. PICS wishes to highlight the following concerns about these developments:

- It is unfortunate that the large-scale earthworks and creation of artificial mounds at the Phillip Island Hot Springs development have obliterated the natural landscape, including views of the south coast from the Phillip Island Tourist Road. PICS is concerned that the proposed accommodation development will also lack sensitivity to its coastal environment.
- The planning permit application to relocate and expand the Vietnam Veterans Museum was recently rejected by VCAT due to its scale and bulk within a sensitive landscape and inconsistency with the Farming Zone. PICS hopes that any future museum proposal addresses these shortcomings with more sensitive location and design.

- The Isle of Wight planning permit was recently approved by Bass Coast Shire Council, with a condition requiring “a plan detailing how the rooftop services and plant equipment will be appropriately screened and integrated with the development through the use of high quality and appropriate colours, materials, and architectural treatment”. PICS has submitted that rooftop landscaping will be critical to screening the lift overruns and softening the overall appearance of the hotel building to preserve the quality of the iconic view from the Cowes Jetty.

*Principle 5: Improve Visitor Movements
(support for reducing reliance on cars)*

PICS supports the DMP’s intention to “develop more climate friendly transport options and reduce the reliance on cars”. We support the focus on better aligning existing public transport services and advocating for new services, including “making it easy for visitors to get to Cowes via the Western Port Ferry and connecting Melbourne trains”.

*Focus Area 5.3: Active & Public Transport
(comment re car ferry)*

PICS supports the DMP’s intention to improve active and public transport options to enable visitors to get to and around the destination without a car or paid tour.

We are disappointed that the considerations for this focus area state: “The Car Ferry is still a consideration if external conditions aligned, as it would support increase capacity of passenger traffic to the destination. However its business case is not a current priority for destination stakeholders.”

PICS disagrees that the car ferry should remain a consideration. Firstly, past proposals have demonstrated that a car ferry could not transport enough cars or people to be highly impactful from a tourism or emergency perspective, but the concentration of traffic into Cowes and hard coastal infrastructure required would degrade amenity and our unique north-facing coastline. Secondly, a car ferry should not be conflated with public or passenger transport, as it transports private cars. If the aim is to increase passenger traffic, the response should be to upgrade passenger ferry services and public transport connections.

Conclusion

Thank you once again to Destination Phillip Island and The Tourism Collective for the opportunity to participate in the development of the DMP. We look forward to further engagement in its development and implementation. If you have any queries regarding the issues raised within this submission, please contact us via phillipislandconservation@gmail.com.