

Wilson's Promontory Revitalisation

Victorian National Parks Association Submission May 2022

The Victorian National Parks Association (VNPA) welcomes the opportunity to have our say on the Wilson's Promontory Revitalisation 2022.

The VNPA has been a community voice for the protection of Victoria's unique natural heritage for 70 years. VNPA is an independent, non-profit, membership-based group, which exists to protect Victoria's natural environment and biodiversity through the establishment and effective management of national parks, conservation reserves and other measures.

We find that the current "conversation" offered on the Engage Victoria website is a confused and inadequate consultation process, with little background information offered to the public, scarce reference to current management problems at the Prom, and a lack of context, especially in regard to the clear conservation management objectives mandated by the National Parks Act 1975

Nevertheless we provide comments on the following:

- Tidal River visitor area
- Traffic congestion management
- Park interpretation
- The lack of a proper planning process under which the Park must be managed, as required under the National Parks Act 1975.

We note that the park is assigned the International Union for the Conservation of Nature (IUCN) Category II (National Parks) on the United Nations' List of National Parks and Protected Areas. Category II areas are managed primarily for ecosystem conservation and appropriate recreation. That important objective is consistent with the objects of Victoria's National Parks Act

Tidal River visitor area

We assume the two accommodation buildings being proposed are to replace the 'wilderness tents' at Tidal River. These tents were allowed and fitted within the park management plan as they were not built structures. The proposal for new built accommodation is a clear case of development creep and is not supported within the park management plan.

As highlighted in section 5.3 *Amenity* of the park management plan "Any increase in the capacity of built accommodation at Tidal River would unacceptably impact on the ecological values, both directly and through development of additional capacity of the infrastructure, and also on the amenity of the area (p34) ".

Any new built structures at Tidal River would be outside of the management plan, which puts clear limits on built accommodation within the park. This is clearly unacceptable.

Replacement with the original 'Wilderness Tents', or another similar design should be considered.

Traffic congestion management

The park management plan puts an 800 vehicles per day strict limit on vehicle access to the park, but the current vehicle access levels at peak periods are two to three times higher than the acceptable limit established in the park management plan.

Management of vehicles within the park is the biggest visitor problem for the park, affecting both visitor safety and enjoyment, and it is concerning that it has taken until now to focus on the issue.

As the United State National Parks Service states '*As visits to national parks continue to increase, some parks suffer from the increased use of private automobiles: traffic congestion, parking problems, exhaust and noise pollution. The resource suffers, and the visitor experience is diminished*' in the case of Wilsons Prom, the impact of increased car use is also impacting native wildlife through collisions causing death or injury also.

There is a clear need to assess the shuttle bus program that has operated over the summer months previously, (to Mount Oberon car park and we believe Squeaky Beach), and to extend it to other key locations to support visitors in their use of the park. This would alleviate the current and future stresses personal vehicle use is having on the park, especially on wildlife, park values and visitor safety and amenity.

A shuttle bus system could pick up park visitors outside of the park where they leave their vehicles and would drop them at visitor nodes such as at Tidal River, Darby River, Squeaky Beach, Picnic Bay and other key locations. We understand that some areas don't have adequate access for a bus to turn around currently, however we believe smaller 'bus stops' or turn around points, if necessary, could be less impactful to park values than creating larger car parks elsewhere.

A shuttle bus system is a commonly used management option in Protected Areas across the world. Including a very successful program at Cradle Mountain-Lake St Clair National Park in Tasmania managed by the Tasmania Parks & Wildlife Service.

The planned predator proof fence being built across the isthmus will lead to an increase in small mammal and wildlife numbers within the park. There is a need to reduce the travel load on roads within the park to avoid unnecessary harm and death of these animals through collision with personal car use. A shuttle bus would reduce this risk for local wildlife by reducing the traffic load on park roads.

Clearing of further native vegetation to increase car parking facilities instead of a shuttle bus program is an unacceptable management outcome.

Park interpretation

Providing interpretation that is clear, concise and understandable to the public can help with visitor enjoyment, and visitor understanding of the need for park regulations. This brings about visitor co-operation in park management, and can greatly reduce management costs.

Good interpretation and education programs encourage visitors to understand why we have protected areas such as national parks, the values that are being protected, and how they can help protect these values.

In this regard, the Parks Victoria website is clunky and generally lacks specific information on its parks and reserves. Specialised reports, management plans, studies and maps for the park should be publicly accessible through the Parks Victoria website to allow a deeper understanding of the park. These are public documents for a reason, and should be made available to the public through the website.

The lack of proper planning process, as required under the National Parks Act 1975, which the Park is managed.

The 10km predator-proof fence is within the current park management plan and has been since 2002.

It is unclear why Parks Victoria has included the predator-proof fence as part of this consultation, as the project is funded, and hopefully underway. There is also very little information about the fence offered to the public in this current 'consultation'.

Park planning is done through park management plans, in accord with the National Parks Act 1975. The information provided on the Engage Victoria website is brief, seriously inadequate, and effectively downplays the importance of thorough park management planning. That this should be seen as appropriate consultation for one of the oldest, most valuable and most loved of Victoria's parks does little credit to Parks Victoria.

We urge that current proposals for infrastructure at the Prom be consistent with the current management plan for the park as required by the National Parks Act 1975, and that any future review of the management plan should follow a thorough and proper consultation and planning process.

Other notes

The proposed three accommodation units outside the northern park boundary is generally welcomed, however the lack of information presented is of concern and does not allow the public to understand the proposal fully.

If you seek further information please contact Jordan Crook, Nature Campaigner, jordan@vnpa.org.au or 0401635573