



Wilsons Prom at sunset, ZAC PORTER

SUBMISSION TO

Wilsons Promontory Revitalisation #2

Wilsons Promontory draft designs survey – visitor area, accommodation and park interpretation

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Thank you for the opportunity to provide feedback on the second round of Wilsons Promontory Revitalisation surveys for the Wilsons Promontory draft designs survey.

The Victorian National Parks Association (VNPA) is an independent member-based organisation, working to improve protection of Victoria's biodiversity and natural areas, across land and sea. VNPA has been actively working to protect Victoria's biodiversity for 70 years.

Visitor area

VNPA is concerned about the overall lack of detail in the Wilsons Promontory draft designs survey on the Engage Victoria website. For example, it is unclear how many existing trees will be removed or retained, this is highlighted in *Table 2 Tidal River Precincts* under 'natural vegetation' stating that Parks Victoria must *Maintain or restore native vegetation* in the precinct.

Access to improved park-related interpretation regarding nature, the geology and indigenous knowledge of Wilsons Prom was highlighted by the public as a much-needed aspect of the visitor centre in the Consultation Summary Report (July 2022). These concerns are not reflected in the Engage Victoria website nor the design of the visitor centre.

Many of the submissions (including VNPA's submission to the 2022 Prom Revitalisation survey) highlighted the need to reduce car pressure on the Prom by using shuttle buses to move people in and around the park. The existing layout and design of the visitor area at Tidal River does not incorporate any infrastructure for this, such as a pickup and drop off area, or ramped areas for those with a disability to access a shuttle bus.

The lack of planning of the Tidal River visitor area in incorporating shuttle buses is quite concerning. Shuttle buses are an effective management tool for both reducing car movements and the clearing of precious native vegetation for the installation of car parks. This strategy also reduces the impact of car movement on the increasing native wildlife population that will result from the investment in predator proof infrastructure.

Parks Victoria should be commended for including a 'changing places' facility in the upgraded visitor areas.

We would like to see the buildings remain within existing building footprint, and not result in the loss of existing mature trees within the proposed development site. VNPA would also like to see the inclusion of shuttle bus infrastructure incorporated into the planning of future upgrades at the Prom.



Accommodation

Although the survey has a question about accommodation, little to no information, or proposals, have been put forth by Parks Victoria in the form of mapping, net area of native vegetation to be lost, number of beds in the accommodation. The planning of future increased accommodation must align with the parks management plan (such as the number cap).

Here we emphasise the need to place such accommodation on private land outside of the national park. The conversion of existing glamping tents to built cabins is an example of infrastructure creep and is unacceptable.

From the small amount of information provided by Parks Victoria, it shows that all new accommodation will be constructed within the park, except:

- Just inside the gate (in the north of the park, but is unclear if in the park or rented private land)
- Shipwreck (Tidal River, north of the visitor centre and existing cabins) designed for universal access, and
- Wilderness retreat tents (eastern Tidal River).

We note the Management Strategy 5.3 Amenity (p. 33 onward) in the Park Management Plan notes that 'Development proposals for the park, particularly in the Recreation Zones at Tidal River and the lightstation, must take account of the inherent ecological constraints.'.

The proposal by Parks Victoria to increase accommodation within the park goes against management strategies outlined in section 5.3 (amenity), including the following;

- Maintain the 800 day-visitor vehicle per day limit for the park
- Protect and maintain the natural setting of the park entrance
- Limit the overall capacity of camping and accommodation facilities to 4000 visitors (as outlined in table 5), maintaining the relative proportions of camping and roofed accommodation (Tidal River Recreation Zone).

In line with the park's management plan, VNPA don't want to see any increase in total accommodation numbers and cabins within the park, consistent with plan's considered cap on visitor numbers. With the proposed increase in park visitor and overnight accommodation numbers it is unclear how Parks Victoria have met their obligations to cap numbers under the management plan.

As the management plan states in section 5.5 (overnight accommodation): "Any increase in the capacity of built accommodation would place pressures on infrastructure and environmental amenity'.

Learning about Wilsons Prom

Increased interpretive signage and park information is warranted across the whole parks estate and helps parks users understand park regulations and rational behind them and connecting to the parks natural and cultural heritage.

The visitor centre at Tidal River was once a renowned site for park interpretation. We have attached an article from 1984 *Putting the Visitor First: Displays in Victoria's National Parks* by the then National Parks Service.

The article outlines how the high value interpretive set up that was once at Tidal River has since dwindled to very minimal educational interpretation at the centre. This has been highlighted by park users as a much needed improvement — as shown in the summary report: "There was also strong appetite for learning about conservation, the national park, marine park and Sanctuary. (P.9, Consultation Summary Report)'.

This has since dropped off at Wilsons Prom with very little accessible interpretive signage available for the public to better learn about their park.

A simple renaming of the Tidal River Information Centre to 'Information and Education' can help set the tone for the centre, and engage the public in a more meaningful manner.

Interpretation is pivotal to clearly communicate the biological importance of the plants, animals, fungi and geology that makes Wilsons Prom such an important and amazing place. It is also critical to communicate the cultural heritage of the site – from the profound connections of Indigenous peoples to the Prom, to the long-run efforts to protect the Prom by early conservation groups such as the Field Naturalists, Bird Observers and VNPA.

Parks Victoria need to listen to park users and stakeholders and improve the interpretation resources at Wilsons Prom for children and adults for now and into the future.

Extra note

The use of shuttle bus stations would allow Parks Victoria to avoid and minimise vehicular impact on native vegetation, reduce roadkill of native wildlife as well as better manage visitor numbers and experiences.

Any loss of native vegetation would be an unnecessary and unacceptable outcome of erratic park funding. Funding would be directed to better management of park values such as; pest control, erosion control or increased biosecurity measures (such as foot washing stations to combat Phytophora invasion).

Parks Victoria must demonstrate how it has avoided and minimised the loss of native vegetation in planning for new accommodation, as well as meeting the management strategies of the parks management plan prior to releasing further information on the proposed new built accommodation.

Link to Engage Victoria's survey - https://engage.vic.gov.au/project/wilsons-prom/survey/3905#sub-nav