



8 June 2023

Planning Department
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Re: Objection to Planning Permit Application 210357, 115 Kitty Millers Bay Road, Ventnor

To the Planning Manager,

The National Trust of Australia (Victoria), in association with our Bass Coast Branch would like to object to the above planning application for the development of group accommodation for an eco-tourism retreat. We believe this permit would result in the disturbance of the state significant Phillip Island Western and Southern Coast landscape including an endangered Ecological Vegetation Class (Swamp Scrub, Gippsland Plain).

The National Trust of Australia (Victoria) (National Trust) is the state's largest community-based heritage advocacy organisation actively working towards conserving and protecting our heritage for future generations to enjoy, representing more than 40,000 members and supporters across Victoria.

As Victoria's premier heritage and conservation organisation, the National Trust has an interest in ensuring that a wide range of natural, cultural, social, and Indigenous heritage values are protected and respected, contributing to strong, vibrant, and prosperous communities. The Bass Coast Branch is the National Trust's voice in the region and works with the community on local heritage issues.

The National Trust of Australia (Victoria) has classified the Southern Coastline of Phillip Island (L10076) as a place of national significance for scientific and social reasons, and of state significance for aesthetic and historical reasons. This classification includes Swan Lake which receives inflows from the 115 Kitty Millers Bay Rd wetland through the Swan Lake Drain. As such it is our submission that the proposed development upstream would have an adverse impact on the natural significance of Swan Lake and the Phillip Island Nature Park.

Furthermore, the south-western section of the property at 115 Kitty Millers Bay Rd is currently being considered in the boundary of the Phillip Island Western and Southern Coast state significant landscape for the Bass Coast Distinctive Areas and Landscapes Statement of Planning Policy. This will most likely result in Planning Scheme Amendments for the protection over that portion of the property which should be taken into consideration for the current Planning Permit Application.

Environmental Impacts

The artificially created lagoons on the property are connected to Swan Lake (which forms part of the significant Phillip Island Nature Park). Any works that occur at 115 Kitty Millers Bay Rd wetlands will have an impact downstream on the health of the ecosystem at Swan Lake and surrounds. The proposed environmental rehabilitation works are planned for only the north west corner of the property where the resort is located. This project is staged however, there is no information about the rehabilitation plans for the southern portion of the property and there is no guarantee this section won't be neglected and the only maintained areas will be those which visitors have access to or can view. The National Trust has two major concerns for the environmental impacts of this project.

Firstly, the disturbance caused by major earth works to deepen the wetland is completely unnecessary from an environmental perspective and there is not enough evidence in the Planning Report that this will assist with the rehabilitation process. The major reason for deepening the wetland would be to create a pool and allow for recreational activities for visitors and not for the benefit of the local environment. The National Trust believes that major earthworks should only be undertaken for conservation reasons as any changes to the current wetland system will change the flow into Swan Lake, will likely increase salinity, pollutants and also expose hydrogen sulphide from the soil which could lead to sulphuric acid oxidization which would have terrible consequences on the ecosystem (Agricultural Impact Study).

The second concern is that Phillip Island Nature Park and Swan Lake are important habitat sites for many native fauna species, in particular migratory birds such as the Short-tailed Shearwaters (*Ardenna tenuirostris*) which begin their migration to the northern hemisphere around mid-April and get disorientated by artificial lights which results in an increase in roadkill.

Due to this, it is important to keep light pollution around the Southern Coast to a minimum. A resort accommodating up to 100 people will increase traffic and light pollution in this area not just from visitors but also during the construction phase. The proximity of the proposed resort to Swan Lake and its birdlife is therefore problematic.

Tourism and Farming Zone

While the Agricultural Impact Study states that the property is not viable for agricultural use, it does not mean the land cannot be rehabilitated and used for regenerative farming. The report only considers viability in terms of standard and traditional farming practices.

Additionally, land protected by the Farming Zone provides other valued benefits to the Phillip Island community such as the landscape views of the rural countryside which are important features of Phillip Island's history.

This property in particular has a history of community members participating in revegetation volunteer work through Landcare and other conservation organisations. While it is commendable that the developer intends to restore the wetlands, this restoration would not serve the local community but rather be exclusive to visitors.

In summary, we object to the application on the basis that the proposal would adversely impact the natural significance of the Southern Coastline of Phillip Island and the delicate and threatened ecosystem that it supports and that a tourism resort is not an appropriate use of land in a Farming Zone. Should you require any clarification on our position, I welcome you to contact me at jelena.ljubisic@nattrust.com.au or on 9656 9842.

Yours faithfully,

Jelena Ljubisic
Environmental Heritage Advocate
National Trust of Australia (Victoria)

CC: Mr Ross Lloyd, President, Bass Coast Branch, National Trust of Australia (Victoria)