



**THE GREAT OCEAN ROAD (GOR) ACTION PLAN
RESPONSE FROM THE AIREYS INLET AND DISTRICT ASSOCIATION (AIDA)**

(NB All recommendations are coloured blue)

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Foreword

Rather than continue without a proper strategy and with too many organisations involved in making uncoordinated decisions concerning the Great Ocean Road (GOR), the establishment of the Taskforce and the Government's response through the creation of the Action Plan represent a real opportunity; an opportunity not only to protect the local environment, the sea and landscapes and the local character/way of life, but also to ensure that tourism becomes part of the solution to developmental problems rather than the problem. But this will only happen if it is recognised that simply increasing tourist numbers will inevitably lead to spoiling the very characteristics of the GOR that attract tourists in the first place.

This reality needs to be accepted, before the Action Plan is implemented, because controls and limitations on numbers will inevitably be required. Timing of these decisions will be sensitive but crucial. The opportunity not to make the same mistakes that have been made across the globe, and to create a visitor experience which is unique, and that will last the test of time, is now possible. AIDA is willing to do everything in its power, including working with the local community, to ensure the best possible outcome.

Charlotte Allen

President

Aireys Inlet and District Association

Background on AIDA

1. AIDA is a voluntary organisation devoted to preserving the natural environment and character of the area of the Surf Coast that lies between Eastern View and Urquhart Bluff, including the coastal communities of Eastern View, Moggs Creek, Fairhaven and Aireys Inlet. AIDA members include ratepayers, residents, their families and others who share a love of our district. Our membership averages 400-450.
2. Over the more than fifty years of AIDA's existence, the community has displayed remarkable constancy of opinion on the importance of the preservation of our natural environment and the desirability of retaining and conserving the special rural-coastal character of our settlements and their environs. In response to this robust and consistent community feedback, the Surfcoast Shire Council has developed planning tools such as local provisions and neighbourhood character overlays, which in conjunction with current zoning regulations, has largely, but not wholly, protected the existing low-key character of our residential communities and two small commercial zones, and preserved views of the pristine environment, which is of great tourism and heritage value.

Introduction

3. AIDA believes that the development of any strategy regarding the management of tourism along the GOR must consider the strong support for preserving our natural coastal environment demonstrated by residents, ratepayers and visitors to our area, and equally consider their significant aversion to increased infrastructure. AIDA also believes that encouraging tourism by providing increased infrastructure will not necessarily add to the economy of the GOR region, but risk degrading its landscape and threatening its value as a tourist destination. AIDA also agrees that attracting fewer tourists but for them to stay longer, particularly in the 'off-seasons', would probably provide much greater benefit to the local communities.
4. Whilst AIDA welcomed the establishment of the Task Force, supports many of its recommendations and agrees in large part with the Action Plan, we have some concerns regarding the underlying assumptions upon which some of the propositions are based; the absence of strategies grounded firmly on evidence; some seemingly incompatible objectives and the lack of recognition that local environments and communities on the GOR region are different and unique – one size does not fit all.
5. It is fitting to note that at the launch on 13 April 2018 of the Victoria Tourism Industry Council (VTIC) *Tourism is Victoria's Business*, VTIC's CEO, Felicia Mariani, said, "The Great Ocean Road is our single biggest tourism attraction, but it is operating at the edge of capacity – it's being loved to death. Proper investment is needed to improve safety on the Great Ocean Road, disperse our visitors across the area, encourage tourists to stay longer and spend more in the region, and most importantly, ensure this beautiful natural asset is maintained for generations to come". These are hardly reassuring words with respect to increasing tourist numbers along the GOR from the CEO of an organisation which represents the tourist industry and advocates for increased tourism to Victoria and, in particular, the regions.

Starting Point

6. Whilst AIDA is pleased that the Taskforce report and the Government's response acknowledges the importance of "sustainable tourism", one problem is that the concept means different things to different people and could represent more "motherhood" than an actual strategy. **There needs to be agreement by all stakeholders of what comprises "sustainable tourism"** so that everyone is on the same page. Perhaps as a starting point we could use the definition adopted by the United Nations World Tourism Organization (UNWTO) which has also been adopted by UNESCO: "Sustainable tourism development meets the needs of present tourists and host regions while protecting and enhancing opportunity for the future. It is envisaged as leading to management of all resources in such a way that economic, social, and aesthetic needs can be fulfilled while maintaining cultural integrity, essential ecological processes, biological diversity, and life support system."

Need for Evidence-Based Strategy

7. One underlying assumption that requires much **more analysis is that the economy will automatically benefit by increased numbers of tourists**. A significant body of research indicates that unless controlled, tourism can lead to serious environmental, cultural and economic damage. Academics researching the impact of tourism express considerable doubt as to whether mass tourism can ever be sustainable (for example see "Why tourism mobility behaviours must change" in Scott A. Cohen, James E.S. Higham, Gossling Stefan, Paul Peeters (Editors), *Understanding and Governing Sustainable Tourism Mobility: Psychological and Behavioural Approaches*, Routledge, London, (2014)). Increasing the numbers of tourists does not build a sustainable tourism industry and the UN's 'Sustainable Tourism Strategy' is very clear about this. The issues raised in this paragraph need to be addressed in the implementation of the Action Plan.
8. As well as the publicity given to the bad experience of mass tourism, particularly in Europe, there is considerable evidence that the full costs of tourism are not widely known or understood. The book, *Destinations at Risk: The Invisible Burden of Tourism* by Megan Epler Wood, Mark Milstein, and Kathleen Ahamed-Broadhurst (the Travel Foundation, Cornell University; Epler Wood International (2019)) states, "Local capacity to manage the ballooning costs of tourists is hindered by a lack of quality analysis that accounts for the cost of managing each tourist on local municipal ledgers. This invisible set of local budgetary obligations is placing destinations in a position of financing additional required infrastructure for energy, waste, waste water and the protection of natural and cultural resources, without recompense from the tourism economy. These costs lower the economic benefits of tourism and are not recognized in international and local economic impact analyses. A new net economic benefit basis for destination tourism accounting is required in order to capture this invisible burden, together with a bold plan for preserving tourism's valuable assets. A wide range of new talent will be required to safeguard invaluable global heritage, life-giving natural capital, and essential social and community resources". These comments certainly apply to tourism and the GOR. **Before implementation of the Action Plan, AIDA believes a full analysis of the "invisible burden" of tourism on the GOR should be undertaken.**

9. There is also considerable research into the deleterious interaction between tourism and climate change, which is a fundamental issue for coastal areas such as the GOR (for example Gossling, S.; Hall, M.; Peeters, P.; Scott, D. (2010), "The future of tourism: can tourism growth and climate policy be reconciled? A mitigation perspective", *Tourism Recreation Research* 35 (2): 119–130). Again, **the impact of climate change on tourism and the impact of tourism on climate change along the GOR deserves further consideration.**
10. In *Tourism Development and the Environment: Beyond Sustainability?* (Earthscan, London 2009), Richard Sharpley states "... each and every tourism destination is unique in terms of its environmental, political, economic and socio-cultural characteristics, as well as in terms of the scale, scope, nature and stage of development of its tourism sector. By implication, each destination has a unique set of developmental needs that tourism may or may not be able to address." In this light, AIDA submits **that in the implementation of the Action Plan it needs to be recognised that the GOR is not one tourist site but a large number with different characteristics and needs.**

Need for Controls and Limitations on Tourism

11. Given the issues raised above, AIDA believes **it is imperative that before the Action Plan is implemented there be a thorough analysis of the plentiful examples from overseas of visitor numbers being controlled**, rather than assuming – as stated in the Taskforce terms of reference - that the final objective is to increase tourism expenditure, investment and the take from the tourist dollar. Many popular tourist destinations limit visitor numbers through measures such as tolls (Torndirrup National Park near Albany WA and Yosemite National Park in the US), the need to book in advance (Alhambra, Granada), increased taxes on accommodation (Venice) (there is a proposal to introduce this measure in Queenstown, NZ), higher fees to enter tourist sites (e.g. Barcelona, Phillip Island) and a range of other approaches.
12. A major constraint to increasing tourist numbers is that much of the GOR is nestled between the ocean and the National and Forest Parks of the hinterland. Any expansion of car and long vehicle parking and hotel, motel and caravan park accommodation on the GOR has a very high likelihood of degrading the natural environment and spoiling the iconic views that are the greatest draw cards of the GOR region. More needs to be done to stop parking in inappropriate places including on the verges of the GOR and in No Parking areas, both for safety and environmental reasons. Car parks, especially at look out points, should be designed to be not visible from the GOR, and hence not compromise the views. New sites for development of large-scale infrastructure in townships are almost absent and, in any case, are limited in the hinterland unless undesirable incursion into national parks is permitted. Even sites in the hinterland would have to be well shielded to avoid spoiling the environmental values, and the effect on residents of streams of vehicles travelling between these sites and the GOR would have to be carefully considered. We make some recommendations concerning these issues below.
13. A second major constraint is the severe lack of exit routes from the Surf Coast in times of bush fire emergency, or even just on code red days, when people are urged to leave the area. Encouraging increased numbers of vehicles, and particularly long vehicles, into the area would greatly exacerbate this problem.

Consultation Required Before Action

14. AIDA believes that the Taskforce terms of reference were inherently contradictory, seeking to both "boost tourism expenditure and investment along the Great Ocean Road [and] better support local communities to benefit from the visitation economy" and to "maintain appropriate environmental and landscape protections". Nevertheless, whether local communities are indeed supported in the Action Plan will depend on whether all decisions which impact in any way on the GOR and its environs are preceded by transparent, honest, comprehensive and genuine consultation with all local communities along the GOR. In any such consultations all participants must recognise that the term "benefit" should refer not only to economic benefit, but also to social and environmental benefits. **Membership of the Great Ocean Road Coast and Parks Authority should include representatives of local communities whilst the Great Ocean Road Strategic Framework Plan should properly reflect the views of all local communities in the region.**
15. **The Capacity Analysis referred to under Action 14 of the Action Plan should also involve very close consultation.** AIDA is concerned that under the Action Plan there is scant regard for the actions which would follow should such an analysis show that the GOR is already at capacity. We believe that at certain times this is presently the case.
16. The Action Plan seems to place emphasis on building more or "better" infrastructure rather than controlling and/or limiting numbers and/or extracting more income from fewer numbers of tourists. **In the implementation of the Action Plan it needs to be recognised that the local community in the Aireys Inlet area sees "increasing the economic benefit to local communities" as a very much lower level priority, well below protecting the environment, sea and landscape, local character and life style.** AIDA believes that the views of our community would be shared by most if not all of the communities along the GOR.

Environmental/Social Impact Assessment Required Before Action

17. **AIDA also requests that an independent environmental and social impact statement be prepared and made public before there is any consideration of boosting tourism expenditure or for any major tourism infrastructure.** This could investigate ways of supporting local communities to benefit from the visitor economy and maintaining landscape, environmental protections, local character and lifestyle. A wide selection of professionals could contribute including anthropologists, geographers, planners, geologists, engineers, social scientists, etc.

Limitation of New Road Infrastructure along the GOR

18. AIDA believes that avoiding major development of road infrastructure is crucial to preserving the natural environment and character of the GOR. It will therefore be necessary to mitigate traffic demand along the GOR. This could be achieved by:
 - a) **Retaining the two-lane character of the GOR and not widening it;**
 - b) **Promoting the inland route as the "fast route" and the GOR as the "slow route";**
 - c) **Creating completely new, alternative tourism-related developments and economic growth from the whole Princess Highway to, but not including, the GOR;**
 - d) **Not allowing any additional tourist accommodation, resorts, hotels, camping grounds or other major tourist attractions on the GOR itself or between the GOR and the ocean. With local community support, such building should be**

encouraged in the inland townships allowing visitors to have a range of accommodation choices and travel to the coast from them;

- e) **Creating an Electronic Permit System for all drivers of vehicles planning to travel the Great Ocean Road with fees of zero for residents/local businesses but steadily increasing as per the load capacity of the vehicle. Proceeds from the permits system should be placed in a fund administered by the Great Ocean Road Authority and used solely for maintaining public infrastructure on the GOR;**
- f) **Issuing pre-travel parking permits for all buses travelling the GOR with set times and places where they can park with hefty fines for breaches;**
- g) **Dissuading many of the buses and large vehicles from directly using the Great Ocean Road through a permit system.**

Reducing Risk on the GOR

- 19. AIDA has serious concerns about road safety on the GOR and the possibility of major blockages, particularly when there is a high risk of fires but also when emergency vehicles are using the Road. AIDA asks that in implementing the Action Plan due consideration should be given to prohibiting tourists from entering the GOR during days of Extreme Fire Danger and Code Red. Most of those who live on the coast, or have holiday homes there, have a fire plan for these days and for many it is to leave, and leave early, as recommended by the CFA. It is irrational and frightening to see cars, buses and minivans full of tourists travelling down the GOR Ocean heading to the Twelve Apostles on these days while the locals, following their fire plan and advice of the CFA, are leaving the area and heading towards Geelong. It seems that the potentially significant risks involved in the current practice have not been considered.
- 20. In summary AIDA believes:
 - a) **All tourists should be banned from entering the GOR when there is extreme fire danger and/or there is a Code Red fire warning on any part of the road;**
 - b) **That in all built-up areas apart from the GOR speed limits be reduced to 40kph;**
 - c) **Testing/training of all overseas drivers (perhaps for all Victoria) should be introduced before they can hire cars/buses.**

Tourism in Aireys Inlet and District

- 21. AIDA does not want to give the impression that it is against tourism per se. However, like many areas along the GOR, the coastal communities of Eastern View, Fairhaven, Moggs Creek and Aireys Inlet have limited capacity to accommodate more tourist traffic without degrading the natural environment and diminishing the experience for residents and tourists alike.
- 22. **AIDA believes that the most valuable contribution our district can make is to eschew significant new development and to offer a sustainable “nature-based/eco/slow tourism” experience.** Aireys Inlet and the surrounding district have all the attributes required to attract visitors for a multi-day holiday, not in the summer season when the area is crowded and accommodation fully booked, but throughout the rest of the year when the area remains exquisitely beautiful, but accommodation is plentiful, and facilities are underused.

23. One of AIDA's major aims has long been to promote Aireys Inlet as a destination for nature-based and cultural tourism that offers a variety of walking/cycling experiences including our beaches, cliff platforms, wetlands, estuary and river, and bush trails in the National and Forest Parks of the hinterland. To this end AIDA has been very active in promoting the development and maintenance of a network of walking paths and unsealed shared roadways that link all parts of the township to the coastal and hinterland walking trails. Add to this menu of walks a variety of other activities – lighthouse tours, rock pooling, canoeing on the Painkalac Creek and on the inlet, horse riding, and if desired, day trips to Lorne or to Anglesea, Bells Beach, Jan Juc or Torquay using the V-Line buses that pass through Aireys Inlet in both directions several times a day. The township offers an iconic pub and a variety of restaurants and cafes, and accommodation ranging from the motel to bed and breakfast establishments, cabins in the caravan park and rental units and houses, again all within walking distance. All this without any need for a car.
24. AIDA's strategy is in line with that of the Victorian Tourism Industry Council (VTIC) and of Tourism Victoria. "Investment in nature-based assets is seen as crucial to our future", stated Felicia Mariani, CEO of the Victorian Tourism Industry Council, at the 2019 VTIC Visitor Economy Briefing - 26 February, Melbourne.

Tourism Infrastructure in Aireys Inlet and District

25. AIDA's history of involvement in tourist infrastructure has provided lessons as to the danger of immediately resorting to engineered solutions and to actual construction of infrastructure to solve problems arising from increased tourist numbers. The lighthouse precinct of Aireys Inlet suffered many years of increasing congestion with cars, buses, caravans and camper vans, leading to the perception that much more parking needed to be provided, particularly for long vehicles. In fact, after 15 years of consultants' reports, community activism and collaboration with local councillors and the shire's planning and infrastructure departments, the solution (at least for a period) turned out to lie in improved traffic management, and in implementation of revised directional and regulatory signage on the GOR. Whilst that solution has worked for several years, increasing tourist traffic, failure to obey signage and lack of policing has meant that additional measures are now required. This is a typical problem of increasing tourist numbers where one solution to the problem has a limited life and where pressure is then applied to construct additional infrastructure which detracts from the natural environment and decreases the value of the tourist experience.
26. AIDA and community members have also raised concerns over recent activities and non-compliance and lack of enforcement of various planning controls in the Painkalac Valley. The valley is of historical and cultural significance (both from an indigenous and white settlement perspective) and is environmentally sensitive with extensive wetlands supporting what is an important location for indigenous flora and fauna. The valley could become an important walking and observation area for nature tourism but is facing serious degradation.
27. AIDA believes that, other than the items listed below, the development of sustainable tourism in our area would not require any major infrastructure changes in our area.

Relocation of the Memorial Arch

28. The Memorial Arch at Eastern View, first constructed in 1939, has been replaced several times. It is one of the area's best recognised historic landmarks. The Arch is on VicRoads land in a very fragile environment adjacent to sand dunes close to the GOR and without public facilities nor room for the growing numbers of tourists and large buses. Unfortunately, some visitors are using the local surrounds as toilets, creating health and environmental concerns. GOR traffic is also routinely disrupted and endangered by bus tourists queueing in the middle of the road to take turns photographing their friends standing beneath the arch. **The Memorial Arch and associated statues also face severe degradation in the longer term and should be relocated to a less fragile site with adequate car parking and toilet facilities which properly reflects their importance.** The ideal location would be on the GOR (perhaps near the Chocolaterie) between Bellbrae and Anglesea, where there would be no impact on the coast and coastal views. Large panoramas and audio-visual displays with detailed explanations of the Arch's historical significance could be established to turn the Arch into a major attraction which properly respects the history of the GOR and those who sacrificed so much in its construction. There could also be commercial opportunities associated with the new site.

Walking and Cycling

29. Within the Aireys Inlet district, **priority should be given to walking and cycling over motor vehicles**, with Aireys Inlet being promoted as 'The Walking and Cycling Town'. Ways of achieving this goal, following community consultation, would include:
- a) **Implementing a 40kph speed limit, except for the GOR itself, throughout the township and in Fairhaven, Moggs Creek and Eastern View;**
 - b) **Not sealing any more roads and classifying all roads, except for the Great Ocean Road, as shared for vehicles, pedestrians and cyclists;**
 - c) **Implementing traffic calming measures, including road narrowing, constructing bends and chicanes (particularly on long stretches of roads) and beautifying streetscapes,**
 - d) **Establishing walking/cycling precincts and limiting vehicles in certain areas to those of residents and their guests;**
 - g) **Implementing the various planning controls, planning policies and Conservation Management Plan that covers the three lots on the Painkalac Valley floor so as to ensure that the Valley becomes a notable eco-tourist site (see immediately below);**
 - h) **Adding to the variety of excellent walking experiences available in our area by constructing the *Walking the Painkalac* pathway, proposed to include trail loops in the lower and upper sections of the Painkalac Valley on land owned or managed by the Surf Coast Shire Council;**
 - i) **Integrating *Walking the Painkalac* into other trails such as the Lighthouse Trail, which leads from the bottom shops to the lighthouse and takes in scenic coastal views;**
 - j) **Designation, marking and improvement of inland tracks to create mountain and other bike tracks that link Anglesea, Aireys Inlet and Lorne.**
 - k) **Implementing the link as proposed by the Federal Government for a coastal cycling and walking trail from Geelong to Adelaide.**

Car/Bus Parking

30. Construction of more car/bus parking detracts from the local environment and, particularly in the case of large buses (i.e. those carrying more than 13 passengers), encourages pass-through tourism with no benefit but only cost to the local community. Although some new car parking may be required in our area in the future, **AIDA does not believe that additional bus parking should be made available in Aireys Inlet.**

Public Toilets

31. There are clearly not enough public toilets for the number of tourists visiting the GOR (and AIDA is concerned as indicated above that many people are using the bushland, in particular near the Memorial Arch, as toilets). We are also concerned that the local community is paying the price through the damage to the environment and lack of amenity. The local community should also not have to foot the bill for the construction and maintenance of such toilets. AIDA proposes that:

- a) **Additional public toilets could be constructed at the Community Centre, Aireys Inlet;**
- b) **No public toilets should be constructed at the existing site of the Memorial Arch, but toilet blocks suitable for busloads of passengers should be provided at the newly proposed site for the Memorial Arch (see above);**
- c) **All public toilets could require payment for their use, the proceeds of which should be used for their upkeep.**