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Mr Warren Groves Northern Grampians Shire Council PO BOX 580 STAWELL VIC 3380

Dear Mr Groves,

Re: Northern Grampians Planning Scheme Amendment C54

The National Trust of Australia (Victoria) thanks you for the opportunity to respond to Amendment C54 and the proposed review of the Municipal Strategic Statement (MSS).

The National Trust recognises the need to update and review all planning policy from time to time, however, we are concerned at the changes regarding heritage as a key objective and strategic aim in selected parts of Amendment C54.

Heritage recognition in the Northern Grampians Shire

'Northern Grampians Shire has an abundance of natural, cultural and historically significant sites. Recognition and preservation of the natural, spiritual, cultural and built forms including heritage buildings, monuments, streetscapes and precincts is important for conservation of the Shire's heritage. The protection of sites and precincts of historic, cultural and natural significance and identification and assessment of the heritage assets of the Shire are important issues', as stated in the current (2006) MSS at clause 21.11. The National Trust endorses this statement and are pleased to see this statement is retained verbatim in the proposed clause 21.04.

The existing clause 21.11 (2006) states that the key strategic issues in the shire for heritage are:

- Protection of sites and precincts of historic, cultural and natural significance
- The identification and assessment of the heritage assets of the Shire is incomplete

These objectives have not been translated into clause 21.04-3 in the new MSS.

Currently there are only 32 places included within Heritage Overlays in the Northern Grampians Planning Scheme, 18 of which are included as they are on the Victorian Heritage Register. A design Development Overlay covering Napier Street, St Arnaud, has some heritage provisions within its requirements. Further to this, the National Trust maintains a Heritage Register of significant places, including buildings, landscapes and trees. Within the Northern Grampians Shire, the National Trust maintains 80 location files, a number much greater than the 32 currently recognised by council. Of this 80, we have classified:

- 11 buildings of State significance
- 1 landscape of National significance
- 2 trees of State significance

More than ten years ago, in 2004, the Northern Grampians Heritage Study Stage 2 was completed. The study assessed 1,415 places identified in the Stage 1 study and resulted in 1,015 places being documented. 10 heritage precincts were recommended for inclusion in the Northern Grampians Planning Scheme. The study was adopted by the Northern Grampians Shire Council. Despite multiple recommendations that this occur, an Amendment to the Heritage Overlay did not proceed. The National Trust submits that this is a necessary and urgent objective for the Council.

Clause 21.02-8 Implementation, Clause 21.04-4 Implementation, and Clause 21.06-6 Implementation should both add a commitment to:

Implement the recommendations of the Northern Grampians Heritage Study Stage 2 to protect and maintain the heritage of the Shire.

The implementation of the recommendations of the Northern Grampians Heritage Study Stage 2 should also be explicitly listed as a strategic goal in the proposed MSS at Clause 21.11 Further Strategic Work and Clause 21.06-6 Implementation for Economic Development.

Clause 21.02 Settlement

Heritage protection is not mentioned as an objective or strategy in clauses:

- 21.02-2 Shire wide objectives and strategies
- 21.02-3 Stawell
- 21.02-5 Halls Gap
- 21.02-6 Great Western

Clause 21.02-2 Shire wide objectives and strategies should include a strategy to:

Ensure any future development protects and enhances identified heritage buildings, streetscapes and places.

In particular, Clause 21.02-6 Great Western should include a strategy to: Ensure any future development protects and enhances identified heritage buildings, streetscapes and places.

Great Western was one of the heritage precincts recommended by the Stage 2 Heritage Study.

As mentioned earlier, Clause 21.02-8 Implementation should add a commitment to: Implement the recommendations of the Northern Grampians Heritage Study Stage 2 to protect and maintain the heritage of the Shire.

Clause 21.04 Heritage

- At Clause 21.04-3 Heritage, the National Trust fully supports Objective 1, which seeks: To conserve and protect sites and precincts of architectural, cultural and historical significance.
- At Clause 21.04-3 Heritage, Strategy 1.1 should be broadened to *Protect places and precincts of significance.*

At Clause 21.04-3 Heritage, Strategy 1.2 needs to be more strongly worded. It currently reads: Ensure that development on or neighbouring a site or precinct which is considered to have natural, archaeological, cultural or historic significance will give due consideration to the significance of the site.

Strategy 1.2 could be replaced with:

Ensure that development on or neighbouring a site or precinct which is considered to have natural, archaeological, cultural or historic significance will <u>not have a detrimental impact on the significance of the site.</u>

At Clause 21.04-3 Heritage, we submit that Strategy 1.3 should be reworded to avoid specifying St Arnaud, as heritage streetscapes across the Shire should be valued. A reworded form of Strategy 1.3 could read:

Ensure development of main streets recognises heritage values, and enhances the pedestrian experience.

As mentioned earlier, Clause 21.04-4 Implementation should add a commitment to: Implement the recommendations of the Northern Grampians Heritage Study Stage 2 to protect and maintain the heritage of the Shire.

Clause 21.04 Housing

Clause 21.05 Housing, under Objective 1, should add a strategy to: Protect and retain heritage places as a means of diversifying housing styles and preserving neighbourhood character.

Clause 21.06-5 Tourism

Heritage, in its broad sense including natural, cultural and built heritage places, underpins the tourism offering in the Shire, and this should be recognised in the MSS under Clause 21.06-5. Currently St Arnaud is the only town whereby it is identified that tourists are attracted to its (built) heritage values, but this should be broadened to recognise that heritage contributes to tourism across the whole Shire.

As mentioned earlier, Clause 21.06-6 Implementation should add a commitment to: Implement the recommendations of the Northern Grampians Heritage Study Stage 2 to protect and maintain the heritage of the Shire.

The National Trust appreciates the opportunity to comment on the proposed MSS. Should you have any queries regarding the above, please contact myself or Rosalind Mearns on 9656 9823.

Yours sincerely,

Anna Foley Acting Manager, Advocacy and Conservation