



1 February 2019

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**Re: Pyrenees Futures Public Exhibition—Lexton, Snake Valley and Waubra Township Framework Plans**

Dear Madam/Sir,

Thank you for providing an opportunity to comment on Pyrenees Futures Public Exhibition—Lexton, Snake Valley and Waubra Township Framework Plans.

The National Trust of Australia (Victoria) is state's largest community-based heritage advocacy organisation actively working towards conserving and protecting our heritage for future generations to enjoy, representing 16,000 members across Victoria. The National Trust maintains a Heritage Register of Significant Places, including buildings, landscapes, gardens and trees. Within the Pyrenees Shire we have classified 29 built heritage places, 2 gardens and 3 trees.

As Victoria's premier heritage and conservation organisation, the National Trust has an interest in ensuring that the wide range of natural, cultural, social and Indigenous heritage values of the municipality are protected and respected, contributing to strong, vibrant and prosperous communities.

The National Trust commends the Pyrenees Shire for progressing this strategic work, and for the holistic approach taken which encompasses place-making, urban design, population growth and climate change alongside the important natural, cultural and Indigenous heritage values of the region. The unique and diverse character of Lexton, Snake Valley and Waubra townships is well captured by the current plans, which demonstrates a meaningful engagement with local communities. The following submission provides feedback as these plans are finalised, while also focusing on details regarding the implementation of the recommended actions. Feedback in this submission might also be useful in the development of the next six plans (Beaufort, Avoca, Raglan, Amphitheatre, Landsborough and Moonambel).

The National Trust owns and manages Mooramong Homestead, (Mooramong Road, Skipton) which is within the Pyrenees Shire. We would be interested to work with the Shire on increasing local community and visitor engagement with the property. While we recognise that the actual township of Skipton is located in the neighbouring municipality of Corangamite, a connection to Mooramong could be included in the Beaufort or Avoca Township Framework Plans if appropriate. The National Trust welcomes building a relationship with the Pyrenees Shire through our Mooramong property.

We strongly encourage the Shire to work collaboratively with the City of Ballarat in the implementation measures of these Framework Plans, particularly where reference is given to

the inter-connection between particular townships and Ballarat. This is important in recognising that heritage values don't stop or start at municipal boundaries, and is an approach that the National Trust supports.

### **Aboriginal cultural heritage**

We encourage Pyrenees Shire to prioritise ongoing and meaningful consultation with the Traditional Owner groups of the region, including the Registered Aboriginal Parties Dja Dja Wurrung Clans Aboriginal Corporation, Wathaurung Aboriginal Corporation and Martang Pty Ltd. Budgets for strategic work, including implementation measures in these Framework Plans, should account for this consultation. We submit that meaningful engagement with Traditional Owner groups' should move beyond acknowledgement within these reports and in places, to the integration of voices, stories and knowledge from Traditional Owners across all aspects of the Shires urban design principles, place making, story-telling as well as the conservation and management of landscapes and townships. We highly recommend that the Shire make use of the *Australian Indigenous Design Charter* to guide and facilitate accurate and respectful representation of Aboriginal cultural heritage. This document could be referenced in the Framework Plans. It is available to view here:

<http://indigenousdesigncharter.com.au/australian-indigenous-design-charter/>.

We support the public art initiatives included in the report, acknowledging that such outcomes provide opportunities for heritage, including Aboriginal cultural heritage to be interpreted, celebrated and present cross the region.

We note a number of instances across the documentation when capitalisation has not been utilised for 'Indigenous' and 'Traditional Owner' and 'Country'. It is recommended that capitalisation occurs in every instance of using these terms.

### **Trees**

We are pleased that each report specifically addresses the challenges each region will face as a result of climate change, and that this is based on climate modelling completed for the broader Pyrenees Shire, *Future Landscapes* (Cunningham et al 2016). We are also pleased that the Shire specifically note the use of canopy trees, which will help mitigate heat in a warming climate.

The Pyrenees Shire should ensure that the species chosen for each township be consistent with the climate modelling for the region. This could be confirmed via a commissioned report based on the findings of the Shire's *Future Landscapes* report, through reference to the *Pyrenees Biodiversity Action Plan 2016* or referencing existing research on species choice in climate change. Useful references with regard to this are Dr Dave Kendal's research (Honorary, Ecosystem and Forest Sciences and BioSciences at the University of Melbourne); the Clean Air and Urban Landscapes Hub's *Risks to Australia's urban forest from climate change and urban heat, 2017* and *The City of Melbourne's Future Urban Forest: Identifying vulnerability to future temperatures* report, 2016. The National Trust encourages the Shire to make informed decisions about tree species and their appropriate range to ensure the resilience of trees in both the public and private realm.

Furthermore, reference to new landscaping in townships, both public and private, should encourage water sensitive urban design. We note that the City of Melbourne have published useful guides for municipalities and individuals, available at

<https://www.melbourne.vic.gov.au/building-and-development/sustainable-building/Pages/water-sensitive-urban-design.aspx>.

We also encourage the Shire, if they have not done so, to consult with the community regarding species selection, and any decision making process behind choices. In the experience of the National Trust many local communities have strong preferences for species, and any township's 'Species Guide' should accurately reflect this. Community consultation on tree species is also a useful to raise community awareness to the benefits of trees.

We support the high priority action in the Implementation Plan for Waubra with regard to tree protection in the Heritage Overlay to protect significant trees south of the war memorial. The National Trust would be pleased to advise the Shire on investigating a Significant Tree Register for implementation across the whole municipality. Many councils across Victoria have committed to protecting significant trees through statutory registers and the National Trust assists with and supports these initiatives.

### **Heritage places and studies**

The National Trust notes that the last heritage study completed in the Shire was the *Pyrenees Shire Heritage Precinct Study* (2001). Given the period since this study (18 years), this study may not be up to date, or adequately identify and protect the range of heritage places within the municipality or the community's expectations regarding the identification, protection and celebration of these places. We strongly recommend commissioning heritage studies for the Shire as part of each Framework Plan, and support the inclusion of the Implementation Plan for all Framework Plans. It would be useful for the Shire to familiarise themselves with the Heritage Council's 2012 *Municipal Heritage Strategy: A Guide for Councils* document in reviewing this important strategic work. Any new heritage study should also be undertaken in consultation with key stakeholders, local communities and Traditional Owner Groups.

We would encourage the prioritisation of heritage studies within the Shire, particularly given that townships such as Lexton currently have no heritage overlays in place, despite the presence of places worthy of inclusion. It is of concern to the National Trust that significant changes to or losses of heritage places may occur if this work is not prioritised.

We support actions in the Implementation Plan with reference to the encouragement of adaptive reuse of heritage places, recognising that use is the best form of conservation and community connection to the Shires heritage.

With regard to actions in the Implementation Plan that involve an event or form of celebration of a heritage value/place, we strongly encourage the Shire to engage in the National Trust's annual Heritage Festival. The festival is the largest annual community-driven festival, and provides an opportunity for the Shire to support the local community in celebrating their heritage places. To find out more about the festival please visit:

<https://www.nationaltrust.org.au/ahf/vic/>.

### **Significant Landscapes**

It is noted that the Pyrenees Shire does not make use of the Significant Landscape Overlay (SLO) as a form of protection for landscapes in the municipality. We submit that some actions in the Implementation Plan for each township could make good use of the SLO as a form of landscape protection, particular with regard to significant view lines from townships. The National Trust has long been involved in advocating for the protection of significant

landscapes. While the National Trust does not have any landscapes on our Heritage Register within the municipality, it is anticipated that there will be some places with high landscape value within the Shire that deserve protection. We attach with our submission a discussion paper on the use and application of the Significant Landscape Overlay in Victoria, developed for a 'Landscape Lab' we hosted in 2013. We would welcome further discussions with the Shire about the significant landscapes of the region.

We are pleased to see strong recognition of 'Dark Skies' as a feature of the Snake Valley Township Framework Plan. The National Trust supports acknowledging that astronomy, and its related landscapes, is a form of intangible cultural heritage. We strongly support actions in the Implementation Plan, including those in partnership with neighbouring municipalities, to protect this special characteristic of the township in the development of public and private land. We commend the Shire for being bold in focusing strategic attention to planning outcomes protecting the dark skies of Snake Valley.

### **Urban Design Guidelines**

We are pleased to see focused attention on urban design, particularly with regard to how that intersects with heritage places and landscapes. We suggest that a line could be added in this section, perhaps under both 'Town Centre' and 'Residential Areas' subheadings, to encourage design, material use and siting of new built form in response to the landscape.

We strongly support the Shire in discouraging fences that obscure views of places, and also significant view lines within landscapes. We recommend adding 'views to the surrounding landscape' with reference to fences in the Urban Design Guidelines. In the experience of the National Trust, fencing can be an issue difficult for municipality to control, particularly within significant landscapes and places included in the Heritage Overlay. This is in part due to the use of the Smart Planning permit system which has seen the unlawful demolition of a heritage wall in Portland (see *Portland Historic Building Restoration Committee Inc. v Glenelg SC (Red Dot) [2017] VCAT 519 (1 May 2017)*). The National Trust has also been involved in cases where a Smart Planning permit has allowed the construction of a fence blocking part of a significant view line in the Collins Settlement site in the Mornington Peninsula. We strongly encourage any new strategic planning work to consider permit triggers for fencing of a particular height, and how significant fences are identified in the Heritage Overlay.

### **Conclusion**

In conclusion the wide range of natural, cultural, social and Indigenous heritage values of the Pyrenees Shire deserve recognition, protection and celebration as recognised in the Pyrenees Futures strategic work exhibited. The National Trust welcomes future opportunities to provide comment and feedback on the Pyrenees Shire as it progresses with the associated implementation measures of these Framework Plans.

If you have any questions regarding the above I welcome you to contact me on (03) 9656 9823 or [Jessica.hood@nattrust.com.au](mailto:Jessica.hood@nattrust.com.au).

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Jessica Hood', written in a cursive style.

Jessica Hood  
Community Advocate Environmental Heritage  
National Trust of Australia (Victoria)