

From: [REDACTED]
Sent: Friday, August 9, 2024 4:38:00 PM
To: [REDACTED]

Subject: Urgent Call to Vote NO on the Significant Landscape Overlay (SLO) in Its Current Form

Dear Council Members,

I am writing to urgently request that you vote NO on the proposed Significant Landscape Overlay (SLO) for our region in its current form, or, at the very least, delay the vote until drastic revisions can be made. Recent community meetings in Kilmore and Pyalong have underscored widespread opposition to the SLO as it stands.

While the goal of conserving the Granitic boundaries of the region is important, the current SLO places an unjust and disproportionate burden on farming communities that have responsibly managed the landscape for generations.

Despite my previous submission and active engagement in community meetings, the minimal revisions made to the SLO are deeply disappointing. Given these insufficient changes, I am now firmly opposed to the SLO in its current form.

The permit process under the current SLO is unworkable, overly complex, time-consuming, and costly. It requires landowners to jump through bureaucratic hoops just to maintain agricultural viability. This is not only inefficient but places an undue strain on those who are the backbone of our local economy and who have been stewards of the land for generations.

Particularly concerning is the requirement to obtain a permit to lop any native vegetation. This mandate is insane, given the need to maintain farming pastures, reduce fire risk, and manage ground fuel in the region. When native vegetation isn't maintained, highly flammable scrub takes over, which has been noted as a noxious weed in other states due to its severe impact on people and assets. This increases the risk to both the environment and the community, contradicting the very goals the SLO aims to achieve.

The SLO not only seeks to prevent development on significant ridgelines—which may be justified—but it also imposes undue restrictions on the placement, grouping, size of houses, agricultural buildings, and land usage. This overreach severely hinders farming operations and land management.

Furthermore, prioritising tourist views over the socio-economic and cultural needs of the community is a grave misstep. The current proposal, while well-intentioned, does not reflect the practical realities of those who live and work in the area.

We strongly urge you to vote NO on the SLO as it is currently drafted or, at the very least, to delay the vote until the proposal can be revised to better align with the needs and rights of our local farming community.

Below are some of the previous detailed concerns and suggested revisions to the permit requirements and application criteria that highlight the significant flaws in the current proposal.

Previous submission:

3.0 Permit requirement

A permit is not required for the following buildings or works:

- A building used for agriculture or an alteration or extension to a building used for agriculture that is an open-sided rural structure and sited away from any significant granitic formations.
 - The inclusion of only open-sided structures fails to acknowledge the benefits of closed structures in fire/fuel risk management. Agricultural sheds hold considerable fuel (hay), and doors enable oxygen to be starved from this fuel in cases of lightning strikes.
 - Furthermore, doors enable better pest management practices and limit non-native grasses from spreading by wind.

- Suggested revision to include closed structures without size limitations.
- A building used for agriculture or an alteration or extension to a building used for agriculture where all the following are met:
 - The building is constructed using external materials and finishes that minimise its visibility in the landscape, such as natural timber, subdued colours, or galvanised iron.
 - the total floor area of the buildings is no more than 150 square metres.
 - This footprint is not representative of agricultural or farming realities basically nullifying the permit exception in almost all cases. Placing undue burden on farming communities to seek approvals and meet SLO requirements for basic rights on their land.
 - Suggested revision to 300 square metres at a minimum.
 - Suggested revisions: Extensions to existing homes should be included in the SLO permit exception as planning and building permits pertain.
 - the building is single storey and no more than 5 metres in height above ground level.
 - This height is not representative of agricultural, or farming realities and the machinery used basically nullifying the permit exception in almost all cases. Placing undue burden on farming communities to seek approvals and meet SLO requirements for basic rights on their land.
 - Suggested revision to 7 metres at a minimum.
 - the building is not sited on a ridgeline, or on the upper slopes of a hill face so that it protrudes above a ridgeline.
 - This is not representative of agricultural or farming realities and the requirements to place sheds away from water courses and flood plains basically nullifying the permit exception in almost all cases.

Placing undue burden on farming communities to seek approvals and meet SLO requirements for basic rights on their land.

- Suggested revision to ridgelines near granite structures only.
- the building does not result in the disturbance of any significant granitic formations.
- Water tank
 - Water tanks are used in agricultural or farming communities for drinking, stock watering and fire management practices, requiring a permit places undue burden on farming communities to seek approvals and meet SLO requirements for basic rights on their land and to enable them to up-hold their duty as landholders in relation to fire management.
 - Suggested revision exclude water tank permits.
- Construction of a farm access track that does not change the topography of the land.
 - This is not representative of regional realities cuts are required for tracks period. Tracks enable farmers to mend and maintain fences, attend to injured stock and wildlife and put out fires one their land.
 - Suggested revision to remove permits for access tracks.
- A permit is required to construct a fence, except for a post and wire fence up to 1.8 metres in height.
 - This requirement is not representative of agricultural or farming realities, it would mean that stockyards and holding pens would require a permit which would place undue burden on residents to get approval to carry out their livelihoods.
 - It also excludes the use of rock walls to prevent livestock and farm thefts which have increased substantially in the region – which I can contest too personally. Rock walls would be in keeping with the scenery and prevent farm fences from being cut and multiple vehicles gaining access in sub-10 minutes.
 - There need options for secure fencing / Screens that allow for secure options.
 - Solid Fencing around a dwelling is necessary to keep family, children, and pets secure and safe.

- Suggested revision include stockyards, holding structures and rock walls up to 1.8 metres in height from requiring a permit.
- A permit is required to remove, destroy, or lop any native vegetation.
 - This requirement is not representative of agricultural or farming realities whereby lopping of vegetation is required to reduce safety risks – older tree limbs can become unstable and require lopping to avoid risk to people or property.
 - Suggested revision: remove lopping and add a requirement that if any tree is to be removed or destroyed due to risks to people or animals 3 more trees need to be planted in its place.
- A permit is not required for works undertaken by a public authority relating to watercourse management; environmental improvements; or emergency works, repairs, or maintenance.
 - This clause should be extended to farmers and landholders as this maintenance, repairs and improvements are predominantly carried out by farmers and landholders (as was evident on our farm from the recent floods).

4.0 Application requirements

The following application requirements apply at the responsible authority's discretion to an application for a permit under Clause 42.03, in addition to those specified elsewhere in the scheme and must accompany an application, as appropriate, to the satisfaction of the responsible authority:

- A site analysis that demonstrates a thorough understanding of the existing landscape context, including topography, vegetation, and the location of any significant granitic formations, if relevant.
 - The use of \$130,0000 of rate payers' money for this landscape assessment would suggest that detailed assessment of the region has been conducted, therefore adding an additional burden of developing a site analysis for all permit requirements is ridiculous.
 - Building and planning requirements already require Detailed Site Plans of the proposed and arborist reports within the rural planning scheme.

- Suggested revision: Exclude class 1 and class 10 dwellings along with ancillary works related to these builds, such as fencing, retaining walls etc.
- A visual impact assessment of the proposal from adjacent road corridors, especially Lancefield-Tooborac Road, High Camp Road, West Road, and Lancefield-Pyalong Road, if relevant, with particular consideration of the impact of the proposal on outviews to the landscape.
 - The use of \$130,0000 of rate payers' money for this landscape assessment would suggest that detailed visual assessment of the region has been conducted, therefore adding an additional burden of developing a site analysis for all permit requirements is ridiculous.
 - Building and planning requirements already require Detailed Site Plans of the proposed and arborist reports within the rural planning scheme.

5.0 Decision guidelines

The following decision guidelines apply to an application for a permit under Clause 42.03, in addition to those specified in Clause 42.03 and elsewhere in the scheme which must be considered, as appropriate, by the responsible authority:

- The visual impact of the buildings or works on the landscape and cultural significance of the Granitic Uplands.
- Whether the buildings or works are sited:
 - Away from significant weathered granitic boulders and granitic rock scatterings, to maintain their visual prominence in the landscape.
 - To avoid visually prominent locations such as ridgelines and elevated hill faces.
 - To maximise clustering of new buildings with existing buildings where possible.
 - Concerns regarding the potential fragmentation of the landscape due to new building clusters and their impact on established vegetation.

- Among established vegetation or screened with landscaping of an appropriate native species, with consideration of bushfire risk.
 - Significant concerns regarding bushfire risks and the impacts of tree roots in plumbing causing leaching into soil and water courses.
- To follow the contours and natural form of the landscape and minimise cut and fill.
- A sufficient distance from roads to minimise their visual impact when viewed from the road corridor.
 - Significant concerns regarding bushfire risks and the need for escape and access routes.
- An adequate distance from watercourses.
 - Specify if this exceeds the current 100m watercourse requirement.
- Whether the buildings or works are designed:
 - Using simple, pared-back building forms and design detailing.
 - Utilising colours and finishes that best immerse the building within the landscape.
 - Utilising building finishes that reduce distant visibility, such as dark, muted tones and natural materials within the landscape, and lighter colours against the sky.
 - This is too broad and vague. Dark muted tones are in direct contradiction to planning advice given to ourselves from Mitchell shire council. Mitchell Shire was suggesting building finishes regardless of placement would be better in Light reflective colours to keep new buildings energy efficient. Is it the councils' position to now value aesthetics over energy efficient practice?
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- The visible impact of the buildings or works from viewing locations within the landscape, particularly road corridors that travel through or adjacent to the area, including Lancefield-Tooborac Road, High Camp Road, West Road, and Lancefield-Pyalong Road.
 - Road corridors are positioned typically through the flat contours of the land. To position the SLO as preventing dwellings from being

built on ridgelines for visibility and then to capture their impact on visibility on road corridors creates an untenable option for buildings.

- The use of the word “Works” is too vague and can include anything. Farming practices can include a range of activities that can be deemed as works. Soil needs to be moved, tilling, slashing, remediation works to weather damage all constitute as works.
- The effect of removing remnant vegetation on the landscape character and significance of the area, and any alternative means of locating buildings or works to conserve the trees.
- Whether farm access tracks or other access roads are located across the slope to minimise their visibility.
 - Farm Access tracks are made to work in with the contour of the land and minimise cuts within the landscape. To create effective and safe farm tracks, they need to be made with safety and practicality in mind not visibility.

We appreciate your consideration of these concerns and hope to engage in further constructive dialogue.

Sincerely,

████████████████████ - resident directly affected by the SLO

████████ [Dairy Flat Road, Tooborac](#)