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SUBMISSION TO MACEDON RANGES LOCALISED PLANNING STATEMENT- CONSULTATION DRAFT

Thank you for the opportunity to comment on the draft *Macedon Ranges Localised Planning Statement*.

The purpose of undertaking this work is to provide updated protection to the Macedon Ranges in the manner provided by the Statement of Planning Policy No 8 (SPP8) that was prepared in 1975. The Localised Planning Statement will be an additional planning tool that identifies and protects the environmental, landscape and cultural values of the area and appropriately addresses and responds to current threats.

Although I agree with the direction of the objectives and strategies in the draft document, they are generally 'motherhood' statements and are not a robust response to the exercise in replacing and updating SPP8 to protect the Macedon Ranges.

The need for clear priorities

Having regard to the imperative to protect the Macedon Ranges, I believe the *Planning and Environment Amendment (Distinctive Area and Landscapes) Bill 2017* provides a good legislative framework. However I do not believe the draft Localised Planning Statement is the correct response.

The statement reads as just another Clause in the MSS and does not assist in clear decision making as no guidance is provided as to where the statutory emphasis must lay.

Crucially, the Planning Statement should clearly articulate that when assessing the multitude of planning imperatives, it is the environmental, landscape and cultural values that are the prime consideration. As presently drafted it does not.

A good example of policy that has environmental protection as the prime objective can be found in the Knox Planning Scheme. In a recent Government Land Standing Advisory Committee hearing for the proposed rezoning of a site in Boronia, Council's submission stated '*when read with the foothills controls, the clear policy and statutory emphasis in the planning scheme is that the need for the protection of areas of environmental and landscape significance outweighs the need for urban consolidation*'.

The need to clearly prioritise planning objectives is stated in the *Macedon Ranges Protection Advisory Committee* report as follows:

- '*It must clearly identify objectives for the future of the Shire which embody the precautionary principle, and prioritise the protection and preservation of the environment, water catchments and nature conservation as SPP8 did.*

- *It must provide clear direction, through clear prioritisation of values and clearly defined outcomes, to guide planning decision-making and to help planners resolve conflicts between competing values or activities.'*

Focus on the main objectives – protection of the environmental, landscape and cultural values

The draft Planning Statement tries to do too many things. The previous draft policy prepared by Macedon Ranges Shire Council read as an economic prospectus to encourage investment within the Shire. Although economic imperatives are important, there are other tools to promote this through clauses in the MSS and LPPF and Council's Economic Strategies that may be referenced in the Planning Scheme or operate outside the Planning Scheme altogether.

Although the Bill refers to economic matters, it is in the light of ensuring that the area's values aren't eroded, thereby creating an adverse impact on the economy. The Bill states *'the Minister must be satisfied that an area is under threat of significant or irreversible land use change that would affect the environmental, social or economic value of the area in order to recommend that the area be declared as a distinctive area and landscape'*.

The current Statement refers to the benefits of tourism based on the area's natural attractions. However tourism opportunities should not be at the expense of the natural environment. For example a mountain bike trail may bring many visitors to the area, but unless it is appropriately located it may adversely impact upon important habitat.

The relevant strategy associated with Objective 8 that would address the above example, namely dot point one which states *'Support and facilitate tourism- and recreation-related land uses and developments (such as agritourism) in keeping with the policy area's state-significant landscape, environmental and cultural value'* is a weak response.

Objective 9 reads *'to manage the provision of infrastructure that supports the social and economic needs of communities and increases resilience to climate change'*. This is a 'pie in the sky' objective and the associated strategies are similarly aspirational. For example *'Ensure equitable access to community infrastructure'* is simply not feasible in rural and remote parts of the municipality. Furthermore, how will this help a decision maker to assess a proposed land use change? It is also not relevant to the core objectives of protecting the environmental, landscape and cultural values of the area. If this objective is to be retained it could simply sit in the relevant section of the MSS.

Settlement boundaries

The application of the Protected Settlement Boundaries to include the areas identified as 'Investigation Areas' under the current planning scheme is misleading and inappropriate.

General Comments

The objectives are generally just 'motherhood statements' that I do not disagree with but they need to be clear and targeted. I do not believe DELWP would approve a planning scheme amendment to a MSS by a local Council with similar wording for this reason. In fact the draft Planning Statement does not perform any different function than an MSS and does not assist in decision making.

There is too much emphasis on the protection of assets or values of state or national significance. The cumulative impact of the erosion of other attributes of the area can be catastrophic.

In Objective 2, should the strategy *'Encourage revegetation with native vegetation in areas of identified state significant biodiversity value'* refer to indigenous rather than native vegetation?

Finally I will again emphasise that the Planning Statement must clearly articulate that when assessing the multitude of planning imperatives, it is the environmental, landscape and cultural values that are the priorities. I would encourage closer reference to the recommendations of the *Macedon Ranges Protection Advisory Committee* and SPP8 when revising the Statement.