HAMILTON FIELD NATURALISTS CLUB



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Mr Michael McCarthy
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Southern Grampians Shire Council
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16 Oct 2017

re. SOUTHERN GRAMPIANS PLANNING SCHEME AMENDMENT C36

Hamilton Field Naturalists Club strongly supports the Council's intention to protect the Harman's Valley lava flow with a permanent SLO. We believe the geological features of this landscape are a great asset to the Shire. The flow along the valley to the east of the Port Fairy Road is the best example of its kind in Australia, while the Wallacedale tumuli are volcanic forms that are rare anywhere in the world. Both are featured in our Club's "Hamilton Region Nature Guide" (published in 2010) and on our website. In addition to their geological value, the rocks of the flow are important for local biodiversity as they provide habitat for some plants and animals now rare in the region. The area also includes human-made stone structures significant for the culture of the original aboriginal inhabitants and of European settlers.

We do have comments to make regarding the crucial details of the amendment because we believe that the proposals need to be adjusted to ensure that the amendment will actually result in <u>long-term</u> protection of the volcanic features. Failure to do that could result in ambiguities that will be a source of frustration and contention for landholders, Shire and other concerned citizens.

Boundaries. The outline of the proposed overlay appears to follow property boundaries, omitting some parts of the flow while at the same time including areas that are not of significance. We note that the current proposal differs from Planning Scheme Map 42ESO which was prepared by the then Department of Sustainability and Environment in late 2004. At that time our late member, Ken Grimes, supplied maps to the Shire showing all the volcanic features he had identified from on-ground exploration and aerial photography. The Club has copies of these maps which we can provide if required.

Permit specifications. The wording of the Schedule would not appear to be sufficiently precise to prevent the kind of damage that has occurred in the past.

- Natural rock formations or aboriginal constructions Under 3.0 Permit requirement it is stated that A permit is required for the demolition or removal of drystone walls, but there does not appear to be any mention of the demolition or removal of either natural rock formations or aboriginal constructions. Destruction of the features of the volcanic flow by crushing, ripping or removal is surely what the Overlay is primarily designed to prevent, yet this is not specified. The amendment, as it stands now, would seem to be of little use in preventing future damage/loss of the features it is supposed to protect.
- <u>Farm access tracks</u> no permit is required for construction of farm access tracks and that is also of concern, since there are no constraints on width or siting or methods used in such construction. For example, one possible scenario that a creative landholder might employ may be to construct a track through stone arrangements in one year and then, later, abandon that and form an adjacent 'track'. Repetition of that, with no permit being required, would ultimately result in the loss of all significant stone features. Surely a permit should be needed to ensure that any constructed track did not damage or result in the removal of significant volcanic features?

Yours faithfully

Dr PR Bird

Secretary Hamilton Field Naturalists Club