

Victorian
Farmers
Federation

SUBMISSION

**Protecting Melbourne's Green Wedges and
agricultural land**

12 February 2021

INTRODUCTION

Thank you for the opportunity to make suggestions for Industry / land holder viewpoints as to whether the Planning for Melbourne's Green Wedges and agricultural land (GWAL) will be effective in ensuring a future for Melbourne's food bowl.

For over 4 years VFF has had a well-developed policy position on the changes to the planning system that are required to support the retention and growth of agriculture in Victoria. Repeated failures to address or consider these matters, in response to submissions or in preparation of documents such as this, reinforces industry belief that there is an urban bias in the planning system that sees farming land as vacant, waiting for an urban use.

The VFF accepts that farming operates in a regulated space but that there is a need to ensure planning and environmental regulations, which are generally designed for urban scenarios, do not have a perverse or adverse outcome in relation to facilitating the ongoing and productive use of land for production of food and fibre.

The rural suite of zones, including green wedge zones, represented 62.86% of zoned land in Victoria (February 2020). It is time for more than a throw away platitude to be made in respect to this land. It is time for all controls to properly consider how they may impact on zones that provide for Victorians most basic needs.

This response to the exhibited document will outline our concerns that there is a risk that the changes will actually exacerbate the rate of loss of productive agricultural land in the study area and wider. The VFF will reinforce previous evidence-based advice given to government, on what work is needed to ensure agriculture continues to be a key economic driver for Victoria. VFF has regularly called for system changes through its response to strategies, through ongoing advocacy and through budget and election cycle asks. The simple test is: *does it help grow the value of food and fibre production to the Victorian economy and ensure Victoria maintains food security when interstate and international trade and transport is disrupted?* This work has been consistent, tailored to the planning system, and based on an analysis of

- existing council and VCAT decisions, and
- compliance with existing zone considerations, and
- what is needed to return the clear decision-making support for agriculture that was removed by VC71 without explanation. This change has had many direct and consequential changes on the ability of Councils to have strong local policy considerations. The PPF translation process weakened local policy to reflect weak state policy.

The simplest and easiest thing that could be implemented to achieve the aim to protect agricultural land into the future is to have strong recognition of agriculture as something that is critical to the economy, and food security and needs to be protected in planning decisions.

While some content may, in the long term, assist in this aim, we believe that the document as a whole will exacerbate the rate of loss of productive agriculture from the study area, and may have negative outcomes for agriculture in the state - one of the key pillar of the Victorian economy.

We commend the government on its stated objective to protect Melbourne's Food Bowl. While we don't believe the document outlines the right approach, we have taken the time to say not only why we believe the document will increase loss, but also the reasons why we believe this to be true. We will propose what we believe to be some simple actions that overnight could address many of the problems facing the industry, and would help provide scheme content that allows advice to be prepared.

Planning for Melbourne's Green Wedges and agricultural land is an opportunity for the government to be at the cutting edge. To show how to work with industry to vision future ag, and the planning system we need to get there. 2020 demonstrated that Victoria, in a crisis, can be self-sufficient - we had food security. That future is at risk unless the planning system gives serious consideration to industry knowledge on what is needed to evolve to changing climate and markets.

A range of medium to long term options are also outlined. These build upon advice given to DELWP Planning in regards to Native Vegetation, SMART Planning, Solar Energy facilities, Strategic Agricultural Land and prior to the 2018 Victorian State Election. At a minimum, DELWP should address the detailed planning system issues and considerations previously raised by the VFF, the key industry stakeholder, in preparing any new document from your terms of reference

This submission will mainly focus on the reasons why we believe the exhibited document will not be successful in addressing the issues facing agriculture. I doing so we will refer to:

- reports relating to the VPP system and agriculture;
- Parliamentary inquiries into agriculture in "suburban" areas;
- VFF policy positions;
- previous requests regarding changes needed to the VPP; and
- records relating to the changes which removed agriculture from the economic development section of the VPPs.

This will then provide urban planners a better understanding of why the peak body for the agricultural sector in Victoria believes the document reinforces an urban bias which fails to understand or value agriculture and seeks to prevent the evolution required to remain competitive nationally and internationally.

SUMMARY OF RECOMMENDATIONS

Recommendation in relation to the future status of GWAL

1. That the document be treated as a good first start at identifying the challenges facing agriculture.
2. As an urgent interim reinstate the Pre VC71 Agriculture policy clause and reference future farming and climate change adaptation in agriculture in all relevant PPF clauses.
3. That DELWP work with MAV and VFF to determine the work program to determine planning system changes required to ensure a future for Victorian agriculture.
4. That the 2021-22 Victorian State Budget allocate resources to undertake the work program.
5. As an urgent interim reinstate the Pre VC71 Agriculture policy clause and reference future farming and climate change adaptation in agriculture in all relevant PPF clauses.
6. That the GWAL team and planning advisors meet on the farms of VFF members to understand first-hand the challenges being faced by producers in periurban areas and state-wide.
7. That the recommendations included in the Endnote, in the Victorian Government Response to the *Inquiry into sustainable development of agribusiness in Outer Suburban Melbourne*, be audited, to determine the extent to which GWAL has responded to those Government recommendations.

Actions required to be undertaken to protect and promote agriculture in planning scheme

8. Reinstate Agriculture into economic development section of PPF (pre VC71 version).

9. Undertake a review of 2010 SPPF changes and the impact that has had on loss of productive agricultural land, loss of strategic support for agriculture, and creating a policy imbalance that encourages a bias to secondary uses over the primary purpose for which the land is zoned.
10. Include a State and Regionally Significant Agriculture clause into the PPF.
11. Insert policy seeking to avoid permanent loss of productive agricultural land, into settlement policy, renewable energy policy and infrastructure policy.
12. Refer to agricultural adaptation / use of technology in climate change policy and clause 52.17.
13. Reinstate local policy support based on the pre VC71 agriculture clause that was removed through PPF translation requirements.
14. Include material into the PPF from Regional Growth Plans for agriculture.
15. Audit planning permit and VCAT conditions as background to understand the need for controls and decision making guidance to protect and support agriculture.
16. Review land use conflict studies in other jurisdiction for opportunities to understand how controls and decision making guidance will improve protection and support of agriculture.
17. Work with industry to streamline approvals processes for agricultural buildings and to implement sustainable technology.
18. Remove Vicsmart consideration of clauses 59.12 and 59.13 which currently disallows consideration of Decision Guidelines but review use and development permits which are constraining climate change and market adaptation in agriculture.
19. Provide a grant program for councils to undertake “joint studies” similar to the Campaspe, Greater Shepparton and Moira Regional Rural Land Use Strategy for agricultural regions to ensure agricultural provision.
20. Fund the work outlined in VFF’s SMART planning submission, and inherent in the PPF translation guidelines – to look at the land use and development nexus / appropriate statutory tools regarding overlays and other provisions relating to agricultural land; ensuring s12 compliance with clear considerations of social, economic and environmental impacts of the proposal on agriculture with any state, regional or local amendment which impacts on green wedge, farming, rural conservation or rural activity zoned land, to provide guidance between the nexus between planning scheme trigger and conditions (especially in relation to ultra vires conditions by referral bodies) and providing clear strategic guidance on how to consider impacts on agriculture in planning scheme provisions and planning permit applications.
21. Mandate the need to protect agriculture as a primary role in each green wedge plan and to specify how land for landscape and environment will be acquired and maintained by the Crown.
22. Revise Precinct Structure Plan guidelines to require inter-urban breaks, buffer zones to agriculture, large format urban uses, key urban infrastructure and environmental, landscape and passive recreational areas are to be provided for within Precinct Structure Plans. LDRZ is an underutilised option in PSPs.
23. Fund a land use conflict study.
24. Make all consequential changes to VPPs to ensure controls on farming land are fit for purpose, designed to application to farming land, do not duplicate or conflict with other regulatory systems and do not require private funding of community expectations.
25. Review primary produce sales in conjunction with VFF and Agriculture Victoria.
26. Prepare detailed guidelines on how to consider the impacts of development proposals on agriculture
27. Amend the ministerial assessment guidelines (20(4)), the strategic assessment guidelines and provide detailed examples of how to consider the impact of new planning controls on agricultural land uses.
28. Mandate direct landholder notice of any planning scheme change – zones, overlays and particular provisions that will apply to farm land or have the potential to impact on farming land.
29. Commit to identifying circumstances where these changes will be too late for agriculture, even of an intensive nature to be feasible and then undertake work to determine a beneficial use of the land.
30. VFF supports the concept of ‘right to farm’ but believes it is better achieved by a legislative requirement for every Act, Regulation or subordinate document which impacts on farming to consider

‘right to farm’ and ‘good governance’ principles in its implementation via an agricultural impact statement.

Recommendations for whole of government action

In addition to the planning system issues already outlined, the following actions would start the process of creating an environment of protecting existing agricultural land and farm practices:

31. Existing road and rail networks are upgraded and maintained to get goods to market, including first and last mile upgrades and removal of restrictions to operate and transport machinery in metro areas;
32. Preparation of land access legislation to apply to any infrastructure proposal through farming land to:
 - Prioritise the use of crown land / existing infrastructure alignment;
 - Mandate full involvement of landholders in route design;
 - Ensure commercial consent and compensation for loss of production;
 - Ensure any ongoing restrictions on use (weight, height of machinery), access roads, inspections; Biosecurity compliance, footprint etc) and loss of opportunities are fully compensated on an annual basis;
 - Formal agreements be prepared that determine how the ‘operation’ is to occur and how biosecurity and other requirements are to be delivered;
 - Where the infrastructure impacts on viability of farming the whole site is acquired and efforts made to locate appropriate new property and assist in all consequential costs;
 - A regulated ‘rehabilitation’ process similar to mining regulations; and
 - Proponent fully funding legitimate legal and technical costs of the landholder.
33. Removal of any ‘over fence’ impacts of urban development on farming practice. If the planning system encourages a hard urban edge to farm land then use of chemicals, hours of operation, use of scare guns, frost fans etc must not be constrained. (Right to Farm);
34. Developers to include “buffer zones” to agriculture within their development area. LDRZ & PPRZ are options;
35. EPA sensitive use requirements relating to production of food and fibre should not apply to dwellings within land zoned for agriculture including the Green Wedge zone;
36. Full funding of pest plant and animal management on crown land by the relevant crown land manager, to prevent impacts on neighbouring farmers who are meeting their obligations, but receive ongoing reinfestation from Crown Land;
37. Revision of land tax provisions that penalise farmers leasing UGB land. The provision deters a model of young farmer entry to agriculture, with retiring farmer as mentor or leasing of land for economies of scale;
38. EPA education and enforcement campaign on biosecurity and the risk, and the danger of rubbish dumping by the public, on farm land;
39. Penalties to perpetrators and a compensation scheme akin to victims of crime compensation scheme, to farmers for loss of stock or production, due to biosecurity breaches;
40. Funding EPA, VicPol and Agriculture Victoria to enforce and prosecute biosecurity breaches Education and enforcement campaign on biosecurity and the risk and danger of trespassing on farms; and
41. VFF calls on the Government to fund the farming advisor roles on the Farm Safety officer model and to ensure VFFs active involvement at all stages of the development of planning system guidance documents.

Recommendations relating to specific proposals

42. VFF recommends that the only strategic and fair way forward to address the issue of subdivision and dwellings is the reinstatement of the pre VC71 Agriculture policy direction and the preparation of a Land Use Strategy similar to the PB work for Shepparton, Campaspe, Moira to determine the future of agriculture and how the planning scheme can help achieve it.

OUR POSITION

VFF positions on planning systems role in supporting agricultural land uses

The excerpt below from the VFF Right to Farm Policy statement is clear in what it calls for. It does not go beyond what was previous Victoria Planning Provision content, Planning and Environment Act principles or good governance considerations. VFF has also given more detailed direction on simple planning system and decision guidance changes to deliver these outcomes.

- *the State Planning Policy Framework be amended to ensure that:*
 - *State and local government must have regard to the impact the loss of agricultural land on the food and fibre security for the needs of a growing and evolving market.*
 - *Agricultural production in the Farming Zone is protected from encroachment of non-farming uses.*
 - *Non-agricultural land uses and subdivisions which are likely to have an adverse impact on existing farming enterprise or future growth of a farming enterprise are limited.*
- *The impact of environmental policy and controls on agricultural production must be taken into account in strategic planning for farming areas.*
- *The Victorian Planning Provisions must give strong direction to local councils that farming must take precedence over other land uses in rural and agricultural zones.*
- *That State and local government policy be balanced to ensure growth of the Victorian agricultural sector.*
- *The State Government must establish a Standing Advisory Committee to ensure the content and implementation of the Victoria Planning Provisions facilitate the ability of the farming sector to grow and respond to an evolving market.*

Excerpt from VFF Right to Farm Policy

The Sustainable Animal Industries process was driven by an Advisory Committee and a series of stakeholder reference groups and technical reference groups. In comparison the ‘Strategic Agricultural Land’ work which is the genesis of the exhibited document, had no agriculture industry input into its design or content. Although an improvement, this work is without the ‘data collection and review’ processes the Department requires councils to undertake in performing a planning scheme review or discussion of previous VFF requests.

It was the Cain Labor Government with the VFF that jointly created “Landcare”. We need DELWP to work with industry to create “ClimateCare” – enabling agriculture to continue leading the globe in research and development to develop production systems that are efficient and sustainable, and then planning controls to facilitate its use in Victoria.

DELWP must stop seeing farm land as land to to deliver amenity or environment outcomes for urban communities at no cost to the Government. It is a first principle that public benefit should be at public costs. Cost shifting from government or developer onto farmers to deliver landscape and environment conservation for public benefit at private cost is unfair. As is seeing agricultural land as the place for large format urban uses or infrastructure, open space or ‘inter urban break’ that should be considered within Precinct Structure Planning processes including equalisation schemes.

Although green wedges are only a part of the land within the 100km radius of Melbourne, the document is confused and confusing as to what relates to green wedges, and what is to the farming zone, within the study area..

A house is a Section 2 use in the Green Wedge, but deficient consideration of State and Local Policy by many Councils has resulted in permits for dwellings with no link to agriculture. This has major impacts of loss of productive agriculture, and land use conflict to existing agriculture.

Just expanding this provision to 100km radius, without making State and Local Policy more explicit, is unlikely to deliver the stated aim and will increase red tape on legitimate and large scale farming operations.

VFF cares about the planning system as for the last decade the policy support has been weighted to not supporting farming uses in land zoned for farming – but supporting secondary uses and one-off applications for urban development that take advantage of cheaper land in rural areas, compared to the cost of land in the urban zones where these developments are envisaged.

GWAL proposals seem to be at odds at the Brumby Labor Government's commitments in response to the *Sustainable Development of agribusiness in outer suburban Melbourne report*.¹ This is partially due to poor policy, partially due to planners not understanding what causes impact to farming and non-existent guidance.

The strategic assessment guidelines (SAG) include a few examples of how to consider impact of planning controls on agricultural use. Examination of VC and C planning scheme amendments introducing a wide range of controls on farming land shows that it is rare for agriculture to be considered in outlining social, economic or environmental effects of the proposal. Even when these issues are raised a section 12 test is rarely applied in a response

The Government needs to model compliance with s12 and the SAG. VC amendments should show Council how to make these considerations. VC amendments that impact on existing farming practice but are silent on these impacts telegraph to Councils that these considerations are not important.

It is time for DELWP to model best practice consideration in regards to the consideration of social, economic and environmental effects on farming, and to review both the Victoria Planning Provisions and guidance to ensure the planning system leads to outcomes that support agriculture.

What is needed to support agriculture in Victoria?

For several years VFF has been giving direction to Government and DELWP about the outcomes that need to be delivered and to give direction to the work and planning system changes that are required.

The VFF 'Right to Farm' Policy (February 2017) details the need for a range of systems changes and guidance. The following sections in particular are most relevant to the stated aims of *the PMGWAL* document, and why the issues outlined are not fully addressing the current challenges inherent in the planning system.

Permit requirements for agriculture

- *Planning permit requirements for varied farming operations must be transparent and unambiguous in the land use definitions of the planning scheme.*
- *Local councils should be directed to only notify planning applications in the farming zone to a limited area to limit vexatious objections from parties not directly affected from a proposal. A similar approach is used in industrial zones in Victoria's planning provisions.*
- *Proposals that relate to subdivision of houses or construction of housing on small lots in the Farming Zone should be advertised to all farms within a 3km radius of the proposal to allow for informed consideration on the impact of the proposal on the agricultural production.*

- *Farm practices that are compliant with State Government and industry accepted standards must not be impeded by local government planning policies, planning scheme overlays or environmental regulations.*

Other initiatives

- *State Government must reinstate the Vendor Statement notice (Section 32 Statement of the Sale of Land Act) warning people that if they move into a farming area they may be exposed to noise, smell and dust normally produced by agricultural activities.*
- *The MAV and VFF establish Rural Advisory Committees to assist in engaging the farming sector in local decisions.*
- *Government develop appropriate regulatory tools for land management issues (and compensation) relating to agricultural land uses, including:*
 - *Relocation of the head of power of the regulation from the Planning and Environment Act to the Catchment and Land Protection Act or other specific regulation.*
 - *Preparation of regulatory impact statements for any proposed framework or for any proposed control in the planning system.*
 - *Exemption of priority agricultural land (Regional Growth Plan) from any regulation.*

Zones, Overlays and Provisions

- *a lower level of amenity be applied to land uses and developments in Victoria's agricultural zones (such as dwellings), where these are not undertaken 'in conjunction' with agriculture.*

Planning Decisions

- *Planning schemes must limit non-agricultural land uses and subdivisions that are likely to have an adverse impact on existing farming enterprise or future growth of a farming enterprise.*
- *Buffer distances to 'dwellings' in areas identified for intensive animal industries should be measured to dwellings in an urban zone.*
- *Fixed urban boundaries are adopted to minimise the impact of urban expansion for all Victorian cities to provide more certainty for the future use of farming land for agriculture.*
- *Existing farming enterprises, regardless of zone or zone changes, must be protected by existing use rights.*
- *Subdivision of land to excise a dwelling lot should only be allowed where there is no risk to the current or future farming opportunities of the area.*
- *The State Government publish industry guidelines in consultation with the agricultural sector to inform planning decisions over agricultural uses.*
- *the Minister for Planning / Standing Advisory Committee prepare a suite of planning practice notes to address:*
 - *Use and development considerations in potable water catchments in agricultural zones*
 - *Use and development considerations for removal of native vegetation in agricultural zones*
 - *Use and development considerations for intensive agricultural industries in agricultural zones*
 - *Use and development considerations for dwellings in agricultural zones*
 - *Use and development considerations for industrial development in agricultural zones*
 - *Use and development considerations for places of assembly in agricultural zones*
 - *Use and development considerations for tourism in agricultural zones*
 - *Use of Environmental Management Plans in permit conditions*
- *Excerpt from VFF Right to Farm Policy*

Why is state policy critical to whether the planning scheme supports or threatens agriculture?

VFF supports the objective to protect agricultural land from loss. While it does not believe the document will achieve this aim, there are many previously effective planning tools to protect and support agriculture, that have been sidelined in previous "reforms". Clear and targeted state policy is core to achieving this – as it provides a framework for the decision making and underpins decision guidance.

VC71 change – loss of understanding of agriculture in planning

Agriculture was taken out of “economic development” in VC71. Unfortunately the VC71 amendment documents and background report do not specify why agriculture was removed from the economic development sections of the then state planning policy framework.

Analysis of the changes in the planning system around this time demonstrate that there was significant change to allow urban development on high quality agricultural land as well as changes that prioritise land management outcomes on agricultural land in preference to its agricultural use, often without a clear nexus to land use and development. The Catchment and Land Protection Act is the principal land management act in Victoria, and a special area plan is required to be prepared to achieve land management change, which may require compensation. The Planning Scheme should not be utilised to achieve a land management outcome or to place the cost of providing community benefit to private individuals.

If the link between these changes and the removal of agriculture from the economic development section of the Victoria Planning Provisions is accidental then there should be no reason why the Department has not considered the role these changes have played in accelerated loss of agricultural land in Victoria or form a barrier to the reinstatement of the previous clause as well as listing state and regional areas of significance.

17.05 Agriculture

19/01/2006
VC37

17.05-1 Objective

19/01/2006
VC37

To ensure that the State's agricultural base is protected from the unplanned loss of productive agricultural land due to permanent changes of land use and to enable protection of productive farmland which is of strategic significance in the local or regional context.

17.05-2 General implementation

19/01/2006
VC37

Land capability is a fundamental factor for consideration in rural land use planning.

Planning authorities should consult with the Department of Primary Industries and utilise available information to identify areas of productive agricultural land.

Regional and State, as well as local, issues and characteristics should be taken into account in the assessment of agricultural quality and productivity.

Permanent removal of productive agricultural land from the State's agricultural base must not be undertaken without consideration of its economic importance for the agricultural production and processing sectors.

Planning should support effective agricultural production and processing infrastructure, rural industry and farm-related retailing and assist genuine farming enterprises to adjust flexibly to market changes.

Planning and responsible authorities should encourage sustainable land use.

Planning should provide encouragement for sustainable agriculture and support and assist the development of innovative approaches to sustainable practices.

Subdivision of productive agricultural land should not detract from the long-term productive capacity of the land.

In assessing rural development proposals, planning and responsible authorities must balance the potential off-site effects of rural land use proposals (such as degradation of soil or water quality and land salinisation) which might affect productive agricultural land against the benefits of the proposals.

Excerpt from pre VC71 Agriculture State Policy

Many of our members are frustrated with regulations which are actually impacting on existing lawful use of the land, particularly in peri-urban areas. At the same time land use conflict is reducing productivity and increasing costs. Land values are increasing due to development expectations which increase rates and charges payable often above the productive capacity of the land. This can lead to extreme social and

economic distress and reduces the ability of farmers to keep land in production let alone manage pest plants and animals on the site.

Farmers concerns with the planning system having perverse and anti farming outcomes increased post the 2010 changes to the agriculture clause in the Victoria Planning Provisions. These impacts may have been unintended, but the Government response to the 2010 Inquiry into sustainable development of agribusiness in outer suburban Melbourne do support the need for the work outlined by VFF. Failure of the document to reference this report, or previous reports on planning system and agriculture demonstrates urban bias.

Agriculture seems to be constantly subject to poor corporate knowledge. Failure to reference prior reports or assess the impact of previous change ensures that GWAL, despite good intent, is riddled with urban bias which consistently delivers perverse outcomes for agriculture from planning decisions.

Agriculture is the major land use in Victoria. It is the least understood by planners. By removing considerations of markets and technology in planning, the system is at odds with research and development required to transition agriculture for climate security. Investment in research and systems that allow new production systems is critical to the future of agriculture. The planning system is keeping agriculture in a romantic agrarian myth.

The document *Making Local Policy Stronger* that was the ‘detail’ to explain the change has only one comment in relation to agriculture. It focuses purely on subdivision not undermining agriculture. No guidance on agriculture as an important use on its own. Ironically the changes in VC71 in effect had the opposite effect in operation.

2.2 Are the roles of state and local government in administering the planning system clear?

The state government should be primarily concerned with:

- Dealing with matters of state and regional significance such as supporting economic development, state investment in infrastructure, ensuring that there is a greater diversity of dwellings to support young and older household growth, guidance on residential densities, development of major centres, uses of state significance, ensuring that subdivision does not undermine agriculture, tourism and environmental assets and other matters of state importance.

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MAKING LOCAL POLICY STRONGER

Excerpt from Making Local Policy Stronger

Similarly farming was mentioned once in *Making Local Policy Stronger*. It acknowledged local work and the need for more targeted state policy and the four year audit of the SPPF. Again, this objective was not delivered for agriculture with the change removing targeted content, and the ability of local direction of protecting agriculture as a critical economic development opportunity. At no stage, including in the current document, has the VFF position on the need for SPPF (PPF) change to deliver SMART Planning objectives been considered. It is critical that the planning system enables agriculture.

VC71 removed key considerations from agriculture policy which is now removing the local planning scheme content from the studies the report highlighted. Without this policy bases the principles of the Act are not being delivered and for agriculture the system is far from SMART.

At no stage have VFF positions on the need for SPPF (PPF) change to deliver SMART Planning objectives been considered, including in the current document.

Subsequently, GWAL understates the importance of agriculture to the state and regional economy. It achieves the opposite of making local policy stronger – it removes the ability of local PPF content to address much more than dwelling impacts on farming.

Despite the *Making Local Policy Stronger* document's only mention of farming being a reference to farming and rural strategies and the need to be "incorporated into more targeted state planning policy direction", it actually removes the direction that enables excellent rural land use strategies such as the Campaspe, Greater Shepparton and Moira Regional Rural Land Use Strategy.

The current PPF translation process is exacerbating this problem by removing any existing agricultural content supported by the previous state policy direction.

The working group notes that one of the strongest outcomes of the new planning system has been the great deal of strategic work done by the State and local government since the introduction of the VPP including:

- Municipal Strategic Statements;
- Melbourne 2030²;
- Growth area planning;
- The development of housing strategies;
- Detailed structure planning of centres and townships by local government;
- Coastal Spaces;
- The Great Ocean Road Regional Strategy;
- The work on farming zones and rural strategies in municipalities;
- The design evolution in mixed developments and medium-density buildings.

This work needs to be incorporated into more targeted state planning policy direction on issues of state importance and in turn local government should be able to translate this direction into more positive and certain local planning provisions.

Consequently, the working group supports the recommendation of *Cutting red tape in planning* that the SPPF be audited every four years to improve its effectiveness. The working group notes a review of the State Planning Policy Framework is presently underway and that some of the working group's recommendations have implications for the SPPF review.

Finding:

- **The SPPF should be more targeted on issues of state importance.**
- **The SPPF should be reviewed on a regular basis.**

Excerpt from Making Local Policy Stronger

Using the 'planning scheme rules', the initial review of the LPPF needs to identify the appropriateness of content and decide whether it should:

- be translated because it is:
 - relevant, necessary and proportional to good decision-making
 - clear and unambiguous in its application and intent
 - consistent with the Act, the VPP and relevant Ministerial directions
- not be translated because it is:
 - outside the scope of planning or a planning scheme
 - repetitive, both with the VPP and the LPPF itself
 - inconsistent with state policy or controls
 - outdated or unclear.

The review should determine what each local policy is seeking to achieve and whether it is already being achieved by existing state policy or controls, or through another legislative regime.

Excerpt from PPF review guidelines

How does the C71 translation impacting on agriculture and farmers? Is it policy neutral?

If the government is to proceed with a suite of changes relating to Melbourne's peri-urban area then it is essential that the role of the *Making Local Policy Stronger* changes policy change is understood and rectified before considering any other action. It must also be recognised that this change has also led to loss of agricultural production state-wide and hampered the agricultural sectors ability to use technology for environmental and economic benefit.

The planning system plays a role in increasing the financial stress on many producer as well as added red tape restricting the ability to recover from natural disasters which can exacerbate financial and mental health challenges. Conversely, the planning system has the opportunity to create financial security for agribusiness.

VFF believes the planning system does have a role to play in not only protecting the future of agriculture in Victoria but also the social and economic wellbeing of farmers which goes to the heart of the following objectives of Planning in Victoria, especially:

- a) to provide for the fair, orderly, economic and sustainable use and development of land;
- b) to provide for the protection of natural and man-made resources and the maintenance of ecological processes and genetic diversity;
- c) to secure a pleasant, efficient and safe working, living and recreational environment for all Victorians and visitors to Victoria;

Our members are calling out for DELWP to actively listen and address their stories regarding how the planning system is not treating agriculture in a fair or orderly manner and how this is impacting on not only the sustainable use of the land but the sustainability of agriculture in many areas. Without a sustainable land use such as agriculture the active stewardship of the land will not be undertaken – leading to loss of

soil health, reduction in carbon cycling and spread of pest plants and animals impacting on biodiversity (weeds and vermin)

Planners need to understand that a farm is a workplace. It is not a nice dog walking park or where you dump rubbish over the fence. If urban communities do not value farming, respect biosecurity or understand the several hundred regulations farmers must comply with then agriculture will continue to be forced out of areas near an urban population.

The exhibited document's Green Wedge visions / chapters discuss landscape and interurban breaks as if these areas are publicly owned land like a "national park". This is part of the systemic urban bias which only intensifies a sense of entitlement within urban communities in relation to this land being there for urban use and benefit. The document reinforces this view through its restrictions on agriculture and support for non-agricultural uses. There is very little technical planning discussion or tools for 'production' yet the only element of the work which gives detail is a whole chapter on landscape controls that will actually increase urban bias red tape on planning.

In the UK the Government insures farmers in relation to trespassers and consequence of trespass. In Victoria the farmer must take out insurance – and many insurers will not cover this. Farmers are responsible if the public leave a gate open and stock leave the farm and cause an accident. For example dangerous trees on state owned property drop limbs that destroys a fence or harms humans or livestock, or stock escapes the farmer is responsible – even when the risk has been pointed out to the owner (eg dangerous tree). The planning system is part of this wicked problem by not considering risk or safety in particular provisions.

The document shows that government planners do not understand the regulatory, natural and market signals to which a farmer must respond, to stay productive. Until this occurs or until the former PPF clause for Agriculture is reinstated, planning will continue to exacerbate land use conflict and loss of productive land.

By encouraging "conflict" and hard edges to development, planning continues to ignore the impact of urban communities on farming which make it a stressful and sometimes dangerous working environment.

Agriculture is a highly regulated industry with farmers requiring expert knowledge. The planning industry needs to respect that farming is a profession and ensure planners are not acting as agricultural experts. Just as planners do not override engineering design requirements, they should seek and consider technical advice on potential impacts on agriculture from their actions and decisions.

How state policy change led to blighting of productive farm land

Prior to VC71, encroachment of urban uses were to be avoided. Hard urban edges were recognised as having many impacts that impacted on production for up to 500 metres in regards to chemicals and kilometres in relation to use of fans, guns and machinery.

City of Hume – hard urban edge case study

A VFF member actively farming in the green wedge zone. Residential development has been allowed to encroach with no buffer zone. Council expects a 'fire break' to be maintained to protect the urban development, however urban residents have dumped hard rubbish, garden and food waste and even nappies in the area. This causes damage to machinery, is costly to remove, is a public health and biosecurity risk and has led to loss of livestock. Energy, gas and water easements have been forced on the property reducing farmable area and restricting use of machinery. People let dogs run free on the property like it is a dog park. Weeds are spread on the site but there are restrictions on spraying. Machinery size is limited by regulation and when moved on public roads the farmer is abused and threatened. A fourth 'infrastructure' easement is proposed as well as an overlay in favour of a waste facility. Speculation has

increased the value of the land so rates are artificially high. There is no ability to expand or intensify due to urban uses surrounding the site.

Were the impacts of the policy change considered?

The explanatory report for C71 did not even consider that the complete change in location and content in relation to agriculture would have any effect and therefore explicitly stated that it would have no social, economic or environmental impact. This may be due to the explanatory report primarily focusing on this change in the context of *Melbourne at 5 million* and the desire to facilitate the provision of housing in Melbourne.

How does the amendment address the environmental effects and any relevant social and economic effects?

- **Restructured SPPF**

The implementation of the revised SPPF focuses on restructuring existing policies, rather than introducing new policies. As such, it will not alter environmental, social and economic effects.

- **Policy updates**

The policy updates into the SPPF will generate positive social and economic benefits.

Both the *Melbourne @ 5 million* changes and the new *Victorian Integrated Housing Strategy* policy will assist investment in housing and make the supply, availability, diversity and affordability of homes in Victoria keep pace with population growth.

Excerpt from VC71 explanatory report

What is the impact of the removal of agriculture from economic development policy?

The following point are a snapshot of the consequences of VC71 on agriculture. It is not an exhaustive list. Although understanding all of these issues should be central to the exhibited document, it is clear that rather than addressing these issues the failure to understand them will see the changes support urbanisation land use conflict and lead to increased 'urban bias' pressure on agriculture leading to loss of production even in areas with good soil and water.

- Policy change enabled urban expansion into green wedge
- Policy change to enable urban expansion into the green wedge led to land use conflict and loss of agricultural land across the state
- Impacts on agriculture not considered in changes and DELWP have not considered requests to address the land use conflict and impact on climate change adaptation consequences.

As a direct result of the policy changes the PPF review is:

increasing the loss of supportive statements

- not looking at SMART issues – land management as a CALP issue etc
- not recognising or enabling climate friendly technology in agriculture
- is not facilitating a triple bottom line assessment in land management triggers applying to agricultural land
- support land management outcomes without a clear use trigger and often at expense to use.

VFF is concerned that the impact of these changes has never been considered in the eleven years since the changes were made. There seems to be systemic resistance to consider industry research or develop a comprehensive and inclusionary process to support agricultural production.

What are Planning System actions to facilitate protection, versatility and growth of agriculture?

One of the major gaps in both the current planning policy for agriculture and the exhibited document is the failure of planning to understand the social, economic and environmental system agriculture operates in. It is a highly regulated industry which is a price taker. It cannot pass on increases in costs of production from regulation or land value. Australian agriculture is not subsidised. Unlike the Green Wedges of the UK or Continental Europe, farmers are not paid to protect landscape or environmental outcomes. UK Rates are paid on house and curtilage only – not productive land. To retain land in production a farmer must be able to achieve regulatory compliance, invest in research and development to be sustainable and efficient, earn enough to pay rates, wages and management costs. Planning needs to understand these priorities; enable evolution of production; support sustainable and profitable production of food and fibre, rather than position agriculture as an amenity for the urban community.

Since February 2017 VFF has consistently outlined the research, planning system support, industry engaged and indicative budgets required to ensure planning in Victoria seeks to support and grow agricultural production and the related jobs in manufacturing and service industries.

As a matter of urgency a steering group must be created with DEWLP, VFF and MAV to oversee the project and VFF input sought on all current and future planning system changes which may impact on agriculture.

The actions and processes outlined below reflect previous VFF advocacy on embedding right to farm into the planning system. Since the first iteration of the VPPs there has been discussion of high quality agricultural soils versus productive land. Unlike most other Australian states Victoria still has no mapping of agriculture on any measure, or the desire by the planning system to understand non-urban land uses.

It is critical that 25 years of inaction on speaking to industry about what they need to be productive into the future is ended. Without industry research and holistic planning studies the Victorian Planning System will continue to be based on an urban bias that does not understand a use that is not reliant on a building.

It is critical that the work outlined below is undertaken as a matter of urgency and the VFF and MAV are involved as a key stakeholder at all stages of the project – from project briefs to drafting provisions.

[Inquiry into sustainable development of agribusiness in Outer Suburban Melbourne](#)

Not long after VC71 was gazetted the Brumby Government released their response to *Inquiry into sustainable development of agribusiness in Outer Suburban Melbourne*. The recommendations to which the Government agreed to address and which are relevant to this review are included as an endnote to this submission.

It is interesting to note that not only was VFF identified as a key partner in planning for agriculture in Victoria, but that many recommendations support the tenet of VFF submissions seeking planning scheme change to support agriculture.

[Recommendation on rural advice](#)

- That the Victorian Government discuss how the government has acted upon the Victorian Government Response to the Inquiry into sustainable development of agribusiness in Outer Suburban Melbourne have been progressed and the extent to which the recommendations included in the Endnote have been responded to in GWAL.

Recommended Planning System Actions / Changes

- Reinststate Agriculture into economic development section of PPF (pre VC71 version)
- Undertake a review of 2010 SPPF changes and the impact that has had on loss of productive agricultural land, loss of strategic support for agriculture, and creating a policy imbalance that creates a bias to secondary uses over the primary purpose for which the land is zoned.
- Include a State and Regionally Significant Agriculture clause into the PPF.
- Insert policy seeking to avoid permanent loss of productive agricultural land, into settlement policy, renewable energy policy and infrastructure policy
- Refer to agricultural adaptation / use of technology in climate change policy and clause 52.17.
- Reinststate local policy support based on the pre VC71 agriculture clause that was removed through PPF translation requirements.
- Include material into the PPF from Regional Growth Plans for agriculture.
- Audit planning permit and VCAT conditions as background to understand the need for controls and decision making guidance to protect and support agriculture.
- Review land use conflict studies in other jurisdiction for opportunities to understand how controls and decision making guidance will improve protection and support of agriculture
- Work with industry to streamline approvals processes for agricultural buildings and to implement sustainable technology.
- Remove Vicsmart consideration of clauses 59.12 and 59.13 which currently disallows consideration of Decision Guidelines but review use and development permits which are constraining climate change and market adaptation in agriculture.
- Provide a grant program for councils to undertake “joint studies” similar to The Campaspe, Greater Shepparton and Moira Rural Land Use Strategy for agricultural regions to ensure agricultural provision.
- Fund the work outlined in VFF’s SMART planning submission, and inherent in the PPF translation guidelines – to look at the land use and development nexus / appropriate statutory tools regarding overlays and other provisions relating to agricultural land; ensuring s12 compliance with clear considerations of social, economic and environmental impacts of the proposal on agriculture with any state, regional or local amendment which impacts on green wedge, farming, rural conservation or rural activity zoned land, to provide guidance between the nexus between planning scheme trigger and conditions (especially in relation to ultra vires conditions by referral bodies) and providing clear strategic guidance on how to consider impacts on agriculture in planning scheme provisions and planning permit applications.
- Mandate the need to protect agriculture as a primary role in each green wedge plan and to specify how land for landscape and environment will be acquired and maintained by the Crown.
- Revise Precinct Structure Plan guidelines to require inter-urban breaks, buffer zones to agriculture, large format urban uses, key urban infrastructure and environmental, landscape and passive recreational areas are to be provided for within Precinct Structure Plans. LDRZ is an underutilised option in PSPs.
- Fund a land use conflict study.
- Make all consequential changes to VPPs to ensure controls on farming land are fit for purpose, designed to application to farming land, do not duplicate or conflict with other regulatory systems and do not require private funding of community expectations.
- Review primary produce sales in conjunction with VFF and Agriculture Victoria.
- Prepare detailed guidelines on how to consider the impacts of development proposals on agriculture
- Amend the ministerial assessment guidelines (20(4)), the strategic assessment guidelines and provide detailed examples of how to consider the impact of new planning controls on agricultural land uses.
- Mandate direct landholder notice of any planning scheme change – zones, overlays and particular provisions that will apply to farm land or have the potential to impact on farming land.
- Commit to identifying circumstances where these changes will be too late for agriculture, even of an intensive nature to be feasible and then undertake work to determine a beneficial use of the land.

VFF notes that the agricultural policy prior to VC71 achieved a majority of the aims of the document in one simple tool that then guided local policy and decision making; It referred Councils to agriculture department experts, sought to protect agricultural land, required the consideration of its economic importance for production and processing in relation to planned loss of agricultural land, included active language regarding how planning could support genuine farming, adjust flexibly to market change and support and assist development of sustainable practices (not call them “convenient”), and established a strategic basis to consider fragmentation of land (subdivision) and secondary uses on agriculture.

As the consultation does little to achieve these actions, we cannot have confidence that the development of the tools envisaged will deliver the agricultural objectives or the higher order issues within the "election promise" to protect green wedges from urban development.

Why is VFF concerned that GWAL will not achieve its stated aims for agriculture?

The nature of this challenge is not new. The basis of what VFF has been calling for is not new. The shortcomings of the document in relation to likely effectiveness is best considered in the context of the issues identified by the then Chief Panel Member, Helen Gibson in her April 1999 *Final Report: New Format Planning Schemes*, which also suggested planning system solutions. PMGWAL does not reflect on twenty years of reports and inquiries addressing agriculture and the VPPs. It is important to reflect on both the 1997 and 1999 VPP reports in relation to **ensuring councils have the strategy to be able to say no to section 2 uses that were not supporting the purposes of the zone and policies on that specific site.**

The panels’ experience in dealing with the new format planning schemes leads to the conclusion that, in rural areas, the greatest challenges, which will face planning in the new millennium, will be to:

- *maintain agricultural land in productive use;*
- *ensure an ongoing supply of water for irrigation and stock purposes; and*
- *manage water supply catchments to ensure an adequate supply of high quality water for domestic consumption.*

The greatest threat in this respect is the growth of residential use and the conflicts this creates.

The result is that agriculture cannot be regarded as a benign activity, but is one with potential to cause substantial detriment to surrounding uses, particularly residential, through noise, traffic, odour, spray drift, runoff and visual impact. Conversely, agriculture is also being adversely impacted by surrounding uses through the spread of plant and animal pests..... and complaints about agricultural practices.

These land holdings are being fragmented in ownership, with new owners frequently purchasing them for residential purposes. They move in with quite different expectations about what constitutes rural amenity and what farming means in practice compared to farmers themselves.

The panels consider that unresolved conflicts between residential use and agriculture have the potential to inhibit the growth of agriculture and the contribution it can make to the economy, or create ongoing dissension and dissatisfaction within communities.

Many previous planning schemes have controlled the proliferation of residential uses in rural areas by including tenement provisions, which have limited the fragmentation of lots in the one ownership by limiting the number of potential houses.

The planning problems associated with small lot rural subdivision are of an incremental nature, much like development in flood plains or demands upon infrastructure. It is the cumulative effect that is the problem, rather than any individual subdivision.

The greatest threat to agriculture is to take productive land out of production by converting it to residential use. The pressure for this arises from two primary sources.

One is the increased cost of land when its value for residential purposes exceeds its value for agricultural purposes. The second is by a failure to manage conflicts between agricultural use and residential use, so it simply becomes too hard to continue farming.

The solution to the broad problem of the loss of productive agricultural land is to limit, where possible, the proliferation of residential use within agricultural areas, and to state clearly within the MSS the priorities the Council sees as applying in different areas. In this respect, it needs to be remembered that the objectives of the Rural Zone make no mention of residential use. It is the purpose of the Rural Living Zone to provide for residential use in a rural environment.

It is therefore recommended that the SPPF should be reviewed to better recognise the role that all forms of productive agricultural land play in maintaining and expanding the State's agricultural base, not just high quality agricultural land. DOI should encourage Councils to develop mechanisms in the form of policies and other initiatives by which to deal with pressures, which may result in the loss of productive agricultural land from production.

The panels also believe that recognition should be given to the contribution that all forms of agricultural production make to the overall economy, as distinct from the returns to individual landowners.

It has long been a central tenet of our planning system that planning is not intended to protect individuals from the effects of competition.¹¹ The purpose of the planning system should be to protect resources, in this case productive agricultural land, to enable it to be used in a sustainable way. The system should also recognise that agriculture, in common with most activities, is susceptible to change. Just because one activity ceases to be attractive because of low returns or management problems (for example, grazing), does not mean that the land ceases to be suitable for all forms of agriculture and should therefore be subdivided for rural residential purposes. These were the sort of pressures faced by the Yarra Valley 20 years ago. Fortunately the pressures were resisted. A different form of agriculture in the form of viticulture gradually took over, resulting in a thriving wine industry, which today brings far more economic benefit to the region and Victoria than residential use of the land was ever likely to do.

The issue is whether greater emphasis needs to be given in certain locations to the primacy of agriculture over residential uses. This could be achieved by the creation of an Agriculture Zone. The primary purpose of the zone would be the same as the current Rural Zone, but the name of the zone would better reflect this purpose. Dwellings would be more strictly controlled and become Section 2 uses. In some way the nexus between subdivision and the expectation this gives rise to in terms of the right to construct a dwelling would need to be broken.

Excerpt from Final Report: New Format Planning Schemes, 1999

Failure to listen to these warnings has led to a situation in some area of such high land use conflict that the "new use" would not be approved or could not spray, use oversized machinery on roads, use machinery to scare birds or prevent frost settling, establish an intensive use due to setback to sensitive uses etc. VFF understands the response regarding dwellings in the document might have its basis in this report – but the 'big picture' lesson has not been considered. The planning system has done nothing to break the nexus between subdivision and dwelling rights and have issued permits for dwellings on very small lots in actively farmed areas.

The Casey horticultural land is an example of just saying you are protecting it, but introducing land use conflicts that restrict existing practice led to the permanent loss of that land as it is blighted.

The GWAL proposal will not take strong action on non-farming dwellings but make it harder for farmers or farm workers to live on farm when that is essential to the production system. If strong action isn't going to be taken to stop dwellings not needed by the nature of the agricultural use, why should a farmer on 600

hectares be required to jump through the same hoops and have all the “land management” conditions placed on their farm? It just adds red tape and reduces their flexibility. The system has failed to deliver ‘primacy of agriculture’ over residential and ‘urban’ uses that generate similar land use conflict issues.

GWAL does not address land use conflict and how it impacts on use of climate smart technology. These will be this centuries key challenge for agriculture in the developed work. Urbanised communities with expectations on farm practice not underpinned by science. Desires for agricultural land to be areas for them to ramble, camp and admire without consideration of biosecurity. An urban community that sees farming as something pretty to view not an industry producing food and fibre.

DELWP must start to listen to producers that secondary uses are as bad as dwellings in relation to potential conflict. The Planning System does not recognise them as, until 2000, these uses like restaurants and cabins were generally prohibited in farming areas. The ‘freeing’ up of secondary uses needed strong policy to allow a site-specific decision on whether the proposed uses support the zone policies and strategies.

It is not surprising that Helen Gibson’s 1999 report focuses on subdivision and dwellings as the principal threat to agriculture the SPPF had agricultural policy to protect agricultural land from encroachment and conflict. Without the system providing and maintaining strong guidance on how to protect agriculture, and with new zones like the Green Wedge promoting ‘conflict’-generating uses over agriculture, Councils cannot ‘say no’ to these uses when they impact on agriculture.

Green Wedge issues

Green wedges and prioritising landscape over land use is dangerous. Our National Parks were created to protect the landscape places people wanted to visit. Community benefit at community cost. Applying an EU model without the EU funding, rates systems and subsidies, an in reality increasing the costs of production is a double competitive disadvantage for Victorian agriculture.

It is disappointing that DELWP has done little to actively engage with industry groups, including VFF and agricultural RDCs, in relation to what are the trends in the industry, what are the threats to production and how can the planning system help not just maintain agriculture but see it become even more important to the Victorian economy.

VFF would expect that GWAL would be based on a knowledge of industry needs, a detailed assessment of the current planning system, an audit of existing controls and decisions, and what is needed in policy, controls and guidance to make the system achieve the stated aim of protecting agriculture.

Unless you understand the regulatory and market systems and how they impact on farming you cannot ‘plan’. As the document does not acknowledge that many of the issues identified were created by VC71 there can be no confidence that typical ‘planning scheme review’ process has been applied to the document and its recommendations.

By failing to identify the good process and success of the Campaspe, Greater Shepparton and Moira work, that was undertaken in accordance with previous policy the VFF cannot be confident the land use / permit triggers and policy work will be based on a detailed understanding of industry in the area, its future and how orderly and proper planning can facilitate a supportive system.

If the Government is serious about protecting agricultural land it would ensure the higher order principles and objectives within the Act were delivered in consideration with agriculture – not just in the green wedge but state-wide. Achieving those objectives would be clear in the zones, overlays and general and particular provisions. VPP practice notes, assessment guidelines, and ministerial directions would clearly require all

amendments to consider social, economic and environmental impacts of agriculture and ensure all decisions relating to agriculture required these considerations to be undertaken in line with agriculture being the use for which the land is zoned.

DELWPs response to consultation questions state that ‘overlays’ on agricultural land are directly notified. VFF believes that this is the exception not the rule. Not only are exemptions from notice regularly granted, despite a mail merge being a simple action in 2021, the explanatory report will be completely silent on how the overlay will impact on existing and future land use. While it is understood that no overlay should stop an existing lawful use, VFF is also aware of controls that require a permit for “ploughing” as this changes the “view”. Not being able to plant a crop is an economic impact which should be considered.

A recent overlay exhibited in Hepburn sought to ban the planting of trees. Again, this can impact in provision of shade and shelter, on creation of habitat links, or the ability to offset on farm unavoidable removal of vegetation.

This is why VFF has called for a review of all existing overlays and their provisions against SMART Planning principles – which has not occurred. In fact the Hepburn SLO was part of the PPF translation process.

This is also why VFF is concerned about an overlay to “protect” farming. The experience with overlays is often red tape that not only makes it harder or more expensive to farm, but stops Landcare and land management activities of farmers. These overlays are often based on a desire to provide a pleasant “view” for tourists or create a non-urban break. To date the Distinctive areas and landscape work continues and increases this urban bias despite the legislation identifying ‘agriculture’ as a key asset to be protected. In reality the opposite is occurring.

The document also contains concepts like a separate ‘right to farm act’ and ‘agent of change’ principles – rather than addressing issues with the planning system.

VFF supports the concept of ‘right to farm’ but believes it is better achieved by a legislative requirement for every Act, Regulation or subordinate document which impacts on farming to consider ‘right to farm’ and ‘good governance’ principles in its implementation via an agricultural impact statement.

For example, the previous state policy was stronger on ‘right to farm’ issues. If a ‘right to farm’ act was introduced it should mandate the active consideration of the impact of changing this provision – or any other provision that impacts on farming, then the explanatory report would have had to clearly address the change, the impact and how it is justified – like what happens with the *Transport Integration Act*. It is disappointing that this ‘direction’ is required as s12 of the *Planning and Environment Act* is rarely complied with in the broadest sense. As the PPF has a range of competing objectives these considerations should not be cherry picking areas that support but a proper consideration of support and potential impacts and how the design of the provision has carefully responded to this to meet the objective while minimising any perverse outcomes.

Agent of Change in this context not only goes against ‘right to farm’ but orderly and proper planning. A broiler farm legally operating who needs to amend a permit, should not then be blocked by a dwelling that has been approved near it which is not linked to agriculture.

What could explain 20 years of inaction on planning system demonstrating an understanding of agriculture?

With so much written on agriculture since the Victoria Planning Provisions were commenced it is surprising that not only has the Chief Panel Members guidance not been built in to the planning system, the planning system removed the only content that clearly sought to understand that agriculture was not just a natural system but a market exposed industry with a track record of industry investment in productivity gains that achieve environmental objectives.

The VFF does not believe that DELWP is deliberately trying to make life harder for farmers but the experience is that agriculture is never a priority for consideration.

Recently VPP provisions have been created on a range of issues – with the focus on the ‘piece’ of the jigsaw – rather than the objective to be achieved – in that thematic area – or the triple bottom line approach. Maybe it is because planners know little about farming? Maybe it is because councils and ‘urban’ operators see this ‘vacant’ land as an opportunity to deliver outcomes for them. This is what we are calling ‘urban bias’ in the Victorian context.

There is an unwillingness to discuss issues with farmers – and maybe a belief that they are a group that do not care for the environment or are causing habitat loss or climate change – none of which is actually true. VFF was the cofounder of Landcare. Farmers for generations have been investing in research and development to not only make them more efficient but more sustainable. Agriculture is the one industry that can “store” and “cycle” carbon. Agriculture has not only met its own ‘targets’ but has funded meeting Australia’s commitments due to regulatory change on the sector. For instance, does the planning system consider the loss of carbon from the soil, carbon cycle losses and embedded energy implications when land goes from farming use to urban?

VFF has been using “native vegetation” as the prime example of this issue. Each time DELWP say “net gain” isn’t occurring the system is tightened. Trees are like humans – they have a life cycle. To achieve ‘gain’ you need to not just save all the old trees but create a ‘community of trees’ at different ages. Farmers are told “they cleared the land” and “are at fault”. Until the 1980s it was government policy on the release of land for the title holder to completely clear the land. Farmers have been breaking that rule (by not clearing everything) or replanting vegetation for 160 years. Agriculture would be the main land use which has actively planted trees over the past 40 years.

Tightening the regulations has stopped many farmers doing their Landcare plantings and habitat links as native vegetation rules are too complex – and when there is a safety or predation issue, they cannot remove vegetation they planted, and it is difficult to claim it as an offset. This leads to farmers waiting until they are hit with the requirement for an ‘offset’ before planting, rather than annual programs.

Despite DELWP assurances to the contrary we have had a ‘red dot’ decision from VCAT as even though DELWP as referral body was happy to approve the removal of a small percentage of trees to facilitate climate friendly GPS agriculture, lack of recognition of climate change adaptation or protection of soil exist in the PPF, the agriculture content is weak and an application which had positive social, economic and environmental impacts (the legislative test) was refused as “being convenient” and therefore could be avoided.

This also meant that fencing off and protecting other trees, allowing regeneration in these areas and significant offset plantings that would lead to “net gain” was not facilitated.

VFF does not have confidence that DELWP understands the nature of the problem, or what makes people invest into achieving gain. The lived experience in relation to ‘protecting’ agriculture and in a range of

'environmental' controls is that the planning scheme does not actually "protect from loss" but actually reduces gain and accelerates loss.

VFF has regularly offered to provide examples of planning system failures on the ground. The Sustainable Animal Industry process, which called for submissions, was overseen by an advisory committee and then had a long process of SRG and TRG. Development of planning system responses is obviously required in this instance.

The GWAL consultation document is peppered with inconsistencies. It proports to protect green wedges from "development" yet it proposes placing into farming areas a whole range of urban uses in which should be provided for within the UGB and by PSPs. The officer response of Hume City Council that the document was all about protecting agriculture at all costs and should be about facilitating restaurants not farming does demonstrate this "urban bias". Planners don't understand that what is proposed will not help farming, nor do they understand how 150 diners al fresco might lead to impacts on the dairy farm next door. This demonstrates "urban bias".

Is guidance alone the answer?

While strengthening regional policy and preparing better guidance are supported, they will be ineffective unless the restructure and wording previously submitted by VFF is incorporated and agriculture is mentioned widely throughout other PPF provisions – settlement/ urban growth; renewable energy; timber plantations; climate change adaptation and even native vegetation (recognise not permanent loss and on - site offset – should have own provision as not use and development triggers).

VFF has often questioned why there is no guidance on the Farming Zone despite it being the number one zone by land area.

VFF has often called for SMART planning principles to be appropriately applied to agriculture especially duplication of regulation and compliance with the Act.

VFF has often called for guidance on how to make a decision in farming zones, and how to ensure a nexus between the permit trigger and permit conditions, including from referral bodies. A response by DELWP of "take it to VCAT" in relation to a referral authority regularly applying what DELWP agreed was an ultra vires conditions to planning permits compounds urban bias. It shows a lack of responsibility for the proper implementation of the scheme. It infers that there is Departmental consent to the use of the Planning Scheme to achieve land management change without any nexus to land use or development change to avoid the need to consider compensation.

We do believe guidance is lacking and is important. Unless VC71 changes for agriculture are reversed, guidance will not stop "urban development in green wedges" or on farmland. Guidance needs to be based on good provisions and to raise the understanding of referral bodies duties and responsibilities under the *Planning and Environment Act* – another issue which former Panel Chair Ms Gibson recommended.

VFF believes that reinstating the previous "agriculture policy" in concert with practice notes, and correct interpretation/enforcement of "in conjunction" with farming, is likely to be highly successful in achieving many of the aims of the Government's current paper. That is why it is a duty of a responsible authority to 'enforce' the planning scheme. Note that the "In conjunction" use must be subordinate to agriculture, the primary use.

VFF is willing to work with DELWP to draft the suite of guidance notes outlined in this submission, and also to assist in the development of the planning system changes required to give effect to the guidance.

What is VFFs position on provision of guidance

In the past VFF have called for funding for four officers to provide advice to government agencies when they are planning developments on farming land and to councils when considering applications in the rural suite of zones. This would be similar to ‘heritage advisors’. The *Inquiry into sustainable development of agribusiness in Outer Suburban Melbourne* made recommendations for agribusiness officers in interface councils. The need for advice is wider than just metro Councils and needs to be individuals that understand the industry as a whole, rather than promoting specific production methods.

<p>Recommendation 16:</p> <p>That the Victorian Government determine a funding model which ensures all interface councils employ – or have access to – agribusiness officers.</p>	<p>Support in part</p> <p>Participants in the agribusiness sector in interface council areas (and other parts of the state) may access a range of existing service provider networks, including industry-based agribusiness networks such as the Yarra Valley Agribusiness Network, specific Department of Primary Industries (DPI) -supported initiatives such as the Horticulture Industry Network and AgFutures, and other Victorian Government programs.</p> <p>DPI services available to farmers and industry are articulated in a series of sector service plans (available at www.dpi.vic.gov.au/agriculture).</p>
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Excerpt from the Inquiry into sustainable development of agribusiness in Outer Suburban Melbourne

Two examples of how such a program of technical advice would have assisted Government programs and council decisions are TAC wire barriers and the approval of a poultry farm as “grazing” by a periurban council in the GWAL.

Community concern at the roll out of wire rope barriers included stretches of highway where fire trucks and farm machinery could not easily access property. Centre of road installation did not consider the width of farm vehicles in relation to the seal and the ability to turn into an access point. On at least one major freeway the CFA had to travel nearly 20 kilometres in the wrong direction to be able to turn around and head in the direction of fire.

In the *Sustainable Animal Industries* processes, and after the Minister for Agriculture clearly stating that all poultry farms were “intensive” as they required a majority of food being brought in, one Council approved a free range poultry farm based on a statement that the chickens would live on snails. Intensive uses were prohibited in that zone. No advice was sought as to whether that statement was true, and if that was to be the operation is would have animal welfare implications.

It is critical that people who have knowledge and understanding provide advice if perverse outcomes are to be avoided.

Recommendation for farm advice

- VFF calls on the Government to fund the farming advisor roles on the Farm Safety officer model and to ensure VFFs active involvement at all stages of the development of planning system guidance documents.

How does government impact on right to farm?

The following list is an example of how failure to consider agriculture by government can impact on ongoing agricultural production

- EPA sensitive use placing the priority on the secondary use not the purpose for which the land is zoned
- Restrictions in urban areas (farm machinery size and days of operation, firearms, chemical use, frost fans, scare guns etc)
- Inconsistent Authority of Control Wildlife processes
- Crown Land Managers not managing overly abundant wildlife and pest plants and animals
- Transport impacting on viability (BMID)
- Government not investing in getting goods to market
- Land tax changes making it difficult to lease land to remain viable or give a young farmer a start in life
- Highest and best use valuations leading to high land values based on urban development that cannot occur – and increasing rates to unsustainable levels
- Rates cap not capping to category is seeing farmer increasingly subsidising urban communities
- 20(4) changes not considering agriculture
- Ministerial intervention not considering ‘agriculture’

How can planning facilitate a ‘whole of government’ approach to ensure agriculture can evolve and grow its economic value to Victoria?

By understanding the nature of agriculture now, what opportunities and threats climate change present to future agriculture and by identifying all of the regulatory regimes applying to agriculture (Productivity Commission work may assist) DELWP is well placed to take ownership of local government, planning, environment (including EPA), crown land management and water considerations and to facilitate decisions relating to valuation methods, land tax calculations, restrictive urban regulations minimising the size of farm machinery in metropolitan areas, land access considerations for utilities etcetera.

A plan stating “this will always be agriculture” cannot make it happen. If there is no market for the produce, or if the land is so conflicted the production costs of the goods are higher due to ‘urban’ factors than other similar produce then production will cease.

Case Study - Keilor

The Keilor river flats are an example of these pressures. The soil is high quality. There was irrigated water available. The cost of water rose to a point market garden use was no longer feasible. Development was occurring around the site raising expectations for development and impacting on valuations – which increased rates. The presence of dwellings near the farm meant a restriction on the use of chemicals which reduced yield. New technology / large tractors were not viable due to the investment cost and the inability to move machinery on local roads to other properties or sharing the investment. The ‘natural systems’ were conducive but government regulation increased total production costs to a point where costs were no longer covered.

Unless planning commits to taking this “whole system” approach each year more versatile agricultural land will be priced out of production.

Sunbury Case Study

Helen Gibson used the example of transitioning to ‘high value’ grapes. A VHR listed vineyard in Sunbury is an example of a small lot that was once sustainable under grapes. It is also an example of urban encroachment and environmental promises impacting on existing operation. Despite being outside the Metropolitan Assessment Area this property has been “promised” as a growling grass frog protection site.

As it is outside the assessment area it is not included in any equalisation scheme. Letters from DELWP have instructed the landholder to undertake actions to an extent where farming 90% of the block is contravening the advice.

As DELWP or the developer are not purchasing the site the owner needs to farm the land to make a living and pay rates. If it wasn't farmed then they would also be paying land tax. Council has suggested they "donate" their home and source of income to Council.

VFF hopes that this is an error however no explanation of the legality of the DELWP position or a retraction / correction has been made. The 'process' that created this situation was a DELWP Planning process and a DELWP Environment authored study upon which a federal approval was based. It demonstrates how an "urban bias" seeing agriculture as land waiting to provide community benefit at farmer cost can be the outcome of existing planning processes.

Even though this is hopefully an outlier administrative error at no stage did the MAA process really consider the development contributions principles of ++ vs Pakenham Shire. It did not consider whether the *Planning and Environment Act* had the head of power to demand land management outcomes or to sign over land without compensation. It did not look at the social, economic and environmental consequences of the proposal on that site or afford its owner natural justice.

Farmers need to have confidence that the whole Government is working together to secure a future for Agriculture in the state, and that farmers will be treated fairly by regulatory systems.

Increasingly the planning system is being used to tell farmers what they need to do on their land and how they should farm. Studies looking at the benefit of revegetation on sheep properties in cold and wet climates are being used by planners to state what should happen on a grain property in the Wimmera. The government needs to understand that farmers need to be able to make market decisions based on production – not hypothetical farming objectives of lobby groups that cannot be applied at scale, or are less effective than GPS enabled machinery.

Urban bias is often about "perception" of what is ethical or good without really understanding the issue. The Sustainable Animal Industries process did seek to address some of these issues. Many planners and even 'new' or 'artisanal' producers learnt about federal biosecurity and state pandemic plans in relation to why pigs and poultry need to be separated regarding zoonotic disease and mutations. 2020 has shown why the VFF has long been advocating for better understanding of biosecurity and how the planning system needs to understand what biosecurity is if they are to not create a public health or animal welfare issue by seeking outcomes contrary to state and federal regulations.

What type of "whole of Government" approach will assist agriculture?

In addition to the planning system issues already outlined, the following actions would start the process of creating an environment of protecting existing agricultural land and farm practices:

- Existing road and rail networks are upgraded and maintained to get goods to market, including first and last mile upgrades and removal of restrictions to operate and transport machinery in metro areas
- Preparation of land access legislation to apply to any infrastructure proposal through farming land to:
 - Prioritise the use of crown land / existing infrastructure alignment;
 - Mandate full involvement of landholders in route design
 - Ensure commercial consent and compensation for loss of production
 - Ensure any ongoing restrictions on use (weight, height of machinery), access roads, inspections. Biosecurity compliance, footprint etc) and loss of opportunities are fully compensated on an annual basis

- formal agreements be prepared that determine how the 'operation' is to occur and how biosecurity and other requirements are to be delivered
- Where the infrastructure impacts on viability of farming the whole site is acquired and efforts made to locate appropriate new property and assist in all consequential costs
- A regulated 'rehabilitation' process similar to mining regulations
- Proponent fully funding legitimate legal and technical costs of the landholder
- Removal of any 'over fence' impacts of urban development on farming practice. If the planning system encourages a hard urban edge to farm land then use of chemicals, hours of operation, use of scare guns, frost fans etc must not be constrained. (Right to Farm)
- Developers to include "buffer zones" to agriculture within their development area. LDRZ & PPRZ are options.
- EPA sensitive use requirements relating to production of food and fibre should not apply to dwellings within land zoned for agriculture including the Green Wedge zone
- Full funding of pest plant and animal management on crown land by the relevant crown land manager, to prevent impacts on neighbouring farmers who are meeting their obligations, but receive ongoing reinfestation from Crown Land.
- Revision of land tax provisions that penalise farmers leasing UGB land. The provision deters a model of young farmer entry to agriculture, with retiring farmer as mentor or leasing of land for economies of scale.
- EPA education and enforcement campaign on biosecurity and the risk, and the danger of rubbish dumping by the public, on farm land.
- Penalties to perpetrators and a compensation scheme akin to victims of crime compensation scheme, to farmers for loss of stock or production, due to biosecurity breaches.
- Funding EPA, VicPol and Agriculture Victoria to enforce and prosecute biosecurity breaches Education and enforcement campaign on biosecurity and the risk and danger of trespassing on farms.
- VFF calls on the Government to fund the farming advisor roles on the Farm Safety officer model and to ensure VFFs active involvement at all stages of the development of planning system guidance documents.

Response to specific issues / recommendations

Subdivision and Housing

VFF does not support the recommendations in relation to subdivision and housing at this stage.

As discussed previously the appropriate planning scheme considerations and assessment of available tools has not been undertaken.

The proposal does not respond to the issues outlined by VFF in its right to farm policy, or in the 1999 Review of the VPPs.

VFF believes that reinstatement of the pre VC71 state policy, better guidance and detailed work to establish what the appropriate minimum for subdivision and dwellings are in each area which would be the 'orderly and proper' approach.

Dwellings in conjunction with genuine farming are not the major threat to agricultural land. Farmers aren't rushing to subdivide farms – they are actively seeking more land to gain the economy of scale required. Being able to buy 20, 30 or 40 hectares of land to make your farm more sustainable can be the benefit of subdivision of land – when the expectation of a "dwelling" on that land is removed.

It is ironic that despite VFF asking for stronger guidance on subdivision and dwellings for non agricultural purposes DELWP created 52.12 and 52.13 which makes it quicker and easier to subdivide. The exhibited document does not discuss this clause, or why it was introduced. It does not suggest its removal, but it does seem to want to treat a ‘lifestyle’ purchase on 2ha the same as a farm business on 400 hectares with farmers and farm managers required to be on site for welfare and safety reasons.

The proposal does not look at standing strong in the face of community pressure to be able to live on small lots in farming areas. This land is only lost to agriculture when a dwelling is placed on it, and the resultant land use conflict then may see neighbours having to sell and relocate to an area they can farm. It is this change that often sees land subdivided by speculators. Having a minimum that reflects the farm size required for the predominant commodity to be viable in 30 years time is a much more sensible approach than treating a dwelling on a 400 hectare farm the same as on a 2 ha lot, or not allowing a 400 hectare farm to subdivide off 20 hectares to sell to another farmer – which could then keep them viable.

The planning system has four residential zones and a rural living zone which are better placed to provide for a range of residential lifestyles. Rural residential displaces agriculture, distorts land prices and introduces conflict with the ongoing neighbouring farms. This should not be confused with the need for some larger farms to provide farm worker accommodation. The focus needs to be on justified need for another dwelling. It is perplexing that current and proposed policies are actively encouraging multiple dwellings on even small lots for host farm and tourism purposes, not stopping dwellings on lots not linked to farming, or the 4ha carve up of green wedge zoned land for “rural living”.

VFF Right to Farm Policy guidance relating to subdivision and dwellings

Planning Decisions

- Planning schemes must limit non-agricultural land uses and subdivisions that are likely to have an adverse impact on existing farming enterprise or future growth of a farming enterprise.
- Buffer distances to ‘dwellings’ in areas identified for intensive animal industries should be measured to dwellings in an urban zone.
- Fixed urban boundaries are adopted to minimise the impact of urban expansion for all Victorian cities to provide more certainty for the future use of farming land for agriculture.
- Existing farming enterprises, regardless of zone or zone changes, must be protected by existing use rights.
- Subdivision of land to excise a dwelling lot should only be allowed where there is no risk to the current or future farming opportunities of the area.

Excerpt from VFF Right to Farm Policy

Where does the default 40 ha come from and why is it part of the problem?

VFF believes that the root cause of the problem is failure of Council’s to undertake the studies called for in the pre VC71 Agriculture Policy. Reference to the “default” 40 hectares dates back to at least 1968. Not only has the planning Act and system changed since 1968 the nature of agriculture has undertaken a change similar to that of telecommunications.

We wouldn’t plan a telecommunications system around the rotary dial phone on the kitchen wall and voice only systems. Telecommunications now include mobile, satellite, VOIP, data, streaming, visual teleconferencing. No the planning system really needs to consider all the changes in agriculture and where that is heading to ‘future proof’ the system such as:

- Being able to buy land to achieve economy of scale and returns on investment in machinery and technology;
- Allowing the introduction of new technology, varieties and practice which reduce labour units, increase production per hectare, reduce carbon footprint;

- Allow transition to different commodities or production systems to respond to market demand.

Can Victoria afford to lose agriculture and food and fibre processing industries? The loss of TCF, auto manufacturing and many large chemical producers demonstrate that industries must be allowed to adjust to remain competitive.

The GWAL dwelling and subdivision proposals and agent of change are more akin to old interim development orders – everything needs a permit and everything will be considered equally as there is no policy, zones or provisions to lead to a balanced and strategic outcome.

VFF recommends that the only strategic and fair way forward to address the issue of subdivision and dwellings is the reinstatement of the pre VC71 Agriculture policy direction and the preparation of a Land Use Strategy similar to the work for Shepparton, Campaspe, Moira to determine the future of agriculture and how the planning scheme can help achieve it.

Non agricultural uses / buffer zone

A majority of the secondary uses proposed in the document are generally “urban” in nature, with the exception of farm gate sales. If the use is not agricultural in nature or its primary catchment is urban then it should be located in an urban zone. No “transition” zone should be implemented. PSP guidance must be reviewed to require places of worship, data centres, schools, places of assembly etc to be planned for within the UGB.

This should also be applied to infrastructure that is serving an urban community and to any “inter urban” or landscape / green lungs objectives. Just as recreation is to be planned for within PSPs they should also provide urban breaks as a buffer to agriculture, for urban amenity and for habitat. If these functions are for a “community benefit” then they should be public and managed by the crown or council.

A farmer should not be expected to provide an inter-urban break where it impacts on farming. Data centres, 1000 patron places of worship, 150 seat restaurants should be in the urban communities they serve.

These uses should not be badged as “versatility” as they can actively prohibit versatility in agricultural production. Appropriate farm gate sales do demonstrate value adding that is linked to and secondary to the main agricultural use. Allowing a 150 seat restaurant with associated car parking and traffic movements that may lead to restriction on movement of farm machinery is seen as “versatility” even on the high quality soil that the same document suggests intensive agricultural uses should not be allowed. This is inconsistent and demonstrates an “urban bias” suggesting farms predominant role is to provide ‘leisure’ and amenity, not to produce food and fibre. Such urban uses must still be “in conjunction” with agriculture, and the proposed agriculture must be in place and productive **before** the “in conjunction” use can commence.

Where infrastructure is to be provided it must not threaten the viability of an area, and the ‘land access’ considerations outlined previously must be implemented.

Bacchus Marsh Irrigation District Case Study

An example of infrastructure threatening an area is the Bacchus Marsh Irrigation District. This area produces apples, lettuces and turf. The distribution system is aging and costly. If one more ‘user’ is lost to the system it is believed the system will no longer be viable. Over the past 10 years a second freeway alignment has been constructed in the area, land rezoned for housing, and non agricultural uses been permitted in irrigated areas.

VicRoads is looking at another 100m wide corridor through the area to facilitate urban development on the “inter urban break” rural living zoned land at Bences Road. The former state coal mine is a proposed site for PFAS contaminated soil. Either of these proposals could push the irrigation district past feasibility but the planning system is not considering these impacts and the exhibition document is not clearly prioritising this high quality soils with irrigated water over the urban uses that threaten its future.

Relevant recommendations and response - Inquiry into sustainable development of agribusiness in Outer Suburban Melbourne

GWAL by supporting a wide range of conflict issues seems to be contrary to Recommendations 47 and 49 and the intent of the Government response. It is critical that future work recognises the specific policies, resources and skills needed to plan for agriculture, especially in interface areas of all cities and for Green Wedge Plans and PSPs to consider adjacent land use and amenity issue with the aim to support compatibility not conflict.

<p>Recommendation 47: That the Victorian Government recognises that the interface is a unique planning area requiring specific planning policies, resources and skills.</p>	<p>Support The Victorian Government recognises that the interface is a unique planning area requiring specific planning policies, resources and skills. Amendment VC66 also incorporated planning principles for Melbourne’s hinterland in Clause 12 of the State Planning Policy Framework. This is consistent with a key goal of the <i>Future Farming</i> strategy which is for the land-use planning system to provide certainty to farm businesses and ensure that they can maintain, expand and intensify current operations while also balancing competing community demands for amenity land-use. The Government’s <i>Ready for Tomorrow – A Blueprint for Regional and Rural Victoria</i> specifically focuses on the need for coordinated planning in Melbourne’s hinterland.</p>
<p>Recommendation 49: That the Growth Areas Authority prepare detailed guidance information to help local governments plan for urban growth and agriculture in a way that supports compatibility between land uses. This is to occur in close consultation with the Port Phillip & Westernport Catchment Management Authority.</p>	<p>Support in principle See response to recommendation 48. Green Wedge Management Plans and Precinct Structure Plans (PSP) provide an opportunity to consider interface issues from outside and within the urban growth boundary. Adjacent land uses, and amenity issues that result, will be considered as part of the PSP process.</p>

Excerpt from the Inquiry into sustainable development of agribusiness in Outer Suburban Melbourne

Farm Gate Sales

Primary Production sales have been treated as the same as non-agricultural uses. VFF supports concept of primary production sales as well as the need to consider the nexus to production. This is a prime example of the need for clear guidance to producers and councils and of the opportunity for DELWP to partner with industry to view not only the definition or guidance but the policy and decision guidelines support versatility in production, pass the in conjunction with tests and do not create land use conflict.

Soil based restrictions

The document proposes to exclude broiler farms or “shed based” production from high quality soils. No such limitation is to be placed on the ‘urban’ secondary uses and infrastructure.

Keilor flats is excellent soil. The irrigation water required to support a high value ‘horticultural’ use is too expensive to be viable. The land has existing land use conflicts. Would a broiler farm or growing hydroponic vegetables / flowers be a better use than restaurants?

Planning policy should let the farmer determine what they can produce on the site.

The Government would be better to protect key soils where water is available from loss to non farming use, and from land use conflict. The two areas on the Werribee Irrigation System, Werribee South and Bacchus Marsh have both been put under stress by secondary uses, loss of land for infrastructure and rezoning for urban development as a hard edge. Not only does this make it difficult to farm in the area it increases the price of water threatening both the viability of the system and the intensive horticulture and animal industries in these areas.

The soil based recommendations and restrictions in GWAL should be reviewed in conjunction with industry and considered in the context of recommendations 57 and 61 of *the Inquiry into sustainable development of agribusiness in Outer Suburban Melbourne*.

<p>Recommendation 57: That the Victorian Government recognise the need for further investment in ongoing soil monitoring and research and the implementation of soil conservation practices.</p>	<p>Support in principle The Victorian Government recognises the importance of healthy and productive soils to regional industries, particularly agriculture. While practices to protect and enhance soil quality generally have a strong private benefit, DPI is currently considering expanding its capabilities in this space, recognising the likely benefits to agricultural productivity now and into the future.</p>
<p>Recommendation 61: That the Victorian Government encourage the development of clusters of hydroponic greenhouses in those peri-urban areas which are unsuitable for soil based agriculture and have access to class A recycled water.</p>	<p>Support in principle The Victorian Government supports the development of various agricultural systems across Victoria, including hydroponic greenhouses. In a market economy, the private sector will seek out a range of (agricultural) opportunities to invest and operate in those peri-urban areas that are unsuitable for soil based agriculture and have access to class A recycled water. The Victorian Government sets out clear strategic directions through policy, programs and appropriate strategic land use planning studies, as a way to provide clarity and inform decision processes relating to a range of future uses of land resources.</p>

Excerpt from the Inquiry into sustainable development of agribusiness in Outer Suburban Melbourne

Cleanfill is a planning issue

VFF members have raised concern with clean fill soil being “dumped” in farming zones. GWAL incorrectly states that this is a matter for the EPA who has confirmed that it regulates contaminated soil only.

Previous planning controls included clear triggers for planning approvals where earthworks change the topography or the rate or volume of water from the site.

Many farmers need a planning permit to laser grade a farm – where the profile might be changed by less than a metre over 400 hectares. If a farmer needs an approval to achieve a more water efficient and

sustainable soil profile for agriculture it is surprising that taking land out of agricultural production to stockpile soil because it is cheaper than finding a beneficial use for it again demonstrates the planning systems “urban bias” that farm land is vacant and waiting for a use that will assist urban development.

CONCLUSION

VFF has been forced to conclude that the fundamental problem with both Strategic Agricultural Land and GWAL is that there is a systemic and likely unconscious urban bias in the planning system and the planners administering the system. This bias demonstrates that despite policy statements to the contrary, the system still interprets the planning scheme in a way that sees farming land as vacant, underutilised and waiting for an urban use.

Although this may be based on lack of education, lack of guidance or lack of knowledge about planning, these are all things that can and should be addressed.

A year ago DELWP) undertook a calculation of green wedge and rural / farming zone area as a percentage of zoned land in Victoria. It was 62.86%. You would expect a land used based planning system would have a better understanding of the issues and challenges facing nearly two thirds of Victoria.

Yet when you look at the planning system today, not only do you see very little mention of the economic importance of farming, you see VicSmart provisions that encouraged dwellings, particular provisions developed for urban growth areas being applied to farmland, and failure to acknowledge the need for the industry to determine how best to 'adapt' to climate change despite significant industry research and development investment and sector guidance.

For at least the last four years VFF has consistently been raising industry concerns and expressing them in planning system outcomes. Despite twenty years of planning system and government reviews and reports discussing what is needed, there seems to be strong resistance to considering the needs of, and “to foster and encourage”, Victoria's main land use.

Planning has increasingly become a popular location for government environmental policy to be delivered. In debating the Planning and Environment Act and the wider 'development' trigger, these concerns were discussed: The checks and balances in the Act, the nexus to land use and development change, the commitment to a balanced assessment, where the assurances were given to farmers that their fears would not eventuate. As we have shown, the planning system and its processes are not allowing the proper consideration of the principles of the Act for agriculture.

GWAL does not consider or address these issues. History has demonstrated that there has been no commitment to applying a partnership approach to a considering the issues, or the work program to address them. In its place is a document on inconsistent approaches, agriculture as an afterthought in describing green wedges, and theoretical controls that will sit outside planning and other regulatory systems.

Rather than discussing why many of the issues it seeks to address were, and no longer are, included in state policy the document goes in to its greatest detail on outlining landscape controls so at least these areas look 'pretty' not 'productive'.

VFF is planning for a bright future for agriculture. Our members are producing high quality food and fibre with world leading practice. We are sustainable. We are productive. We are future focused. We are under pressure. We need a planning system that understands that.

Emma Germano
President
Victorian Farmers Federation

VICTORIAN GOVERNMENT RESPONSE TO THE REPORT OF THE OUTER SUBURBAN/INTERFACE SERVICES AND DEVELOPMENT COMMITTEE INQUIRY INTO SUSTAINABLE DEVELOPMENT OF AGRIBUSINESS IN OUTER SUBURBAN MELBOURNE

Recommendations	Response
<p>Recommendation 5:</p> <p>That the Minister for Agriculture and the Minister for Planning convene a search conference (or similar forum) no later than 2012, to discuss current issues confronting farmers and other stakeholders in peri-urban Melbourne.</p>	<p>Support in principle</p> <p>The discussion of issues confronting farmers and stakeholders is supported by the Victorian Government.</p> <p>Exploration of these issues is already available through the Victorian Government's AgFutures Initiative. AgFutures is delivered across peri-urban areas and has provided 2 series of events in the Casey/Cardinia area.</p> <p>The Department of Planning and Community Development have also hosted two annual planning forums, funded by the <i>Future Farming</i> strategy, which provide an opportunity to explore rural planning and peri-urban issues.</p> <p>Peri-urban issues have been discussed by the Future Farming Advisory Panel (FFAP), a reference stakeholder panel formed under the <i>Future Farming</i> strategy. Subsequent to the FFAP, the Minister for Agriculture is examining the feasibility of establishing a Rural Futures Panel to work with farmers and other stakeholders to discuss issues relevant to agricultural development, including in peri-urban areas. This may provide an effective forum for the discussion of issues as proposed in this recommendation.</p>
<p>Recommendation 6:</p> <p>That, following the above recommendation, a report of the conference/forum should be prepared with a view to establishing a Ministerial advisory body to take further action arising from the outcomes and recommendations.</p>	<p>Support in principle</p> <p>See response to recommendation 5. In the event that a Rural Futures Panel is convened, this recommendation will be forwarded to the panel for its consideration.</p>

<p>Recommendation 16:</p> <p>That the Victorian Government determine a funding model which ensures all interface councils employ – or have access to – agribusiness officers.</p>	<p>Support in part</p> <p>Participants in the agribusiness sector in interface council areas (and other parts of the state) may access a range of existing service provider networks, including industry-based agribusiness networks such as the Yarra Valley Agribusiness Network, specific Department of Primary Industries (DPI) -supported initiatives such as the Horticulture Industry Network and AgFutures, and other Victorian Government programs.</p> <p>DPI services available to farmers and industry are articulated in a series of sector service plans (available at www.dpi.vic.gov.au/agriculture).</p>
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<p>Recommendation 20:</p> <p>That all rural land outside the Urban Growth Boundary becomes eligible for rural grants.</p>	<p>Support in principle</p> <p>Grants are typically designed to address particular needs and focus areas.</p> <p>The Victorian Government provides a range of grants to support agribusiness and related industries. Many of these are available to applicants in interface councils.</p> <p>Grants available through Regional Development Victoria (RDV) are specifically targeted at overcoming the challenges faced by regional and rural communities and are limited to the forty-eight regional and rural councils identified in the <i>Regional Infrastructure Development Fund Act 1999</i>. In recognition that parts of interface councils can face similar challenges to regional areas, there is scope within the <i>Regional Development Victoria Act 2002</i> for some grants administered by RDV to be made available in the nine interface councils, which has been utilised in the past on a case by case basis.</p>
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Recommendations	Response
<p>Recommendation 26:</p> <p>That the Department of Primary Industries partner with the Victorian Farmers Federation, VicHealth, growers and other stakeholders to develop a strategy to address perceptions of peri-urban agriculture, including but not limited to, publicity and education campaigns explaining the link between farming and fresh, local and healthy food.</p>	<p>Support in principle</p> <p>The Victorian Government is developing a whole of Government Food Strategy, due for release in 2011. The <i>Victorian Food Strategy</i> is a whole of government initiative and will consider the issues raised in the recommendation. The Strategy will however have a broader application beyond peri-urban agriculture. The stakeholders identified in the recommendation will be consulted as part of the strategy development.</p>

<p>Recommendation 28:</p> <p>That the Victorian Government, in consultation with the Victorian Farmers Federation, industry bodies and the interface local governments, provide direct assistance to agribusinesses to implement best practice farming methods which minimise off-farm impacts on neighbouring properties.</p>	<p>Support in principle</p> <p>The <i>Future Farming</i> strategy supports best farm practice and transfer of knowledge to farmers.</p> <p>RD&E priorities for investment are determined through well developed processes in association with industry, particularly Rural Research and Development Corporations.</p> <p>This recommendation will be further considered against the priorities of the DPI <i>Better Services to Farmers</i>, principally that DPI will provide services where public benefits arise, and will collaborate with other service providers and industry partners.</p>
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Recommendations	Response
<p>Recommendation 29:</p> <p>That the Victorian Government, local government and Australia Pacific Airports (Melbourne) meet with affected landowners in the vicinity of Melbourne Airport to resolve problems concerning the use of private aircraft for weed control purposes.</p>	<p>Support</p> <p>The Melbourne Airport Planning Coordination Forum and Community Consultative Group is the most appropriate forum for discussion and progression of issues concerning the use of private aircraft for weed control in the vicinity of Melbourne Airport. The Group consists of Victorian Government department representatives, local government, industry and Melbourne Airport representatives.</p>
<p>Recommendation 30:</p> <p>That the Department of Primary Industries urgently consider declaring <i>Galenia pubescens</i> a noxious weed in view of its impact on agricultural industries (such as beekeeping) and native vegetation in peri-urban Melbourne.</p>	<p>Support in principle</p> <p>The Victorian Government has noted the impact of <i>Galenia pubescens</i> in areas including peri-urban Melbourne and elsewhere throughout the State, and included assessment of this species as part of its current Noxious Weeds Review. The review is being undertaken by DPI in partnership with Catchment Management Authorities, and uses a risk assessment tool which assesses social, environmental and economic impacts to recommend additions to the noxious weeds register under the <i>Catchment and Land Protection Act</i>.</p> <p>The current review's findings are set to be delivered shortly and will consider <i>Galenia pubescens</i> as part of the process.</p>

<p>Recommendation 31:</p> <p>That the Victorian Government work with all stakeholders to develop strategies to reduce the fuel load on the edge of the Urban Growth Boundary and residential areas and to continue increasing funding for weed control initiatives on public and private land. The Committee acknowledges that this recommendation may need to be reviewed in light of the findings of the 2009 Victorian Bushfires Royal Commission.</p>	<p>Support</p> <p>The Bushfires Royal Commission has in its final report set a planned burning target for the state of 5% of public land and the Victorian Government has accepted this recommendation. Further planning and consultation will be required to determine the benefits and risks of planned burning across the state, including in peri-urban areas, where issues of public safety and amenity can arise. Funding for weed control initiatives will continue to be determined primarily on a biosecurity basis.</p>
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Recommendations	Response
<p>Recommendation 32:</p> <p>That the Victorian Government, in partnership with local government, investigate ways to put pressure on absentee landholders to control weeds and reduce fuel loading to ensure that the safety and economic viability of nearby agricultural operations are not compromised. The Committee acknowledges that this recommendation may need to be reviewed in light of the findings of the 2009 Victorian Bushfires Royal Commission.</p>	<p>Support in principle</p> <p>All landowners including absentees have a responsibility to control certain noxious weeds (regionally controlled and regionally prohibited species) on their land. The Victorian Government takes action to enforce this responsibility, particularly where this can provide significant public benefit and support community action on weeds.</p> <p>Noxious weed risk is primarily managed on a biosecurity basis, which includes consideration of weed impacts in the form of increased fire risk.</p> <p>When assessing fire risk, the Victorian Government will consider measures for reduction of fuel loads on private land in formulating its approach to strategic reduction of fuel loads across all land tenures and vegetation types.</p>
<p>Recommendation 33:</p> <p>That the Grow West model of pest and weed control be studied and expanded, where appropriate, into other areas of the Port Phillip and Westernport region.</p>	<p>Support in principle</p> <p>Grow West is an excellent example of integrated landscape management where problems such as serrated tussock, rabbits and soil erosion are addressed and the land revegetated with trees and native vegetation as part of a more sustainable form of land management. The Port Phillip and Western Port Catchment Management Authorities are well placed to progress this recommendation through their catchment planning processes.</p>

<p>Recommendation 34:</p> <p>That, where dogs caught on farms can be identified (through permanent identification devices, such as microchips), the Department of Primary Industries and local councils actively enforce the strongest penalties for dog owners and organise compensation to be paid for damage or loss of livestock.</p>	<p>Support in principle</p> <p>The <i>Domestic Animals Act 1994</i> provides for microchip identification of dogs (compulsory for all new registrations) and the requirement to be registered and wearing a council marker.</p> <p>If a dog is identifiable to an owner, the owner is liable for dog attack, trespass and being at large offences, and for court awarded damages (compensation) if found guilty for livestock attack. The Act is enforced by local councils.</p>
<p>Recommendation 35:</p> <p>That the Department of Primary Industries prepare information concerning domestic dog attacks on livestock, for interface and peri-urban local governments to distribute to dog owners with council rates notices.</p>	<p>Support in principle</p> <p>The Victorian Government currently has a declared dog register on which Councils are required by law to record the causes of a dog being declared dangerous (including attacking livestock). Councils have access to local and state-wide information from this database. The information would be available to Councils to distribute with rates notices as they see fit. In addition to this, Government is considering updating the database in 2010/11 to make it more comprehensive.</p> <p>Owners of livestock or their agents are empowered under the <i>Domestic Animals Act 1994</i> to destroy dogs found at large near their confined or tethered animals.</p>
<p>Recommendation 36:</p> <p>That all local governments consider imposing curfews for domestic animals.</p>	<p>Not support</p> <p>This is a local government issue to be considered on a council-by-council basis.</p>
<p>Recommendation 37:</p> <p>That the Environment Protection Authority change its guidelines on frost fans to ensure that acceptable noise limits in the green wedges are consistent with farming zones throughout Victoria.</p>	<p>Support in principle</p> <p>The Environment Protection Authority (EPA) is currently finalising guidelines for noise in regional Victoria. This project looks comprehensively at the noise levels appropriate to different land zonings in country areas, based on the purpose and uses allowed for zones under the Victoria Planning Provisions.</p> <p>Once complete, the final approach of these new guidelines will be reflected in the frost fan guidelines. EPA notes that there are important differences between the Farming Zone and Green Wedge Zone in the emphasis given to agricultural and non-agricultural uses, which needs to be considered.</p>

<p>Recommendation 38:</p> <p>That the Department of Primary Industries conduct research on technology which may assist peri-urban growers to reduce the noise from frost fans and other methods of protecting crops from frost.</p>	<p>Support in principle</p> <p>The Victorian Government recognises that frost protection technologies are important in protecting crops from frost damage. RD&E priorities for investment are determined through well developed processes in association with industry, particularly Rural Research and Development Corporations.</p> <p>Equipment manufacturers may see opportunity in the private development of such technology that delivers a differentiated product meeting market needs.</p>
<p>Recommendation 39:</p> <p>That the Victorian Government, in consultation with local government, remove the requirement for primary producers to obtain a planning permit to install netting, providing that applicable building safety standards are met.</p>	<p>Support in principle</p> <p>The Victorian Government recognises the potential benefits of crop netting and supports the removal of unnecessary limitations on the ability of farmers to conduct their farming operations. Where unreasonable restrictions exist the government will work with local governments to remove those restrictions.</p>

<p>Recommendation 42:</p> <p>That VicRoads consult with the Victorian Farmers Federation and local farming communities in the planning of transport routes for new urban development where agribusinesses are likely to be affected.</p>	<p>Support in principle</p> <p>For metropolitan growth areas the Growth Area Framework Plans will set out the location of arterial roads in the new growth areas. The Victorian Farmers Federation will have an opportunity to comment on the Framework Plans along with other stakeholders. Detailed road design will be undertaken in Precinct Structure Plans (PSPs). An opportunity is provided for public comment on the content of PSPs through exhibition.</p> <p><i>Ready for Tomorrow – A Blueprint for Regional and Rural Victoria</i> will develop regional land use plans that respond to a range of issues including population growth and change.</p>
<p>Recommendation 43:</p> <p>That the Victorian Government encourage local councils to remove or streamline the permits required by farmers moving livestock on roads, including the option of introducing longer (5-10 year) permits rather than annual permits.</p>	<p>Support in principle</p> <p>The Victorian Government supports the streamlining of process and the removal of unnecessary regulatory burden. The Victorian Government will encourage local councils to consider streamlining process where appropriate on roads for which they are responsible.</p> <p>The role and function of arterial roads is such that site specific circumstances need to be carefully considered in the issuing of permits to ensure the safe and efficient operation of the road. The rapidly changing role of roads in the outer suburban areas requires careful consideration of road safety matters for existing and identified future arterial roads.</p>

<p>Recommendation 45:</p> <p>That the Victorian Government work with local government and the Victorian Apiarists Association to review local laws in conflict with the Apiary Code of Practice 1997.</p>	<p>Support in principle</p> <p>DPI is available to assist in this process in an advisory role concerning beekeeping and crop pollination practices. There may be potential for local laws to adversely affect location of beehives for pollination of crops, particularly high value intensive horticultural bee pollination dependant crops.</p>
<p>Recommendation 46:</p> <p>That the Department of Primary Industries provide training for local government officers to improve awareness of the Apiary Code of Practice 1997.</p>	<p>Support</p> <p>The Victorian Government, through DPI, will provide training for local government officers on a cyclical basis. DPI delivered a presentation to the 2009 conference of the Planning Enforcement Officers Association of Victoria.</p>
<p>Recommendation 47:</p> <p>That the Victorian Government recognises that the interface is a unique planning area requiring specific planning policies, resources and skills.</p>	<p>Support</p> <p>The Victorian Government recognises that the interface is a unique planning area requiring specific planning policies, resources and skills.</p> <p>Amendment VC66 also incorporated planning principles for Melbourne's hinterland in Clause 12 of the State Planning Policy Framework.</p> <p>This is consistent with a key goal of the <i>Future Farming</i> strategy which is for the land-use planning system to provide certainty to farm businesses and ensure that they can maintain, expand and intensify current operations while also balancing competing community demands for amenity land-use.</p> <p>The Government's <i>Ready for Tomorrow – A Blueprint for Regional and Rural Victoria</i> specifically focuses on the need for coordinated planning in Melbourne's hinterland.</p>
<p>Recommendation 49:</p> <p>That the Growth Areas Authority prepare detailed guidance information to help local governments plan for urban growth and agriculture in a way that supports compatibility between land uses. This is to occur in close consultation with the Port Phillip & Westernport Catchment Management Authority.</p>	<p>Support in principle</p> <p>See response to recommendation 48.</p> <p>Green Wedge Management Plans and Precinct Structure Plans (PSP) provide an opportunity to consider interface issues from outside and within the urban growth boundary. Adjacent land uses, and amenity issues that result, will be considered as part of the PSP process.</p>

<p>Recommendation 50:</p> <p>That the Victorian Government encourages landholders in farming zones to undertake a Whole Farm Planning course before applying for a permit to construct a dwelling.</p>	<p>Support in principle</p> <p>Several Victorian Government programs support a whole farm planning approach.</p> <p>The First Farm Grant which was launched under the <i>Ready for Tomorrow – A Blueprint for Regional and Rural Victoria</i>, requires whole farm business planning to be completed as a first component of the grant.</p> <p>The Victorian Government will continue to support and encourage the adoption of whole farm planning as an integral part of good farm business practice.</p>
<p>Recommendation 51:</p> <p>That the Victorian Government, through the Department of Sustainability and Environment, consider establishing a 'green wedge eco tender' for green wedge landholders, along the lines of the existing BushTender program.</p>	<p>Support in principle</p> <p>The <i>Land and Biodiversity White Paper</i> commits the Victorian Government to the investigation of new environmental markets and payments for environmental goods and services. However, further analysis would be required to establish whether there is an economic basis for a green wedge eco-tender approach. A range of approaches to influencing land use in different locations across the state will need to be tried to ensure the best mix of market-based instruments is used for the circumstances.</p>
<p>Recommendation 57:</p> <p>That the Victorian Government recognise the need for further investment in ongoing soil monitoring and research and the implementation of soil conservation practices.</p>	<p>Support in principle</p> <p>The Victorian Government recognises the importance of healthy and productive soils to regional industries, particularly agriculture. While practices to protect and enhance soil quality generally have a strong private benefit, DPI is currently considering expanding its capabilities in this space, recognising the likely benefits to agricultural productivity now and into the future.</p>
<p>Recommendation 58:</p> <p>That the Victorian Government seek opportunities to increase awareness of the benefits of using organic compost and mulch within agriculture, including progressing this as part of its compliance with the Australian Government's National Waste Policy.</p>	<p>Support in principle</p> <p>The use of organic compost and mulch is already common practice in a number of commercial farming systems, particularly horticulture and nurseries.</p> <p>The Victorian Government currently invests in composting RD&E and will consider the benefits of further investment to increase organic compost and mulch application within its established framework for determining RD&E priorities for investment.</p>
<p>Recommendation 59:</p> <p>That the Department of Primary Industries progressively scale-up its research, training and extension services for organic agriculture in Victoria. This should also include training for relevant departmental officers in organic agriculture.</p>	<p>Support in principle</p> <p>The Victorian Government supports the development of various agricultural systems across Victoria, including organics. The \$205 million <i>Future Farming</i> strategy is the Victorian Government's strategy for helping farm businesses become more productive, competitive and sustainable. The <i>Future Farming</i> strategy has allocated \$1.08 million over three years to assist the Victorian organic sector to develop resilience in this sector, as well as further differentiating and substantiating organic products.</p> <p>RD&E priorities for investment are determined through well developed processes in association with industry, particularly Rural Research and Development Corporations.</p>

<p>Recommendation 61: That the Victorian Government encourage the development of clusters of hydroponic greenhouses in those peri-urban areas which are unsuitable for soil based agriculture and have access to class A recycled water.</p>	<p>Support in principle The Victorian Government supports the development of various agricultural systems across Victoria, including hydroponic greenhouses. In a market economy, the private sector will seek out a range of (agricultural) opportunities to invest and operate in those peri-urban areas that are unsuitable for soil based agriculture and have access to class A recycled water. The Victorian Government sets out clear strategic directions through policy, programs and appropriate strategic land use planning studies, as a way to provide clarity and inform decision processes relating to a range of future uses of land resources.</p>
<p>Recommendation 62: That the Victorian Government, through the Department of Primary Industries and Sustainability Victoria, support the development of technologies that enable farmers to produce their own electricity, fuels and other energy inputs</p>	<p>Support in principle The Victorian Government has a range of policies and programs that support the development of technologies that enable farmers to produce their own electricity, fuels and other energy inputs. The Victorian Government's premium feed-in tariff offers Victorians with small-scale solar photovoltaic systems of up to five kilowatts in size a guaranteed minimum credit of at least 60 cents per kilowatt hour for excess electricity fed back into the grid at any time of the day or year. To complement this program, the Victorian Government has a standard feed-in tariff available to households, community organisations and small businesses generating up to 100 kilowatts of clean electricity from wind, solar, hydro and biomass sources. The standard feed-in tariff allows farmers to sign up and receive the standard rate for any excess electricity they feed back into the State's electricity grid. In addition to these programs, there are alternative opportunities available for farmers to pursue. One emerging area is cogeneration which is a process where heat from electricity generation that would otherwise be wasted is used for other purposes like domestic and commercial heating and cooling, or for industrial processes. In Victoria, there are more than 30 sites with installed and operating cogeneration facilities. New technologies are being explored in Victoria, including a type of cogeneration that uses ceramic fuel cells. These could expand the range of sites for which cogeneration is applicable. In terms of farmers producing their own fuel and other energy inputs, the Victorian Government's <i>Victoria's Energy Future</i> notes that first generation bioenergy is only suitable for local uses due to limited supplies and feedstock being located in specific areas. DPI, through Farm Services Victoria, plays an active role in bioenergy industry support including assessment of barriers and opportunities. Second generation bioenergy technologies are at an early stage of development and the Government is exploring emerging opportunities. Targeted regional programs are also being implemented, including \$2.85 million to support the development of an advanced biofuels industry in Victoria. As more information becomes available the appropriate roles for government partnership and support will be considered.</p>

<p>Recommendation 63:</p> <p>That the Department of Primary Industries provide advice and practical assistance to peri-urban farmers seeking to establish Community Supported Agriculture schemes.</p>	<p>Support in principle</p> <p>The Victorian Government supports a range of farm business arrangements that provide for viable and sustainable agribusiness, and provides information and support to farm businesses.</p> <p>RD&E priorities for investment are determined through well developed processes in association with industry, particularly Rural Research and Development Corporations.</p> <p>This recommendation needs to be further considered against the priorities of the DPI <i>Better Services to Farmers</i>, principally that DPI will provide services where public benefits arise, and will collaborate with other service providers and industry partners.</p>
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<p>Recommendation 63:</p> <p>That the Department of Primary Industries provide advice and practical assistance to peri-urban farmers seeking to establish Community Supported Agriculture schemes.</p>	<p>Support in principle</p> <p>The Victorian Government supports a range of farm business arrangements that provide for viable and sustainable agribusiness, and provides information and support to farm businesses.</p> <p>RD&E priorities for investment are determined through well developed processes in association with industry, particularly Rural Research and Development Corporations.</p> <p>This recommendation needs to be further considered against the priorities of the DPI <i>Better Services to Farmers</i>, principally that DPI will provide services where public benefits arise, and will collaborate with other service providers and industry partners.</p>
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<p>Recommendation 64:</p> <p>That the Department of Planning and Community Development consult with interface local councils on amendments to the Victorian (sic) Planning Provisions to allow the direct sale of value-added produce in the green wedges. This change should be widely publicised (in cooperation with local government) to ensure producers are aware of the new rules and their associated rights and responsibilities in selling direct to the public.</p>	<p>Support in principle</p> <p>As noted in the response to Recommendation 14, State Government has recently announced \$2.5m million over 4 years for a continuing green wedges program.</p> <p>\$215,000 of this funding has been allocated for the review and implementation of green wedge planning provisions to ensure that planning controls deliver the intent of green wedge policy.</p> <p>Changes to enable the reasonable sale of value added produce in rural and green wedge areas will be considered as part of this review.</p>
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<p>Recommendation 74:</p> <p>That the Department of Primary Industries examine the feasibility of establishing a 'Melbourne Food' brand (or similar), to identify and promote locally produced food.</p>	<p>Support in principle</p> <p>The Victorian Government has developed Put Victoria on Your Table (PVOYT) in response to messages from industry (producers, manufacturers and processors and retailers) that the State of Victoria required a message/brand to highlight product of Victorian origin. The PVOYT brand icon is used in conjunction with a campaign designed to:</p> <ul style="list-style-type: none"> • educate and encourage consumers to buy Victorian; • drive access and business opportunities for food and beverage producers into domestic markets; and • demonstrate State Government leadership within this sector to food and beverage industries <p>The whole of state logo was designed to complement existing regional brands promoting provenance i.e., Mornington Peninsula Gourmet, Yarra Valley Regional Food, North East Valley's etc.</p> <p>Another tier of provenance branding may struggle to gain a foothold, and Melbourne has limited resonance as a source of food production and supply. However, food produced in Melbourne will be supported under the PVOYT brand as part of the wider Victorian program.</p>
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excerpts from VICTORIAN GOVERNMENT RESPONSE TO THE REPORT OF THE OUTER SUBURBAN/INTERFACE SERVICES AND DEVELOPMENT COMMITTEE INQUIRY INTO SUSTAINABLE DEVELOPMENT OF AGRIBUSINESS IN OUTER SUBURBAN MELBOURNE

https://www.parliament.vic.gov.au/images/stories/committees/osisdv/sustainable_development_of_agricultural_business/Government_response_to_OSISDC_inquiry_into_Agribusiness9.10.10.pdf

The Victorian Farmers Federation

Victoria's agricultural production accounts for over \$13 billion of Victoria's economy and over 25 per cent of the State's exports per annum. Victoria's farmers produce high quality food and fibre, produced to high standards of safety, with little taxpayer support, and to some of the strictest environmental and highest animal welfare controls in the world.

The Victorian Farmers Federation (VFF) represents a farming community which creates a profitable, sustainable and socially responsible agriculture sector connecting with consumers.

We have a proud history representing Victoria's farm businesses since 1979 – primarily family farms that produce the eggs, grain, fruit and vegetables, meat, and milk that help to feed Victoria's six million people, and the bigger global community, every day.

The VFF consists of commodity groups: dairy (United Dairyfarmers of Victoria), grains, horticulture (including Flowers Victoria), intensives (chicken meat, eggs and pigs), and livestock – and expert committees representing; water, land management, agricultural and veterinarian chemicals, farm business and rural development, and workplace relations.

Our purpose is to make Victorian farmer's lives better; enhancing Victoria's future.

Our mission is to ensure a community of farmers creating a profitable, sustainable and socially responsible agricultural industry connecting with all Victorians.



Our place in Victoria



What we do



- Victoria's **20,775 farms** cover **10.6 million** hectares
- We are **24.2%** of Australian farmers
- **91%** family operated, with only **2%** foreign owned



- We employ **87,800** people mostly in regional areas
- **\$4739** of food consumed each year by every Australian
- As a net exporter we have long term food surity






- Our annual production is **\$13.16 billion**, **3.5%** of Victoria's economy
- **27.8%** of Victoria's exports are agricultural product valued at **\$11.9 billion**

How we do it



-  Farmers invest **\$80 million** in R&D
-  Every R&D **\$1** converts to **\$12** in farmer generated impact
-  **2.7%** productivity growth through innovative efficiency gains
-  Farmers receive less than **1.5%** in government support



-  **63%** reduction in greenhouse gas emissions between 1996-2016
-  Water consumption reduced by **7%** from 2014-2015
-  Land conservation has increased to **18%** of total land mass.
-  Farmers spend **\$20,000** annually on feral animals and pest weeds



-  **3.5 million** beef cattle
-  **140 million** chickens
-  **1.1 million** dairy cows producing **6.186 billion** litres of milk
-  **65,992** sows
-  **13.1 million** breeding ewes and a fleece clip of **66,100 tonnes**
-  **6.5 million** tonnes of grain
-  **\$2.35 billion** in horticultural production

https://www.parliament.vic.gov.au/images/stories/committees/osisdv/sustainable_development_of_agribusiness/Government_response_to_OSISDCDC_inquiry_into_Agribusiness9.10.10.pdf