

ADDITIONAL QUESTIONS FROM THE COMMITTEE

1. Land use and development decisions are primarily made at the local government level. In your view, should the Government track the cumulative loss of agricultural land and ensure it is factored into decision making? How is this best achieved?

Answer: Yes, the government should track the loss of agricultural land. This can best be done by spatial analysis. Lawton and Morrison (State of Australian Cities conference 2021) tracked the loss of peri-urban agricultural land in Greater Western Sydney (GWS) with a methodology which could be repeated for the Melbourne peri-urban area. They used:

- ABS agricultural commodities data to show that GWS continues to be a significant food bowl, with the estimated total value of agricultural output in the region just over \$597 million in 2015/16.
- ABS Mesh Block data to show land classified as 'primary production' in GWS was reduced by 193,124.7 ha between 2011 and 2016. By correlation, other land uses increased, including 'residential' (+10,961.2 ha).
- Nearnmaps imagery to show that although much of the residential development in GWS is being concentrated in designated Growth Areas and existing urban centres, there is also slow but steady residential sprawl occurring outside these areas.

RMIT has worked closely with the firm Spatial Vision to track agricultural land loss and land ownership patterns including urbanisation, rural subdivision, rural-residential lots and the capacity for housing growth in rural zones – see Buxton, M. Phelan, K. Groenhart, L. Fish, B. Farrell, S. Kennedy, M. Butt, A. (2015) *Alternative Futures for Melbourne's Peri-urban Region*, RMIT University, Melbourne for the spatial methodology used. Spatial analysis will show the loss of agricultural land from urban growth through factors such as expansion of the urban growth boundary, but also from rural subdivision and from the potential for agricultural land loss if houses are ever constructed on the extensive area of rural-residential lots without dwellings. For example, over 53,000 ha have been excised from this green belt including important intensive agricultural land.

The Department of Primary Industry has undertaken significant mapping of agricultural land use. Parbery P, Wilkinson R, Karunaratne K (2008) in *Square pegs in green wedges?* Department of Primary Industry, used spatial analysis, ABS figures on value of agricultural production and qualitative interviews to show that the total area of agricultural land in Melbourne's green belt declined by 18 % between 1986 and 2001.

El Wazan J and Ruwini Edirisinghe R (2022) (Measuring agricultural loss and the impact of differing dwelling types: a case study in Melbourne) used a quantitative analysis of housing types, the types' growth and agricultural land area taken up by those different housing types over 18 years to show a significant loss of agricultural land. Separate housing was found to be the main culprit due to the number of houses and the area the houses require. Both the numbers and the area of farms declined in these five farm sectors (generally by around 50%), with the exception of viticulture (which grew astronomically) and nurseries (which grew modestly). Their conclusions point to the importance of identifying type of agricultural product. Agricultural production might rise because of the impact of high value crops while the land area used for agriculture overall might be in decline.

2. How can we better utilise Melbourne's urban growth boundary to reduce speculative land investment?

Answer: The urban growth boundary (UGB) should remain in place as an inflexible limit to urban growth. This was the intention of legislating its location – to remove from the Minister for Planning the power to unilaterally change it by varying the boundaries of planning schemes. The inviolate nature of the UGB is essential for four reasons: to protect the rural nature of the green belt; and to redirect development to the existing growth corridors and established city where a large area of land for development exists; to prevent speculative development by not rewarding developers who buy up land adjoining the boundary; and to prevent uneconomic, difficult to service urban division occurring far from existing services. See Buxton, M and Taylor, E (2011) "Urban Land Supply, Governance and the Pricing of Land", *Urban Policy and Research*, Vol 29, No 1 pp 1-17.

It is essential to couple the immovable nature of the UGB with preventing urban related uses from being approved in the green wedges/green belt. If such urban related uses are permitted to 'leap frog' the UGB then a de-facto erosion of the UGB will occur by allowing urban related uses outside the area set aside for urban development. At least 16 major urban-related uses are able to be considered in the green wedge zones.

Planning for Melbourne's Green Wedges and Agricultural Lands Action Plan

3. In your view, which actions in the Action Plan are likely to be effective and which should be strengthened?

Actions 5 and 9 of the Action Plan commit to updating the planning policy framework to better protect agricultural land (within 100km of Melbourne and within green wedges).

Answer: Action 1 will introduce a new overlay but only for two areas – and the details of the overlay are not mentioned. An overlay could assist in the protection of agricultural uses and other non-urban values but only if protective measures are written in unambiguous, mandatory and measurable terms. How strong will it be? Any overlay should be applied much more broadly – are these two areas the only agricultural areas worth protecting? Actions 5, 8 and 9 refer to changes to policy and introduction of practice notes. All these commitments are vague with few details, using language such as 'amend', 'update', 'refine'. Policy and practice notes are weak provisions constantly ignored by decision makers. Action 16 is a firm zonal commitment, as is action 17. However, the use of minimum land sizes and patron numbers is an ineffective way to control development such as function centres and the large range of other commercial uses which are inconsistent with green wedge values. The land uses and other measures in zones are key to protection because if written properly they should apply mandatory, measurable language.

4. The planning policy framework already includes policies directing planners to protect agricultural lands. How will updating the framework materially improve protections?

Answer: it will provide little additional protection if zone provisions are not amended to exclude urban-related uses because even if no longer inconsistent and vague it must competes with zonal and other provisions.

5. How appropriate is the 100km limit on protecting farmland around Melbourne? Why?

Answer: This is a useful expansion of the traditional Melbourne green belt into the broader peri-urban area. Agriculture in this broader area will become progressively more important to

Melbourne. In addition, the increasing population in this broader area constantly interacts with Melbourne and the Melbourne population increasingly uses the peri-urban area for a wide range of activities.

6. Action 16 of the Action Plan will introduce a prohibition on subdividing farming or rural activity zoned lots into land parcels smaller than the minimum lot size within 100km of Melbourne. In your view how effective is this measure likely to be? Why?

Answer: This is a very important measure. Subdivision leads to loss of agricultural activity. About 70,000 existing lots without houses already exist in the broader peri-urban area.

7. Action 11 contemplates 'a new Planning Practice Note for urban-rural interface areas that manages land use pressures and supports a permanent edge to growth'. In your experience, how do planning practice notes influence land use and development decisions?

Answer: The note will be relatively ineffective. Practice notes are weak advisory measures without any real statutory impact.

8. What should be included to make this effective?

Answer: Only changes to the zones will be effective in controlling land uses and developments which are inconsistent with protecting agricultural land and other non-urban uses. All urban related uses, including all commercial uses, should be prohibited.

9. Action 4 contemplates the development of 'a new regional policy to preserve opportunities for irrigated agriculture around Melbourne'. In your view which areas should be included?

Answer: An advantage of peri-urban areas is that they are not subject to variable water use and costs common to large irrigation schemes. However, great potential exists for targeted irrigated agriculture using water recycled from water treatment plants to supplement the practice in areas such as Werribee south. These should be carefully planned and related to soil type and proximity to recycling infrastructure.

10. As part of Action 7, the Government will introduce the 'right to farm' and 'agent of change' principles into the Victorian Planning Provisions (as subordinate legislation) in rural zones where agriculture is a primary purpose of the zone within 100 kilometres of Melbourne. Would you like to comment on this proposal?

Answer: Right to farm legislation can have a place in protecting agricultural production depending on the content of the legislation. It should not be used to expand the notion of farming to retail and other urban related and commercial uses.