

ADDITIONAL QUESTIONS FROM THE COMMITTEE (ANSWERS from Professor Andrew Butt)

Land use and development decisions are primarily made at the local government level.

1. In your view, should the Government track the cumulative loss of agricultural land and ensure it is factored into decision making?

Yes, however this is not easy as what actually constitutes 'agricultural land' and what it is to 'lose' it are unclear. The reduction in use may be temporary, it may also be part of a change in farming practices that offers other benefits (revegetation, regenerative practices) or it may be a 'permanent' change to residential development.

- a. How is this best achieved?

We need to know what we have, and the categories of use at a finer scale, but also to make assessments of land use conversion that can be registered. Of course critical issue here is to what purpose – a form of 'state of agricultural land' statement for example could quantify this, but also identify the challenges in categories. The crucial policy question is to what purpose – of course losing farm land may be worth it for broader benefits, but presently we do not have the means to assess that risk and impact

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

I consider that the UGB needs to be taken as a clear, target driven model for housing delivery (the main impact use – of course other urban uses matter but often have a strategic logic like inter-modal transport hubs etc). So the trigger for expansion needs to be based on transparent metropolitan-scale targets for housing, infrastructure and jobs in regions, greenfield and established. The 70:30 aspirations of Plan Melbourne start this, but without the sophistication required. New housing targets for Plan for Victoria are promising, but also need infrastructure targets for achieving required development pathways and densities. At present the politics of seeking expansion relies on past examples of a changing boundary that seemed to not be taken seriously – of course it may need to change, but it should be signalled that any change is a very long-term prospect and land banking will be an expansive wait.

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?

See below regarding Actions 4, 5, 7, 9, 11, 16. In addition I would add:

- Action One is vital and should be extended to areas such as Koo Wee Rup, areas in the Dandenongs and region and other strategic areas.
- See notes below re water re-use and extending strategic locations (agree with Action 3)
- Action 6 and Action 11 similar – see comments
- Action 8 risks being problematic if agriculture remains concerned at inherent risks of land use conflict – precedence should be clear here
- Action 17 is ambiguous – while tourism etc. in green wedge areas is important, what is the priority, how should impacts be determined and will this (see Action 8) constitute a conflict that prevent future farming?

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).

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

The critical issue seems to be equipping planners to make unequivocal decisions. Current Farming Zone criteria allow developments that effectively convert use and alter land markets – setting a clear policy agenda for specific, ‘at risk’ locations (strategic locations) and a clear presumption of continued farming offers an important extra layer in these peri-urban areas.

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

While arbitrary, it does cover the critical areas under pressure. Beyond this pressure exists but is often driven by urban (and urban-like) expansion connected to other urban centres and perhaps policy relating to them needs to be tailored to local issues

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.

6. In your view how effective is this measure likely to be? Why?

In some case yes. The use of the RAZ is not widespread so will have limited impact, but it may be a suitable zone (with changes) to consider for more coverage in working peri-urban landscapes. More generally, this Action sets up a presumption against assuming a location is ‘lost’ to farming and is just waiting for peri-urbanisation. If course a perverse result is that fragmented land holdings may offer a better protection against pressure for urban development – although this is not always the case as many locations within the current UGB are former or current ‘hobby farm’ locations (e.g. Wallan East at the northern tip of the UBG)

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’.

7. In your experience, how do planning practice notes influence land use and development decisions?

The use of PPNs in drafting provisions and in decision-making is important, but clear and concrete provisions in Zones seems to be more significant in decision making at all levels (public, planners, elected Councillors, appeals etc).

8. What should be included to make this effective?

Clarity on the presumption that productive agriculture is the priority use, and that housing (dwellings) may not necessarily be required for these uses.

Action 4 contemplates the development of ‘a new regional policy to preserve opportunities for irrigated agriculture around Melbourne’.

9. In your view which areas should be included?

This is important. Obviously, sites like Bacchus Marsh and Werribee South should be identified and clearly protected. But the opportunities arising from water re-use will create various opportunities – including new systems based on closed/protected growing (e.g. container-based). Critical locations where this infrastructure can be used – as a benefit of urban water activities – should be the next priority areas.

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.

10. Would you like to comment on this proposal?

Right to Farm is an important step. It should signal clearly what an area or locale is for. However it should be considered that often farming is itself the agent of change – farming is not static and clarifying when change is necessary, possible and desirable will be important considerations.