

13 June 2024

Ms Juliana Addison MP
Chair
Legislative Assembly Environment and Planning Committee
Parliament House, Spring Street
MELBOURNE 3000



c/o - foodsupplyinquiry@parliament.vic.gov.au

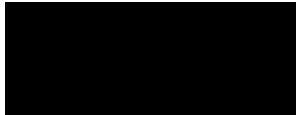
Dear Ms Addison,

RE: Inquiry into securing the future of Victorian food supply – Response to additional questions

Thank you for the opportunity submit and present to the Inquiry into securing the future of Victorian food supply on behalf of the state's farming communities.

Please find herein the VFF's response to additional questions put forward by the Committee. We are happy for this response to be treated as a public submission, supplementary to the written submission and evidence already provided to the inquiry.

Yours sincerely,



Emma Germano
President
Victorian Farmers Federation

Response to additional questions

1. Can you comment on the actions to protect agricultural land proposed in the Action Plan?

Response:

The VFF responded to each question raised in the consultation draft of *Planning for Melbourne's Green Wedges and Agricultural Land Study* (GWAL) and its precursor document '*Strategic Agricultural Land*' (SAL). These submissions are attached.

The VFF is concerned that the GWAL Action Plan fails to deliver on the key issues identified through this process and does not respond to the key areas identified for action in 2018-19.

The VFF is concerned that the Planning Policy Framework content for agriculture is a leading cause of the loss of agricultural land. Agriculture Policy was relocated and amended without discussion as part of VC71 (Melbourne at 5 million) in 2010. This had led to 14 years where the economic significance of agriculture to the Victorian economy has been excluded from consideration in planning provisions and decisions by promoting conversion of agricultural land to other land uses that directly impact on the ability to farm.

There are 4 key areas identified by the VFF for urgent action statewide to ensure that Victorian's can access locally sourced food that is affordable and to keep the agriculture sector as a powerhouse of export earnings for the state. The GWAL Action Plan has failed to deliver the reasonable changes sought by the agriculture sector.

These are:

- a) Revising the Green Wedge and Distinctive Area and Landscape elements of the *Planning and Environment Act* to recognise agricultural land as a key beneficial land use in these areas.
- b) Ensure that agriculture is recognised as an industry by returning it to the economic development section of the Planning Policy Framework (PPF)
- c) Undertake regular reviews of the Victoria Planning Provisions with the agriculture industry to ensure that they are not delivering perverse outcomes for agriculture.
- d) Prepare a practice note on how to apply agriculture decision guidelines in the rural suite of zones.

The VFF is concerned that the GWAL Action Plan fails to look at the systemic issues within the planning provisions and planning system that reflects a focus on a built system response.

For thirty years the planning system has been calling for the protection and mapping of agricultural land and after six years of GWAL we are further away from achieving its original aims.

The Action Plan has failed to make state-wide changes to policy and guidance. Yet it is proposing statewide changes to relatively minor issues that are likely to be resolved by clear policy and provisions.

The VFF is concerned that rather than fixing the systemic issues within the planning system the Action Plan is promoting two standalone regulatory systems that will be at cross purposes with the Objectives of the Planning in Victoria and the Planning System (Right to Farm; Agent of

Change) and has already defunded a key Action (Agriculture advice – impact on existing agriculture).

Revising the Green Wedge and Distinctive Area and Landscape elements of the *Planning and Environment Act* to recognise agricultural land as a key beneficial land use in these areas.

The Action Plan has not recognised the need to ensure that Green Wedge or Distinctive Areas and Landscape processes that are to be applied to farming land are tailored to understand and support the ongoing use of the land for farming.

The Actions taken in relation to Part 3AA of the *Planning and Environment Act* and relevant guidelines were not discussed with the agriculture industry and fail to even acknowledge agriculture as a beneficial use.

Action Plan Pg 4 includes a completed action that exacerbates the impact of VC71 by not clarifying the importance of agriculture to green wedges and includes guidelines that fail to recognise agriculture as a beneficial use whilst listing beneficial uses in direct land use conflict with existing agriculture in these areas.

The VFF seeks recognition in the planning and environment regulatory systems that agriculture is the preeminent use of land in Farming and Green Wedge Zones, including decision guidelines that ensure non-agricultural uses do not reduce agricultural production on the subject site.

We also seek amendments to the Green Wedge and Distinctive Areas and Landscape elements of the *Planning and Environment Act* to ensure that plans prepared for these areas must actively seek to protect and support agricultural production that is an intrinsic part of these landscapes.

Ensure that agriculture is recognised as an industry by returning it to the economic development section of the Planning Policy Framework (PPF)

Agriculture underpins regional economies. Different agricultural commodities form the great majority of Victoria's export earnings. Soil is the natural resource. Agriculture is the industry.

It is critical that there is a home in the PPF to identify key local, regional or state areas. This might be important soil resources to protect; an area served by irrigation or a pipeline that provides versatility in production; or specific areas that support manufacturing; or even the identification of key land use conflict for agriculture in an area.

The Shepparton, Campaspe and Moira agricultural work was completed not long before VC71 came in to being. This work was used as an example of the kind of work that should be undertaken to support agricultural resources and how to embed that into the planning system. All of the local policy content that helped make sense of the schedules to zones and

overlays has been removed by the 'policy neutral' translation of the LPPF into the current PPF that has no 'state content' to allow local content to reside.

As the background documents to [VC71](#) (approved by Minister Madden in September 2010) or its explanatory report were silent on the loss of agriculture policy content or the potential consequences we believe this was another 'unintended consequence' of an amendment focused on urban development. Failure by the government to address this issue in a timely manner has led to the continued loss of local agriculture content from the planning scheme as PPF translations continue.

In its submissions to government, the VFF has included a draft PPF clause to illustrate how to improve the policy content to allow for the identification of sites of strategic agricultural significance at local, regional, and state level. The VFF used Regional Growth Plan content as a source for areas of regional significance.

Action Plan Pg 4 suggests a change to clause 11 to address policy content for green wedges only. GWAL also applied to land outside the Melbourne metropolitan area and assumes all farming land is within a green wedge zone. The VFF have repeatedly called for improvements to the agriculture policy be made (current clause 14), including the return to Clause 17 (economic development).

Action Plan Pg 5 suggests regional content (c11) for Melbourne's green wedges only. Regional content from Regional Growth Plans has been included for environmental issues but excluded when it identified strategic agricultural land.

Action Plan Pg7 acknowledges the need to update Agriculture Policy but the response limits that to removing inconsistencies with the regional policy for Melbourne. It proposes to consider land use conflict impacts based on soil which will be an improvement but does not demonstrate a holistic understanding of land use conflict and agriculture.

Undertake regular reviews of the Victoria Planning Provisions with the agriculture industry to ensure that they are not delivering perverse outcomes for agriculture.

Significant changes are often made to the planning system by a Ministerial Amendment without an opportunity to provide feedback, or for a Ministerial Advisory Committee to provide feedback on drafting and implications for farming.

The VFF is aware that the provisions that have been developed with a 'built environment' often do not include content related to farm safety, operations and ability to change practices to lower emissions intensity. Some clauses, such as native vegetation, do not even allow for applications to consider social, economic and environmental outcomes and provide safety provisions to public servants and houses rather than to 'life and property'.

The VFF is concerned that the limited actions included in the Action Plan focus on a 'built form response' reinforcing the perception that the planning system sees productive agricultural land as vacant land. These issues have been repeatedly raised in VFF submissions to the Planning Department since 2016.

The VFF calls for the regular review of the Victoria Planning Provisions to ensure policy and controls facilitate the use of farming land for production of food and fibre. This may be via a Standing Advisory Committee.

Prepare a practice note on how to apply agriculture decision guidelines in the rural suite of zones.

The VFF presents Professional Development Courses for planners on land use conflict and how to better understand agricultural impacts. Many attendees discuss their fears of applications as they have no idea now to understand what types of developments may impact on different types of agricultural production.

Action Plan Pg 5 proposes a practice note for green wedge structure plans. This fails to address one of the original purposes of SAL – being the call for stronger zones as agricultural land wasn't being protected. The VFF and others highlighted that the zones are strong however there is little guidance for planners on how to assess the potential impact of a proposal on agricultural production. After six years we are further away from achieving the solution presented to Government in 2018.

Action Plan Pg 8 discusses amending decision guidelines in the rural zones relating to 'Agricultural issues and the impact from non-agricultural uses', 'Rural issues' and 'Design and siting issues'. The concern is not the decision guideline but the inability for planners to be able to know what might impact production in different farming systems. The Action Plan also seeks to resolve land use conflict through design and siting controls. Placing a school or a dwelling next to a dairy will lead to conflict with the *Environment Protection Act*, as it then seeks to protect the sensitive use. Its size or building materials will not negate the impact.

Actions 6 and 11 refer to a practice note for Councils decision making on agricultural impact however this is limited to urban / rural interface areas. Land use conflict can occur in any location.

The VFF calls for accurate mapping of strategic agricultural land to underpin policy provisions to grow the economic importance of agriculture at local regional and state levels.

The VFF calls for planning provisions and decision support tools that not only protect strategic agricultural land from loss, but actively enables the adaptation of agriculture in response to climate change, market access changes, safety, technology, and welfare considerations. This includes the development and maintenance of guidance to planners on how to avoid land use conflicts from dwellings, renewable energy, places of assembly, tourism, and infrastructure and a full range of practice notes and decision guidance notes to ensure proper consideration of impacts on agriculture. These tools should be developed in consultation with industry.

Other issues

The VFF is concerned that the implementation of GWAL is occurring without budget appropriation. It is promoting actions as being completed – such as the agriculture advisory service, where the service has already been severely reduced in scope. Councils have been informed that advice on agricultural impacts from non-agricultural uses will no longer be provided prior to the publication of the Action Plan.

The VFF is concerned that the Right to Farm and Agent of Change (Action 7) requirements will lead to perverse outcomes. It identifies a problem with the existing planning provisions and proposes to solve that problem outside of the planning system, which is neither orderly nor conducive to proper planning. The VFF recommends that a Ministerial Advisory Committee be appointed to consider submissions and make recommendations on how to strengthen the planning system to protect agricultural land and promote agricultural production.

2. How can the Government better support young farmers?

Response:

Traditionally young farmers have been supported through farm succession planning or on farm employment leading to share farming opportunities.

The major issue facing the agriculture sector is the increase in regulatory compliance costs and the reduction in farm gate pricing. This can have a particular impact on young farmers who may not have the experience in regulatory compliance and managing their business.

With respect to the inquiry's terms of reference, the VFF recommends that young farmers can be best assisted through the government's commitment to address the issues in planning outlined in the VFF's submission to remove complexity and enable young farmers to innovate and to focus on developing their business.

3. How are members preparing to meet increased demand for food from population growth here and overseas?

Response:

The National Farmers' Federation (NFF) has laid down a bold vision for the industry to exceed \$100 billion in farm gate output by 2030, which would help meet overall demand for food. The [2030 Roadmap](#) sets out the objectives required to achieve this outcome.

At the farm business level, farmers are constantly seeking ways to grow their business to produce more food and secure additional markets. These efforts are supported through industry investment in research and development and marketing through the Rural Research and Development Corporations (RDCs) such as Meat and Livestock Australia, Horticulture Innovation, Grains Research Development Corporation, Dairy Australia, Australian Pork and AgriFutures. The collective work of these bodies help farmers to increase production while improving safety, sustainability, quality, welfare and reducing emissions intensity.

The ability for farmers to use industry best practice developed by RDCs intersects with the Victorian planning system which can inhibit those practices on farm. This may still require an

approval from Council, but we believe that the need should be more strictly linked to a land use / development trigger (not land management) and that a provision must allow the broad consideration of all social, economic, and environmental considerations that underpins the principles within the *Planning and Environment Act*. Applications should not be refused on the basis of 'convenience' when the alternative is using the existing technology and foregoing opportunities to improve climate, soil and air impacts.

4. How can the Government support innovation?

Response:

There are many opportunities for government to support innovation in agriculture. This includes ensuring regulatory systems enable the adoption of best practice management systems; supporting the Australian agriculture sustainability frameworks efforts to streamline reporting standards and promoting Victorian agriculture's regulatory standards to local and international markets.

With regard to the planning system, the VFF emphasises the need for it to be responsive to innovative on-farm practices which have been discussed in the previous answers and the substantive submission to the inquiry.