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Protecting Strategic Agricultural Land in Melbourne's
Green Wedge and Peri Urban Areas
Melton City Council Submission

Melton City Council
April 2019

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INTRODUCTION

Thank you for the opportunity to make a submission to the Victorian Government's Protecting Melbourne's Strategic Agricultural Land.

In our attached submission, we have requested that a number of issues be considered before finalising the proposed criteria and mapping of strategic agricultural land. The City of Melton looks forward to further participation in the project and working with DELWP.

Should you have any questions about the above or the content of our submission, please contact Don Lewis, Strategic Planner on 9747 5256 or donaldl@melton.vic.gov.au by email.

Yours sincerely,



Laura-Jo Mellan

Manager City Design, Strategy and Environment

SUBMISSION

1.1 Context

The City of Melton includes two designated Green Wedge areas, the Western Plains North Green Wedge and the Western Plains South Green Wedge, which is also located within part of the City of Wyndham. Melton City Council has completed a number of planning strategies in recent years in respect of the green wedge areas within the municipality.

Council adopted the *Western Plains North Green Wedge Management Plan* in June 2014 which identified eight precincts and included key recommendations for each precinct. The Western Plains South Green Wedge Management Plan is currently being prepared by Council. Figure 1 and Figure 2, shows the extent of the green wedge areas within the City of Melton.

The City of Melton's Green Wedges include significant landscapes and viewing corridors which would likely be maintained as a result of large areas of Green Wedge land being protected for agricultural uses. Providing a degree of certainty in the Green Wedge which will reduce land banking and speculation, particularly close to the urban growth boundary. Protection of agricultural land will provide opportunities for intensive agriculture and other higher value options.

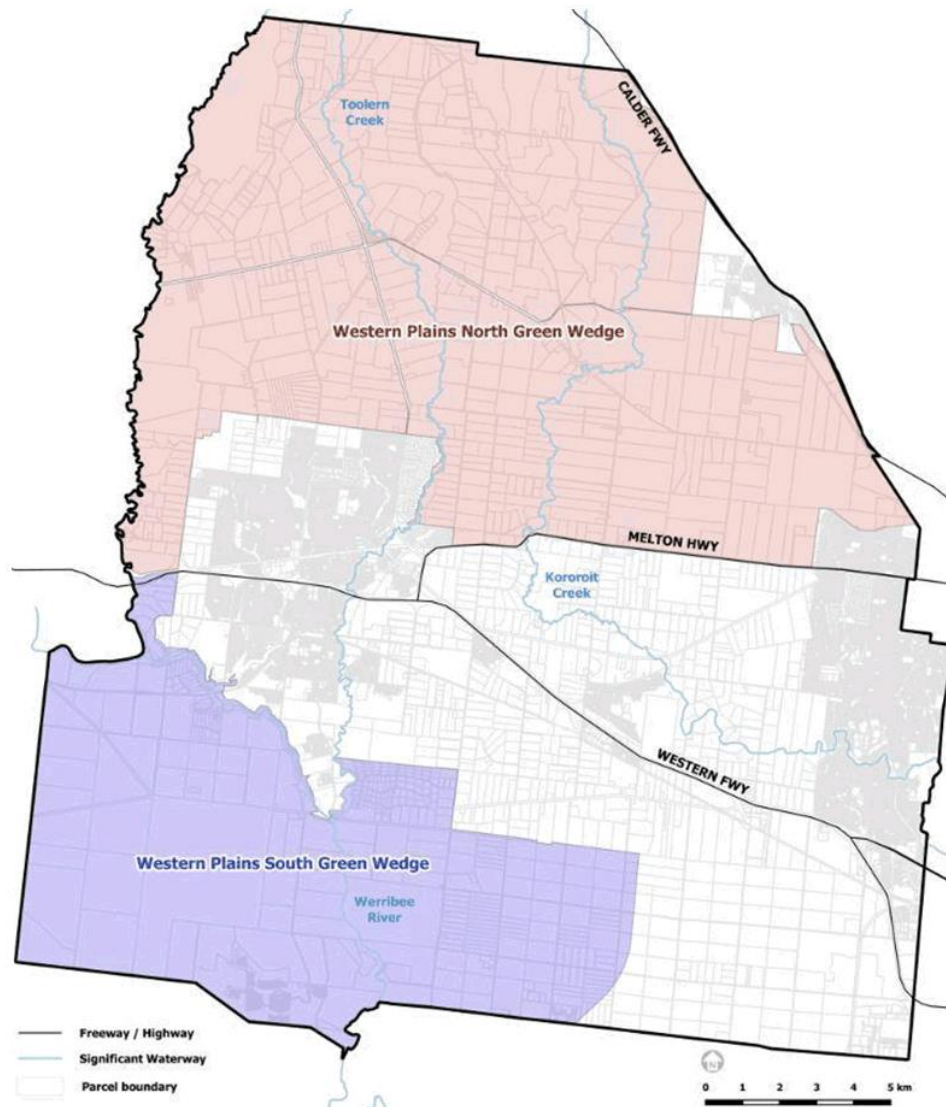
Melton City Council experiences a range of challenges within its Green Wedge Areas such as:

- Managing expectations of landholders in the green wedge who wish to develop/sub divide their land.
- Land speculation in the green wedge.
- Old and inappropriate subdivisions in the Green Wedge
- Managing environmental issues in the green wedge and ensuring land is managed.
- Providing certainty for landholders.
- Discretionary uses in the Green Wedge Zone.
- Attracting investment for agriculture in the green wedge.
- Conflicting uses in the green wedge.
- Adapting to climate change.

This submission responds to DELWP's investigation into protecting Melbourne's strategic agricultural land during its public consultation period of 12 March – 23 April 2019, with Council's given until the 21 May to provide submission to enable them to be reported to Council meetings.

Council notes that technical work has been undertaken by DELWP to identify areas of 'strategic agricultural land,' and that the criteria for this land is underpinned through the Agriculture Victoria Land Capability Research report and the Deakin University Land Suitability Assessment.

Figure 1: Green Wedges in the City of Melton



1.2 Proposed Criteria for identifying strategic agricultural land

Council understands that the proposed criteria used to identify Strategic agricultural land within Melbourne's Green Wedges and peri urban areas derived from the *Land Suitability Assessment of Melbourne's Green Wedge and Peri Urban Areas Final Report* (October 2018).

Melton City Council is generally supportive of the proposed criteria however request clarification on how the criteria has been applied to the City of Melton. There are inconsistencies between the Strategic Agricultural Land investigation areas identified by state government and the work undertaken by Council, in consultation with DELWP, for the adopted Western Plains North and Western Plains South green wedges.

Land Capability – Naturally fertile land with minimal constraints and highly capable for intensive, soil based agriculture

Council notes that a scale of 1-5 for land capability, the City of Melton's Green Wedge land is rated at Class 3 (Moderate- High) and Class 4 (Moderate). The City of Melton Green Wedge areas generally receive lower rainfall than other parts of the western region which limits the viability of most non irrigated land.

Cropping and to a lesser extent grazing is still undertaken on larger allotments along with pockets of horticulture and viticulture production. Potential for more sustainable food production has been based on additional water supply at an affordable price.

Council require further information on how this criteria informed the selection of the investigation areas within the City of Melton as the classification does not appear to be consistent with the investigation areas and access to water is a challenge for all areas.

Water Access - Farmland with access to secure water supply

As noted above, the City of Melton's Green Wedge areas have a mixture of moderate to high land capability but the productivity of this land is depending on access to water.

The ability to secure irrigated water from the proposed Western Irrigation Network (WIN) through the City of Melton will increase the viability of its Green Wedge areas to undertake a range of agricultural uses, particularly in high value horticultural production.

Council supports the WIN project that is in preparation and the need to protect agricultural land where possible along its route.

Council is concerned that if the route of the proposed WIN pipeline does not traverse through areas of identified 'strategic agricultural land', how will it be irrigated and therefore viable? It is imperative that there is a strategic alignment between DELWP's identification of 'strategic agricultural land' and the proposed WIN pipeline and other relevant blue infrastructure that may be delivered within the City of Melton.

Resilience and Adaptability - Land that is resilient to the potential impacts of climate change

Melton City Council is supportive of this criteria however, it is unclear how this criteria has led to the selection of the investigations areas within the City of Melton, given the current challenges to agriculture Western Plains North green wedge area in terms of access to water and other environmental factors.

As discussed above, the WIN project would help improve the resilience of future 'strategic agricultural land' in the City of Melton's, including resilience from expected longer and dryer summers. With the aid of the WIN project, a variety of agriculture, horticulture and viticulture methods can expand within the City of Melton and ensure their resilience and viability for the future.

Existing land Use and Integration with Industry - Land that is currently used for intensive agriculture purposes or supports the viability of an agricultural area

The City of Melton has a variety of agricultural uses that include viticulture, horticulture and agriculture and associated processing facilities. The City of Melton's Green Wedge areas have easy access to key transport links such as the Western Hwy and Western Ring Road, distribution/freight centres and existing food manufacturers in the western suburbs of Melbourne.

It is important to note the proximity of other regional agricultural areas and associated processing facilities such as Werribee and Bacchus Marsh in creating a viable and sustainable agricultural industry when applying this criteria.

Other considerations and exclusions - Factors that may prevent land from being classified as strategic agricultural land

The City of Melton's green wedges are in part fragmented into smaller lots. These smaller lots are generally considered incompatible with agricultural practices.

In particular, some areas identified north of the Melton Township and close to the Urban Growth Boundary include clusters of small lots occupied by dwellings and other non-agricultural uses. These areas effectively operate as defacto rural living precincts and would therefore not align with the intent of 'strategic agricultural land.' This was highlighted through the Western Plains North Green Wedge Management Plan (refer), Figure 2.

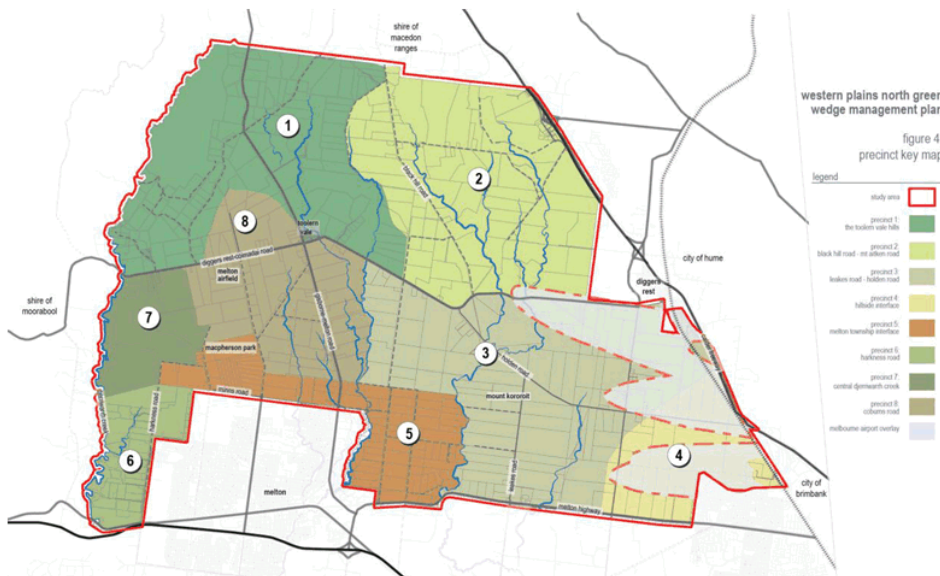


Figure 2: Western Plains North Green Wedge Management Plan – Precincts

1.3 Maps produced for consultation purposes

Areas being investigated as 'Strategic Agricultural Land' map

Part of the Council's Western Plains North Green Wedge is identified in this map while the Western Plains South Green Wedge has identified only the Exford area as worthy of investigation.

The City of Melton questions why existing farming land north of the township of Eynesbury (within the Western Plains South Green Wedge) has not been identified, further clarification is required on why these areas have been excluded based on the high level assessment. Council would also request that DELWP consider the recommendations of Council's adopted Western Plains North Green Wedge Management Plan and Western Plains South Green Wedge Management Plan Background Report in determining the final location and extent of any strategic agricultural land.

Water access map

The proposed WIN project from Sunbury via the City of Melton's North and South Green Wedge areas to the Parwan/Balliang Irrigation Districts is not identified on this map. As discussed earlier in this submission, it is imperative that there is a strategic alignment between DELWP's identification of 'strategic agricultural land' and the proposed WIN pipeline and therefore the proposed route of the pipe line should be shown on this map as 'proposed' or 'draft'.

Land capability map

The City of Melton's North and South Green Wedge areas are identified as having a mix of Class 4 (moderate capability) and Class 3 (moderate to high capability) land capability. Clarification is required on how this map correlates with the Agricultural Victorian Land Capability Research (October 2018).

Resilience and adaptability / versatility map

Melton City Council request further discussions with DELWP to understand how the areas within the City of Melton were identified as the correlation with the supporting background studies is unclear.

Assessment area and constraints map

This map confirms areas that are excluded from investigation including:

- Forested areas within the Rural Conservation Zone in the north west of the City of Melton
- Crown land in and around the Toolern Vale Hills.
- Land zoned for other uses e.g. extraction industries.
- Farming zone land applied as buffers.

Council is supportive of these exclusions subject to detailed mapping.

Existing intensive higher value land use map

There are a number of higher value land uses within the City of Melton including vineyards which are not identified on the plan. Council request that this map be reviewed and refined in the next stage of the project.

1.4 Applying the criteria

It is understood that Strategic Agricultural Land areas will include a 500 metre buffer (workshop 25 February 2019), if a precinct based approach is applied. While Council understands a later stage of the project will consider planning controls and mechanisms in this regard, initial questions in relation to how the buffer would operate may assist Council in assessing the merits of this approach based approach.

These questions include:

- How was the buffer determined?
- Would any buildings and works associated with farming be permitted in the buffer if they do not impact on adjoining land?
- What mechanisms would be put in place to managing the impact of this buffer on the reasonable development of the green wedge?
- Has consideration been given to where the buffer or strategic agricultural land interfaces with urban areas/uses?

1.5 Planning controls

Changes to the urban growth boundary and the Green Wedge Zone and Green Wedge A Zone have over several years reduced the amount of available agricultural land in the City of Melton. While Council understands that a later stage of this project will focus on appropriate responses to planning controls, it is important to provide some initial context in relation to the operation of the Green Wedge Zone and the objectives of this project.

Currently, a range of non-farming discretionary uses can be considered under the zone and in some cases are difficult to refuse and defend at VCAT. Green Wedge land is often seen as an alternative for places of worship and private schools to secure affordable land that is not easily obtained in the urban areas.

This situation has resulted in planning outcomes that undermine existing farming land and land that is no longer attractive as a working farm due to fragmentation and encroachment. Re-alignment of boundaries under the subdivision provisions have also led to smaller lots and reduction in viable farming land.

Integrating the Strategic Agricultural Land project and the Green Wedge Review currently being undertaken by DELWP will be critical to ensuring that any planning controls or similar can be implemented and do not result in unintended consequences that compromise the strategic agricultural land or the balance of the green wedge.

1.6 Other relevant projects and plans

Melton City Council consider the following projects and plans provide important information and local policy directions that should inform the next stage of the project.

City of Melton Rural Residential Land Supply and Demand Assessment

This project involves a supply and demand assessment of small lots in the Green Wedge areas the City of Melton. The assessment concluded that significant future supply of lots between 1-5 hectares are available as a result of older subdivisions, but an undersupply of Low Density Residential type lots under 1 hectare are in short supply. The next stage of the project is to investigate potential sites where future supply could be provided.

Western Plains North Green Wedge Management Plan

As noted throughout this submission, this plan was adopted by Council in September 2014 and included a substantial implementation plan which is still in progress. Some of the recommendations directly involve DELWP and support from other agencies.

Western Plains South Green Wedge Management Plan

As noted throughout this submission, this Green Wedge area is shared between the City of Melton and the City of Wyndham is currently in preparation. A Background Report was completed in 2018 and was developed in conjunction with the City of Wyndham. Both municipalities will prepare separate management plans.

Review of Green Wedge Planning Provisions 2018

In 2018 DELWP commissioned work to review the VPPs in relation to the Green Wedge Zone and held a series of workshops with Local Government planners across the Green Wedge areas of Melbourne. A report was provided to DELWP and Council is awaiting the outcome.

City of Melton Significant Landscape Features Strategy, May 2016

The Significant Landscape Features Strategy 2016 includes the introduction of a Landscape Character Policy for the City of Melton's rural areas. Amendment C173 to the Melton Planning Scheme is awaiting approval from DELWP.

Roadmap for a Resilient and Sustainable Melbourne Food bowl, University of Melbourne, March 2019

This recent report by Melbourne University outlines a vision and roadmap for preserving Melbourne's food bowl for current and future generations as a fundamental building block in a healthy, resilient, sustainable and fair food system. This vision and 'roadmap' was developed through a collaborative process involving stakeholders.

1.7 Summary

The City of Melton thanks DELWP for the opportunity to provide comment on the investigation into Strategic Agricultural Land and looks forward to working with DELWP and participating in the next stage of this important project.

The following section provides a summary of key elements of contained within this submission:

- Melton City Council are generally supportive of the criteria but request a meeting with the project team to understand how it was applied in a City of Melton context. The strategic agricultural land identified in the consultation material is not consistent with the policy direction of adopted Council documents.
- High level mapping provided in relation to 'investigation areas' is difficult to assess and provide detailed feedback as part of this submission. The correlation between the mapping and supporting background reports is not always clear. Council would suggest that the plans are revised and updated following consideration of local policies and plans and that this be done in collaboration with Melton City Council.
- Existing farming land north of the Eynesbury Township is not included in the draft mapping but nearby land at Exford appears to be included. Council requests that this should be clarified before investigation areas are confirmed.

- The proposed WIN is a significant project for the western region and for the City of Melton's Green Wedges. If the WIN proceeds, protection of agricultural land adjacent to the pipeline route and potentially beyond this area will be imperative. The next stage of the project needs to consider the potential impact of this project on the capability of land in City of Melton.
- More details on how the 500m buffer option that was presented at the government workshop in February 2019 was established is necessary when considering the criteria mapping as the background documents do not appear to discuss this issue and it is unclear how it will operate in a planning scheme context.