



**Victorian
Farmers
Federation**

SUBMISSION

Bellarine Peninsula Statement of Planning Policy

August 2021

The Victorian Farmers Federation (VFF) welcomes the opportunity to submit in response to the Bellarine Peninsula Distinctive Area and Landscape draft Statement of Planning Policy. The farming community routinely expresses concern that agricultural issues are not being properly considered by the Victorian planning system.

The VFF represents a number of farmers on the Bellarine Peninsula. These farmers are members of the active Bellarine Branch of the VFF. Around 50 percent of VFF members on the Bellarine run commercial scale livestock, grains or mixed farming enterprises while the other 50 percent are associate members of the VFF, running smaller farming operations. This ratio is consistent with other peri-urban and coastal regions.

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

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, to not have a perverse or adverse outcome in relation to facilitating the ongoing and productive use of land for production of food and fiber.

The VFF is concerned that the draft Statement of Planning Policy for the Bellarine Peninsula will have unintended negative consequences on agriculture in the area. The draft Statement of Planning Policy mentions that agriculture needs to continue to be the main use in rural areas, which the VFF agrees with the principle but is looking for detail to ensure this occurs.

For the Bellarine Peninsula Distinctive Area and Landscape the VFF wants to ensure that:

1. Landscape overlays/controls do not adversely affect agriculture.
2. Land use conflict between agriculture and other uses are minimised and avoided.
3. Engagement with farmers and agricultural industry.
4. This document supports the growth and adaptation of agriculture.

The VFF understands that landscape overlays/controls are sometimes justified, however these overlays/controls should not adversely affect agricultural uses. In the past there have been unintended negative consequences on agriculture from landscape overlays/controls. An example of this is when new landscape overlays were introduced in the Yarra Ranges Council that sought to prohibit horticulture structures, claiming that they ruined the visual aspect for tourists. Horticulture is a key commodity in the Shire and underpins the local economy. VFF had to seek VPP change to exempt these structures from requiring a permit.

Poorly drafted landscape controls can lead to unnecessary planning controls, such as permits for ploughing or making it difficult to develop a machinery shed. Location and size can be restricted due to visual concerns, and design features are required which make the cost prohibitive.

Such controls are problematic to agriculture as farms need sheds for a number of reasons including the storage of machinery, improving OH&S by providing shelter for workers or to store feed for animals. The Yarra Ranges decision was reversed but is a good example of unintended consequences to agriculture that need to be avoided.

The draft Statement of Planning Policy recognises that agriculture is important to the Bellarine Peninsula landscape and mentions that rural land should be primarily used for agriculture. The 'right to farm' is mentioned within the draft Statement of Planning Policy to emphasise this point. The VFF think it is important that land use conflicts are avoided. The VFF believe that farmers 'right to farm' should not be eroded by secondary uses which create land use conflict, which can include tourism.

The words within the draft Statement of Planning Policy gives unfettered support to agri tourism and identifies that the area is increasingly focused on 'value-adding enterprises and on the co-location of primary production with consumer-facing activates', specifically wineries. This wording exacerbates land use conflict with agriculture and is problematic as the majority of agricultural land on the Bellarine Peninsula is used for cropping, share cropping, and grazing.

The purpose of the Farming Zone is:

- *To provide for the use of land for agriculture.*
- *To encourage the retention of productive agricultural land.*
- *To ensure that non-agricultural uses, including dwellings, do not adversely affect the use of land for agriculture.*
- *To encourage the retention of employment and population to support rural communities.*
- *To encourage use and development of land based on comprehensive and sustainable land management practices and infrastructure provision.*
- *To provide for the use and development of land for the specific purposes identified in a schedule to this zone.*

The encouragement of tourism to be located in areas that are zoned for the main purpose of providing land for use in agriculture is a land use conflict. Tourists do not understand that farming in these areas can be noisy, dusty and odorous at various times of the year and the management of crops and livestock can also have a big impact on the way the landscape looks. The Statement of Planning Policy needs to understand that the farms located on the Bellarine Peninsula are working farms and not just there for nice landscape views.

The draft Statement of Planning Policy states that as agriculture practices continue to evolve 'agriculture in the declared area will benefit from increased investment in recycled water infrastructure, soil quality management and other emerging technologies'. However, there seems to have been no engagement with farmers or industry groups, such as the VFF regarding whether investment in these emerging technologies is viable, likely or desired by the local farming community. The VFF support investment into emerging technologies in the agricultural sector and believe that this needs to be reflected in the draft Statement of Planning Policy but specific examples should be informed by local knowledge.

For agriculture to evolve and adapt industry needs to be consulted to ensure that the policy and emerging technologies that are supported are viable options that do not adversely affect agriculture. The VFF recommends that industry groups and local farming communities be engaged to avoid unintended adverse impacts.

Within the statement it is said that agriculture continues to be 'strong in the area, contributing economically, socially and culturally' and contributes to the reason the Bellarine Peninsula is being declared a Distinctive Area and Landscape. Despite this recognition of the importance of agriculture, the Victorian Agriculture Strategy is not listed as a document that 'aligns' with the draft Statement of Planning Policy. The Agriculture Strategy recognises that change is part of agriculture and that with targeted investment and coordinated action, Victoria can respond to this change, maintain the enviable position and reputation it holds around the world, and continue to grow. The draft Statement of Planning Policy that is going to influence planning decisions for years to come also needs to recognise that agriculture is constantly changing and support the growth and adaptation of agriculture to factors such as climate change and market forces. The agricultural use should take precedence in the farming zone over other uses such as tourism, as productive agricultural land located so close to cities and ports is important to maintain now and into the future.

Farming is part of the history and social fabric of the Bellarine and will continue to be an important part of the local economy and environment. The VFF has made the recommendations in this submission in an effort to ensure farming on the Bellarine is not impeded by unnecessary or unintended impacts on the local agricultural industry.

Thank you for the opportunity to provide this submission. The VFF remains committed to assisting the Department of Environment, Land, Water and Planning in developing the Statement of Planning Policy for the Bellarine Peninsula and welcomes and encourages industry engagement.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Emma Germano".

Emma Germano
President