



**Victorian
Farmers
Federation**

SUBMISSION

**Planning for Rural workers' accommodation: issues
and options paper**

24 February 2021

EXECUTIVE SUMMARY

Accommodation for rural workers has always been an important issue for the farming community.

Accommodation and housing is a basic necessity of human life. Once a person accepts a rural position outside of their locality, their next step is to source a place to live for themselves and their family. If they are unable to find accommodation then the likelihood of working in that job is greatly diminished.

One VFF member stated **“If there is no accommodation you cannot attract workers”**.

Accommodation for farm workers is often a critical issue for agriculture – both in terms of peak periods (temporary) or farm managers (permanent).

VFF is aware that the planning system currently has little policy or provision content to guide consideration of what may be essential to the safe and sustainable use of the land for production of food and fibre. It is essential that this type of accommodation is envisaged and supported where it meets appropriate tests. Policy guidance / support recognising the need for agriculture to be able to respond to market and other forces needs to be placed back into the PPF following its removal without discussion by VC71.

This action will then allow for:

- expansion of state, regional and local policy content regarding farm worker accommodation;
- the preparation of a nested land use term (Rural worker accommodation – with nested definitions for temporary and permanent);
- inclusion of decision guidelines for rural worker accommodation;
- preparation of particular provisions, if required, for temporary and permanent accommodation;
- preparation of guidance to determine need for temporary and permanent accommodation in conjunction with industry and generally on the NSW model.

VFF will outline what it sees as ‘rural worker’, the variance in accommodation types required, and some context relating to the question on “on site” which can vary due to availability of accommodation – in proximal, fiscal and availability (vacancy) aspects.

We believe this should assist in ensuring the planning system tools guide a strategic outcome which supports genuine farming need and avoids land use conflict.

We are grateful that you are willing to hear our feedback and that timeliness is critical so this submission will be a brief synopsis of our position on the issues identified – and the context for that feedback and we are eager to discuss or explain these issues if this would be of assistance.

OUR POSITION

What is a rural worker?

“Rural worker” is a general term used but has a wide meaning.

Rural workers can be described as:

- Permanent workers working on farms, such as, on a mixed farm where the workers are engaged on a permanent basis and their families are generally housed on farm or are accommodated in the local area. Many farms have another house/houses on the farming property that are solely used for farm workers;
- Seasonal workers, such as:
 - Shearers, where shearing quarters are required to house these workers. The seasonal workers may only require to be housed on a semi- permanent basis in furnished accommodation;
 - Working holiday maker- back packers who require accommodation during the harvest period usually in furnished accommodation;
 - Pacific Labour scheme-workers need accommodation during the harvest periods as do seasonal workers on the seasonal worker program in furnished accommodation.

There is not just one suitable type of accommodation that is required. There is quite a variance based on suitability/requirements based on the type of farming business. For example, for Broad Acre/Livestock farming businesses require fixed, on property, self-contained, permanent accommodation on property for their rural workers due to the nature of the business and roles.

Whereas for a Horticulture farming business, due to their differing operational business need flexibility in relation to accommodation. This will include a mix of , require temporary/seasonal, movable and fixed, self-contained and on property.

Due to the vast differences in operational requirements between farming businesses, the type of accommodation that will be suitable for rural workers will be on a “business to business” basis and what is the most productive fit. There is no “one shoe fits all” answer to accommodation types for rural workers.

There are market forces i.e. supply and demand involved in getting accommodation. Regional accommodation is hard to source generally as housing is in short supply. This may have been due to high building costs. Generally it has been expensive to build a house in country areas due to transporting the building materials and the lack of tradespeople in those areas.

Also, there is the competition for the available rentals in regional towns. Rural farm workers requiring accommodation area versus regional tourist accommodation for tourists who generally can pay more and major project proponent housing workers to build wind farms, roads and other major infrastructure.

A rural worker will not be able to pay high rent for a short term rental during the harvest period so this may narrow the available rental market. For example, in the caravan parks there may be some available rentals but they are usually booked out by holiday makers leaving no capacity for rural workers to find accommodation in caravan parks during the peak tourist season. There needs to be a range of rentals that are available with affordable rentals being offered to rural workers.

Councils, farmers and regional communities need to allocate accommodation for rural workers exclusively. On farm accommodation is ideal as this cuts out for the need of sourcing transport to and from the farm as well as competition from tourists.

Should rural workers' accommodation be allowed to be provided both off site and/or onsite, and under what circumstances should it be provided?

It should be allowed in the capacity that it ties in with the community, where the rural workers will be working and also taking into consideration the required type of accommodation based on farming business requirements. The aim is to achieve the easiest work/living arrangement for the farm business and rural worker.

The planning requirements should allow for flexibility. Rural accommodation on farm is not a new concept. Historically houses for farm workers were built on farm. Councils in various regions allowed workers/managers houses to be built in addition to the main homestead previously, subject to conditions, such as size of the farm.

Rural accommodation should be allowed to be provided on site and also off site depending on the circumstances. If the accommodation is to provide for rural workers accommodation, a permit can be issued conditional on the undertaking. If the purpose changes then reconsideration of the use of the building needs to be agreed upon by relevant authorities.

Role of policy to guide use of discretion

Before VC71 state policy content for agriculture was included under the 'economic development' heading and included information relevant to the needs of the sector to adapt to changing market and other forces. Removal of information that didn't directly related to "housing and subdivision" or a 'public land' view of natural resources from state policy is a problem as not only does it fail to give policy context to the role of attracting workers to production, it leads to the removal of local content on these matters from rural land studies.

While there is the opportunity to provide additional guidance on this issue, it is best placed in the context of this version of state policy – that sought industry input, recognised the economic importance of agriculture, including genuine farming enterprises to adjust to market changes (which could include market failure in provision of accommodation). This context then allows a more specific discussion of the need for labour.

Land capability is a fundamental factor for consideration in rural land use planning.

Planning authorities should consult with the Department of Primary Industries and utilise available information to identify areas of productive agricultural land.

Regional and State, as well as local, issues and characteristics should be taken into account in the assessment of agricultural quality and productivity.

Permanent removal of productive agricultural land from the State's agricultural base must not be undertaken without consideration of its economic importance for the agricultural production and processing sectors.

Planning should support effective agricultural production and processing infrastructure, rural industry and farm-related retailing and assist genuine farming enterprises to adjust flexibly to market changes.

Planning and responsible authorities should encourage sustainable land use.

Planning should provide encouragement for sustainable agriculture and support and assist the development of innovative approaches to sustainable practices.

Subdivision of productive agricultural land should not detract from the long-term productive capacity of the land.

Potential nested land use terms

It is clear that there may be confusion over what constitutes ‘rural worker’ and what type of ‘rural workers’ should be / can be accommodated on farm while meeting the objectives of protecting agricultural land from conflict.

VFF believes it would not be appropriate to provide accommodation on farm for teachers, mine workers, factory workers, forestry workers– which a poorly defined land use term may lead to.

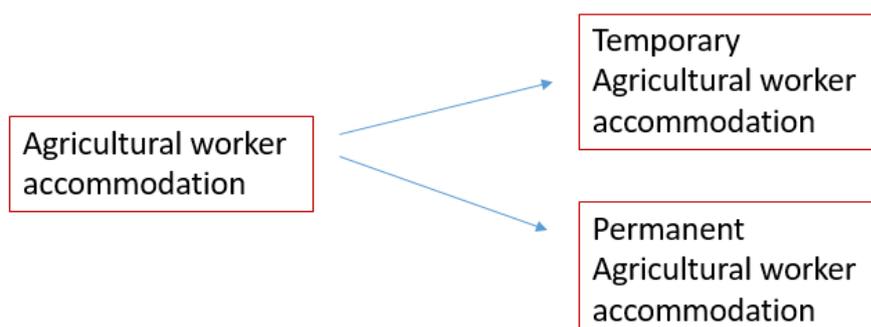
It is recommended that the term reference agriculture – which is a defined term. This will then minimise any confusion regarding what cohort of rural worker housing is appropriate.

Agriculture	Land used to:	Animal husbandry
	a) propagate, cultivate or harvest plants, including cereals, flowers, fruit, seeds, trees, turf, and vegetables;	Aquaculture
	b) keep, breed, board, or train animals, including livestock, and birds; or	Crop raising
	c) propagate, cultivate, rear, or harvest living resources of the sea or inland waters.	

Host Farm, is currently a defined term. While it is surprising that the planning system has chosen to recognise a ‘tourism’ opportunity over a genuine need for farm labour, it does provide a model for at least a ‘temporary’ definition, and, when read in conjunction with the ‘agriculture’ definition, give direction for the definition.

Host farm	Accommodation
	An agricultural property used to provide accommodation for persons, away from their normal place of residence, to experience living on land used for agricultural purposes.

VFF recommends that the following nesting diagram and definitions be considered and refined in conjunction with industry.



Agricultural worker accommodation

Temporary or permanent accommodation for persons undertaking work on the property relating to that farm business where the work is directly related to the use of the land for agriculture.

Temporary Agricultural worker accommodation

Accommodation away from their normal place of residence for persons undertaking seasonal work on the property relating to that farm business where the work is directly related to the use of the land for agriculture.

Permanent Agricultural worker accommodation

Permanent accommodation, in addition to the land holder accommodation, for persons undertaking permanent work on the property where the work is directly related to the use of the land for agriculture.

Potential considerations for decision guidelines / particular provisions / guidance

While the definitions need to be general in nature, there will be a need to use a range of tools throughout the scheme in addition to policy guidance. This may include zone tables (conditions); decision guidelines in zones, particular provisions (52, 53, 59), general provisions (62.01, 62.02) and guidance / practice notes. VFF is keen to be involved in how to determine the best suite of controls to minimise red tape for genuine farming accommodation, minimising land use conflict and enable enforcement for use of Agricultural Works accommodation for another purpose.

VFF gives provisional support to the use of considerations similar to the 'NSW' model, with the following comments.

- The suitability of communication infrastructure – not relevant to the need for accommodation as many farms have limited communication infrastructure
- The accessibility of nearby residential zones and surplus dwellings on other properties – this is relevant, as is potential caravan parks with cabins. What is not discussed is the price and availability of this accommodation when considering timing of seasonal work or ability to pay for accommodation in high amenity areas, or what 'roles' require workers to be on site for animal welfare or safety.
- The scale of the enterprise and need for additional resident farm labour – this will require a range of production system and scale considerations best guided by industry.
- The mobility of farm workers / managers to work on more than one property.

Emma Germano
President
Victorian Farmers Federation

The Victorian Farmers Federation

Victoria's agricultural production accounts for over \$13 billion of Victoria's economy and over 25 per cent of the State's exports per annum. Victoria's farmers produce high quality food and fibre, produced to high standards of safety, with little taxpayer support, and to some of the strictest environmental and highest animal welfare controls in the world.

The Victorian Farmers Federation (VFF) represents a farming community which creates a profitable, sustainable and socially responsible agriculture sector connecting with consumers.

We have a proud history representing Victoria's farm businesses since 1979 – primarily family farms that produce the eggs, grain, fruit and vegetables, meat, and milk that help to feed Victoria's six million people, and the bigger global community, every day.

The VFF consists of commodity groups: dairy (United Dairyfarmers of Victoria), grains, horticulture (including Flowers Victoria), intensives (chicken meat, eggs and pigs), and livestock – and expert committees representing; water, land management, agricultural and veterinarian chemicals, farm business and rural development, and workplace relations.

Our purpose is to make Victorian farmer's lives better; enhancing Victoria's future.

Our mission is to ensure a community of farmers creating a profitable, sustainable and socially responsible agricultural industry connecting with all Victorians.



Our place in Victoria

What we do



- Victoria's **20,775 farms** cover **10.6 million** hectares
- We are **24.2%** of Australian farmers
- **91%** family operated, with only **2%** foreign owned



- We employ **87,800** people mostly in regional areas
- **\$4739** of food consumed each year by every Australian
- As a net exporter we have long term food surity



- Our annual production is **\$13.16 billion**, **3.5%** of Victoria's economy
- **27.8%** of Victoria's exports are agricultural product valued at **\$11.9 billion**

How we do it



-  Farmers invest **\$80 million** in R&D
-  Every R&D **\$1** converts to **\$12** in farmer generated impact
-  **2.7%** productivity growth through innovative efficiency gains
-  Farmers receive less than **1.5%** in government support



-  **63%** reduction in greenhouse gas emissions between 1996-2016
-  Water consumption reduced by **7%** from 2014-2015
-  Land conservation has increased to **18%** of total land mass.
-  Farmers spend **\$20,000** annually on feral animals and pest weeds



-  **3.5 million** beef cattle
-  **140 million** chickens
-  **1.1 million** dairy cows producing **6.186 billion** litres of milk
-  **65,992** sows
-  **13.1 million** breeding ewes and a fleece clip of **66,100 tonnes**
-  **6.5 million** tonnes of grain
-  **\$2.35 billion** in horticultural production