

6.1.4 Submission to DELWP's Consult on Planning for Melbourne's Green Wedge and Agricultural Land

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Recommendation(s)

That Council endorse the attached submission to the Victorian Government's consultation on Planning for Melbourne's Green Wedge and Agricultural Land

Attachments

1. Cardinia Submission DELWP Planning Melbourne's Green Wedge [6.1.4.1 - 22 pages]

Executive Summary

Cardinia Shire Council has advocated for stronger protection of green wedge and agricultural land and the right-to-farm for more than a decade. Over recent years DELWP has consulted with Council on changes to planning policy and controls that would improve these protections.

DELWP have now prepared 'Planning for Melbourne's Green Wedges and Agricultural Land Consultation Paper May 2020'. This consultation paper proposes 46 Options and 12 Design Elements to improve protections of green wedge and agricultural land and the right-to-farm within a 100km radius of Melbourne. It seeks to address many issues Council has previously raised including:

- Green Wedge Management Plans (GWMPs)
- Proposed 'Right-to-farm' and 'Agent-of-change' provisions
- Subdivision of rural landscapes
- 'Host farm' as a section 1 use
- 'Halls' to mirror requirements for 'Function centres'
- Strengthening of the 'in-conjunction-with' tests
- Strengthening locational requirements for non-green wedge uses
- Decision guidelines and application requirement for new dwellings
- New planning policy and overlay to protect land with access to secure water
- Farm gate sales
- Design Guidelines and Design Requirements

Any State Government initiatives to protect green wedge and agricultural land and the 'right-to-farm' are welcomed, and 25 of the 46 proposed Options and 11 of the 12 proposed Design Elements are supported. There is partial support of 3 Options and 1 Design Element, and conditional support of 15 Options. Options 11, 22, 33 are not supported, and parts of Options 28, 30, 32 and Design Element 2 are not supported.

Several of the proposed options may place an unreasonable workload and funding burden on Council to prepare and review GWMPs, as such Council's submission provides conditional support on many proposed options and requests that funding from the State government be provided to resource some pieces of work should they become mandatory planning requirements.

Background

Cardinia Shire has strongly advocated for better protection of green wedge and agricultural land and the right-to-farm for decades. As such, any effort made by the State government to enhance protection of green wedge and agricultural land and the right-to-farm is welcomed.

In early 2019, the Department of Environment, Land, Water and Planning (DELWP) commenced a consultation by asking ten questions about 'Identifying and protecting strategic agricultural land within green wedge and peri-urban land around Melbourne'. Officers briefed Council on that consultation and Cardinia Shire's submission on 13 May 2019. In response to submissions to that consultation DELWP have now prepared 'Planning for Melbourne's Green Wedges and Agricultural Land Consultation Paper May 2020'. This consultation paper proposes 46 Options and 12 Design Elements to improve protections of green wedge and agricultural land and the right-to-farm within a 100km radius of Melbourne. Officers briefed Council on this consultation and Cardinia Shire's submission (Attachment 1) on 14 December 2020.

Discussion

There is support for 25 of the 46 proposed Options and 11 of the 12 proposed Design Elements, partial support for 3 Options and 1 Design Element, and conditional support for 15 Options. Options 11, 22, 33 are not supported, and parts of Options 28, 30, 32 and Design Element 2 are not supported. A discussion of the main matters follows.

Green Wedge Management Plans

Several proposed options relate to the preparation of GWMPs, such as mandating the preparation of GWMPs plans for the two remaining green wedges in Cardinia Shire's north, reviewing our current Western Port GWMP, followed by ongoing regular reviews of all three plans. This work would have to be carried out in accordance with specific frameworks and requirements to be outlined by new planning provisions and practice notes. Council has previously advocated that preparation of the northern GWMPs needs to be funded by the State government. If these proposed options become mandates in the planning provisions, Council will require State government funding to ensure these pieces of work can be resourced.

The State Government should also make it clear to land speculators that any mandated reviews of GWMPs cannot be used to apply pressure on Council or the State Government to expand the Urban Growth Boundary (UGB) as UGB changes should be considered during the State Government's holistic review of its Metropolitan Strategy (currently 'Plan Melbourne 2017-2050') or through a separate logical inclusions process, and not in an ad-hoc manner through GWMP reviews.

Proposed 'Right-to-farm' and 'Agent-of-change' provisions

Option 8 proposes to establish new right-to-farm legislation that ensures primary production carried out on a farm does not constitute a nuisance, provided that it is conducted lawfully and agriculture is a primary purpose of the zone. This legislative change is supported provided that solar farms, wind farms, horse (or other recreational animal) breeding are not automatically included as farm uses unless specified in a schedule. This option should also ensure that intensive farming is not prioritised over biodiversity protection.

Option 9 proposed to establish new agent-of-change legislation that assigns the responsibility for mitigating impacts from farming operations to those who introduce a new use or development adjacent to the farm. This legislative change is supported provided that it does not create a barrier for existing agricultural uses to expand, pivot or diversify. For example a farm may be currently used for grazing but should be able to retain the right-to-farm in a

different way if they choose to, such as cropping, greenhouses, packing sheds, even if a sensitive use has established nearby and may be affected by noise, dust and odours generated by the changed farm use.

Subdivision of rural landscapes

Options 11 and 12 seek to tighten the ability to subdivide land into more lots or smaller lots than is currently provided for in the Farming Zone and Rural Activity Zone within 100km of Melbourne.

Option 11 seeks that planning scheme amendments that would facilitate an increase in the subdivision potential of Farming Zone and Rural Activity Zone land within 100km of Melbourne must be approved by the Minister for Planning and ratified by both Houses of Parliament to mirror the approval requirements of the Green Wedge Zone and the Green Wedge A Zone. This change is not supported.

Cardinia Shire has no Rural Activity zoned land. However, the Farming Zone is used as a holding zone for land that is identified for rezoning to an urban zone in approved strategic documents such as the State Government's *Plan Melbourne 2017-2050* and several of Council's Township Strategies. The growth front depicted in Plan Melbourne includes Pakenham East which is in the Farming Zone. This would mean that the Pakenham East Precinct Structure Plan would have to be ratified by both Houses of Parliament. Council has already justified the use of the Farming Zone as a holding zone on land identified by Township Strategies for rezoning to a residential zone (Bunyip) and an industrial zone (Koo Wee Rup) for example, as these strategies have been through a planning scheme amendment process to be included in the Cardinia Planning Scheme. Requiring ratification of both Houses of Parliament will impose unreasonable additional processes and extended timeframes on Council to achieve strategic visions that were already accepted by DELWP when the Farming Zone was initially applied to this land.

If the proposed changes to the Farming Zone are to proceed, it is submitted that a new type of 'holding zone' is simultaneously implemented and applied to land that has been strategically justified for future rezoning to an urban zone and was rezoned to Farming Zone as an interim holding zone.

Host farm as a section 1 use

Option 22 proposes to move host farm to a Section 1 use (as-of-right) in the Farming Zone, rural activity Zone, Green Wedge Zone and Green Wedge A Zone, providing that it is undertaken in conjunction with agriculture and accommodates no more than 10 people. This change is not supported. 'In conjunction with 'agriculture'' provides too many loop-holes for rental accommodation to be established on land that is not an authentic or genuine farming operation. This will create an unreasonable planning enforcement burden for Council. 'Bed and Breakfast' already provides sufficient ability for this kind of rental/tourism accommodation to be established on a property as a Section 1 Use (as-of-right).

'Halls' to mirror requirements for 'Function centres'

Option 33 proposes that 'Hall' mirror the minimum lot size and maximum patron requirement of 'Function centre' in the Green Wedge Zone. This change is not supported. A publicly owned Hall in the green wedge is very different to a privately owned Function centre in the green wedge.

A private Function centre must be used in conjunction with Agriculture, Natural systems, Outdoor recreation facility, Rural industry or Winery, must have less than 150 patrons, and must be located on at least 40 hectares. A public Hall on the other hand is often a crucial and central community building for a rural area in the green wedge that is provided for the use of

the community and may be used to provide services to the community (immunisation programs for example). While a Hall may be hired out for a function, it is not to make a great profit, and the building regulations restrict the number of patrons for health and safety reasons. In consideration of the community services that are provided, a public Hall in the green wedge should not be subject to 'in conjunction with' tests, nor a minimum lot size of 40 hectares.

Strengthening of the 'in-conjunction-with' tests

The 2013 Zone Reforms increased the number and ability of discretionary uses that can establish in the green wedge zones without connection to the purpose of the zones thereby creating conflict with farming uses. Several proposed options relate to providing new policy to clarify and tighten up the application of 'in-conjunction-with' tests, whereby new uses (such as Host farms and Group accommodation) must demonstrate a genuine connection to the use of the land that accords with the purpose of the zone. This change is supported. It will go a long way to addressing problems such as conflict of use and fragmentation of farmland that have been increasing for several years.

Strengthening locational requirements for non-green wedge uses

The 2013 Zone Reforms increased the number and ability of discretionary non green wedge uses that can establish in the green wedge zones without locational requirements thereby creating conflict with farming uses.

Several proposed options in the Discussion Paper relate to the location where several non-green wedge uses can establish. It is proposed to require Educational facilities, Places of Worship and Data centres to locate adjoining the UGB or urban zones rather than out in the middle of the green wedge. This change is supported. It will go a long way to addressing problems such as conflict of use and fragmentation of farmland that have been increasing for several years.

Decision guidelines and application requirement for new dwellings

Option 13 proposes to introduce decision guidelines and application requirements for new dwellings in green wedge zones requiring them to demonstrate a genuine connection to the use of the land that accords with the purpose of the zone. Cardinia Shire has been advocating for and support this change. As with the proposed changes to strengthen the locational requirements, this proposed change will address problems such as conflict of use and fragmentation of farmland that have been increasing for several years.

New planning policy and overlay to protect land with access to secure water

Options 16, 17, 18 and 19 propose new State planning policy, a new planning overlay, and new referral and notice requirements to protect land that has access to secure water supply and irrigation infrastructure. The proposed Cora Lynn Recycled Water Irrigation Scheme area is earmarked for application of the new overlay. These changes are supported provided that Council has input into the content of the new overlay and the extent of land it is applied to ensure the range of allowable uses are not too limiting, the overlay is versatile enough, and it is applied to the correct extent of land.

Farm gate sales

Option 20 proposes to increase the ability of as-of-right farm gate sales to allow for sale of ancillary goods such as crackers and bottled drinks to consume with the primary produce that is for sale, also the sale of produce from other land that is held in the same ownership, and a percentage of produce sourced from producers within 5km. This change is supported provided that an ancillary test is defined and applied to the sale of 'ancillary goods', and the sales do

not grow to a size that would trigger consideration of car parking, food safety, waste collection etc.

Design Guidelines and Design Requirements

Several proposed options and the 12 Design Elements relate to the introduction of Design Guidelines and Design Requirements for new development in green wedge zones. This change is supported provided that Council has input into the development of the guidelines and requirements prior to their implementation. Part of 'Design Element 2 - Site Layout' is not supported as it would allow buildings to be sited with zero setbacks if surrounding properties have examples of zero setbacks. It is considered that perpetuating bad past decisions should not be allowed and that preferred boundary setbacks should be respected by new development.

Policy Implications

DELWP have posed several options relating to the preparation of Green Wedge Management Plans. If DELWP implement these options, it may become mandatory for Council to prepare the two remaining GWMPs for Cardinia's northern areas, and to review the current Western Port GWMP.

Relevance to Council Plan

3.3 Our Environment - Enhanced natural environment

3.3.4 Manage water in an integrated way, including the reduction of potable water consumption by Council and households.

3.3.5 Promote water catchment management practices that improve the quality of our waterways.

3.3.6 Protect and improve biodiversity by increasing the area of natural ecosystems across the Shire.

3.3.7 Manage agricultural land use by supporting farmers to utilise sustainable farming practises.

3.5 Our Environment - Balanced needs of development, the community and the environment

3.5.4 Ensure the planning of rural (green wedge) areas protects and enhances important agricultural, environmental, natural resource, infrastructure and recreational values.

4.2 Our Economy - Maintained strong agricultural activities

4.2.1 Support our farmers and growing agricultural industry in adapting to the changing economy and climate.

4.2.2 Identify innovative ways to value-add to the region's primary production and transportation.

Climate Emergency Consideration

Protecting Cardinia's green wedge and agricultural land from inappropriate development will contribute positively to mitigating the climate emergency.

Consultation/Communication

In early 2019, the Department of Environment, Land, Water and Planning (DELWP) carried out a consultation by asking ten questions on 'Identifying and Protecting Strategic Agricultural land within green wedge and peri-urban land around Melbourne'.

In response to submissions DELWP have now prepared 'Planning for Melbourne's Green Wedges and Agricultural Land Consultation Paper May 2020'. DELWP commenced

consultation in May 2020. Due to Covid-19 the closing of submissions was postponed twice. Submissions to the consultation period will now close on 5 February 2021. More information about this consultation can be found on DELWP's website via this link:
www.engage.vic.gov.au/gwal

Internal consultation was carried out and input was provided by the Statutory Planning, Environment, Economic Development, Growth Area Strategic Planning, and Food Circles teams.

The Senior Leadership Team and Council was briefed in late 2020 and direction was provided and included in the submission.

Financial and Resource Implications

DELWP have proposed several options relating to the preparation of Green Wedge Management Plans. If DELWP implement these options, it may become mandatory for Council to prepare the two remaining GWMPs for Cardinia's northern areas, and to review the current Western Port GWMP. It is not clear at this stage whether the State Government will provide funding to resource these significant pieces of work. This is of concern to Council Officers and has been noted within the submission.

Conclusion

Cardinia Shire Council welcomes any State Government initiatives to protect green wedge and agricultural land and the 'right-to-farm' and supports most of the 46 proposed options. Options 11, 22, 33, and parts of Options 28, 30, 32 and Design Element 2 are not supported.

Several of the proposed options may place an unreasonable workload and funding burden on Council to prepare and review GWMPs, as such Council's submission provides conditional support on many proposed options and requests that funding from the State government be provided to resource some pieces of work should they become mandatory planning requirements.

Submission to DELWP

5 February 2021



Planning for Melbourne's Green Wedges and Agricultural Land

Introduction

This is the Cardinia Shire Council's submission to DELWP's consultation on planning for Melbourne's Green Wedges and Agricultural Land.

This submission has been prepared by Council officers and has not been formally adopted by Council. It seeks to be consistent with the 'Cardinia Western Port Green Wedge Management Plan 2017, Clause 22.05 of the Cardinia Planning Scheme, and previous feedback related to green wedge and agricultural land which includes submissions to:

- DELWP's consultation on 'Identifying and protecting Strategic Agricultural Land within Green Wedge and Peri-urban Land around Melbourne' 2019.(attachment 1)
- The Minister for Planning regarding the Stockpiling and dumping of soil in rural areas, 18 April 2019 (attachment 2).
- DEPI regarding Cardinia Planning Scheme's Special Use Zone 1 – Horticultural Preservation, 2013 (attachment 3).
- 'Future farms - providing for Victoria's future rural land use', 2009 (attachment 4).
- 'Parliamentary inquiry into sustainable development of agribusiness', Cardinia Shire and City of Casey 2008 (attachment 5).

Cardinia Shire Council welcomes all State government efforts to enhance protection of green wedge and agricultural land, and the 'right-to-farm'.

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Section 3.1.1 Legislative and policy framework for Melbourne's green wedges

Strengthening legislative protection of green wedges

Proposed Option 1: Amend Part 3AA (Metropolitan Green Wedge Protection) of the Planning and Environment Act 1987 to:

- Clearly express the Victorian Government's vision and objectives for green wedges.

Supported.

- Enshrine regional policy for each green wedge in legislation.

Supported.

- Introduce legislative requirements to prepare and implement strategic planning frameworks for each green wedge

Supported provided that:

- It is not a mandatory requirement to regularly review each Green Wedge Management Plan in a similar way to Planning Scheme Reviews (e.g. every four years) as Council does not have the resources to review three GWMPs at such regular intervals.
- the State Government provides funds to Council to ensure resources can be allocated to carry out the necessary work to develop Green Wedge Management Plans for the two remaining green wedges that fall partly within Cardinia Shire, and any ongoing regular reviews that may be mandated for all three green wedges that fall partly within Cardinia Shire
- the State Government makes it clear that:
 - the regular GWMP reviews cannot be used by land speculators to apply pressure on Council or the State Government to expand the Urban Growth Boundary (UGB); and,
 - UGB changes should always be holistically considered when the State Government reviews its Metropolitan Strategy (currently 'Plan Melbourne 2017-2050') or through a separate logical inclusions process, and not in an ad-hoc manner through GWMP reviews.
- Require ministerial approval for the adoption and implementation of strategic plans for green wedges prepared by local government authorities

Supported.

Clarifying state policy objectives for green wedges

Proposed option 2: Update state planning policy to clearly articulate the preferred outcomes for Melbourne's green wedges. The objectives of Clause 11.01 of the VPP (Green Wedges: Metropolitan Melbourne) can be potentially revised to include:

- 'To maintain the important non-urban purpose of the green wedges and avoid use and development that would adversely affect their future productive use or environmental significance'

Supported provided that:

- The term 'productive use' is defined to remove ambiguity.
- This objective is strengthened to emphasise that development can be deemed inappropriate where it will result in unacceptable loss of biodiversity.
- 'To support preferred land uses and encourage uses that contribute to the non-urban landscape and character'.

Supported.

It is assumed preferred land uses will ideally be identified by the relevant Green Wedge Management Plan and implemented via a Local Policy in planning schemes. In the absence of a Green Wedge Management Plan, some preferred land uses should be identified in State policy to remove ambiguity.

Reviewing Green Wedge Management Plans

Proposed option 3: Review and update Planning Practice Note 31 'Preparing a Green Wedge Management Plan' to improve the structure, form and content of Green Wedge Management Plans.

Supported provided that:

- It is not a mandatory requirement to regularly review each Green Wedge Management Plan in a similar way to Planning Scheme Reviews (e.g. every four years) as Council does not have the resources to review three GWMPs at such regular intervals.
- the State Government provides funds to Council to ensure resources can be allocated to carry out the necessary work to develop Green Wedge Management Plans for the two remaining green wedges in Cardinia Shire, and any ongoing regular reviews that may be mandated for all three green wedges that fall partly within Cardinia Shire
- the State Government makes it clear that:
 - the regular GWMP reviews cannot be used by land speculators to apply pressure on Council or the State Government to expand the Urban Growth Boundary (UGB); and,
 - UGB changes should always be holistically considered when the State Government reviews its Metropolitan Strategy (currently 'Plan Melbourne 2017-2050') or through a separate logical inclusions process, and not in an ad-hoc manner through GWMP reviews.

Introducing state-backed regional policy for green wedges

Proposed option 4: Develop and introduce regional policy directions in the PPF for Melbourne's green wedges in Clause 11.01-1R (VPP) and through Land Use Framework Plans

Supported provided that:

- Council has input into the drafting of the State policy and Land Use Framework Plans.
- It does not create unreasonable funding and resourcing burdens on Council.

Section 3.1.2 Legislative and policy framework for Melbourne's agricultural land**Protecting all agricultural land surrounding Melbourne**

Proposed option 5: Update the PPF to ensure that all agricultural land is protected.

Supported.

There are a large number of allowable uses under Section 2 that have no link to the purpose of the zone. As such the 'in conjunction with' tests also need to be strengthened.

Protecting the natural resources that underpin agricultural land use

Proposed option 6: Update the PPF to encourage land uses that have limited or negligible reliance on soil as the basis of production to be located in areas where soil-based agriculture is likely to be constrained.

Supported.

Cardinia Shire has already identified the areas of high quality soils and applied a Special Use Zone to protect and encourage soil-based agriculture in these areas. Cardinia's Western Port Green Wedge Management Plan together with Local Policy at Clause 22.05 also identify these high quality soil areas and provide direction for non-soil based agriculture to be located outside these high quality soil areas, in the green wedge zones.

Thought should be given to updating the 'Guidelines for Land Capability Assessment Guide in Victoria 1981' as it appears these have not been updated since 1981.

Improving regional policy protection of Melbourne's agricultural land

Proposed option 7: Update the PPF to include new regional policy for Melbourne's agricultural land. The new policy should:

- Support greater resilience of Melbourne's food bowl by encouraging re-use of valuable city waste streams, including recycled water, stormwater, nutrients and biogas.

Supported provided that consideration is given to the following:

- How a written response to this policy would be assessed?
- Would a referral to the water authority or other experts be required?
- Encourage opportunities for growth and diversification of other activities complementary to agriculture that leverage the advantages of proximity to the city of Melbourne and its local markets.

Supported provided that 'other activities' are defined to remove ambiguity.

- Support the establishment and expansion of infrastructure that benefits agriculture.

Supported.

- Recognise the economic and employment contributions of Melbourne's agricultural land to local communities, the region, and the State of Victoria.

Supported.

Right to farm

Proposed option 8: Establish new right-to-farm legislation for Melbourne's agricultural land that ensures primary production carried out on a farm does not constitute a nuisance, provided that it is conducted lawfully and the zoning of the land supports agricultural use as a primary purpose of the zone.

Supported provided that:

- the farms to be protected do not include solar farms, wind farms, horse (or other recreational animal) keeping and breeding, unless a schedule accommodates these uses.
- intensified agricultural production is not prioritised over biodiversity protection.
- The 'agent of change' rule will not impact or prevent planning authorities from strengthening environmental protections legislation in the future.

Proposed option 9: Introduce the 'agent of change' principle into legislation to assign responsibility for mitigating impacts of lawful agricultural operations (e.g. dust, noise, odour) to the 'agent of change' – the person or organisation who introduces a new use or development in an existing environment.

Supported provided that this does not prevent or add an additional barrier for existing agricultural uses to expand, diversify or pivot. For example, a farm may be currently used for grazing livestock but should retain the right-to-farm the land in a different way if they choose to, such as cropping, greenhouses, packing sheds etc., even if an 'agent of change' sensitive use has justified itself to be established on a nearby property that may become affected by machinery noise, dust and odours associated with the different farm use.

Proposed option 10: In conjunction with legislative changes above, update the PPF to encourage appropriate siting, design and scale of sensitive uses and developments within rural areas to avoid conflicts with agricultural uses and to maintain capability to intensify agricultural production

Supported.

Primary production of food and fibre must have higher land use priority than uses such as rural living, leisure, education and worship etc. This will help to ensure that right-to-farm legislation is successful and will encourage and support investment, expansion and modernisation, as well as farming land to its current and future capacity and capability. This will support farmers to make the best environmental farm management decisions to adapting to climate and other variables which directly affect a farmer's ability to farm the land.

Section 3.2.1 Managing subdivision and dwelling development in agricultural areas

Subdivision of rural landscapes

Proposed option 11: Reduce the subdivision potential of Melbourne's agricultural land by requiring parliamentary ratification of proposals to subdivide land into more lots or smaller lots than currently provided for in the planning scheme in the Farming Zone and Rural Activity Zone within 100 km of Melbourne. Currently any amendment that increases the subdivision potential of green wedge land requires the approval of the Minister for Planning and ratification of both Houses of Parliament. This option extends the current requirements to agricultural land in peri-urban areas.

Not Supported.

The Farming Zone is used in Cardinia Shire as a holding zone for land that has been identified for rezoning to an urban zone by approved strategic documents such as the State government's *Plan Melbourne 2017-2050* and several of Council's Township Strategies. The growth front depicted in Plan Melbourne includes Pakenham East which is in the Farming Zone, which means the Pakenham East Precinct Structure Plan would have to be ratified by both Houses of Parliament. Council has already justified the use of the Farming Zone on land identified by Township Strategies for rezoning to a residential zone (Bunyip) and an industrial zone (Koo Wee Rup) for example, as part of a separate planning scheme amendment process. Requiring ratification of

both Houses of Parliament will impose unreasonable additional processes on Council to achieve strategic visions that were already accepted by DELWP when the Farming Zone was initially applied to this land, as well as extended timeframes.

If the proposed changes to the Farming Zone are proceeded, it is requested that a new type of 'holding zone' is simultaneously implemented and applied to land that has been strategically justified for future rezoning to an urban zone and was rezoned to Farming Zone as an interim holding zone.

It is also requested that a new overlay be applied to all green wedge/farming land within 100 km of Melbourne to ensure that it is transparent in planning schemes that additional provisions apply and to make clear distinction from land in the same zones beyond the 100 km radius.

Proposed option 12: Amend the subdivision provisions of the Farming Zone and Rural Activity Zone to prohibit the creation of a lot for an existing dwelling that is smaller than the minimum lot size. This only applies within 100 km of Melbourne

Supported.

It is requested that a new overlay be applied to all green wedge/farming land within 100 km of Melbourne to ensure that it is transparent in planning schemes that additional provisions apply and to make clear distinction from land in the same zones beyond the 100 km radius.

Dwellings in rural areas

Proposed option 13: Better control dwellings in Melbourne's agricultural areas by:

- Adding the following condition to the use of land for an as-of-right dwelling in the Farming Zone:
 - Must not be within 100 km of Melbourne. This change would remove Dwelling as an as-of-right use in the Farming Zone within 100 km of Melbourne

Supported.

It is requested that a new overlay be applied to all green wedge/farming land within 100 km of Melbourne to ensure that it is transparent in planning schemes that additional provisions apply and to make clear distinction from land in the same zones beyond the 100 km radius.

- Introducing decision guidelines for 'Dwelling Issues' into the Green Wedge Zone and Green Wedge A Zone. The decision guidelines would mirror the guidelines provided in the Farming Zone, which require the responsible authority to consider, as appropriate:
 - Whether the dwelling will result in the loss of fragmentation of productive agricultural land.
 - Whether the dwelling will be adversely affected by agricultural activities on adjacent and nearby land due to dust, noise, odour, use of chemicals and farm machinery, traffic and hours of operation.
 - Whether the dwelling will be adversely affected by the operation and expansion of adjoining and nearby agricultural uses.
 - The potential for the proposal to lead to a concentration or proliferation of dwellings in the area and the impact of this on the use of the land for agriculture and natural systems.

Supported provided that Council has input into the content.

It is recommended to include in all zones:

- Where the application is also located in a BMO and proposes an unacceptable level of biodiversity loss, it may not be appropriate to approve a dwelling.
- Consideration of whether an established agricultural use of the land has been demonstrated to help justify the development of a dwelling. If the dwelling application is made prior to the establishment of agriculture, how does the responsible authority ensure an agricultural use is carried out rather than a rural living use? Also, what happens if the agricultural use becomes unviable over time and ceases?
- Introducing application requirements for dwellings into the Green Wedge Zone and Green Wedge A Zone that require applications for dwellings to be accompanied by a written statement that explains how the proposed dwelling responds to the decision guidelines for dwellings in the zone. (This change allows dwellings to be considered but ensures the use does not compromise the long-term productivity of surrounding farmland or limit the operation and expansion of agricultural uses).

Supported provided that Council has input into the content.

It is recommended that thought be given to a requirement for an Integrated Land Management Plan to be submitted, and how these can be enforced.

Section 3.2.2 Improving decision-making on agricultural land

Proposed option 14: Develop a practice note to guide council decision-making on planning permits in agricultural areas. The practice note would support the interpretation of the planning scheme and guide discretionary decision-making, and may outline:

- How to interpret the decision guidelines for zones relating to agriculture
- How to determine whether a discretionary use will lead to loss of agriculture as the primary use of land.
- How to apply the 'in conjunction with' agriculture test.
- How to assess and minimise potential land use conflicts in development proposals, including proposals adjacent to agricultural land.

Supported provided that a range of industry and government organisations assist in developing the Practice Note.

How to assess the viability of a new agricultural use that is proposed in order to satisfy the 'in conjunction with' test should be included in the Practice Note.

The Practice Note should also assist in identifying unacceptable levels of biodiversity loss.

Proposed option 15: Establish an agricultural referral or expert advisory service to support decision-makers and facilitate compliance with the planning scheme

Supported provided that commercial farming expertise on all types of farming are included and the services of this body is provided at no cost to Council. Making this a mandatory body with Section 55 referral requirements would be very helpful.

Section 3.2.3 Future proofing Melbourne's food bowl

Safeguarding agricultural land with potential access to alternative water

Proposed option 16: Develop a new regional policy, Clause 14.02- 3R of the PPF (Preserving opportunities for irrigated agriculture around Melbourne), with the following objective:

- Safeguard land with potential for future growth in irrigated agriculture, based on alternative water use.

The new policy would:

- Delineate areas with potential for future growth in irrigated agriculture
- Ensure changes to land use in these areas do not limit potential opportunities for development and expansion of irrigation agricultural precincts.
- Maximise the beneficial re-use of treated wastewater and stormwater for agricultural purposes.

Supported provided that Council has input into the final content. Council has local policies and strategies relevant to this issue, including the Western Port Green Wedge Management Plan, the Bunyip Food Bowl Feasibility and the Assessment of Climate Change Impacts on Agricultural Production in the Western Port Green Wedge, and Water for Works.

Supporting agricultural land use in Melbourne's irrigated districts

Proposed option 17: Introduce a new overlay designed to protect food-producing areas with access to secure water supply and irrigation infrastructure. The purpose of the overlay would be to:

- Identify and protect areas with secure water resources for agricultural uses.
- Provide certainty that these areas will continue as key agricultural areas into the future.
- Protect areas of significant water infrastructure investment
- Limit non-farming and incompatible uses that would restrict ongoing productive use of land for agricultural purposes.
- Protect buffers of identified areas from encroaching sensitive uses such as dwellings to ensure agricultural activities continue without restrictions
- Facilitate agricultural uses in areas covered by the overlay by reducing permit requirements for buildings and works associated with agricultural activities continue with restrictions.
- Facilitate agricultural uses in areas covered by the overlay by reducing permit requirements for building and works associated with agriculture and by providing exemptions from notice and review requirements.

Supported provided that Council has input into the content of the new overlay to ensure that:

- the range of allowable uses are not too limited.
- The overlay is versatile enough to be applied to both recycled water re-use from the Pakenham East sewerage treatment plant and the urban stormwater runoff re-use from Cardinia's growth area.
- The area of the Cora Lynn recycled water irrigation scheme area is accurately mapped as it is depicted incorrectly in the discussion paper.

Proposed option 18: In conjunction with the development of a new overlay, establish a process to determine where the new overlay should be applied. In the first instance it is proposed to apply the overlay to irrigation districts with defined boundaries, including the Werribee and Bacchus Marsh irrigation districts, the Boneo Recycled Water Irrigation Scheme, the Western Irrigation network, and the Cora Lynn Recycled Water Irrigation Scheme. There is potential to cover further areas once a clear process and criteria for its application are confirmed.

Supported provided that Council has input into the extent the new overlay applied to the proposed Cora Lynn Recycled Water Irrigation Scheme area. Map 11 on page 45 of the consultation paper does not accurately depict the irrigation scheme area.

Section 3.2.4 Strengthening referral and notice requirements

Proposed option 19: Ensure water authorities have a clear role in the decision-making process for applications to use or develop land in protected irrigation districts or in non-urban areas identified as having potential for access to alternative water in the future.

Supported.

There is currently uncertainty about which authority will be responsible for proposed new infrastructure in Cardinia. It is not clear whether Melbourne Water or South East Water will be responsible for proposed infrastructure for alternative water collected from the urban growth area to be used for farm irrigation in rural areas. Southern Rural Water and the Western Port Catchment Management Authority also hold responsibilities in Cardinia Shire.

Section 3.2.5 Strengthening agricultural diversification, value-adding and innovation

Farm gate sales

Proposed option 20: Update the definition of 'Primary produce sales' to:

- Allow sale of ancillary goods (such as crackers and bottled drinks) to be consumed with the primary produce (e.g. cheese or strawberries).
- Allow sale of produce from land held in one ownership to support farms comprising divided holdings in the ownership.
- Allow percentage of produce sold to be sourced from local producers within 5 km of the use.

Supported provided that:

- An 'ancillary test' is clearly defined and applied to the sale of ancillary goods to be sold alongside the primary produce, to ensure the amount of the ancillary goods offered for sale remains at the ancillary level.
- As-of-right farm gate sales can continue at a reasonable level without causing the use to grow to a size that would trigger consideration of car parking, food safety, waste collection, etc.

Host farms

Proposed option 21: Amend the definition of the land use term 'Host farm' to require a direct link to an operating agricultural property'

Supported provided that 'Operating agricultural property' is defined to remove ambiguity. Drafting of the definition should consider whether the property is a Principal Place of Business which fulfills the ATO and SRO definitions of farming and farmer.

'Bed and breakfast' should also require a direct link to an operating agricultural property.

[Proposed option 22:](#) Move 'Host farm' to a Section 1 (as-of-right) use in the Farming Zone, Rural activity Zone, Green Wedge Zone and Green Wedge A Zone, providing it is undertaken in conjunction with agriculture and accommodates no more than 10 people away from their normal place of residence at any one time. If these conditions are not met, the use will require a permit.

Not supported.

In conjunction with 'agriculture' provides too many loop-holes for rental accommodation to be established on land that is not an authentic or genuine farming operation. This will create an unreasonable planning enforcement burden for Council.

'Bed and Breakfast' already provides sufficient ability for this kind of accommodation to be established on a property as a Section 1 Use (as-of-right).

[Proposed option 23:](#) If the Host farm is within 100 km of Melbourne, the use must be in conjunction with Agriculture, Natural systems, Outdoor recreation facility, Rural industry or Winery.

Supported provided that:

- Host farm is retained as a Section 2 Use (permit required).
- The Host farm definition requires a direct link to an operating agricultural property.

It is also requested that a new overlay be applied to all green wedge/farming land within 100 km of Melbourne to ensure that it is transparent in planning schemes that additional provisions apply and to make clear distinction from land in the same zones beyond the 100 km radius.

[Section 3.3.1 Managing the urban-rural interface](#)

[Proposed option 24:](#) Provide planning practice guidance for local authorities on how to consider and direct planning for urban-rural interface areas.

Supported. While planning practice guidance will assist, without appropriate zone or overlay controls it will still be difficult to achieve transition areas at the urban/rural interface that properly protects the adjoining green wedge land.

Cardinia Shire Council has advocated through several consultations over the past decades or so, for an urban/rural buffer or transition area to be implemented at the Urban Growth Boundary to ensure separation from sensitive uses and minimise risk of land use conflict, and has identified suitable types of land uses that should be directed to the urban/rural buffer or transition area.

Proposed option 25: Provide guidance on preferred transitional land uses for land at the urban-rural interface and provide urban design guidance that supports a permanent edge and buffer to the urban area through region-level strategic policies (see proposed regional policy for green wedges, Section 3.1).

Supported. While guidance on preferred transitional land uses will assist, without appropriate zone or overlay controls it will still be difficult to achieve transition areas at the urban/rural interface that properly protects the adjoining green wedge land.

Cardinia Shire Council has advocated through several consultations over the past decades or so, for an urban/rural buffer or transition area to be implemented at the Urban Growth Boundary to ensure separation between from sensitive uses and minimise risk of land use conflict, and has identified the following suitable types of land uses that should be directed to the urban/rural buffer or transition area

Types of land uses for buffer/transition area at the urban/rural interface

Forests and biolinks

There are many benefits of this type of boundary which include the fact that forests and biolinks are environmentally friendly boundaries. Biolinks can be used for passive recreation pursuits and form part of a linear park. It also provides a wildlife corridor as well as contributing to the control of the water table in the area thereby reducing salinity. Forests and biolinks contribute to the carbon sink and are a visually attractive asset for both rural and semi urban areas. These buffer/transition areas could also be used by farmers who need to remove native vegetation as offset planting areas.

Golf courses

These are perhaps an obvious choice for a buffer/transition area but the limiting factor is the number of courses that any region can support. However, depending on the locality, a golf course is a practical choice for a buffer zone, especially if the planning permit requires a minimal strip of suitable vegetation adjacent to the commercial farmland.

Open space / Recreation reserves

If the location is appropriate, the provision of other types of public open space could be considered e.g. playing fields or wetlands for providing biodiversity of flora and fauna.

Industrial estates

High quality garden style industrial estates could also be an option with appropriate security fencing and a band of vegetation on boundaries adjoining farmland. These estates would be well located to include complimentary post-harvest value adding enterprises which are important for smaller farmers to maintain viability. Water recycling plants are also well suited to be located in these estates within convenient proximity to farmland.

Proposed option 26: Introduce conditions in land use zones for particular uses, such as public open space or uses serving urban populations (e.g. schools, places of worship and infrastructure), to be located in transitional locations only.

Supported.

Locating Schools and Places of worship on green wedge land that adjoins urban land aligns with Cardinia Council's Western Port Green Wedge Management Plan and Clause 22.05 of the Cardinia Planning Scheme, so the broader application of this requirement in the green wedges is supported.

Proposed option 27: to improve transition between rural and urban land use, introduce the ability to apply other rural zones more suited to the roles and land conditions of particular locations (e.g. Rural Living Zone, Farming Zone), provided the minimum green wedge subdivision provisions are retained.

Supported.

Section 3.3.3 Managing discretionary uses

Educational facilities

Proposed option 28: Amend the Green Wedge Zone, Green Wedge A Zone, Rural Conservation Zone and clauses 51.02 (VPP) to insert conditions of use requiring that primary and secondary schools must be located adjacent to the UGB and adjoin, or have access to, a road in a Road Zone.

Partially supported subject to changes.

Clause 22.05 of the Cardinia Planning Scheme and the Cardinia Shire Western Port Green Wedge Management Plan directs primary and secondary schools to locate within townships or on green wedge land adjoining township boundaries, which may or may not have a UGB.

A condition requiring that a school be located adjacent or have access to a Road Zone is not supported as it will be too stringent and it will conflict with Local Policy at Clause 22.05 of the Cardinia Planning Scheme.

A condition requiring that a school must be adjacent to the UGB will be problematic for townships that do not have an UGB. It is recommended that the condition is amended to require that schools within the green wedge to locate on land adjoining an urban zone. These school proposals should also be required to provide a buffer or transition area at the interface between it and surrounding agricultural land to address the conflict between the sensitive use that it is and the impacts it may experience from the surrounding farmland which will holds the right-to-farm.

Proposed option 29: Amend the Green Wedge Zone, Green Wedge A Zone, Rural Conservation Zone and clauses 51.02 (VPP) to insert conditions of use that prohibit schools in high bushfire risk areas (i.e. areas subject to the BMO).

Supported.

Places of worship

Proposed option 30: Amend the Green Wedge Zone, Green Wedge A Zone, Rural Conservation Zone and clauses 51.02 (VPP) to insert conditions of use requiring that places of worship must be located adjacent to the UGB and adjoin, or have access to, a road in a Road Zone.

Partially supported subject to changes.

Clause 22.05 of the Cardinia Planning Scheme and the Cardinia Shire Western Port Green Wedge Management Plan directs places of worship to locate within townships or on green wedge land adjoining township boundaries, which may or may not have a UGB.

A condition requiring that a place of worship be located adjacent or have access to a Road Zone is not supported as it will be too stringent and conflict with Local Policy at Clause 22.05 of the Cardinia Planning Scheme.

A condition requiring that a place of worship must be adjacent to the UGB will be problematic for townships that do not have an UGB. It is recommended that the condition is amended to require Places of worship within the green wedge to locate on land adjoining an urban zone. These place of worship proposals should also be required to provide a buffer or transition area at the interface between it and surrounding agricultural land to address the conflict between the sensitive use that it is and the impacts it may experience from the surrounding farmland which will holds the right-to-farm.

Proposed option 31: Amend the Green Wedge Zone, Green Wedge A Zone, Rural Conservation Zone and clauses 51.02 (VPP) to insert conditions of use that prohibit places of worship in high bushfire risk areas (i.e. areas subject to the BMO).

Supported.

Halls

Proposed option 32: Develop and implement a land use definition of 'Hall' in Clause 73.03 (Land use terms; VPP). One option is to define 'community hall' to differentiate those uses that provide community support services and activities for a local area from those activities that are purely commercial.

Partially supported.

A Hall is a Council or publicly owned building that is provided for the use of the community and to provide services to the community. Expanding the current definition at Clause 73.03 to recognise this fact would be useful and is supported.

A Hall that is privately owned should be defined as a Function centre.

A separate definition of Community hall is not required.

Proposed option 33: Amend the Green Wedge Zone, Green Wedge A Zone, Rural conservation Zone and Clause 51.02 (VPP) to insert conditions of use for halls that mirror the minimum lot size and maximum number of patron requirements applicable to 'Function centre' in the Green Wedge Zone.

Not supported.

A publicly owned Hall in the green wedge is very different to a privately owned Function centre in the green wedge.

A private Function centre must be used in conjunction with Agriculture, Natural systems, Outdoor recreation facility, Rural industry or Winery, must have less than 150 patrons, and must be located on at least 40 hectares.

A public Hall on the other hand is often a crucial and central community building for a rural area in the green wedge that is provided for the use of the community and to provide services to the community (immunisation programs for example). While a Hall may be hired out for a function, it is not to make a great profit and the building regulations restrict the number of patrons to for health and safety reasons. In consideration of the community services that are provided, a public Hall in the green wedge should not be subject to a minimum lot size of 40 hectares.

If this option is implemented, it is submitted that all Council or other public land that currently accommodates a public Hall be simultaneously rezoned to a public use zone by the Minister for Planning.

Proposed option 34: Amend the Green Wedge Zone, Green Wedge A Zone, Rural Conservation Zone and Clause 51.02 (VPP) to insert conditions of use that prohibit halls in high bushfire areas (i.e. areas subject to the BMO).

Supported provided that existing Halls can be rebuilt as the use already exists on the land.

Exhibition Centres

Proposed option 35: Amend the Green Wedge Zone, Green Wedge A Zone and Clause 51.02 (VPP) to insert conditions of use for exhibition centres that restrict the number of patrons to a maximum total of 150 at any one time.

Supported.

The consultation paper likens the impacts of Exhibition Centres to Places of Worship. This view is supported. Where an 'in conjunction with' link to the agricultural use of the land cannot be demonstrated, it is recommended that Exhibition Centres should be located on land that adjoins the UGB or an urban zone.

Proposed option 36: Amend the Green Wedge Zone, Green Wedge A Zone and Clause 51.02 (VPP) to insert conditions of use that prohibit exhibition centres in areas of high bushfire risk (i.e. areas subject to the BMO)

Supported.

Certain accommodation uses

Proposed option 37: Amend the Rural Conservation Zone to insert conditions of use for 'Group accommodation' and 'Residential hotels' to be consistent with Green Wedge Zone and Green Wedge A Zone (i.e. minimum lot size requirements, maximum number of bedrooms/dwellings, 'in conjunction with' test).

Supported.

Camping and caravan parks

Proposed option 38: Amend Clause 73.03 (Land use terms, VPP) to reflect new categories of camping and caravan parks in line with changes to the registration categories under the *Residential Tenancies Act 1997*.

Supported.

Proposed option 39: Amend Green Wedge Zone, Green Wedge A Zone and Clause 51.02 (VPP) to establish conditions of use that permit 'Camping and Caravan Parks' only when such use falls within 'bush/primitive' or 'tourist' categories.

Supported.

Data centres

Proposed option 40: Amend the Green Wedge Zone, Green Wedge A Zone and Rural Conservation Zone to prohibit data centres or, alternatively,

Proposed option 41: Amend the Green Wedge Zone, Green Wedge A Zone and Rural Conservation Zone to introduce a condition that requires data centres to be located adjacent to residential, commercial or industrial zoned land.

Option 40 is supported and preferred over option 41.

Section 4.1 Implementing design and development guidelines

Observation: Page 62 of the discussion paper, the second sentence of the paragraph states, *'How these guidelines are applied may vary from instance to instance, but it is intended that design requirements are applied to development associated with discretionary uses such as residential development in the first instance, as opposed to primary and preferred land uses, such as agriculture.* It is assumed that the text that we have emphasised should read 'a dwelling and not 'residential development'.

Design and development guidelines, and design requirements are both supported provided councils have input into the content before they are implemented.

The guidelines and requirements should also make it clear that development will not be approved where unacceptable loss of biodiversity would be required in order to reduce bushfire risk to an acceptable level for humans.

Proposed option 42: Introduction of a new planning practice note to assist responsible authorities assess development proposals on green wedge land

Supported.

The planning practice note should include that unacceptable loss of biodiversity to minimise bushfire risk is a measure and indication of an inappropriate development.

Proposed option 43: Adjust the decision guidelines (General Issues and Design and Siting) and introduce application requirements for development applications in green wedge zones

Supported.

It is very important to continue to require an Integrated Land Management Plan in all green wedge areas.

Proposed option 44: Update the form and structure of Green Wedge Management Plans (GWMPs) to require new or updated GWMPs to identify landscape typologies and detailed design guidelines. This would enable matters such as setbacks, siting and site coverage to be determined at a local level and could be used to inform changes to planning requirements.

Supported provided that Council has input into the criteria for identifying different landscape typologies within Cardinia Shire, and the State Government provides funds to Council to ensure resources can be allocated to carry out the necessary work to develop Green Wedge Management Plans for the two remaining green wedges in Cardinia Shire, and any ongoing regular reviews that may be mandated for all three green wedges that fall partly within Cardinia Shire.

Proposed option 45: Introduce a new particular provision in the VPPs that contains design guidelines and standards for development in green wedge areas. The provision could outline relevant considerations, objectives and standards similar to existing provisions in Clauses 54, 55, 56 and 58 of the VPPs.

Supported provided Councils have input into the content before it is implemented.

Proposed option 46: Amend the schedules to green wedge zones to allow for matters such as site coverage, setbacks and building heights to be mandated for developments associated with discretionary uses.

Supported provided that Councils will have the ability to apply these kinds of requirements via various green wedge zone schedules. For example, while Cardinia Planning Scheme currently has a total of six green wedge zone schedules, this option should provide the ability to apply many more schedules to address the different areas of green wedge land in different ways.

Section 4.2 Design requirements

Design and development guidelines, and design requirements are both supported provided councils have input into the content of all proposed Design Elements before they are implemented.

The guidelines and requirements should also make it clear that development will not be approved where unacceptable loss of biodiversity would be required in order to reduce bushfire risk to an acceptable level for humans.

Sustainable development of built form is also not considered. This could be introduced as another element. This could have a positive impact on the reliance on fossil fuels. The use of sustainable building materials, methods of construction will help minimise reliance on fossil fuels. E.g. Use of large roof forms for photovoltaic cells, water catchments etc.

Element 1 - Green Wedge Character

Supported.

In the absence of Green Wedge Management Plan being finalised for local Councils, the provision of a general landscape typology map is recommended.

Guidance on how to tackle the different typologies of landscape should also be provided.

Element 2 - Site Layout

Partially supported.

If there are existing buildings too close to boundaries, the preferred boundary setbacks should be respected by the new development. Perpetuating bad past decisions should not be allowed.

Element 3 - Site coverage

Supported.

Element 4 - Building height

Supported.

Element 5 - Side and rear setbacks

Supported.

Element 6 - Landscaping

Supported.

Element 7 - Detailed design

Supported.

Possible points to be added:

- Built form to respond to site's topography and minimise earthworks.
- Encourage use of innovative designs that could respond to the existing natural landscape character.

Element 8 - Sustainable transport

Supported.

Element 9 - Access

Supported.

Possible points to be added:

- Avoid large entry feature structures that dominate the streetscape and existing landscape setting.
- Advertising signs and entry feature structures could be integrated and should respond to the existing landscape setting of the area.

Element 10 - Vehicle parking facilities

Supported.

Possible points to be added:

- Encourage the use of built forms to screen car parking areas.

Element 11 - Safety

Supported.

Element 12 - Infrastructure

Supported.

Additional comments**Motorcycle racing track**

Currently Motorcycle racing track is prohibited in all green wedge zones. Within Cardinia Shire there is nowhere such a facility can be considered. While it is a Section 2 (permit required) Use in the Farming Zone, Cardinia has only used the Farming Zone as a holding zone within urban boundary areas. It is requested that DELWP investigate whether the use of a Motorcycle racing track could be appropriate in the green wedge zones if strong amenity conditions are met.

Proposed South-east International Airport

Despite the impacts of Covid-19 on international travel, the South-east International Airport proposed to be established by the State Government in Cardinia Shire retains high importance for the region. In coming decades this region will have become even more important for food production when compared to other regions around Melbourne due to its favourable water supply projections combined with its larger area of very high quality soils. As such an airport in this location will enable produce to be expeditiously transported interstate and internationally ensuring its freshness and quality is retained upon arrival at its destination. The proposed changes to the green wedge provisions must not create barriers or delays in the establishment of the South-east International Airport in Cardinia Shire.

Stockpiling and dumping of soil in rural areas

Large-scale dumping of soil is a significant challenge in rural areas that can interfere with the future viability of their intended use, as well as having potential environmental and amenity impacts. Cardinia Shire Council has previously raised this concern with DELWP and the Minister for Planning. A consistent state-wide approach would be preferable to each council needing to address this individually.

This submission is made on behalf of Cardinia Shire Council by:

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Attachments

- Attachment 1: Submission to DELWP's consultation on 'Identifying and Protecting Strategic Agricultural Land within Green Wedge and Peri-urban Land around Melbourne', Cardinia Shire Council 2019.
- Attachment 2: Letter to the Minister for Planning regarding the Stockpiling and dumping of soil in rural areas, Cardinia Shire Council, 18 April 2019.
- Attachment 3: Submission to DEPI regarding Cardinia Planning Scheme's Special Use Zone 1 – Horticultural Preservation, Cardinia Shire Council 2013.
- Attachment 4: Submission to 'Future farms - providing for Victoria's future rural land use', Cardinia Shire Council 2009.
- Attachment 5: Submission to 'Parliamentary inquiry into sustainable development of agribusiness', Cardinia Shire Council and City of Casey 2008.