

6 GROUP ACCOMODATION, CONFERENCE CENTRE AND PLANT NURSERY AT 40 DUBERKES ROAD, LANG LANG

FILE REFERENCE INT1764350

RESPONSIBLE GENERAL MANAGER Andrew Paxton

AUTHOR Jason Gilbert

RECOMMENDATION

That a Refusal to Grant Planning Permit T160582 be issued for the use and development of the land for Group Accommodation, Conference Centre and Plant Nursery at 40 Duberkes Road, Lang Lang, for the reasons set out in this report.

Attachments

1 Locality plan
 2 Development plans
 3 Copies of objections circulated to Councillors only
 5 Pages

EXECUTIVE SUMMARY:

APPLICATION NO.: T160582

APPLICANT: Beveridge Williams

LAND: Crown Allotment 79A Parish of Lang Lang, 40 Duberkes Road,

Lang Lang 3984

PROPOSAL: Use and development of the land for Group Accommodation,

Conference Centre and Plant Nursery

PLANNING CONTROLS: Green Wedge Zone – Schedule 1 (GWZ1)

Land Subject to Inundation Overlay (LSIO)(part)

NOTIFICATION & OBJECTIONS: The application has been advertised by sending notices to the

owners and occupiers of adjoining land.

Four (4) objections have been received to date.

KEY PLANNING CONSIDERATIONS: Protection of agricultural land, Protection of green wedges,

Consistency with Western Port Green Wedge Management Plan and Policy, Appropriateness of scale and intensity of use and

development

RECOMMENDATION: Refusal

BACKGROUND:

There is no Planning Permit history for the subject site.



SUBJECT SITE:

The irregular-shaped site has an area of 47.54 hectares and is located on the western side of Duberkes Road, with a frontage of approximately 1,884 metres, and approximately 1.5 kilometres south-east of the centre of the Lang Lang township.

The subject site generally undulates from east to west and no known easements affect the site. The majority of the site has been substantially modified and cleared to establish improved pastures for grazing, with a number of fenced paddocks. The site falls within the Gippsland Plain Bioregion and is traversed by Adams Creek and Adams Creek North Branch.

A farmhouse and associated outbuildings are located towards the south-west boundary, with a minimum setback of approximately 50 metres from this boundary and approximately 220 metres from the Duberkes Road boundary to the north-east.

The site is accessed via Duberkes Road, which is an unsealed road that extends in a south-east direction from McDonalds Track to the north for approximately 1.2 kilometres. While the road reserve continues in a south-east direction beyond the site, the road itself terminates at the driveway entrance to the subject site, with an approximate 340-metre-long driveway providing access to the dwelling.

The main characteristics of the surrounding area are:

- The site is bounded by Duberkes Road to the north and north-east, and opposite is the
 unused South Gippsland rail line. Further to the north-east is an approximate 79-hectare
 property that is mainly used for agricultural purposes and has been developed with
 agricultural buildings and a single dwelling, which is at least 144 metres from the subject
 site.
- The site is bounded by two approximately 36 hectare and 65 hectare allotments to the south, which are mainly used for agricultural purposes and contain single dwellings and agricultural buildings.
- The site is bounded by an approximate 40-hectare allotment to the south-west, which is mainly used for agricultural purposes and has been developed with agricultural buildings and a single dwelling.
- The site is bounded by an approximate 30-hectare allotment to the west and north-west, which is mainly used for agricultural purposes and has been developed with agricultural buildings and a single dwelling.
- The site is located approximately 1.5 kilometres south-east of Lang Lang, which itself is located approximately 75 kilometres south-east of Melbourne's CBD and is located within the Westernport Green Wedge. As of 2016, Lang Lang had an estimated population of 1,590 and the township provides limited community, retail and commercial services.
- A quarry operated by Metro Quarry Group is located approximately 350 metres to the north
 of the site and a broiler farm is located approximately 400 metres to the south-west. Lang
 Lang Cemetery is located 500 metres to the north-east.
- The site forms part of a large area of land zoned Green Wedge, which generally consists of large allotments that support agricultural activities. Land zoned Low Density Residential is located approximately 300 metres to the north-west and land zoned Neighbourhood Residential is approximately 800 metres to the north-west.

PROPOSAL



The application was first lodged in August 2016 and has been revised throughout the assessment process to address concerns and comments raised by Council's Planning Department.

The original proposal for a function centre and group accommodation was intended to accommodate functions such as weddings, conferences and meetings. The plans included the provision of a chapel and restaurant facilities. A second part of this original proposal involved a native plant nursery and the use of the function and accommodation facilities to enable schools and other groups to learn about the proposed 'integrated organic agricultural' activities to be undertaken on the site.

As part of council's request for further information, there were concerns raised regarding the proposal's response to the requirements of the Green Wedge Zone, and state and local policies relating to agriculture. A series of meetings were held and the applicant refined their proposal.

As such, the final proposal involves development that is concentrated in the north end of the land, with building setbacks of at least 34 metres from the north-east boundary (Duberkes Road) and at least approximately 10 metres from other boundaries.

More specifically, the proposal involves the following:

Group accommodation (for 148 people):

- 34 two-bedroom units within 'Building 3', with each unit accommodating up to 4 guests (total of 136 guests). Building 3 is generally located within the centre of the development area, with 52 car space spaces on both the northern and southern sides of the building. There are 17 ground floor units and 17 first floor units, with a central internal corridor providing access. Each unit consists of three shipping containers and contains two bathrooms and sleeping areas. Building 3 has a length of approximately 67.3 metres, a width of approximately 17.516 metres and a height of approximately 8.2 metres,
- Six two-bedroom standalone cabins for use by training facilitators, with each unit accommodating up to 2 people each (total of 12 people). The cabins are located towards the south of the development area and overlooking a proposed water course. Each cabin measures approximately 8.4 metres by 7.9 metres and contains two bedrooms and meals/living area.

Conference centre (for 150 people plus staff)

- Building 2 provides a multi-purpose building for conferences/training and dining, with a
 central reception area, and kitchen and bathroom facilities. Excluding the entrance portico,
 the building measures approximately 60 metres by 32.5 metres, with the single-level
 building having a height of approximately 7.5 metres. 40 car parking spaces are provided on
 the western side of the building.
- Six training rooms are provided in Building 1, which is in the northern part of the development area and near Building 2. The single-level building measures approximately 14.476 metres by 17.066 metres, with a height of approximately 3.2 metres. 20 car parking spaces are provided to the east of the building.
- Building 4 is referred to as a 'Sustainability Hub' for exhibitions and meetings. The building overhangs the proposed water course and measures 20 metres by 20 metres, plus a 4metre-wide wraparound verandah. It has a maximum height of 6.5 metres.

Plant nursery

 The plant nursery and seed bank are located in the northernmost section of the land and include ten 100-metre-long by 3-metre-wide planting beds and two 100-metre-long by 6metre-wide igloo-shaped greenhouses. Two sheds and a pond are also shown on the plans in support of the nursery.

Associated buildings and works



 The conference centre and group accommodation are located around a proposed watercourse, with associated car parking, access roads and landscaping throughout the development area.

According to the applicant, the overall intent of the above uses and development is to facilitate an environment for onsite education of existing farmers and future farmers/students regarding ecofarming methods. Under the plans, the existing agricultural use of the site would be intensified via the native plant nursery, vineyard and a series of smaller scale farming activities.

PLANNING SCHEME PROVISIONS:

State Planning Policy Framework (SPPF)

The relevant clauses of the SPPF are:

- 11.06-1 Jobs and investment;
- 11.06-7 Green wedges;
- 13.02-1 Floodplain management;
- 14.01-1 Protection of agricultural land;
- 14.01-2 Sustainable agricultural land use;
- 15.03-2 Aboriginal cultural heritage; and
- 17.03-1 Facilitating tourism.

Local Planning Policy Framework (LPPF)

The relevant clauses of the LPPF are:

- 21.02-7 Aboriginal cultural heritage;
- 21.02-2 Landscape;
- 21.04-1 Employment;
- 21.04-2 Agriculture;
- 21.04-5 Tourism;
- 21.05-3 Local roads;
- 21.06-1 Design and built form; and
- 22.05 Western Port Green Wedge Policy

Relevant Particular/ General Provisions and relevant incorporated or reference documents

The relevant provisions/ documents are:

- Westernport Green Wedge Management Plan;
- Clause 52.06 Car Parking;
- Clause 52.07 Loading and Unloading of Vehicles;
- Clause 52.17 Native Vegetation;
- Clause 52.34 Bicycle Facilities;
- Clause 57 Metropolitan Green Wedge Land:
- Clause 65 Decision Guidelines: and
- Clause 66 Referral and Notice Provisions.

Zone

The land is subject to the Green Wedge Zone - Schedule 1 (GWZ1).



Overlays

The land is partially subject to the Land Subject to Inundation Overlay (LSIO).

PLANNING PERMIT TRIGGERS

The proposal for the subdivision of the land into two (2) lots requires a planning permit under the following clauses of the Cardinia Planning Scheme:

- Pursuant to Clause 35.04-1 of the Green Wedge Zone, a permit is required to use the land for a Conference Centre;
- Pursuant to Clause 35.04-1 of the Green Wedge Zone, a permit is required to use the land for Group Accommodation;
- Pursuant to Clause 35.04-1 of the Green Wedge Zone, a permit is required to use the land for a Plant Nursery;
- Pursuant to Clause 35.04-5 of the Green Wedge Zone, a permit is required to construct a building or carry out works associated with a use in Section 2 of Clause 35.04-1;
- Pursuant to Clause 35.04-5 of the Green Wedge Zone, a permit is required to construct a building within 100 metres of a waterway / floodway; and
- Pursuant to Clause 35.04-5 of the Green Wedge Zone, a permit is required to carry out earthworks.

PUBLIC NOTIFICATION

The application has been advertised pursuant to Section 52 of the *Planning and Environment Act* 1987, by sending notices to the owners and occupiers of adjoining land.

Council has received four (4) objections to date. The key issues that were raised in the objections are:

- Land use conflict with surrounding agricultural properties;
- The function centre and group accommodation do not meet the requirements for agricultural enterprises:
- The potential for the proposal to negatively impact the water table and water runoff;
- The impact of the proposal on the future development of sand quarries;
- Concerns regarding supervision of students and staff;
- Noise and odour issues associated with the plant nursery and animal husbandry;
- The potential that surrounding properties will be required to contribute to the cost of any required sewerage or water supply infrastructure; and
- The impact of additional traffic on the road network, particularly the intersection of Kettles Road and McDonalds Track.

REFERRALS

Melbourne Water

The application was referred to Melbourne Water for comment. Melbourne Water did not object to the proposal, subject to conditions.

VicTrack



Due to the adjacent to the railway corridor and objector's concern about Duberkes Road being subject to a VicTrack lease, the application was referred to VicTrack for comment. No response has been received to date.

Environmental Health

The application was referred to Council's Environmental Health Department, who requested a Land Capability Assessment before providing any further comment. As the recommendation is to refuse this application, this information was not requested from the applicant.

Environment

The application was referred to Council's Environment Department, who had no objection subject to conditions requiring the preparation and implementation of a creek management plan to manage the impacts of the development on Adams Creek.

Strategic

The application was referred to Council's Strategic Planning Department, who objected to the proposal based on the following:

- The proposal contradicts policies 1.4.1, 4.5.1 and 4.5.2 in Plan Melbourne;
- The proposal contradicts the objectives and policies contained in Clause 22.05 Western Port Green Wedge Policy; and
- The proposal contradicts Clause 14.01-1 (Protection of agricultural land) of the State Planning Policy Framework.

Waste

The application was referred to Council's Waste Department, who requested a Waste Management Plan.

Traffic

The application was referred to Council's Traffic Department, who requested further information before making any comment. The requested further information included a traffic impact assessment and additional detail on the plans relating to car parking and internal road networks. As the recommendation is to refuse this application, this information was not requested from the applicant.

Engineering

The application was referred to Council's Engineering Department, no response provided.

<u>Urban Design</u>

The application was referred to Council's Urban Design Department, no response provided.

DISCUSSION

The proposal for the use and development of the land for Group Accommodation, Conference Centre and Plant Nursery has been subject to a lengthy review and assessment process that involved a number of Council's departments, and discussions with the applicant and associated



team, who endeavoured to address the concerns and issues raised by Council's Planning Department. Despite this, after almost 12 months, it became apparent that the proposal was not consistent with the Cardinia Planning Scheme and could not be supported.

There were several elements to the assessment of this application, which are addressed below.

The definition of the proposal

The application involves several proposed land uses, and given the changing nature of the proposal during the assessment period, categorising each land use was difficult.

In relation to the accommodation component, the land use definitions of 'group accommodation' and 'host farm' were considered.

'Group accommodation' is defined as:

Land, in one ownership, containing a number of dwellings used to accommodate persons away

from their normal place of residence.

'Dwelling' is defined as:

A building used as a self-contained residence which must include: a) a kitchen sink; b) food preparation facilities; c) a bath or shower; and d) a closet pan and wash basin.

'Host farm' is defined as:

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.

Based on the plans, group accommodation is deemed the most appropriate, as the land is in one ownership and all proposed units and cabins provide self-contained accommodation and include the four components of a dwelling. The proposal was also considered beyond the scope of the 'Host farm' definition as rather than providing an 'agricultural experience', the purpose of the accommodation is to support the education and training facilities.

Under the Green Wedge Zone, group accommodation is a section 2 use (permit required) and must meet the following conditions:

Must be used in conjunction with Agriculture, Natural systems, Outdoor recreation facility, Rural industry, or Winery.

The number of dwellings must not exceed the number specified in a schedule to the zone or 40 dwellings, whichever is the lesser.

The lot on which the use is conducted must be at least the minimum subdivision area specified in a schedule to this zone. If no area is specified, the lot must be at least 40 hectares.

With a maximum of 40 dwellings, a lot size in excess of 40 hectares and a proposal that is in conjunction with agriculture, the proposal is considered to meet all three conditions of the zone.

In relation to the conference centre component, other land use terms such as function centre and place of assembly were considered. The proposal involves the construction of three buildings (Building 1, Building 2 and Building 4) for seminars, exhibitions and functions.



Conference Centre is not defined in the Planning Scheme but is nested under Function Centre. The case of Watts v Wyndham CC [2007] provides useful and relevant discussion. In this case, Members Davies and Potts were considering an application for a "Demonstration Farm, incorporating a Function Centre, Plant Nursery and Primary Produce..." in a Green Wedge Zone. The Function Centre was to be used for expos, field day demonstrations, seminars and conferences.

In Watts v Wyndham CC, the Members made the following comments:

The use of the proposed building for conferences, seminars and the like appears to fit within the definition of "Conference Centre", which is nested within the definition of "Function Centre". However "Function Centre" is a land use term that also includes reception centre. It is more than likely that as a reception centre one will encounter activities of "entertainment and dancing" as included in the definition of "Function Centre" rather than at a "Conference Centre". Having regard to the nature of this application and the condition of uses for a Function centre within the table of uses at Clause 35.04-1 we consider that the land use term "Conference Centre" to be the preferred term and one that is acceptable under the zoning.

Based on the findings in Watts v Wyndham CC and its similarities with the current application, Conference Centre has been determined as the most appropriate land use. As previously stated, conference centre falls under function centre, and in the Green Wedge Zone, function centre is a section 2 use (permit required) and subject to the following conditions:

Must be used in conjunction with Agriculture, Natural systems, Outdoor recreation facility, Rural industry, or Winery.

The number of dwellings must not exceed the number specified in a schedule to the zone or 40 dwellings, whichever is the lesser.

The lot on which the use is conducted must be at least the minimum subdivision area specified in a schedule to this zone. If no area is specified, the lot must be at least 40 hectares.

The plant nursery has been determined to be a use in its own right; rather than ancillary to the agricultural or other proposed uses of the land. While there is some relationship with the other land uses proposed for the site, the application documents and plans show a clear and separate business plan for the nursery, and it has been located and sited in a way that appears to provide a degree of separation and independence from the other components.

The proposed agricultural component involves a number of more specific uses, such as apiculture, horticulture, market gardens and animal husbandry; all of which are section 1 uses and therefore do not require a planning permit in the Green Wedge Zone.

'In conjunction with agriculture'

The use of land for group accommodation and conference centre in the Green Wedge Zone can only be considered if the three key conditions discussed earlier are met. If any of these conditions are not met, these uses would be prohibited. The conditions are also reinforced by Clause 57 Metropolitan Green Wedge Land.

Two of the conditions are met: the area of the land exceeds 40 hectares and no more than 150 patrons are proposed for the conference centre and no more than 40 dwellings are proposed for the group accommodation. The proposal's compliance with the requirement to be 'in conjunction



with agriculture' was less clear and these concerns were outlined to the applicant throughout the application process.

According to Clause 64.02, if a provision of this scheme provides that a use of land must be used 'in conjunction with' another use of the land: there must be an essential association between the two uses; and the use must have a genuine, close and continuing functional relationship in its operation with the other use.

The concept of 'in conjunction with' has been explored in a number of VCAT cases, including Jinalec Park PL v Mornington Peninsula SC [2007] where Deputy President Helen Gibson made the following comments:

I consider the association should be between the uses on the land. They can be broad associations and may be aesthetic, economic, practical, environmental or the like. Any association that provides a mutual benefit is sufficient...

The second limb of section 64.02 emphasises that the benefit must be continuing. This limb requires that the secondary use must have a genuine, close and continuing functional relationship in its operation with the primary use. Permit applicants will need to demonstrate what the nature of this relationship is and how its ongoing nature will be guaranteed. Permit conditions requiring that the secondary use may only operate whilst the land continues to be used for its primary use would seem to be called for.

The initial application lacked detail and there was minimal aspect to determine the level of association between the uses. The applicant provided additional detail that helped to reinforce the association between the proposed conference centre and group accommodation with the agricultural uses.

However, as the proposed primary use (i.e. the agricultural component) has not commenced, the level of association between the uses has been difficult to ascertain. The applicant has provided broad details of the intended agricultural uses but has not been able to describe in any detail the how the uses will operate. For example, the proposed course outline describes a workshop on business management which appears to have no direct interaction with the agricultural use of the land. The agricultural land management plan provides a description of 'proposed' and 'intended' farming enterprises. The site plan shows broad areas of proposed agricultural activities but there is little discussion of how these areas will be integrated with the conference centre and group accommodation, which are generally kept separate from the agricultural areas due to the location of the proposed water course. The application describes 'likely partners' who would use the conference centre facilities but no definitive details are provided.

Protection of agricultural land

Clauses 11.06-1 (Jobs and investment), 11.06-7 (Green wedges), 14.01-1 (Protection of agricultural land) and 21.04-2 (Agriculture) have objectives and strategies that seek to protect and support areas of agricultural production.

In particular, Clause 11.06-7 has a strategy to "(protect) important productive agricultural areas such as ... Westernport..."

Clause 14.01-1 has an objective to protect productive farmland which is of strategic significance in the local or regional context, with strategies that seeks to avoid the removal of productive agricultural land from the state's agricultural base and require responsible authorities to balance potential offsite impacts of rural land use proposals against the benefits of the proposals.



Clause 21.04-2 seeks to maintain agriculture as a strong and sustainable economic activity within the

Municipality, with strategies that include:

- Protect agricultural land, particularly areas of high quality soils, from the intrusion of urban uses, inappropriate development and fragmentation which would lead to a reduction in agricultural viability, the erosion of the right of farmers to farm land, and ultimately the loss of land from agricultural production.
- Discourage non-soil based uses (eg: poultry farms) being located on soils which are of high agricultural quality and, recognising the economic importance of such uses, encourage their location on land with a lesser soil quality.
- Ensure that any agricultural development proposal is appropriately located in terms of buffer distances of surrounding uses.

The Cardinia Western Port Green Wedge Management Plan identifies the Western Port Green Wedge "as a highly productive agricultural and horticultural area that plays a vital role in providing food for Victoria's population and food security. Its strategic importance as a food supply for the metropolitan area will increase over time as Melbourne grows and rainfall patterns change with increasing uncertainty over rainfall and water allocations to Australia's traditional food bowl, the Murray Darling Basin."

The Victorian Government's Plan Melbourne metropolitan strategy also recognises the Western Port Green Wedge as a key agricultural area, with strategies that seek to protect agricultural land from incompatible uses, maintain farm size, promote the continuation of farming and provide a secure long-term future for productive and sustainable agriculture.

The application is not considered responsive to the above clauses as it lacks clear definition of how it will respond to the horticultural significance of the area. A large proportion of the land is to be used for non-soil-based activities, while the proposed development area for conference centre, group accommodation, and associated landscaping, watercourse and accessways also occupies a significant portion of the site. The development is also considered to lack sufficient setbacks and buffers from surrounding agricultural properties, which has the potential to cause land use conflict and diminish the agricultural productivity of these surrounding properties.

Consistency with Western Port Green Wedge Management Plan and Policy

The Cardinia Western Port Green Wedge Management Plan provides a strategic planning framework that enables Council to take advantage of opportunities and proactively attend to challenges occurring in the Cardinia Western Port Green Wedge over the next 20 years. It recognises Western Port's key attributes, including its environment, established agriculture industry and, rich agricultural soils.

The plan was introduced as a reference document via Amendment C215 to the Cardinia Planning Scheme, which was gazetted on 10 August 2017. The amendment also inserted a Western Port Green Wedge Local Planning Policy at Clause 22.05 to provide further guidance in relation to the protection and management of the Western Port Green Wedge.

The Plan divides Western Port into three precincts, with the subject site being within Precinct 1 – Agriculture, horticulture and soil based food production. The vision for Precinct 1 is for to be a hub of agriculture, horticulture and soil-based food production that takes advantage of its highly versatile soils, vegetable production (in particular asparagus), dairy and beef farming, other agricultural pursuits, potential access to Class A recycled water and the important role this precinct plays in food security.



The vision and objectives of the Plan are reinforced by Clause 22.05, which outlines a number of policies for use and development applications. These include:

- Ensure new and growing tourism businesses have a strong link to an agricultural use based on the strengths and assets of the green wedge and have minimal adverse impact on the environment.
- Ensure that green wedge soils and their versatility are recognised as a finite resource and are protected accordingly.
- Maintain and protect the highly productive agricultural land from incompatible uses including non-soil based farming

The relevant decision guidelines of Clause 22.05 include:

- The vision and local policy for the Cardinia Western Port Green Wedge.
- Whether the use or development will adversely affect soil quality or permanently remove land from agricultural production.
- The potential for the use or development to limit the operation and expansion of adjoining and nearby agricultural uses.

While the intent of the proposed use and development is not inconsistent with the Western Port Green Wedge Plan and Policy, the scale and intensity is beyond what is considered acceptable for an area where agriculture is promoted as the primary land use. The proposal includes a significant development that is based on yet-to-be-established agricultural activities and that is not considered to take full advantage of the horticultural significance of the area.

The design of the development

The decision guidelines of the Green Wedge Zone include the need to minimise adverse impacts on the character and appearance of the area. These guidelines are reinforced by local policies such as Clause 22.02 (Landscape) and Clause 21.06-1 (Design and built form), which encourage development that is context with the surrounding area.

The subject site is characterised by an open rural landscape, with low-scale buildings such as dwellings and sheds that reflect the agricultural and rural residential nature of the area. The submitted proposal consists of a number of sizeable buildings with bulk and mass that is not considered to reflect the rural character of the area.

Objections

The application has been advertised pursuant to Section 52 of the *Planning and Environment Act* 1987, by sending notices to the owners and occupiers of adjoining land.

Council has received four (4) objections to date.

The objections reinforce the issues discussed earlier in this report; particularly in relation to land use conflict. Other objections, such as concerns regarding supervision of students and staff and odour and noise issues could be managed via permit conditions.

Other issues

It is noted that further information was requested from Council's Traffic (traffic impact assessment and updated plans) and Waste (waste management plan) departments, this was not submitted.



The land also contains areas of cultural heritage sensitivity and the applicant has not provided information relating to cultural heritage management plan requirements.

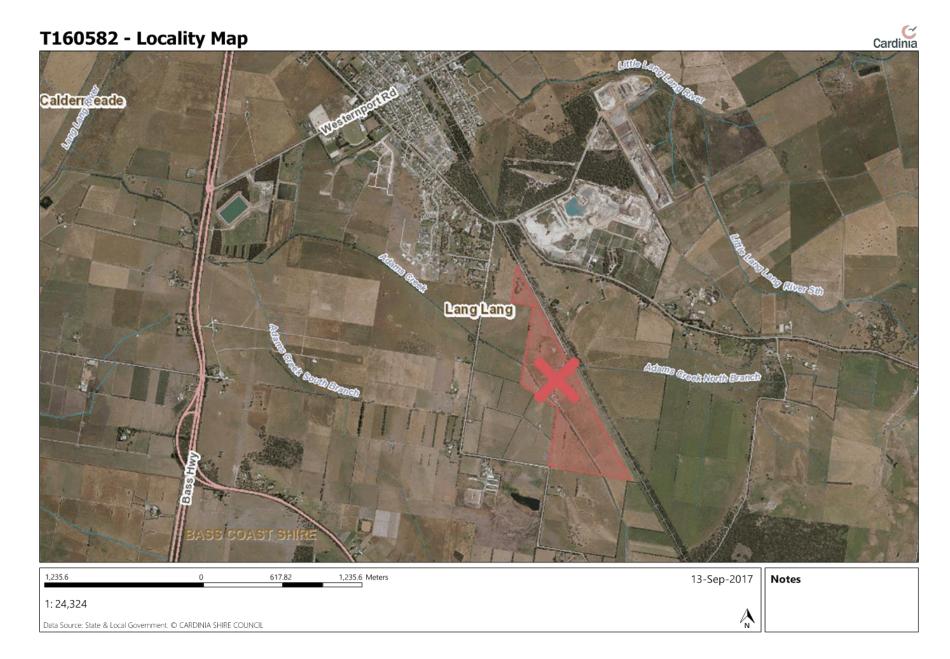
As the application is being recommended for refusal, this information was not requested from the applicant.

CONCLUSION

The proposed use and development of the land for Group Accommodation, Conference Centre and Plant Nursery is considered to be not consistent with the purposes and objectives of the Cardinia Planning Scheme.

It is recommended that a Refusal to Grant Planning Permit **T160582** be issued for the use and development of the land for Group Accommodation, Conference Centre and Plant Nursery at **40 Duberkes Road, Lang Lang, for the following reasons:**

- 1. The design and scale of the development is inconsistent with the decision guidelines at Clause 35.04-6 of the Green Wedge Zone, which seek to minimise impacts of development on the character and appearance of the area.
- 2. The proposed use and development is inconsistent with the decision guidelines at Clause 35.04-6 of the Green Wedge Zone as it is not considered compatible with surrounding land uses and does not provide adequate measures to minimise impacts of adjoining properties.
- 3. The proposal is inconsistent with the Western Port Green Wedge Management Plan and Clause 22.05 Western Port Green Wedge Policy as it does not respond to the horticultural significance of the area and does not demonstrate an adequate relationship between the group accommodation, conference centre and agricultural activities.
- 4. The proposal does not respond to Clauses 11.06-1 (Jobs and investment), 11.06-7 (Green wedges), 14.01-1 (Protection of agricultural land) and 21.04-2 (Agriculture) as it results in the removal of productive agricultural land and lacks appropriate setbacks and buffers to limit offsite impacts on surrounding properties.



Attachment 1 - Locality plan Page 204

