



**AUSTRALIAN FOOD  
SOVEREIGNTY ALLIANCE**

## Submission to the Department of Environment, Land, Water and Planning regarding the Victorian Planning Provisions Reforms December 2017

The recent Discussion Paper released by the Department of Environment, Land, Water and Planning (DELWP) focussed on the structure and operation of the Victorian Planning Provisions but also included proposed changes to specific provisions. It proposed to make amendments to certain clauses, including those relating to Agriculture, Land Use Terms, Design for Rural Areas, Location of residential development and Rural residential development.

This submission seeks to express the views of the Australian Food Sovereignty Alliance (AFSA) in relation to the relevant policy framework.

### About the Australian Food Sovereignty Alliance

The Australian Food Sovereignty Alliance (AFSA) is a collaboration of organisations and individuals working together towards a food system in which people can create, manage, and choose their food supply from paddock to plate. AFSA is an independent organization and is not aligned with any political party. Currently we have more than 700 individual, organisational, business, and farm members.

In 2014 we established a producers' branch of AFSA, Fair Food Farmers United (FFFU) to provide a balanced voice to represent farmers and advocate for fair pricing for those selling to the domestic market, connect Australian farmers for farmer-to-farmer knowledge sharing, and to be a voice for farmer-friendly regulations and standards.

We are part of a robust global network of farmer-led organisations involved in food security and food sovereignty policy development and advocacy. We are members of the International Planning Committee for Food Sovereignty (IPC), Urgenci: the International Network for Community-Supported Agriculture, and La Via Campesina – the global movement of peasant farmers, and we have strong relationships with Slow Food International and its Australian chapters. We also provide support for the sole Australasian representative on the Civil Society Mechanism (CSM), which relates to the Committee on World Food Security (CFS).

We work extensively with primary food producers and consumers across every state and territory in Australia. Our committee has consisted of published academics and lecturers from the University of Melbourne, RMIT, Deakin University, University of Tasmania, University of Sydney, and QUT. We have also had representation from farmers from every state, and local advocates and campaigners such as Food Connect, Friends of the Earth, Regrarians, Fair Food Brisbane, and the Permaculture Network.

Our vision is to enable regenerative farming businesses to thrive. Australians increasingly care about the way their food is produced, including its social and environmental impacts. They seek out food that is grown locally and without damage to the environment. Food produced on small regenerative farms is increasingly in demand, and we believe that it is critical that government heeds changing community expectations and facilitates, supports and encourages the growth and viability of regenerative agriculture while protecting the environment and human and animal health.

The Victorian Planning Provisions (VPPs) are the planning controls upon which all land use decision are made.

#### Modification of Clause 35.07

The Government proposes to review the Farming Zone having regard to the following:

"a) Allow more primary produce sales as a Section 1 (as of right) use by increasing the floor area condition and allow a wider range of related goods to be sold."

The justification was provided as follows:

"This change would support a use that is compatible with agricultural land uses, has relatively low amenity impacts, and facilitates more adaptable business models for farmers. Allowing more 'primary produce sales' as of right (with size conditions) would increase the planning system's responsiveness to new business trends, including the farm-to-table movement which is increasing in popularity across the state and is a welcome income stream for many farmers."

AFSA supports this proposal in relation to the modification of the clause to facilitate on-farm sales of primary produce in direct recognition of the farm-to-table movement. Many farms are operated as home businesses and require an increase in resources and sacrifices to abide by the relevant regulations. The reform process would benefit from collecting information about what business models work best for produce sales based on real case studies.

Recommendation 1: DELWP policy officers should make on-site farm visits to collect such information about suitable on-farm sales plans. Reformed policies should provide for flexible application and regulation to fulfil the policy's intention to 'welcome income stream for many farmers'.
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#### Floor space

The proposal informs that the floor area condition will be increased to allow a wider range of related goods to be sold.

Comparatively, the regulations regarding floor space that apply in the state of NSW have regard to 'floor space ratio' and a Floor Space Ratio Map according to the Standard Instrument Principal Local Environmental Plan. All affected stakeholders should receive information regarding how floor space should be determined and what other ways the VPPs will support the profitability of on-farm sales other than increasing the floor space allowed on the property.

Recommendation 2: Size conditions considered a Section 1 use should be compatible with the land use and bolster an income stream for farmers. A suitable 'floor area condition' should be assessed on a flexible, on-the-merits basis that is compatible with farming land uses. The increase in floor size will only be effective if the clause operates in conjunction with the permitted sale of produce reasonably necessary for the success of farming businesses in Victoria.

#### Clause 74

According to the Discussion Paper, Land Use Terms will also be modified and reviewed. A number of land use terms are to be added including 'Rural workers accommodation'. The land use terms to be reviewed include 'Primary produce sales', 'Animal keeping', 'Community market' and 'Agriculture'.

DELWP justified these changes by explaining that modernising the terms will simplify the use of the planning system. A survey was completed in July 2017, which suggested a holistic review ought to be done to achieve this.

AFSA supports the simplification of the planning system and the use of plain-English terms that the community readily understands. We also support DELWP's aims to 'be less prescriptive by removing overly specific terms'. In 'broadening terms and definitions to account for rapidly shifting industries and lifestyles', the broadened terms should take into account the plethora of farming practices and transparently release information about which farming methods were accounted for. Definitions should reflect real on-farm examples for accuracy and better representation across the state.

Recommendation 3: DELWP should define the land uses with distinction so that the number of permit triggers associated with overly broad definitions is reduced.

#### Other

Due to the established 'non-user friendly' nature of the Victorian Planning Provisions, the streamlined assessment process for 'low-risk permit applications' is welcomed. The expanded role of Vic Smart to facilitate this is also welcomed. However, further information about how the role of Vic Smart will assist farmers is requested.

Recommendation 4: The Department should collaborate with bodies that support small-scale and free range farming, such as AFSA, so that specific feedback to the proposals relating to agricultural land uses can be made in a holistic manner.

We thank DELWP for providing a duly required extension of time for submissions to be prepared. This has provided a welcome consultation period for creating better awareness about the reforms and therefore to the benefit of our members and of the broader public in Victoria.