



**INTERFACE**  
COUNCILS

*Creating liveable communities in Melbourne's outer suburbs*

# GREEN WEDGE AND AGRICULTURAL LAND CONSULTATION

Submission by Interface Councils

February 2021



@InterfaceVic

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## Introduction

The State Government Department of Environment, Land, Water and Planning (DELWP) has exhibited the *Planning for Melbourne's Green Wedge and Agricultural Land Consultation Paper* for agency and authority feedback. The Consultation Paper, to which this submission responds, is the second of DELWP's efforts to seek key stakeholder feedback. The paper puts forward draft planning reforms to the Green Wedge Zone and agricultural land within 100km of the centre of Melbourne.

This submission responds to DELWP's proposed changes and suggests ways that planning for Melbourne's green wedge and agricultural land could be reformed to provide clarity to the community, industry and local governments around land use issues on behalf of Melbourne's ten Interface Councils.

## Background

The Interface Councils is a group of ten municipalities that form a ring around metropolitan Melbourne: Cardinia Shire Council, City of Casey, Hume City Council, Melton City Council, Mitchell Shire Council, Mornington Peninsula Shire Council, Nillumbik Shire Council, City of Whittlesea, Wyndham City Council and Yarra Ranges Shire Council.

The group has a strong interest in maintaining the overall significance of the green wedges, and of identifying opportunities to add sustainable economic value to the areas for the people who live and work there.

The natural environment found in the Interface Councils Region underpins the health and wellbeing of residents and visitors. It provides access to nature, recreation, open spaces, healthy soils, clean air and water. It also sustains many rural businesses including agriculture, agribusiness, viticulture and tourism ventures, which all rely on a healthy ecosystem to thrive.

There are twelve green wedges around the outskirts of the Melbourne metropolitan area, also referred to as Peri-Urban Melbourne. The ten green wedges that are part of the Interface Councils Region include:

- Mornington Peninsula
- Western Plains North
- Nillumbik
- Western Plains South
- Southern Ranges
- Western Port
- Sunbury
- Whittlesea
- Werribee South
- Yarra Valley and Yarra and Dandenong Ranges

## Executive Summary

This submission has been drafted in response to the *Planning for Melbourne's Green Wedges and Agricultural Land Consultation Paper* exhibited by the Department of Environment, Land, Water and Planning (DELWP).

In general, Interface Councils supports the intent of the Consultation Paper to provide increased certainty and clarity of policy for Melbourne's green wedges and is supportive of the State Government's vision. The group also appreciates that the diversities and complexities inherent in each green wedge make it very challenging to develop and implement consistent policies and controls that are suitable for all green wedges.

The submission draws on adopted strategies and policy by the ten Interface Councils, the experience of statutory planners in assessing applications in green wedge and agricultural land in the outer Melbourne region, the DELWP-run workshops for local government, and internal workshops about a preferred approach to planning for green wedge and agricultural land.

The themes of the submission include:

- Support for further protection of Melbourne's green wedge and agricultural land
- The need to avoid a "one size fits all" approach and to provide sufficient flexibility to enable Councils to respond to the particular conditions and priorities most relevant to their green wedge areas
- Seeking clear guidance and increased state level support in the preparation of Green Wedge Management Plans (GWMPs)
- Protection of areas with valued landscape and open space features
- Seeking to ensure that land uses which are incompatible with agriculture are generally discouraged and only allowed in certain locations of green wedge areas.

In addition to the points mentioned above, below are subsequent areas of interest that this group submission does not cover in much detail due to its remit. Please look to individual Council submissions for this information.

- Protection of areas identifies with potential future mineral resources and extractive industries, waste and resource facilities and future state infrastructure projects; and
- Protection of areas of Aboriginal and Torres Strait islander, and post-European, cultural heritage and significance.

The structure of this submission is based on the form provided on Engage Victoria's webpage for Planning for Melbourne's Green Wedges and Agricultural Land. The questions from DELWP are in blue text and the Interface Councils group's responses are in black text.

## Questions from the Department of Environment, Land, Water and Planning:

### Question 1: What is it about Melbourne's green wedges and peri-urban areas that you value most?

Please select your top three of the following values in order of preference

1. Environmental and biodiversity features
2. Agriculture
3. Rural landscapes and open space

#### Additional comments from Interface Councils:

- The Interface Councils group is concerned that this consultation process is overly focused on protecting agriculture to the near exclusion of other important green wedge opportunities such as rural planning concerns, conservation or biodiversity values.
- For example, the Consultation Paper does not consider or address the challenges confronting green wedge areas with low agricultural viability sufficiently.
- *Please refer to individual Council submissions for additional comments and further detail.*

### Question 2: Strengthening the legislative and policy framework

(Consultation Paper section 3.1.1, pages 13 - 27)

Do you support the proposed options to strengthen the legislative and policy framework for Melbourne's green wedges?

	Support	Neutral	Oppose
Amend the <i>Planning and Environment Act 1987</i> to include a vision, objectives and regional policy for green wedges, and require the preparation, review and ministerial approval of Green Wedge Management Plans (GWMPs)		x	
Update state planning policy for Melbourne's green wedges to clearly articulate the preferred outcomes for these areas	x		
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	x		
Introduce regional policy directions for Melbourne's green wedges	x		

#### Additional comments from Interface Councils:

- Interface Councils supports the strengthening of a strategic vision and protecting green wedges and agricultural land. Melbourne's green wedges provide critical environmental corridors and it is vital that they are subject to appropriate protections, without prohibiting them from being useable, to maintain vibrant and liveable communities.
- This submission acknowledges the need for strengthening the focus on protecting agricultural land use while retaining the protection of environmental, landscape and scenic aspects which are greatly valued

by residents.

- In general, Interface Councils recommends changes be made to Part 3AA of the *Planning and Environment Act 1987* to establish the appropriate tone and context for green wedge areas and agricultural land.
- Interface Councils suggests the language in the Act be ambitious and encourage the protection of green spaces in Melbourne, so as the policy and strategy trickles down it has sufficient support to protect it.
- Options to amend 3AA of the Act, and other comments, are provided in individual Council submissions in detail.
- Yarra Ranges Shire has a long history of legislated planning protection, unique to this area, which has prevented ad hoc planning decisions, land speculation and urban sprawl. This protection has played a substantial role in the growth of the Yarra Valley as a high-value agriculture and tourism region.
- Interface Councils welcomes recognition of the diversity of roles the green wedges play and recognition that the appropriateness of different land uses change based on the context of the specific green wedge. For example, tourist uses, which have proliferated in some green wedges, that may be inappropriate within Yarra Ranges and Mornington Peninsula due to a further loss of commercial farming land might be suitable within Hume's green wedges where such constraints do not apply.
- Interface Councils recommends the term 'productive use' is defined to remove ambiguity and that the objective is strengthened to emphasise that development can be deemed inappropriate where it will result in an unacceptable loss of biodiversity.
- There appears to be an emphasis on high intensity "industrial" farming and it is considered that, at least in some green wedge areas, there should be greater emphasis on "sustainable and restorative agriculture," which will be more consistent with other conservation and landscape protection objectives for these areas.
- Overall, there is a need for green wedge policies to be clearer about priorities, particularly where there are potential land use conflicts. One key example is the need for better definition of the type and scale of tourism development that is considered appropriate in green wedge areas (subject to consideration of the local circumstances) and how to avoid "creeping displacement" of agricultural use etc.
  - This could involve better definition of the "in conjunction with" criteria to ensure that "core" green wedge objectives are always given priority – and tourism development is closely linked and only approved to the extent that is consistent with, and in a supporting role to, these objectives.
- The group notes an ongoing issue with legislation is making sure it remains current.
- Interface Councils would like clarity regarding the funding to support the implementation of the GWMPs. In addition, regarding the likely timeframe for the preparation of new GWMPs, there should be consideration given to the interim endorsement of existing GWMPs by the Minister.
- *Please refer to individual Council submissions for additional comments and further detail.*

### Question 3: Legislative and policy framework for Melbourne's agricultural land

[\(Consultation Paper section 3.1.2, pages 28 - 32\)](#)

Do you support the proposed options to strengthen the legislative and policy framework for Melbourne's agricultural land?

	Support	Neutral	Oppose

Update the Planning Policy Framework to ensure that all agricultural land is protected		x	
Update the Planning Policy Framework 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		x	
Update the Planning Policy Framework to include new regional policy for Melbourne's agricultural land	x		
Establish 'right to farm' legislation to protect existing and lawful agricultural uses from nuisance complaints			x
Introduce the 'agent of change' principle into legislation to assign responsibility for mitigating impacts of lawful agricultural operations (e.g. dust, noise and odour) to the person or organisation who introduces a new use or development			x
Update the Planning Policy Framework to encourage appropriate siting, design and scale of sensitive uses and developments to avoid conflicts with agricultural uses	x		

Do you have any comments on the proposed options for strengthening the legislative and policy framework for Melbourne's agricultural land?

- There is no generic approach to green wedges that can be taken – each area is unique with individual character, opportunities and pressures. Therefore, forming standardised 'design guidelines' can be problematic, particularly as a provision in planning schemes.
- The protection of all agricultural land is generally supported. Yet there is concern from some Interface Councils that there may be a need to provide a clear statement which removes the ambiguity and disputes associated with the definition of 'productive agricultural land.'
- In relation to soil grading - the direction of types of farming best suited to different soil types is generally supported. Currently, however, there is no clear definition of "good quality soil" or similar. The direction around different types of land uses linked to soil grading should be investigated and defined through GWMPs and implemented through appropriate zones and overlays.
- Interface Councils note that while the 'agent of change' principle appears reasonable, it would be difficult for Councils to implement via the planning permit process. Even if agreement could be reached about surrounding farms, for example, it would only reflect the surrounding land uses at the time of the permit decision. Therefore, there is no protection for farming that could locate nearby in future. Nevertheless, the group would support a strong mandate to deal with troublesome complaints.
- Some discretionary uses in agricultural areas may serve to buffer impacts of reasonable future agricultural uses likely to locate on the surrounding land. Otherwise mitigation measures for non-agricultural uses could include locating activity away from boundaries and landscape buffers.
- Further, Interface Councils would like to see the definitions and requirements for rural industry and manufacturing sales within the green wedge clarified.
- *Please refer to individual Council submissions for additional comments and further detail.*

#### **Question 4: Supporting agricultural land use/managing subdivision and dwelling development in agricultural areas**

(Consultation Paper section 3.2.1, pages 36 - 40)

Do you support the proposed options for managing subdivision and dwelling development in

agricultural areas?

	Support	Neutral	Oppose
Amend the <i>Planning and Environment Act 1987</i> to require parliamentary ratification of proposals to subdivide land into more lots or smaller lots than currently provided for in the planning scheme in rural zones within 100km of Melbourne			x
Amend the subdivision provisions of the Farming Zone and Rural Activity Zone within 100km of Melbourne to prohibit the creation of a lot for an existing dwelling smaller than the minimum lot size	x		
Amend the Farming Zone and Rural Activity Zone to make all dwellings within 100km of Melbourne a Section 2 (Permit Required) use			x
Introducing decision guidelines and application requirements for new dwellings in the Green Wedge Zone and Green Wedge A Zone	x		

Do you have any comments about the options and proposed responses to managing subdivision and dwelling development in agricultural areas?

#### Parliamentary Ratification of Proposals to Subdivide Land

- Interface Councils note some municipalities have no Farming Zone or Rural Activity Zone at all.
- It is important to recognise that some Interface Councils are generally supportive of the proposed changes associated with the Farming Zone (FZ) and the Rural Activity Zone (RAZ) and do not utilise the FZ outside of the Urban Growth Boundary (UGB) or have land zoned as RAZ.
- Presently, the FZ is mainly utilised within the UGB as a transitional zone for areas where increased urban intensification is anticipated. As such, any amendments to the FZ should be clear that the proposed changes are not relevant to FZ land within the UGB.
- Some Councils are supportive of aligning all rural zones to ensure that parliamentary ratification is received for smaller subdivisions. However, exemptions should be made for minor modifications where it is clear there is no intent to increase subdivision potential e.g. applications for boundary realignment should be excluded from requiring parliamentary ratification.
- For other Councils, requiring ratification from Parliament that any rezoning proposal of Farming Zone land within 100km of Melbourne would significantly delay amendments to implement township structure plans (e.g. rezoning a township growth area from Farming Zone to General Residential Zone) and is therefore not supported by every Interface Council. In effect, this is nearly the same process when reviewing/altering the Urban Growth Boundary.
- Regarding dwellings in agricultural areas, some Councils are supportive of the removal of as-of-right dwellings in the FZ and requests that the changes are also made to other rural zones within the green wedge (e.g. Rural Conservation Zone) to provide consistency.
- Some Interface Councils do not support dwellings no longer being as-of-right in the Farming Zone, regardless of lot size. Councils should be able to schedule their own minimum lot size.
- Interface Councils note that Mitchell Shire is the only LGA with Farming Zone land bordering the UGB. Interface Councils recommends State Government prepares a policy for the Farming Zone land surrounding Mitchell's 25km of Urban Growth Boundary, i.e. the preparation of a peri-urban interface policy.
- Some Interface Councils have advocated without success for the State Government to invest



in noxious weed compliance. The green wedge community has continually expressed the need for compliance programs to address the ongoing burden of land management that is consistently exacerbated by noxious weeds spreading from neighbouring mismanaged land.

- Interface Councils recommends the State Government urgently commits to undertaking compliance programs across the region to demonstrate serious commitment to support green wedge communities and their ongoing viability.
- *Please refer to individual Council submissions for additional comments and further detail.*

## Question 5: Improving decision-making on agricultural land

[\(Consultation Paper section 3.2.2, page 41\)](#)

Do you support the proposed options for improving decision-making on agricultural land?

	Support	Neutral	Oppose
Develop a practice note to guide council decision-making on planning permits in agricultural areas	x		
Establish an agricultural referral or expert advisory service to support decision-makers and facilitate compliance with the planning scheme	x		

Do you have any comments about the proposed options for improving decision-making on agricultural land?

- This submission supports the creation of a new Planning Practice Note (PPN) which guides decision-making for agricultural proposals. Currently, there is insufficient assistance for Local Council planners in assessing discretionary uses on agricultural land and it is difficult to reject proposals which cause degradation to agricultural areas.
- However, Interface Councils believe it is important that a practice note be complementary to, rather than in place of, robust local planning policy.
- The PPN should pertain exclusively to planning matters, rather than other areas of agricultural land management maintenance which extend beyond the planning permit application assessment process.
- The group supports an increased role for referral authorities, such as Melbourne Water and the Environment Protection Authority, to ensure developments and farms in the open catchment do not threaten drinking water supply.
  - This could be a proactive rather than regulatory approach, where Melbourne Water works with golf courses or farms where fertilizers or chemicals are routinely used, for example.
- The formation of an expert advisory service for agricultural uses might be a helpful inclusion to the range of existing referral authorities. The weight given to advice provided by the service should be clear. The service should have either a determining role or should be given strong consideration, where Councils must justify why any decision conflicts with the advice provided by the service. Giving the referral a heavy weight would ensure a level of statutory force which is useable and clear to all parties.
- *Please refer to individual Council submissions for additional comments and further detail.*

## Question 6: Future proofing Melbourne's food bowl

[\(Consultation Paper section 3.2.3, pages 42 - 47\)](#)

Do you support the proposed options for future proofing Melbourne's food bowl?

	Support	Neutral	Oppose
Develop a new regional policy to preserve opportunities for irrigated agriculture	x		
Introduce a new overlay designed to protect food-producing areas with access to secure water supply and irrigation infrastructure		x	
Establish a process to determine where the new overlay should be applied	x		

Do you have any comments about the proposed options to future proof Melbourne's food bowl?

- Interface Councils supports the protection of Melbourne's food bowl near the urban population because this is vital to achieve healthy liveable communities.
- The food bowl is an important source of fresh food and has the capacity to meet around 80% of greater Melbourne's fresh vegetable needs. However, as demand for food is increasing, the capability of the food bowl is decreasing as new housing displaces farmland.
- The proximity of farmland to Melbourne's population is also important for tourism and health benefits. Along with the rest of Australia, the Interface region has a growing problem with accessible fresh and healthy food, and a food bowl located withing proximity of Melbourne's population allows for:
  - easy access to nutritious food
  - tourism/education on farming encouraging healthy food choices
  - engagement in community events, and
  - supporting the local economy.
- In general, Interface Councils supports the use of zones and overlays to protect agricultural land and green wedge land uses. However, the application of a specific overlay which protects food-producing areas could lead to a delineation between general agricultural land and pseudo priority agricultural land areas.
- Given that the intention of the Consultation Paper has stated that changes aim to prioritise *all* agricultural land, the application of such an overlay could inhibit realisation of such a goal and could end up undermining policy for other areas where the overlay does not apply.
- Some Councils are concerned that, in practice, well-intentioned policy imperatives are repeatedly being undermined by rushed and repetitive approaches instead of future-focused and innovative initiatives.
- *Please refer to individual Council submissions for additional comments and further detail.*

## Question 7: Strengthening referral and notice requirements

[\(Consultation Paper section 3.2.4, pages 47- 48\)](#)

Do you support the proposed option for strengthening referral and notice requirements?

	Support	Neutral	Oppose

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	x		
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Do you have any comments on the proposed option for strengthening referral and notice requirements?

- Water and catchment authorities have an important role to play in assisting Local Councils to protect and plan for irrigated land.
- The Interface Councils group requests that state authorities are supported to better understand the purpose of their role as a referral authority for irrigated agricultural land and improving their understanding and knowledge of the statutory referral process.
- It is important that advice from water authorities is consistent across both strategic and statutory planning activities to ensure there is cohesion between these planning functions. Water authorities will need to be ready to:
  - Assist and provide advice on the preparation of GWMPs, including detailed information and mapping about the location of irrigated land and possible future irrigated land
  - Provide support and advice during Planning Scheme Amendments which implement protection of irrigated land, and
  - Provide referral responses on planning permit applications.
- *Please refer to individual Council submissions for additional comments and further detail.*

## Question 8: Supporting agricultural diversification, value-adding and innovation

[\(Consultation Paper section 3.2.5, pages 49-50\)](#)

Do you support the proposed options for supporting agricultural diversification, value-adding and innovation?

	Support	Neutral	Oppose
Update the definition of 'Primary produce sales' to support farm gate sales	x		
Amend the definition of 'Host farm' to require a direct link to an 'operating agricultural property'			x
Make 'Host farm' a Section 1 (as-of-right) use in specified zones, providing it is undertaken in conjunction with agriculture and accommodates no more than 10 people at any one time			x
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			x

Do you have any comments on the proposed options for supporting agricultural diversification, value-adding and innovation?

- The Interface Councils group emphasises that the challenges of agricultural diversification highlighted in the Consultation Paper are not entirely indicative of the challenges experienced across all green wedge areas.

- For example, while some issues might be a concern in Yarra Ranges and the Mornington Peninsula, other Councils would encourage such uses to either support the viability of existing agricultural uses or provide a viable land use in their own right.
- Interface Councils supports additional farm gate sales to promote economic development, while respecting the primary agricultural use of the land. Policy on farm gate sales will require strong and clear definitions so expectations are clear to all parties.
- There are concerns with the five kilometre radius requirement for local produce. This is because complementary produce may not be contained within such a finite geographic area.
  - Ideally, distances should instead be based on practical boundaries given the nature of the agricultural produce sold that would link compatible farms together. However, any kind of geographic restriction on local produce sold at farm gates would be difficult to enforce due to the effort involved in tracking down information about specific produce sold at farm gates.
- We understand the intent of a radius requirement is to support the local economy. However, generally, the benefits of imposing a radius requirement on farm gate sales are outweighed by the strain resourcing such a requirement would put on Local Councils.
- Some of the proposed changes to the policy on host farms are considered appropriate by some Councils as the changes ensure that accommodation uses are adequately connected to established agricultural purposes. Other Councils oppose the changes due to concerns relating to lack of adequate supervision and the potential proliferation of “party houses” in the green wedge and the loss of an ability to apply permit conditions. Any change would require clear definitions with respect to inclusion limits on numbers of people allowed to stay at host farm, for example.
- Interface Councils suggests further work be undertaken to broaden the scope of what appropriate land uses could be considered as value adding to agriculture.
- *Please refer to individual Council submissions for additional comments and further detail.*

## Question 9: Managing use of green wedge and peri-urban land/ urban-rural interface

(Consultation Paper section 3.3.1, pages 51 - 52)

Do you support the proposed options for managing the urban-rural interface?

	Support	Neutral	Oppose
Provide planning practice guidance on how to consider and direct planning in urban–rural interface areas	x		
Provide guidance on preferred transitional land uses for land at the urban–rural interface and provide urban design/buffer guidance for transitional locations	x		
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		x	
Introduce the ability to apply other rural zones more suited to the roles and land conditions of particular locations	x		

### Do you have any comments on the proposed options for managing the urban-rural interface?

- The urban-rural interface should be protected from further urban sprawl. Many Interface Councils agree that creating an obvious and recognisable “urban to rural” transition through built form and protection of landscape character would assist in making the UGB more permanent.
- That said, some Councils including the Mornington Peninsula Shire are greatly concerned that designating areas adjacent to the UGB and inside the green wedge as being appropriate for transitional uses is, in their case, more likely to encourage speculation and land banking given that their current boundaries have been well established and stable for many years.
- Interface Councils looks to the State Government for guidance on this issue. A standard approach at a state level to areas where a new transition area is considered appropriate would assist the relevant Councils protect their UGB. However, with respect to the issues raised by the Mornington Peninsula for example, the establishment of a transition area should not be regarded as the appropriate policy solution in all cases.
- Green Wedge Management Plans (GWMPs) should include landscape character assessment to inform the type and scale of development that is appropriate for different areas. These assessments should be cross-referenced with other assessments of the area so as appropriate zones and overlays may be applied. Interface Councils supports either updating the Green Wedge Zones or allowing application of other rural zones to achieve desired planning outcomes at the urban-rural interface.
- Interface Councils recommends that reviewing a GWMP every four years should not be a mandatory requirement because some Councils do not have the resources to review their GWMPs so regularly.
- *Please refer to individual submissions for comments on Urban-Rural Interface Design Guidelines from Councils for further detail.*

### Question 10: Managing discretionary uses

[\(Consultation Paper section 3.3.3, pages 54 - 60\)](#)

### Do you support the proposed options for managing discretionary uses?

	Support	Neutral	Oppose
Require that Educational facilities (primary and secondary schools) be located adjacent to the Urban Growth Boundary, adjoin or have access to a road, and not be located in high bushfire risk areas	x		
Require that Places of worship be located adjacent to the Urban Growth Boundary, adjoin or have access to a road, and not be located in high bushfire risk areas	x		
Redefine 'Halls' to differentiate commercial uses from those that provide community support services, and require that Halls be located adjacent to the Urban Growth Boundary, adjoin or have access to a road, and not be located in high bushfire risk areas		x	
Restrict the number of patrons for Exhibition centres to a maximum total of 150 at any one time, and prohibit Exhibition centres in areas of high bushfire risk	x		

Amend the Rural Conservation Zone to insert conditions of use (i.e. minimum lot size requirements, number of bedrooms, in conjunction with test) for 'Group accommodation' and 'Residential hotels' consistent with conditions in the green wedge zones	x		
Ensure new categories of camping and caravan parks are reflected in the planning scheme, and permit camping and caravan parks in certain zones only when they fall within 'bush/primitive' or 'tourist' categories	x		
Prohibit Data centres in the Green Wedge Zone, Green Wedge A Zone and Rural Conservation Zone		x	
Amend the Green Wedge Zone, Green Wedge A Zone and Rural Conservation Zone to require Data centres to be located adjacent to residential, commercial or industrial zoned land		x	

Do you have any comments on the proposed options for managing discretionary uses?

- The Interface Councils group generally supports the proposed restrictions on discretionary uses in Green Wedge Zones.
- Some Councils, including City of Casey for example, have received and considered planning permit applications for development in green wedge areas, especially for schools and places of worship.
- Greater clarity in state policies and zones would help limit proposals to appropriate locations only – in relation to the comments on “transition areas” outlined above and the need for Councils to be able to determine where this is an appropriate policy response.
- The group supports the principle of limiting uses within ‘high bushfire risk areas,’ acknowledging that the protection of human life is a fundamental consideration in planning proposals.
- Further, Interface Councils would like more guidance provided on what constitutes high risk, given that a broad interpretation would prohibit specific education centres, places of worship, exhibition centres and halls within the region’s green wedge area.
- *Please refer to individual Council submissions for additional comments and further detail.*

## Question 11: Improving the design of development in green wedges

(Consultation Paper section 4.1, pages 62 - 71)

Do you support the proposed options for implementing design and development guidelines?

	Support	Neutral	Oppose
Introduction of a new planning practice note to assist responsible authorities to assess development proposals on green wedge land	x		
Adjust the decision guidelines and introduce application requirements for development applications in Green Wedge zones	x		
Update the form and structure of Green Wedge Management Plans to require new or updated Green Wedge Management Plans to identify landscape typologies and detailed design guidelines	x		
Introduce a new particular provision that contains design guidelines and standards for development in green wedge areas	x		

Amend the schedule to Green Wedge zones to allow site coverage, setbacks and building heights to be mandated for developments associated with discretionary uses	x		
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Do you have any comments on implementing design and development guidelines?

- Interface Councils' green wedge areas are considerably diverse and would therefore benefit from design requirements which clearly delineate between landscape typologies.
- Some Councils are of the opinion that the typology approach can be too generic and descriptive as opposed to providing effective guidance, and that further consultation on landscape assessment and protection should be undertaken before a particular method is enshrined into a PPN.
- Overall, the proposed modifications and inclusions are considered an improvement to the current considerations available to planners within existing local/state policy and Green Wedge Zones.
- The Interface Councils group agrees a Practice Note, and further State Government assistance, would be beneficial. It is important the Practice Note also considers environmental matters such as conservation, native vegetation, bushfire and habitat concerns.
- It is unclear how the advisory committee referenced in the Consultation Paper will interact with the Planning Practice Note (PPN). It seems that an advisory committee would do much of the "heavy lifting" regarding guiding decision making and there would be risk of the PPN quickly becoming outdated as decision making through the advisory committee evolves and matures.
- The PPN would need to be able to be applied contextually, keeping in mind that there can be vastly different environments across the Interface Councils Region.
- This submission supports the proposed changes to particular provisions as an effective tool to guide discretion in the planning permit process. While the design guidelines must be specific about intent, it is important to avoid including standards which can be satisfied without consideration of the broader context.
- It is important to avoid the 'standard meets the objective' approach that has evolved in other aspects of the planning scheme and, instead, employ contextual provisions using percentages/formulas (e.g. "maximum % site coverage" rather than "must be less than x<sup>2</sup>m").
- In general, the group supports updating the Green Wedge Zones to allow planning issues to be dealt with. Further guidance on form and structure of GWMPs is also supported.
- However, the group does not support planning issues being predominantly managed through GWMPs. The GWMPs should state the preferred outcome for an area, providing the strategic and policy justifications for planning controls, while zones and overlays do the statutory "heavy lifting" and require siting and design guidelines, which implement the preferred outcome.
- *Please refer to individual Council submissions for additional comments and further detail.*