



Department of Environment, Land, Water and Planning

Friday 5 February 2021

RE: Planning for Melbourne’s Green Wedges and Agricultural Land, May 2020.

To Whom It May Concern.

The Australian Institute of Landscape Architects (AILA) is the peak national body for Landscape Architecture. AILA champions quality design for public open spaces, stronger communities, and greater environmental stewardship. We provide our members with training, recognition, and a community of practice to share knowledge, ideas and action. With our members, we anticipate and develop a leading position on issues of concern in landscape architecture. Alongside government and allied professions, we work to improve the design, planning and management of the natural and built environment.

In operation since 1966, AILA represents over 3,500 landscape architects and promotes excellence in planning and designing for life outdoors. Committed to designing and creating better spaces in Australia, landscape architects have the skills and expertise to improve the nation’s liveability through an unique approach to planning issues via innovative integrated solutions. In doing so, landscape architects contribute towards better environmental, social, and economic outcomes for all Australians.

AILA’s Charter stresses that urban and rural landscapes contribute to the Australian quality of life and that the condition of the landscape influences the economic, social and environmental health of the nation.

We support in principle the four aspects of land use and development in green wedge and peri-urban areas of Melbourne as discussed in the consultation paper, and the relevant proposed options. We present below specific comments in relation to each, using the numbering from the consultation paper.

3.1 Strengthen legislative and policy frameworks to provide clear strategic direction

As noted in section 3.1.1 (p. 13) of the consultation paper, a significant challenge for decision-making about land-use and development in Melbourne’s green wedge areas is the different functions it can serve in agriculture, natural resources and open space. This multiplicity of use creates a tension in green wedges. The consultation paper proposes that policy directions should “give non-urban rural uses primacy, provide a non-urban break between urban uses and green wedges, and protect land in green wedge areas from inappropriate use and development” (p. 13). AILA understands this emphasis on agriculture but believes it should not preclude the need to protect all green wedge landscapes, both natural and cultural.



The COVID-19 pandemic has demonstrated the importance of access to regional open space for the community. This can be provided in Melbourne's green wedge areas closer to urban development. A vision for 2050 is the retention of the "natural biodiversity and unique landscapes of Melbourne from 2020" (p. 7). It is not clear how the options in this consultation paper will ensure this retention. This tension between multiple land uses must be addressed explicitly in legislation and policy frameworks.

AILA supports the review and update of Planning Practice Note 31 (p. 17) to improve the structure, form and content of Green Wedge Management Plans (GWMPs). We agree that there must be a state-backed regional policy for green wedge areas. Regional policy can address management of green wedge areas as a whole. Local government policy can then align with the regional policy for greater consistency in management of green wedge areas by neighbouring local councils.

The importance of preparing GWMPs by local councils must be emphasised, and funding made available for their preparation and implementation through the various levels of the planning system. These plans must acknowledge the need for large areas of public open space in the rapidly expanding regions of Melbourne. Parks of the size and character of Westerfolds Park on the Yarra and Jells Park in Glen Waverley need to be created in green wedges along the northern and western urban growth boundaries as permanent public open space for the communities in these regions. These areas also allow for long recreation trails to be established, which can link suburbs, with many associated benefits.

3.2 Support agricultural land use by strengthening rural zones and overlays

As noted earlier, AILA questions the priority given by the options to agricultural use within Melbourne's green wedge areas. Nevertheless, AILA supports the alignment and integration of land use planning with water management policy and infrastructure provision. Use of different fit-for-purpose water sources is essential, including recycled water and stormwater. Use of green wedge land for agriculture must align with available water infrastructure.

The importance of a reliable supply of fit-for-purpose water to farming is illustrated by the case study of Werribee Irrigation District (section 3,2,3). The discussion concludes that "During our Phase 2 consultations, many farmers in Werribee South indicated that in the absence of a reliable supply of fit-for-purpose water, they would seek to convert use of their land to housing, believing it will enable them to sell their land at 'residential value' and fund investment elsewhere or alternatively, move out of farming" (p. 43). While an available and secure irrigation supply is a critical part of sustaining agricultural activities, it is only one of a few. The disparity in the value of peri-urban area land and the commercial value of agricultural practice has increased significantly as a result of urban fringe developments. It is a key driver that motivates farmers to seek to convert the use of their land. This is not a problem that can be solved by planning controls alone. Interdisciplinary collaborations of farmers with experts such as economists should be encouraged and supported at both state and local government levels. Looking at strategies that improve and diversify the commercial opportunities of a farming business that are appropriate to the physical and cultural context of a given location would go a long way to help maintain the viability of Melbourne's food bowl in a commercial sense. It is as important to retain a succession of farmers as to protect agricultural lands.

3.3 Manage green wedge and peri-urban land through more consistent and coherent land use decision-making

Management of the urban-rural interface is critical to keep urban development within the urban growth boundary (section 3.3.1). AILA agrees that “an integrated region- and/or metropolitan-level response” (p. 51) is necessary to guide councils and improve consistency of management and decision-making across green wedge areas. AILA also supports all four options proposed to manage the urban-rural interface (p. 51). These interfaces, similar to the interface between municipality boundaries, are particularly challenging to manage and often overlooked during planning and design processes, partially due to the complexity of the issue.

The option to “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” (p. 52), while allowing and supporting a level of autonomy at local government level, would be an effective way to facilitate cohesive and long-term land management practice. It will minimize the encroachment and degradation of green wedge areas from inappropriate land uses and activities in the interface areas.

This guidance can be in a form similar to structure plans, which guide greenfield developments. They are issued at state level with early input and ultimate execution by the relevant local authorities. The structure plan(s) can be further supported by design guidelines that are tailored to each land use and site.



One limitation of the proposed options is that they relate only to the land within the green wedge. Anticipation of development at this interface is necessary. Where new urban development abuts the green wedge areas, housing density should be low to create a transition between the higher density (250m² lots) on the new developments and the low-density development (min 50 ha subdivision in agricultural land) and open space areas in green wedges. The transition evident in Figure 5, copied from the consultation paper, must be opposed.

Figure 5. Example of 'hard' edge between urban and green wedge land (Hillside, north-west Melbourne). Reproduced from consultation paper.



Fragmentation and erosion of Melbourne's green wedges need to be strongly discouraged. AILA members are aware of instances where roads for developments adjacent to a green wedge area have been placed within the green wedge. This should never happen.

Planning challenges associated with locating infrastructure in Melbourne's green wedges is discussed but no options are proposed (section 3.3.2). This is justified by the need to "work across different areas of government to provide integrated and coherent responses that anticipate future needs" (p. 53). AILA assumes that such interdisciplinary work is required for planning other land uses in green wedge areas. Nevertheless, options could be included that required that placement of any infrastructure in green wedge areas must include appropriate buffer zones and that the land is fully rehabilitated to pre-development condition, at the industry's cost, when the infrastructure is no longer required. This is especially important for extractive industry infrastructure.

4 Improve design of development in green wedges to respond to surrounding landscape

In general, AILA supports the proposed options for implementing design and development guidelines (section 4.1). Implementation of these guidelines is essential to protect the visual amenity of the green wedge areas for the benefit of the Victorian community. Fundamental to this is the characterization of landscape typologies for each green wedge area and the development of detailed design guidelines specific to each typology. Landscape typologies must be identified as part of the preparation of GWMPs (p. 64).

AILA acknowledges that the twelve elements of design requirements (section 4.2) are appropriate. However, some aspects of the design elements can be clarified, improved or strengthened, as suggested below.

- The language of the objectives should be strengthened to be prescriptive rather than advisory. For example, the objectives in Elements 6 and 7 should be required rather than encouraged.
- Element 6 should be amended to require replacement of all trees that have been removed in the 12 months prior to the submission of the application, whether the trees are significant or not (p. 67). All these trees, in time, would have grown to contribute valuable environmental and aesthetic services to the landscape and its occupants. Development should ensure that these services are still delivered. This element should also be broadened to ensure that vegetation within the green wedges is maintained and strengthened where appropriate to revegetate agricultural edges and offset the urban heat effect of the encroaching developments. There is much research on the cooling effect of trees and vegetation. The high density of new residential estates leads to the removal of almost all large vegetation during development. As a result, trees are often restricted to streets and parks. Nearby green wedge areas can serve as substitute treed open space for residents in such developments.



- Innovative design should always be encouraged, not just when “developments complement the overall character or sense of place” (p. 68).
- The principles underlying Elements 8 and 9 reflect recent AILA position statements on Climate Positive Design and Liveable Cities: Healthy Communities – Healthy Living Landscape Solutions. The design requirement that “the creation and location of crossovers and driveways should maximize retention of existing vegetation and informed by traffic engineering advice” (p. 69) should be broadened to include input from landscape architects. Traffic engineers can advise on issues of road design to maximize safety, but landscape architects can ensure that safety accompanies optimal landscape amenity of the green wedge area and take advantage of multifunctional possibilities.
- The design requirement of permeable surfaces in vehicle parking areas in Element 10 should be mandatory. The wording should be strengthened to “these areas must incorporate vegetation and permeable surfaces” (p. 70).
- As stated earlier, a tension exists in green wedge areas between different land uses. For example, agricultural use of land can conflict with management of its environmental values; ensuring safety of residents in bushfire-prone areas can conflict with protection of natural habitats and associated landscape character values. Element 11 explicitly addresses this tension in relation to safety. The consultation document does not address the tension between managing green wedge land for farming while still conserving its environmental values. This might be resolved when landscape typologies are identified, and landscaping (Element 6) undertaken. However, Element 6 seems to relate to landscaping of buildings rather than of green wedge areas more broadly.

In conclusion, AILA congratulates DEWLP for undertaking this task of planning for Melbourne’s green wedge and agricultural land. The consultation paper provides an excellent basis for discussion and refinement of the proposed options. However, one critical aspect to be resolved is the tension between management of green wedge land for agriculture and for other uses. The consultation paper places priority on green wedge land for farming. The Executive Summary states that the proposed options seek to “deliver lasting protection of agricultural land” in green wedge areas and to ensure that “farmers can continue to grow, adapt and innovate in our green wedge and peri-urban areas” (p. iv). They aim “to protect the special qualities and significant features of the environmental, economic, cultural and health values” of the green wedge areas for the community (p. iv).

However, operating a farm in the green wedge might clash with protection of the environmental values of the land, e.g. the need to remove existing native vegetation to plant crops or to provide pasture. This tension is implicit in the statement on p. 18 about “...private landowners who are responsible for delivering land management and conservation outcomes in the area”. The options do not offer guidance to resolve this tension. On p. 53, the consultation paper comments that “land with potential for infrastructure competes with land use for agriculture”. However, no options are proposed for



planning these alternative infrastructure uses or acknowledgement of competition of infrastructure with environmental values of green wedge areas. Although discretionary uses are discussed and options proposed (section 3.3.3), there is no discussion about planning options for land with environmental values or the tension it has with using green wedge land for agriculture. This is a major omission that should be addressed.

AILA Victoria would like to thank DELWP for the opportunity to provide feedback as part of the consultation process to help improve the planning for Melbourne's green wedges and agricultural land. Should you require additional input from AILA, please contact Victoria Chapter Manager, Martha Delfas at vic@aila.org.au.

Sincerely,

A handwritten signature in black ink, appearing to read 'Heath Gledhill', written over a horizontal line.

Heath Gledhill

State Chapter President, Victoria
Australian Institute of Landscape Architects

Submission authored by AILA Environment Committee Chair, **Dr Meredith Dobbie**.