



QUEENSLAND
FARMERS'
FEDERATION



Consultation on the Draft State Planning Policy **October 2026**

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Department of State Development,
Infrastructure and Planning

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This submission is provided to:

The Honourable Jarrod Bleijie MP
Deputy Premier,
Minister for State Development, Infrastructure and Planning and
Minister for Industrial Relations
Department of State Development, Infrastructure and Planning (Planning Policy team)

Submitted via email planningforqueensland@dsdip.qld.gov.au

Our members

- Queensland Fruit & Vegetable Growers
- Cotton Australia
- CANEGROWERS
- Greenlife Industry QLD
- eastAUSmilk
- Timber Queensland
- Queensland United Egg Producers
- Turf Queensland
- Pork Queensland
- Australian Chicken Meat Federation
- Bundaberg Regional Irrigators Group
- Burdekin River Irrigation Area
- Central Downs Irrigators Ltd
- Fairburn Irrigation Network
- Mallowa Irrigation
- Pioneer Valley Water Co-operative Ltd
- Theodore Water Pty Ltd
- Eton Irrigation
- Lockyer Valley Water Users

About the Queensland Farmers' Federation

The Queensland Farmers' Federation (QFF) is the united voice of agriculture in Queensland.

Our members are agricultural peak bodies who collectively represent more than 13,000 farmers who produce food, fibre and foliage across the state.

QFF's peak body members come together to develop policy and lead projects on the key issues that are important to their farmer members and the Queensland agriculture sector.

Together, we form a strong, unified voice leveraging our effectiveness by working together to drive policy and initiatives that support a strong future for Queensland agriculture.

Submission

The Queensland Farmers' Federation (QFF) welcomes the opportunity to provide feedback on the draft State Planning Policy (SPP) 2026, together with the accompanying discussion paper, The future of assessment benchmarks, and the draft Minister's Guidelines and Rules. QFF has also made a separate submission on the *Natural hazards land use planning* discussion paper.

We provide this submission without prejudice to any additional submission from our members or individual farmers.

Introduction

The Queensland Farmers' Federation (QFF) welcomes the opportunity to provide feedback on the draft State Planning Policy (SPP) 2026, together with the accompanying discussion paper, The future of assessment benchmarks, and the draft Minister's Guidelines and Rules. QFF has also made a separate submission on the *Natural hazards land use planning* discussion paper.

Agricultural land is the foundation of Queensland's agricultural sector, and it is a finite resource. Land suitable and available for cropping (ALC Class A and B) covers only around 12 per cent of Queensland,¹ and much of it is located in regions experiencing the greatest growth pressure, including the Lockyer Valley, Scenic Rim, Sunshine Coast hinterland, and the Bundaberg, Mackay, Burdekin and Darling Downs production areas. Once this land is subdivided or developed, it cannot be returned to production. As Queensland plans for one million new homes by 2044, a record infrastructure pipeline and the energy transition, the pressure on this land will intensify, as will the consequences of planning decisions that affect it.

¹ Queensland Government, State of the Environment Report 2024, 'Soil and land resources availability and capability'. In 2021, land classified as suitable and available for cropping (Agricultural Land Classes A and B) covered approximately 12 per cent of Queensland (212,494 km²). Class A land accounted for 7 per cent and Class B land for 5 per cent.

QFF considers the SPP to be the appropriate instrument to secure this resource. It is the only planning instrument that applies across the State, that all regional plans and planning schemes must integrate, and that prevails over them to the extent of any inconsistency. This is particularly important because the loss of agricultural land is cumulative. Individual planning decisions that appear reasonable in isolation can, in combination, undermine broader state objectives.

The State is therefore best placed to establish a consistent framework, rather than relying on incremental, site-by-site approvals. A clear, mapped statement of the agricultural land the State intends to protect would provide local governments with a consistent basis for plan-making, give producers the certainty needed to invest in irrigation, intensive production and processing, and give clear direction to proponents of urban, energy and other non-agricultural development about where such development is inappropriate.

QFF supports the Government's objective of a simpler, outcome-focused SPP, and welcomes the draft's recognition of biosecurity, intensive agricultural industries, on-farm processing, agritourism and agricultural workforce housing. However, the draft does not yet give full effect to its own recognition of agriculture's importance. It removes the SPP 2017 commitment that ALC Class A and B land "is protected for sustainable agricultural use", no longer identifies that land or Important Agricultural Areas, and retains the stock route network as the only agricultural mapping layer local governments must integrate.

Without a statewide baseline, each rezoning, subdivision or non-agricultural approval will be assessed on its individual merits against housing, energy and resource proposals supported by quantified targets and dedicated policy, while the overall loss of productive agricultural land will go unmeasured and unmanaged.

Key recommendations

QFF's key recommendations are summarised as follows:

1. Reinstate explicit protection of ALC Class A and B land and IAAs in the Agriculture state interest and define "agricultural land" in the glossary.
2. Map agricultural land in Appendix 1 as statutory layers: ALC Class A and B land, IAAs and the existing agricultural land audit layers. Publish the missing tables of information maps and locally refinable maps.
3. Add a clear test for competing interests: Development that permanently removes ALC Class A or B land or IAAs from production should proceed only where there is an overriding need in the public interest and no reasonable alternative site.
4. Make the newcomer responsible for buffers (agent of change). New sensitive land uses near existing farms, intensive animal industries and processing facilities should supply the separation distances themselves.
5. Recognise agricultural water in the Water state interest, including irrigation schemes, distribution networks and on-farm storages. Avoid duplicating the Reef protection rules for farm runoff.
6. Fix the treatment of agribusiness in Economic Land. That state interest currently excludes land whose primary purpose is agriculture. Agricultural processing, packing and supply-chain uses still need serviced industrial land.
7. Set proportionate natural hazard settings for rural land, so that farm sheds, dams, levees and earthworks are not assessed as if they were urban subdivisions, and support on-farm works that reduce flood risk downstream.

8. Narrow the fast-track amendment pathways in the draft Minister's Guidelines and Rules where rural zoning or agricultural overlays could change without public consultation.
9. Add an agricultural land assessment benchmark to the Planning Regulation, so protection does not depend on whether each planning scheme has integrated the SPP.

Detailed feedback on the draft SPP

Managing competing state interests

Like the SPP 2017, the draft does not prioritise one state interest over another, and QFF does not object to this principle. What has changed is how conflicts are resolved. Under the SPP 2017, they were resolved through the policy's purpose, guiding principles and local context. The draft adds six strategic aspirations which "guide the resolution of competing interests", are of "equal importance" with the purpose and guiding principles, and will be used to test whether the SPP has been appropriately integrated.

The weight given to agriculture within those aspirations is very limited. Agriculture appears in a single outcome, "Support the extent and viability of agricultural land and production systems", under one of six aspirations, whereas housing, efficient land use, and infrastructure are each reflected across several. Housing is also supported by a quantified target of one million new homes by 2044.

With the mapped commitment to ALC Class A and B land also removed, agriculture enters the balancing exercise with less weight and a less specific policy, and a quantified target will consistently prevail over a general aspiration.

The draft also introduces a guiding principle that plans describe outcomes "rather than what is to be avoided, prevented or discouraged" (Table 2, *Positive*). Agricultural land protection, like Key Resource Area protection, is inherently avoidance-based, and this principle should not discourage agricultural overlays. Similarly, the "Promote efficient land use patterns" aspiration refers to "natural and rural landscapes" but not to agricultural land as a productive resource.

To ensure agriculture is given appropriate weight when interests compete, QFF recommends:

- A statement in Part B that the permanent loss of ALC Class A and B land and IAAs is a matter of state significance, to be accepted only where there is an overriding need in the public interest and no reasonable alternative site or implications for food security.
- Amending the "Promote efficient land use patterns" aspiration to refer expressly to agricultural land.
- Clarifying that the *Positive* guiding principle does not preclude avoidance-based provisions required to give effect to a state interest policy, including for agriculture.

Mapping

The draft's treatment of mapping warrants particular attention. SPP 2017 Appendix 1 sorted mapping into three tables: layers that must be integrated (Table A); layers that must be integrated but may be locally refined (Table B); and information layers (Table C). ALC Class A and B land and IAAs sat in Table B. While Part B of the draft describes the same three categories, Part F contains only Table A, which for agriculture lists the stock route network alone. Table B, and with it the statewide identification of Queensland's most productive agricultural land, has been omitted.

For agriculture, this is the single most consequential change in the draft. Table B was the mechanism that required ALC Class A and B land and IAAs to be reflected in every planning scheme, while allowing local governments to refine that mapping with evidence. Without it, a local government could lawfully

decline to map agricultural land at all, and the State would lose its principal means of ensuring this finite, irreplaceable resource is identified and protected consistently across Queensland. Restoring this mapping is therefore central to QFF's recommendations.

The status of the other SPP 2017 Table B layers, including MSES wildlife habitat, regulated vegetation and natural hazard layers, is also unclear, which may create uncertainty for landholders and local governments.

QFF understands that identifying agricultural land may be intended for regional plans. QFF has previously opposed regional plans that protect only a narrow subset of agricultural land, and does not consider them an adequate substitute for statewide mapping:

- The draft itself provides that a regional plan need not address every state interest, and coverage and currency of regional plans vary considerably across the State.
- Local governments prepare planning schemes directly from the SPP, so where a regional plan is silent or out of date, agricultural land would have no state-level identification at all.
- The draft continues to map Key Resource Areas, infrastructure corridors, and matters of state environmental significance at the state level, and there is no evident reason why agricultural land should be treated differently.

To provide certainty about the full effect of the policy, QFF recommends:

- Reinstating a table of mandatory, locally refinable layers equivalent to SPP 2017 Table B, including ALC Class A and B land and IAAs.
- Releasing the complete mapping schedule for comment before the SPP is finalised.
- Committing to a published program for updating ALC mapping, prepared with industry input, to reflect irrigation development and current land use.
- Include transitional provisions so existing agricultural mapping and provisions in planning schemes and regional plans continue to apply until those instruments are updated.

Agriculture state interest

The overall outcome of the Agriculture state interest is largely unchanged from the SPP 2017: "The resources that agriculture depends on are protected to support the long-term viability and growth of the agricultural sector." The draft also retains the recognition that agricultural resources should be protected from "irreversible impacts". The difference lies in the policies that give effect to this outcome. The SPP 2017 protected specific, defined and mapped land, while the draft relies on general policies that no longer identify the land to be protected.

SPP 2017 policy (2) provides that "Agricultural Land Classification (ALC) Class A and Class B land is protected for sustainable agricultural use", and policy (1) promotes and enhances agriculture in Important Agricultural Areas (IAAs). Draft policy 2 instead protects land by "identifying agricultural land that supports the current and long-term growth of agricultural production", and draft policy 1 facilitates agriculture "in areas with suitable land, resources, infrastructure and supply chain networks". This closely mirrors the Queensland Agricultural Land Audit's description of an IAA, yet the term, its definition and its mapping have all been removed.

The sub-policies under policy 2, on fragmentation, irreversible impacts and land condition, are largely carried forward, and the irreversible impact policy now extends to any adjacent land supporting agricultural production. However, each now attaches to undefined "agricultural land" rather than to a

mapped resource. Moreover, the SPP 2017 glossary defined ALC Class A and B land and IAAs by reference to the SPP Interactive Mapping System or a localised study. The draft defines neither, nor “agricultural land”. Protection will therefore vary between local governments, and the State’s investment in agricultural land classification and the Queensland Agricultural Land Audit will lose its defined role in plan-making.

The draft also removes the productivity safeguard from the co-existence policy. SPP 2017 policy (4)(d) supported co-existing development only where it did “not reduce agricultural productivity”. That phrase was the policy’s clearest link between land use planning and food security: it ensured that other uses could share agricultural land without eroding its capacity to produce food and fibre. Draft policy 4 frames co-existence around economic diversification without that safeguard. QFF supports on-farm processing, farm gate sales and agritourism at the lowest appropriate level of assessment, but without the safeguard, policy 4 could support uses that steadily reduce the land’s productive capacity. Domestic food security and sovereign production capability are now national priorities, reflected in the Australian Government’s development of *Feeding Australia: A National Food Security Strategy*. As one of the nation’s major food-producing states, Queensland’s planning framework should protect, not dilute, the productive base on which that capability depends.

QFF welcomes the draft’s recognition of the expansion needs of intensive animal industries, aquaculture and intensive horticulture, and its reference to biosecurity. However, replacing the SPP 2017 commitment to “protecting” these operations with “avoiding and minimising encroachment” allows encroachment wherever its effects can be minimised. For businesses with significant fixed capital that cannot readily relocate, this falls short of the certainty needed to invest.

To restore the protections of the SPP 2017 while retaining the draft’s improvements, QFF recommends:

- Amending policy 2 to read: “Protect agricultural land, including ALC Class A and Class B land and Important Agricultural Areas, for sustainable agricultural use by...”.
- Reinstating a policy to promote and enhance agriculture in IAAs, consistent with SPP 2017 policy (1).
- Reinstating the SPP 2017 glossary definitions of ALC Class A and B land and IAAs, and defining agricultural land to include ALC Class A, B, and C land, IAAs, and land supporting existing or potential intensive agriculture.
- Reinstating the SPP 2017 qualifier in policy 4 that co-existing development must “not reduce agricultural productivity”.
- Amending policy 3(a) to “avoid encroachment”, with mitigation only where avoidance is not possible, and to require incoming sensitive land uses to provide and maintain separation on their own land (agent of change).
- Developing statewide information mapping of intensive animal industry sites and their separation areas, in consultation with industry.

Housing

The consequences of these changes are most apparent where agriculture meets housing. Neither the SPP 2017 nor the draft directs residential land supply away from agricultural land through the housing state interest itself. Under the SPP 2017, that role was performed by the Agriculture state interest, through the specific protection of ALC Class A and B land. With that protection removed, and housing now supported by a quantified target and the strategic aspirations, the draft provides no clear point at

which housing supply must give way to high-quality agricultural land. The risk is most impactful in regional growth centres, where peri-urban agricultural land, such as horticulture, is under the greatest pressure.

QFF supports draft housing policy 2, which provides land for the non-resident workforce of large-scale projects. However, agricultural labour demand is largely seasonal and dispersed rather than tied to such projects. In addition, “rural workers’ accommodation” is a sensitive land use under the Planning Regulation, so separation policies could be applied to restrict worker accommodation on the very farm it serves.

QFF recommends:

- Amending housing policy 1 so that residential land supply avoids ALC Class A and B land and IAAs, prioritising infill and land already identified for urban purposes.
- Extending housing policy 2 to seasonal and harvest workforces.
- Confirming in the SPP or its guidance that on-farm accommodation ancillary to an agricultural business does not constitute encroachment on that business.

Economic Land

The draft Economic Land state interest replaces the SPP 2017 development and construction state interest, and in doing so omits a safeguard relevant to agriculture. SPP 2017 policy (1) had required the identification of land for residential, commercial, and industrial development to consider “the physical constraints of the land” and “surrounding land uses”. The equivalent draft policy 1 includes neither consideration, weakening a check that previously applied when urban or industrial land was identified next to farming land.

The draft glossary also defines Economic Land to exclude “land whose primary purpose is agriculture”. QFF understands that this is intended to distinguish Economic Land from rural land. However, agricultural processing and supply chain businesses, such as sugar mills, cotton gins, abattoirs, poultry processing, packing and cold storage facilities, and feed mills, require serviced industrial land, freight access, and separation from sensitive uses in the same way as other industries, and the definition should not be read as excluding them. QFF also supports the inclusion of AgTech and biofuels, which should be planned alongside the agricultural land that supplies their feedstock.

QFF recommends:

- Expressly including agricultural processing and agribusiness within the Economic Land state interest.
- Reinstating the SPP 2017 requirement to consider physical constraints and surrounding land uses when identifying Economic Land.

Mining and extractive resources

The interface between agriculture and resources has also shifted. SPP 2017 policy (4) provided, in neutral terms, that “opportunities for mutually beneficial co-existence between coal, minerals, petroleum and gas resource development operations and other land uses are facilitated”. Draft policy 4 retains the reference to “mutually beneficial co-existence”, but now requires planning to “prioritise” it, and limits it to “compatible land uses which do not compromise extraction of resources”. No corresponding protection is provided for agriculture.

When read alongside the removal of ALC Class A and B protection, this tilts the balance between resources and agriculture in favour of resources. The draft also makes no reference to the *Regional Planning Interests Act 2014* framework for Priority Agricultural Areas and Strategic Cropping Areas, which operates alongside the SPP in managing this interface.

To restore genuine co-existence, QFF recommends referencing the *Regional Planning Interests Act 2014* framework to ensure consistency between the two systems.

Environment, heritage, and efficient growth

This new state interest consolidates elements of several SPP 2017 interests and contains provisions QFF supports. Policy 1(e) provides for the logical and orderly expansion of urban areas while limiting the fragmentation of, and encroachment on, rural environments.

The draft also confirms that local planning instruments must not duplicate state assessment of matters of state environmental significance. QFF recommends that this no-duplication principle be extended to agricultural activities already regulated under the *Vegetation Management Act 1999*, the *Environmental Protection Act 1994*, and the Reef protection regulations.

Natural hazards and safety

QFF has made a separate submission on the *Natural hazards land use planning* discussion paper, which should be read alongside this section.

The draft's approach to natural hazards is an improvement on the SPP 2017. QFF supports avoiding development only where risk cannot be mitigated to an acceptable or tolerable level (policy 1(b)). New policy 1(d) requires mitigation strategies "proportionate to the risk" that balance "the economic and social needs of the community". Likewise, draft policy 1(e) carries forward SPP 2017 policy (5)(b), requiring development to "directly, indirectly and cumulatively" avoid increasing exposure to, or the severity of, a natural hazard.

Flood and bushfire mapping commonly covers large areas of farmland. Most farm development, such as machinery and packing sheds, dams, irrigation infrastructure and earthworks, poses little risk to life and recovers well after an event. If policy 1(e) is applied without regard to policy 1(d), routine farm buildings and works could be assessed as if they were urban development. For agriculture, the test of the framework is business continuity: whether farms can prepare, protect critical assets, keep operating where safe and recover quickly.

The draft also drops the SPP 2017 requirement for a fit-for-purpose risk assessment. Hazard mapping alone is not a risk assessment, and controls should follow one. Moreover, policy 1(f), which supports development that maintains or enhances the protective function of landscapes, gives the SPP a basis to encourage on-farm works that reduce risk beyond the farm gate. Landscape rehydration projects, for example, slow overland flow and hold water higher in the catchment, which can reduce peak flows into downstream towns.

QFF recommends:

- Rural-specific acceptable outcomes, with low-risk farm buildings and works remaining accepted or code assessable. Policy 1(e) should be applied to farm earthworks consistent with policy 1(d) and the *Water Regulation 2016* levee framework. Any statewide limits should apply only to vulnerable uses and residential subdivision, excluding rural workers' accommodation.
- Reinstate the fit-for-purpose risk assessment requirement. Hazard information maps should not trigger regulation until refined with local studies.

- Apply the cumulative test to protect farmland downstream of urban development. Under policy 1(f), make on-farm works such as landscape rehydration accepted development where they don't worsen the hazard for neighbours.

Energy

The draft creates a standalone Energy state interest from the SPP 2017 combined energy and water supply interest. Neither instrument refers to agricultural land in the energy context. Under the SPP 2017, that gap was partly filled by the separate protection of ALC Class A and B land. The draft removes that protection while elevating energy to a standalone interest, removing the locational qualifier and strengthening corridor protection. It is therefore more supportive of energy infrastructure on and through farmland than the SPP 2017, just as large-scale solar, wind, battery storage and transmission projects are increasingly locating there.

QFF recommends:

- Reinstate the requirement that energy development occur in appropriate locations, and direct large-scale renewable energy and storage projects away from ALC Class A and B land and IAAs.
- Require consideration of cumulative impacts on agricultural land, water, local roads, and workforce at a regional scale.
- Require decommissioning and rehabilitation to agricultural capability, secured through development conditions.
- Recognise co-location with agriculture only where it is demonstrated to maintain productive use.

Water

The draft Water state interest combines the SPP 2017 bulk water supply and water quality policies. Again, neither instrument addresses water for agriculture, even though the draft's strategic aspirations recognise its role in production. It is also unclear whether "bulk water supply infrastructure" includes the channels, pump stations, weirs and storages operated by irrigation schemes and water user groups.

High ecological value water areas are already a mandatory mapping layer in Table A, and draft policy 4(a)(ii) directs urban development away from high ecological value wetlands and watercourses. QFF supports this approach. However, any future expansion of high ecological value mapping, or of the controls that apply within it, should not restrict existing lawful agricultural activities on the land.

QFF recommends:

- Amending policy 1 to protect existing and planned irrigation infrastructure from encroachment and incompatible development.
- Clarifying whether bulk water supply infrastructure includes irrigation scheme infrastructure and extending the mapping if it does not.
- Ensuring that any expansion of high ecological value water mapping or associated controls does not restrict existing lawful agricultural activities.
- Confirming that policies 3 and 4 do not create an additional layer of regulation for agricultural activities already regulated under the Reef protection regulations.

Infrastructure

QFF supports the draft's recognition of digital infrastructure, but it contains no policy for rural and regional connectivity, which now underpins disaster management, remote monitoring and biosecurity traceability on farms.

QFF recommends:

- Infrastructure policy 1 expressly recognise digital connectivity in rural and agricultural areas.

Transport and supply chains

QFF supports the protection of freight corridors, intermodal terminals and port access, which are critical for agricultural supply chains and exports. The draft defines freight corridors by reference to national key freight routes. The regional routes and first and last mile roads that move cane, grain, cotton, livestock and horticultural produce from farm to processor and port are not identified, and neither is infrastructure such as grain receival depots and saleyards. As urban development extends into rural areas, this infrastructure faces the same encroachment the draft seeks to prevent for state transport infrastructure.

The SPP should also expressly protect privately owned agricultural transport infrastructure, including cane railway networks and their sidings, loading facilities, depots and crossings. The draft's glossary recognises that the transport network includes "privately owned infrastructure", but it is unclear whether cane railways fall within the defined "transport infrastructure" protected by Transport policy 1. The Table A transport mapping is also drawn from State networks. As a result, networks that are integral to agricultural supply chains may receive no practical protection from encroachment, severance or incompatible development.

QFF recommends:

- Amending the Agriculture and Transport state interests to require planning instruments to identify and protect privately owned agricultural transport infrastructure and corridors, including cane railway networks and associated facilities. New development should not compromise their safe, efficient and ongoing operation or future expansion.
- Extending Transport policy 1 to identify and protect regionally significant agricultural freight routes, first and last mile roads, and supply chain infrastructure such as grain receival sites and saleyards, consistent with Agriculture policy 5(a).
- Requiring the road hierarchy under policy 6 to recognise agricultural heavy vehicle and harvest routes.

Tourism

QFF supports agritourism under the Tourism state interest, but the draft does not define it. Local governments therefore apply generic terms such as tourist park or food and drink outlet, which trigger higher assessment than low-risk farm activities warrant. QFF supports streamlined pathways for agritourism that is genuinely ancillary to farming. The SPP should also confirm that agritourism must remain compatible with surrounding farming, as tourist accommodation is a sensitive land use.

QFF recommends:

- Defining agritourism as a use term in the Planning Regulation, with the SPP directing that low impact agritourism ancillary to farming be accepted or code assessable development.

Assessment benchmarks

QFF supports consolidating state assessment benchmarks in the Planning Regulation on a largely “like for like” basis, applying where a planning scheme has not appropriately integrated the relevant state interest.

There has never been an assessment benchmark for agriculture, but under the draft that gap becomes considerably more significant. Under the SPP 2017, a planning scheme that had integrated the Agriculture state interest would necessarily reflect the mapped ALC Class A and B land and IAAs. Under the draft, with no defined or mapped resource and no benchmark, agricultural land may receive no specific protection in development assessment wherever a scheme is silent. The Key Resource Area benchmark shows that the State already uses this model to protect a mapped, finite resource in the absence of local integration, and the same approach is warranted for agricultural land.

QFF recommends:

- A new assessment benchmark for reconfiguring a lot and material change of use for non-agricultural purposes on ALC Class A and B land and IAAs, modelled on the Key Resource Area benchmark.
- Transitioning the water supply buffer area benchmark, which captures intensive animal industries, without any expansion of triggers.
- Retaining the receiving waters benchmark’s limitation to development for an urban purpose.
- Consulting QFF on the redrafted natural hazard benchmarks before they are finalised.

Minister’s Guidelines and Rules

The draft Minister’s Guidelines and Rules would change how quickly, and with how much consultation, planning schemes affecting agricultural land can be amended. The draft extends the minor amendment pathway to adopting state hazard mapping that has not been locally refined (Schedule 1, section 2(k)). It also retains a broad category for amendments “of a minor nature that does not include zoning changes” (section 2(n)) and allows qualified state interest amendments that “reflect the strategic aspirations” and do not “adversely affect a state interest” (section 3(d)(iii)). Section 3(b) also exempts amendments that meet section 3(d)(iii) from the limit of three affected state interests. The pathway that gives the most weight to the strategic aspirations is therefore the one available for the broadest amendments.

QFF supports more efficient plan-making and welcomes the requirement to notify every affected property owner when hazard mapping is adopted as a minor amendment. Taken together, however, these pathways mean that changes affecting agricultural land, including hazard overlays, assessment levels, and policy settings, may be made with limited or no public consultation. The qualified state interest amendment test also relies on the strategic aspirations which give limited weight to agriculture.

QFF recommends:

- Building on the notice requirement in section 5.3, requiring hazard mapping notices to also explain how a landholder can request a review or correction of the mapping, and the timeframe for doing so.
- Expressly excluding agricultural overlays, rural zone minimum lot sizes, and the level of assessment for agricultural uses from the section 2(n) minor amendment category.

- Requiring consultation with the department responsible for agriculture before any qualified state interest amendment affecting rural zoned land, ALC Class A and B land, or IAAs is accepted as not adversely affecting a state interest.

Conclusion

QFF supports the Government's objective of a clearer, more streamlined SPP that delivers housing, infrastructure, and economic growth. The draft rightly retains the SPP 2017 outcome that the resources agriculture depends on are protected, and recognises agricultural resources as being of state and national importance. However, the draft removes the defined and mapped basis for that protection, weakens specific safeguards against encroachment and loss of productivity, and introduces a balancing framework and resource and energy policies that favour competing land uses. No single change is decisive, but in combination they would leave Queensland's most productive agricultural land more exposed than it is today.

Primary Industries Prosper 2050 commits Queensland to growing primary industries production to \$30 billion by 2030. The Department of Primary Industries Strategic Plan 2026-2030 identifies spatial conflict over land and water use as a key risk to that goal. A State Planning Policy that removes the defined and mapped basis for protecting agricultural land does not give effect to these commitments. The SPP is the Government's primary instrument for expressing its land use priorities, and it should be consistent with the Government's own strategy for the sector.

Yours sincerely

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