



QUEENSLAND
FARMERS'
FEDERATION

26 October 2026

The Honourable Jarrod Bleijie MP
Deputy Premier
Minister for State Development, Infrastructure and Planning
Minister for Industrial Relations
Department of State Development, Infrastructure and Planning
(Planning Policy team)
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Via Email: lanningforqueensland@dsdip.qld.gov.au

Dear Deputy Premier,

Re: State Planning Policy 2017 Review Discussion paper: Natural hazards land use planning

Introduction

The Queensland Farmers' Federation (QFF) welcomes the opportunity to comment on the Natural Hazards discussion paper. This submission should be read alongside QFF's separate submission on the draft State Planning Policy 2026.

QFF supports the move to a clearer, risk-based approach. For agriculture, the test of the framework is business continuity: the ability of a farm business to keep producing at an acceptable level through and after a hazard event.¹ In practice, that means farms can prepare, protect critical assets, keep operating where safe and recover quickly.

Our key recommendations are:

- Rural-specific acceptable outcomes in SPP guidance, keeping low-risk farm buildings and works accepted or code assessable.
- Statewide limits confined to vulnerable uses and residential subdivision where risk to life is intolerable.
- Rural workers' accommodation not to be treated as a vulnerable use.
- Hazard information maps not used as regulatory triggers until refined.

Detailed feedback on the draft SPP

Q1 Do you support the shift from "avoid then mitigate" to allowing development where risk can be managed or mitigated?

Yes. QFF supports avoiding development only where risk cannot be mitigated to an acceptable or tolerable level. As the paper notes, regulation should be proportionate to risk. Most farm development,

¹ Adapted from ISO 22301:2019, which defines business continuity as the capability to continue delivering products or services at acceptable predefined levels following disruptive incidents.

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such as machinery and packing sheds, dams, irrigation infrastructure and earthworks, poses little risk to life, yet it is often assessed as if it were urban development.

QFF recommends that:

- SPP guidance include rural-specific acceptable outcomes, with low-risk farm buildings and works remaining accepted or code assessable development in hazard areas.
- Draft policy 1(e), on direct, indirect and cumulative hazard exposure, be applied to farm earthworks in line with the proportionality principle in policy 1(d), recognising that farms must manage overland flow.
- The cumulative impact test also protect farmland downstream of new urban development, which can flood more often as upstream catchments are developed.

QFF supports the alternative approach of framing policies by development context. A rural and agricultural development context, alongside vulnerable uses, would be the natural home for rural acceptable outcomes. In the example Policy x, the first condition (that the hazard “cannot be avoided or mitigated to a tolerable level”) contradicts the second and should be redrafted.

Q2 What should be considered in deciding whether risk is acceptable, tolerable or intolerable?

QFF supports the vulnerable use approach and agrees hospitals and childcare centres warrant particular care. The main factors in judging risk should be:

- Risk to life before risk to property. The occupancy of a development, and whether people sleep there, should carry the most weight.
- The resilience and recovery of the land use. Agricultural land uses generally tolerate and recover from flooding and fire far better than urban uses.
- Off-property impacts. The question should be whether development worsens the hazard for neighbours, consistent with the risk-based framework for levees under the *Water Act 2000* and *Water Regulation 2016*.
- Nationally recognised hazard classifications. These include the H1-H6 flood hazard curves in Australian Disaster Resilience Guideline 7-3, which rate hazard to people, vehicles and buildings.

Acceptable, tolerable and intolerable should be defined in the SPP glossary, consistent with ISO 31000, so councils, landholders and industry share a common basis. Technical thresholds can sit in guidance.

Q3 What roles should the Queensland Government and local governments play?

The State should set a consistent statewide methodology for flood and bushfire mapping, provide model guidance including rural acceptable outcomes, and continue funding local flood studies. Local governments should refine mapping with local studies, set controls that reflect local context and engage directly with landholders to ground-truth mapping.

Council capacity varies widely, so a strong State role is needed. Landholders in less-resourced local government areas should not face more restrictive regulation based on coarser mapping. Risk and land suitability assessments should weigh agricultural land values alongside hazard exposure.

The draft removes the policy requiring a fit-for-purpose risk assessment. Guidance should make clear that hazard mapping alone is not a risk assessment, and that controls must follow one.

Landholders and industry also manage risk at property scale, through on-farm flood management planning and the Industry Recovery and Resilience Officer program. Some of this work reduces 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. Planning settings should support these works, not add cost to them, and should treat them as accepted development where they do not worsen the hazard for neighbouring land.

Q4 Where, if at all, should Queensland set statewide limits on new development?

Statewide limits should be confined to vulnerable uses and to new residential subdivision where risk to life is intolerable and safe evacuation cannot be achieved. They should not apply to agricultural uses or low-occupancy farm buildings and works.

QFF supports extending the ShapingSEQ approach of identifying areas unsuitable for urban development because of intolerable hazard risk. Floodplains can coincide with highly productive agricultural land, so this protects both communities and agriculture. Such designations should limit urban development only, not agricultural use. Growth displaced from hazard areas should not be redirected onto ALC Class A and B land without considering its agricultural value. For the same reason, the draft's state aspirations should name agricultural land and food security alongside housing supply when balancing hazard risk against growth.

Q5 Where should Queensland draw a clear line between acceptable and unacceptable risk?

Development that increases the number of people exposed to a hazard, where safe evacuation cannot be demonstrated, should be unacceptable. For non-habitable development such as farm buildings, the line should be off-property impact: development is unacceptable where it worsens the hazard for neighbouring land or infrastructure.

Q6 When should development be supported in hazard areas, and how should risk be managed?

Development should be supported where it does not increase risk to life, does not worsen the hazard for others, and can recover after an event. For agriculture, that includes most farm buildings, dams, irrigation infrastructure and earthworks. Appropriate measures include siting and floor levels for buildings, securing or relocating chemicals and fuel above flood levels, maintaining access for evacuation and recovery, and designing earthworks so they don't redirect water onto neighbouring land. Levees are already regulated through a risk-based framework under the *Water Regulation 2016*, which treats works with no off-property impact as accepted development and excludes routine farming activities. The SPP and its guidance should align with this framework rather than add another layer of assessment.

Mapping, engagement and benchmarks

Information maps, such as the Queensland Floodplain Assessment Overlay, should not be used as a regulatory trigger before they are refined with local studies. When mapping affecting their property changes, landholders should be notified directly and told how and by when to request a review.

QFF is also concerned about Temporary Local Planning Instruments being extended repeatedly without consultation.

QFF supports moving the natural hazard benchmarks into the Planning Regulation on a like-for-like basis, and asks to be consulted on the redrafted benchmarks if and before they are finalised.

Conclusion

QFF supports a clearer, more consistent and risk-based approach to natural hazards. With the changes above, the framework can protect communities while supporting a productive and resilient agricultural sector.

Yours sincerely

Kylie Porter
Chief Executive Officer
Queensland Farmers' Federation