



QUEENSLAND FARMERS' FEDERATION

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Submission

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Draft South East Queensland Regional Plan feedback
Department of Infrastructure, Local Government and Planning
PO Box 15009
CITY EAST QLD 4000

Via email: SEQRegionalPlan@dilgp.qld.gov.au

Dear Sir/Madam

Re: South East Queensland Regional Plan: Agriculture Interests and Issues

The Queensland Farmers' Federation (QFF) is the united voice of intensive agriculture in Queensland. It is a federation that represents the interests of 15 of Queensland's peak rural industry organisations, which in turn collectively represent more than 13,000 primary producers across the state. QFF engages in a broad range of economic, social, environmental and regional issues of strategic importance to the productivity, sustainability and growth of the agricultural sector. QFF's mission is to secure a strong and sustainable future for Queensland primary producers by representing the common interests of our member organisations:

- CANEGROWERS
- Cotton Australia
- Growcom
- Nursery & Garden Industry Queensland
- Queensland Chicken Growers Association
- Queensland Dairyfarmers' Organisation
- Burdekin River Irrigation Area Committee
- Central Downs Irrigators Limited
- Bundaberg Regional Irrigators Group
- Flower Association of Queensland Inc.
- Pioneer Valley Water Board
- Pork Queensland Inc.
- Queensland Chicken Meat Council
- Queensland United Egg Producers
- Australian Organic.

Thank you for the opportunity to provide feedback on issues of interest to the intensive agriculture sector regarding the review of the South East Queensland Regional Plan – *ShapingSEQ*. QFF provides this submission without prejudice to any additional submission provided by our members or individual farmers.

The united voice of intensive agriculture



Summary

Rural futures strategy

1. The Important Agricultural Areas mapped in SEQ in the Queensland Agricultural Audit and included in Map 4c should be assessed for inclusion in the areas of regional economic significance.
2. A representative working group to develop meaningful and measurable implementation actions to monitor the achievement of agricultural production and land use outcomes for ShapingSEQ should be established.

Regional Landscape and Rural Production Area

3. QFF opposes the designation of 11 potential future growth areas and recommends the plan publish the criteria it may use in the future to define new greenfield areas, but not speculate about areas on a spatial map.

Water resources

4. Strategies for ensuring the security of future water supply for urban purposes and irrigation; an implementation measure that demonstrates alignment with other government water planning initiatives (Chapter 4); and a monitoring measure that relates water supply to demand for urban water and irrigation so that regional water supply security is adequately provided must be included.

Urban Footprint

5. It is concerning that the new Major Greenfield designation at Beerwah East opens up a new development front west of the highway that encroaches on the interurban break and threatens productive rural areas in the vicinity of Beerwah and Glasshouse Mountains.
6. A specific urban footprint principle should state that future urban footprint areas should 'avoid Important Agricultural Areas and avoid impacts on adjacent agricultural land use'.

Rural planning tools

7. The diverse agricultural land classification approaches must be consolidated into a single classification for use in planning tools in ShapingSEQ to resolve confusion and serve as a model for other areas of Queensland.
8. QFF supports the uptake by local government of the Rural Subdivision Precinct methodology to define appropriate subdivision sizes for potential agricultural enterprises in sub-regional areas based on sound agricultural land audit and economic data, but advises caution in defining subdivision sizes based on intensive production of high value uses that would result in lot sizes attractive to the rural living market.
9. QFF supports the definition of Rural Enterprise Areas where regulatory provisions would be tailored to the encouragement of compatible rural production and value-adding activities, but is concerned that ShapingSEQ does not include any incentives for local governments to adopt these innovative planning provisions.

Rural industries

10. QFF supports strategies that promote the conservation and retention of the natural elements of the urban form to enhance liveability and support for small-scale urban food production. However, there are no special provisions in the draft plan for the local nursery and amenity horticulture sector that will promote these strategies. QFF contends that these are legitimate and permanent

establishments within the UF that should be acknowledged and provided for in ShapingSEQ through inclusion in greenspace precincts and protection from encroachment and complaints.

Rural Living Area

11. The Rural Living Area principle 5 (p. 86) should be reworded to ensure these land uses must avoid not only current agricultural land, but more importantly land with the potential for agricultural production: Agricultural Land Class A and Class B and Important Agricultural Land.
12. There should not be a new RLA designation in the vicinity of Lake Clarendon where three relatively large rural lots >50ha in area are included that are on Class A and Class B Agricultural Land and are in an Important Agricultural Area.

Rural villages

13. QFF supports allowing local governments to prepare detailed planning proposals for the sustainable and limited expansion of rural towns and villages on the provision that any growth will be consistent with urban consolidation principles and will not result in the provision of additional rural living areas on the periphery of these small centres.

State Planning Regulatory Provisions

14. QFF strongly supports the retention of regulatory provisions that have brought a consistent and rational approach to rural land use and subdivision in rural area since 2005. The exemption from the regulatory provisions provided for dual occupancy on rural lots is supported.
15. The assessment criteria in Division 4.1 of the regulatory provisions should be strengthened to ensure that large scale tourist, sport and recreation and community activities are only approved on land that is not suitable for agriculture.
16. The State Planning Policy – state interest guideline for Agriculture should include relevant guidance on the assessment of applications for large packing and processing facilities to ensure that these facilities are located appropriately, not subject to excessive assessment processes and agricultural land continues to be protected from inappropriate development.

Resource activity

17. QFF supports the provisions in the plan that are relevant for the assessment of applications under the RPIA, but reiterates its frustration that the RPIA has adopted a different approach to the protection of agricultural land than that in the State Planning Policy and the Planning Act (refer 7. above).

Rural futures strategy

The draft ShapingSEQ makes no reference to the *Rural Futures Strategy for South East Queensland 2009*. The Rural Futures Strategy remains a comprehensive statement of the critical issues and actions required to address the needs of the industries, communities and the natural environment in the rural areas of SEQ.

QFF has been disappointed that the implementation and governance proposals in the Rural Futures Strategy were not taken up by the state government following adoption of the SEQRP in 2009. The lack of an evaluation of the performance of the previous regional plan in meeting the Desired Regional Outcomes (DRO) is a serious weakness in ShapingSEQ and makes it very difficult to understand or support the changes to the plan. There remains a need for a representative working group to assist in the monitoring of the outcomes of the SEQRP with respect to agriculture and rural land use and to advise on actions to achieve the nominated targets.

It is acknowledged that some of the aspirations of the Rural Futures Strategy have been retained in ShapingSEQ. The draft plan includes three strategies under Element 7 Rural Prosperity for Goal 2: Prosper. These strategies cover the profitability and sustainability of rural industries; the intensification or diversification of on-farm activities and new value-adding activities; and rural precinct planning by local governments.

However, under the heading of 'Areas of regional economic significance', agriculture is all but ignored. In recent years, agriculture has developed and continues to adopt high technology in both production and processing sectors. SEQ agriculture also has an outward trade focus and a high level of business to business interconnections. And yet, where the document lists rural precincts as a component of areas of regional economic significance, there has been no effort to indicate either existing or potential areas of agricultural economic significance on the maps of 'Areas of regional economic significance'.

QFF suggests that the Important Agricultural Areas mapped in South East Queensland in the Queensland Agricultural Audit and included in Map 4c (p. 72) be assessed for inclusion in the areas of regional economic significance.

The draft plan also includes one strategy under Element 4 Natural resources for Goal 4: Sustain. This strategy covers the conservation of agricultural areas for fresh food supply, food security and export earning potential. This strategy is supported by Map 4c Natural economic resource areas.

Additionally, Part C of ShapingSEQ includes more detail for each of four sub-regions: Metro, North, South and West. For each sub-region, the plan includes outcome statements for rural prosperity over the next 25 years. These statements provide positive views for rural production, diversification and resilience for these areas over the planning period. However, it is disappointing that there are no statements of how these positive outcomes are to be implemented and no measures to monitor progress. There are no Implementation Actions in the draft plan (p. 122) relevant to the rural industry sector; nor are there Measures that matter (p. 132) that cover rural production or agricultural land use.

QFF urges the establishment of a representative working group to develop meaningful and measurable implementation actions to monitor the achievement of agricultural production and rural land use outcomes for ShapingSEQ.

Regional Landscape and Rural Production Area (RLRPA)

Planning for the RLRPA should receive similar attention to the Urban Footprint (UF) in the review of the SEQRP. The planning needs of this area are different from the UF but are equally important for

safeguarding the future of the region. QFF acknowledges the retention of the RLRPA, but is disappointed that the opportunity to define intensive agricultural production areas within the RLRPA for more detailed policy focus has not been taken. While the rural precinct provisions of the plan allow this to happen in the future, ShapingSEQ must provide guidance for local government for their adoption. The plan should define areas of existing and potential intensive agricultural production to guide the future planning of rural precincts. This comment reinforces the need for the plan to define areas of regional agricultural economic significance raised previously.

QFF opposes the designation of 11 Potential future growth areas (Table 5, Figure 7) in the RLRPA. As these areas are in the RLRPA, they are already protected from fragmentation. These designations however, will become the target of speculative land purchases and drive uncertainty about future land uses in these communities. If the intent is to make provision for such long term growth, criteria for the identification of future new greenfield urban footprint areas may be published, but symbols representing such areas should not be shown. The current locations appear to be arbitrary, are in areas well outside the UF and remote from current development activity. They are not consistent with the principle of incremental growth and will create new development fronts in the RLRPA beyond 2041.

Water resources

One of the key elements that will determine the future prosperity and sustainability of SEQ is the management of water resources for both urban water supply and agriculture in response to increasing population and climate change. However, ShapingSEQ makes no mention of the need for comprehensive water resource planning and management to ensure adequate water supply for the future of the region. If ShapingSEQ is to be the integrating document that achieves a coordinated approach to managing the sustainable growth and development of the region, it cannot achieve this outcome if the future of the regional water supply is not included.

QFF urges the inclusion of strategies for ensuring the security of future water supply for urban purposes and agriculture under Goal 4: Sustain; an implementation measure that demonstrates alignment with other government water planning initiatives (Chapter 4); and a monitoring measure that relates water supply to demand for urban water and agriculture so that regional water supply security is adequately provided.

Urban Footprint (UF)

QFF is concerned that the RLRPA continues to be used to create additional areas in the UF designations to provide for additional residential areas for the projected population growth (Map 1). These are located at Beerwah East and Caboolture West, Ripley Valley, Flagstone, Canungra, Laidley and Gatton.

QFF is particularly concerned that the new Major Greenfield designation at Beerwah East opens up a new development front west of the highway that encroaches on the interurban break and threatens a productive rural area in the vicinity of Beerwah and Glasshouse Mountains.

The Urban Footprint principles (p. 84) are deficient and inconsistent with the State Planning Policy – Agriculture. There is no specific principle for the protection of agricultural land from urban development. While principle 7(k) makes a general reference to ‘minimise impacts on natural resources’, this is contrary to the intent and meaning of the State Planning Policy that states clearly that development should avoid irreversible impacts on or adjacent to Agricultural Land Class A or Class B.

Rural planning tools

With the completion of the Agricultural Land Audit, there is now a much better database of agricultural land suitability available to government, industry and the community than previously existed. Unfortunately, due to the fragmented approach to the development of state government policy, this comprehensive database has been used by a range of separate agencies to develop separate and conflicting classifications of agricultural land for a range of purposes. These include: Strategic Cropping Area; Priority Agricultural Areas (for the Regional Planning Interests Act); Important Agricultural Land and Class A and Class B Agricultural Land (for the State Planning Policy). QFF urges the consolidation of these approaches into a single agricultural land classification for use in planning tools in ShapingSEQ to resolve this confusion and as a model for other areas of Queensland.

QFF supports the uptake by local government of the Rural Subdivision Precinct methodology to define appropriate subdivision sizes for potential agricultural enterprises in sub-regional areas based on sound agricultural land audit and economic data. QFF believes there is significant potential for the growth in agricultural production in the region. While most expansion in production will occur through restructuring processes and the acquisition and consolidation of smaller farms, there is some limited potential for the intensification of production on smaller lot sizes.

QFF advises caution in defining subdivision sizes based on intensive production of high value uses that would result in lot sizes attractive to the rural living market. To avoid this happening and ensure that new lots remain available for productive purposes, the regulatory provisions could set a regional minimum size for Rural Subdivision Precincts such as 40ha. If sizes less than this are proposed, regulatory provisions would be required to place strict controls, even prohibition, on the construction of a dwelling on any new lots created in an agricultural area to avoid the unintended consequence of the lots being used for rural living purposes.

QFF supports the definition of Rural Enterprise Areas where regulatory provisions would be tailored to the encouragement of compatible rural production and value-adding activities provided there is extensive consultation with the target industries, desired outcomes are clearly stated and there are strong measures to ensure that incompatible land uses are not permitted to locate in these areas.

QFF notes that these provisions have been available in previous versions of the SEQRP without uptake by local governments. QFF is concerned that the draft plan does not include any incentives for local governments to adopt these innovative planning provisions.

QFF also notes the ShapingSEQ definition of rural precincts in Chapter 3 (p. 45) and strongly supports the position that rural precincts must not be used to facilitate urban or rural residential development.

Rural industries

Rural production in SEQ is dominated by commodities that are either supplied fresh to urban markets or reliant on processing and packaging for supply to the Australian and export markets. All are reliant on efficient transport to carry commodities to near and distant markets. The need for industry diversification and value-adding for rural industry development is acknowledged in the draft plan in Element 7 of Goal 2: Prosper.

QFF supports planning provisions that facilitate the development of value-adding industries for agriculture in the region and also the development of compatible and appropriate industries that allow diversification of the rural economy. These include small-scale tourism, outdoor recreation and water-based activities that allow the urban population to enjoy the natural resources and natural environment of the region in a sustainable way.

There are four strategies under Element 4 Working with natural systems in Goal 5: Live. These strategies promote the conservation and retention of the natural elements of the urban form to enhance liveability and support for small-scale urban food production. However, there are no special provisions in the draft plan for the local nursery and amenity horticulture sector that will promote these strategies.

There are significant nurseries and amenity horticulture establishments within the UF that supply services and produce to urban areas in the form of landscaping, turf, foliage and flowers as well as fresh produce. These establishments play a key role in maintaining natural systems, urban greenspace and amenity that increase the liveability of urban areas. QFF contends that these are legitimate and permanent establishments within the UF that should be acknowledged and provided for in the SEQRP through inclusion in greenspace precincts and protection from encroachment and complaints.

Rural Living Area (RLA)

The purpose of defining the RLA in the existing and previous regional plans was to ensure that any future rural living development will be consolidated in areas of existing residential land use. QFF does not support the expansion of the RLA land use category. Any expansion would send the wrong message that incremental expansion of the RLA will be provided for in future revisions of the SEQRP. It is acknowledged that there are many areas in the RLRPA that are already fragmented and used for rural living purposes. There are also many existing vacant small lots in the RLRPA that are likely to be used for rural living in the future. There is no need for action in the plan to add to the supply of rural living lots in the RLRPA.

The RLA principles (p. 86) do not adequately prevent the designation of RLA on potential agricultural land. Principle 5 states that “RLA does not include land that is used for agricultural production ...” This principle is poorly worded and is inconsistent with the State Planning Policy – Agriculture. The important principal is that these land uses must avoid not only current agricultural land, but more importantly land with the potential for agricultural production: Agricultural Land Class A and Class B and Important Agricultural Land.

The only land that should be considered for inclusion in the RLA is areas of small lot size, existing residential use and low agricultural potential. Expansion of the RLA designation is proposed in the south and west sub-regions. These are in areas where there is already extensive land fragmentation such as Canungra and in the Lockyer Valley north of Gatton and Laidley.

However, the new RLA designation in the vicinity of Lake Clarendon includes three relatively large rural lots >50ha in area that are on Class A and Class B Agricultural Land and are in an Important Agricultural Area. QFF objects to these lots being included in the RLA designation when they are not existing rural living lots and are on agricultural land.

Rural villages/hamlets

QFF supports a planning process for the limited expansion of small rural villages and hamlets that do not have a defined UF on the provision that any growth will be consistent with urban consolidation principles and will not result in the provision of additional rural living areas on the periphery of these small centres.

QFF supports allowing local governments to prepare detailed planning proposals for the sustainable and limited expansion of rural towns and villages. Where approved by state government, these areas will be exempt from the regulatory provisions of the regional plan.

State Planning Regulatory Provisions (SPRP)

The planning policies and regulatory provisions in the SEQRP have been critical in easing the development and speculative investment pressures that have impacted on agricultural enterprises in the past. QFF supports the retention of these measures to consolidate future population within existing urban areas, towns and villages; to avoid the fragmentation of productive rural land; and to protect areas of productive agricultural land for the expansion of agricultural production.

QFF is a strong supporter of the regulatory provisions that have brought a consistent and rational approach to rural land use and subdivision in rural area since 2005. While these controls have placed restrictions on rural landowners that were not universally supported, the outcomes for agricultural industries have been positive.

QFF would like to see further regulatory action to protect existing agricultural activities from complaints from rural living areas. This is particularly needed where residents on single rural lots may oppose the legitimate agricultural practices on intensive animal and crop production premises. This should be in the form of defined buffer areas where covenants limit the permissible neighbouring land use practices.

QFF does not support a return to policies that would allow the fragmentation of rural land by the excision of individual small lots in agricultural production areas. It should be acknowledged that there is a genuine need to provide for succession in rural enterprises and QFF supports the exemption to the regulatory provisions for dual occupancy (if both dwellings are owned by the same person one land title).

QFF did not support the relaxation of the regulatory provisions to allow large scale tourist, sport and recreation or community activities in the RLRPA without adequate location and design criteria. These uses are not subject to the overriding need test but are required to be compatible with uses in the area surrounding the site. To ensure they are appropriately located, QFF recommends that the assessment criteria in Division 4.1 should be strengthened further to ensure that these facilities are only approved on land that is not suitable for agriculture.

One issue of concern to QFF is the regulations that apply to the construction of large scale packing sheds, particularly when they are a shared facility between multiple businesses. Large packing sheds shared by a number of producers are becoming more common in intensively farmed areas of Queensland. Producers are finding it increasingly difficult to obtain approval for the construction of these facilities due to their size and location on agricultural land. Packing and processing facilities located on farms are important links in the value-adding process for agricultural products and should be provided for in land use planning policies and local planning schemes.

Under the SEQRP regulatory provisions, premises used for processing and packaging forestry or primary industry goods are excluded from the definition of urban activities. As a result, development applications for large packing sheds in the rural area of SEQ are assessed against individual planning schemes. These are currently inconsistent in their treatment of packing sheds. It is important that planning policy documents and their supporting guidelines provide clear guidance for the preparation and content of local planning schemes so that issues that are common across local governments are addressed in a consistent and effective way.

To ensure consistency with the SEQRP, QFF recommends that the State Planning Policy – state interest guideline for Agriculture include relevant guidance on the assessment of applications for large packing and processing facilities to ensure that these facilities are located appropriately, not subject to excessive assessment processes and agricultural land continues to be protected from inappropriate development.



Resource planning

The *Regional Planning Interests Act 2014* (RPIA) now requires all regional plans to address the relevant regional interests affected by resource development.

With the RPIA now in place, ShapingSEQ has identified areas of regional interest where resource (mining) development will be restricted. Extensive areas of the region are designated as Priority Agricultural Area (PAA), which contain various priority agricultural land uses (PALU). The draft plan has also designated the entire region a Priority Living Area (PLA) which will restrict further resource development. In addition, Strategic Cropping Areas are designated separately by a state-wide map. These designations require resource industry proponents to negotiate with landholders to demonstrate it can coexist with the PALU.

QFF supports these provisions, but reiterates its frustration that the RPIA has adopted a different approach to the protection of agricultural land than that in the State Planning Policy and the Planning Act. As stated under 'Rural planning tools' above, QFF urges the consolidation of these approaches into a single agricultural land classification for use in planning tools in ShapingSEQ to resolve this confusion and serve as a model for other areas of Queensland.

If you require further clarification or have questions about this submission, please contact Michael Capelin on (07) 3837 4720 or email mick@qff.org.au.

Yours sincerely

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