



QUEENSLAND FARMERS' FEDERATION

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Submission

29 July 2016

Project Director
South East Queensland Regional Plan Review
Department of Infrastructure Local Government and Planning
Level 3 63 George Street
BRISBANE Q 4000

Dear Sir/Madam,

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

Thank you for the opportunity to meet with you and Departmental staff recently to discuss issues of interest to the intensive agriculture sector regarding the review of the South East Queensland Regional Plan.

The Queensland Farmers' Federation (QFF) is the united voice of intensive agriculture in Queensland. It is a federation that represents the interests of 17 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 profitability, 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
- Bundaberg Regional Irrigators Group
- Central Downs Irrigators Limited
- Fitzroy Basin Food & Fibre
- Flower Association of Queensland Inc.
- Pioneer Valley Water Board
- Pork Queensland Inc.
- Queensland Chicken Meat Council
- Queensland United Egg Producers
- Australian Organic
- Queensland Aquaculture Industries Federation

The united voice of intensive agriculture



Rural Futures Strategy

The Rural Futures Strategy for South East Queensland 2009 remains a comprehensive statement of the critical issues and actions required to address the needs of the industries, communities and the natural environment in South East Queensland. The action plan requires updating to reflect current programs and activities by the public and private sectors that are addressing the key issues in rural SEQ.

QFF urges the establishment of a representative working group to carry out this task as part of the implementation and monitoring program for the SEQRP 2017.

Regional Landscape and Rural Production Area

Planning for the Regional Landscape and Rural Production Area (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. The most important issues remain those set out in part 5 of the SEQRP: Rural futures and the Rural Futures Strategy 2009.

QFF understands there is consideration of a new term for the RLRPA such as the 'Rural Frame'. QFF would prefer the term to include a reference to 'agriculture' or 'production' to emphasise the main economic activity in this land use category in the same way that 'urban' and 'rural living' represents the major activities in other areas in the SEQRP. It is suggested that the area be termed the 'Agriculture and Regional Landscape Frame'.

Current SEQRP Policies

Section 5 of the SEQRP sets out policies for rural futures under four headings: Rural futures strategy; Rural planning; Rural communities; and Rural industries.

1. Rural futures strategy

QFF has been disappointed that the implementation and governance proposals in the Rural Futures Strategy 2009 were not taken up by the State government following adoption of the SEQRP in 2009. 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. The policy and programs in the current SEQRP remain important and relevant, particularly the need to improve coordination of rural issues and service delivery, rural land use policy and implementation through appropriate engagement with stakeholders (5.1.3).

2. Rural planning tools

The planning policies and regulatory provisions in the SEQRP have been critical in easing the development and speculative investment pressures that impacted on agricultural enterprises in the past. QFF supports the retention of these measures to consolidate future population within existing towns and villages (5.2.1); to avoid the fragmentation of productive rural land (5.2.2); and to protect areas of productive agricultural land for the expansion of agricultural production (5.2.6).

With the completion of the Agricultural Land Audit, there is now a much better database of agricultural land suitability 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 Land; 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 the SEQRP 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 (Policy 5.2.3) 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 40 ha. 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.

QFF understands that consideration is also being given to the definition of Rural Enterprise Areas where regulatory provisions would be tailored to the encouragement of compatible rural production and value-adding activities. This is consistent with Program 5.2.7 in the current plan. QFF supports this approach in appropriate areas 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.

3. Rural communities

Farmers are the predominant component of rural communities and share the desire to access social infrastructure as well as transport, communication and other services of an equal standard that is available in urban areas.

4. Rural industries

Rural production in South East Queensland 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. QFF supports the provision of planning provisions that facilitate the development of value-adding industries to 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 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 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 Areas

The purpose of defining the RLA in the existing and previous plans was to ensure that any future rural living development will be consolidated in areas of existing land use. QFF does not support the expansion of the Rural living area (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.

If expansion of the current land use category is to occur, it should be strictly limited to areas contiguous with existing RLAs and should NOT result in any further subdivision activity. 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.

Rural Villages/Hamlets

QFF understands that consideration is being given to provisions to allow the limited expansion of small rural villages and hamlets that do not have a defined Urban Footprint. QFF supports this approach 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 (SPRP)

As stated previously, 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 may take the form of defined buffer areas where covenants define the rights of landholders to complain about neighbouring land use practices.

QFF would 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 measures such as allowing for multiple dwellings on rural lots (with a reasonable limit) should contribute to satisfying this need.

QFF did not support the relaxation of the regulatory provisions to allow large scale community facilities in the RLRPA without adequate location and design criteria. These provisions should be amended to ensure that these facilities are only approved on land that is not suitable for agriculture and in locations that may result in complaints and restrictions on neighbouring agricultural activities.

I look forward to continuing discussions with you and your team in the preparation of the revised SEQRP to ensure that it meets the needs of the agricultural sector and related industries in the region.

Yours sincerely,

Travis Tobin
Chief Executive Officer