



QUEENSLAND FARMERS' FEDERATION

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Submission

2 February 2021

Ms Seija Wellington
Executive Director, Regional and Spatial Planning
Department of State Development, Infrastructure, Local Government and Planning
PO Box 15009
CITY EAST QLD 4002

Via email: WBBRegionalPlan@dsd.qld.gov.au

Dear Ms Wellington

Re: Wide Bay Burnett Regional Plan: Draft Issues and Opportunities Discussion Paper

The Queensland Farmers' Federation (QFF) is the united voice of intensive and irrigated agriculture in Queensland. It is a federation that represents the interests of 21 peak state and national agriculture industry organisations and 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 farmers by representing the common interests of our member organisations:

- CANEGROWERS
- Cotton Australia
- Growcom
- Nursery & Garden Industry Queensland (NGIQ)
- Queensland Chicken Growers Association (QCGA)
- Queensland Dairyfarmers' Organisation (QDO)
- Australian Cane Farmers Association (ACFA)
- Queensland United Egg Producers (QUEP)
- Turf Queensland
- Queensland Chicken Meat Council (QCMC)
- Bundaberg Regional Irrigators Group (BRIG)
- Burdekin River Irrigation Area Irrigators Ltd (BRIA)
- Central Downs Irrigators Ltd (CDIL)
- Fairbairn Irrigation Network Ltd
- Mallowa Irrigation Ltd
- Pioneer Valley Water Cooperative Ltd (PV Water)
- Theodore Water Pty Ltd
- Eton Irrigation Scheme Ltd
- Pork Queensland Inc
- Tropical Carbon Farming Innovation Hub
- Lockyer Water Users Forum (LWUF)

The united voice of intensive and irrigated agriculture



QFF welcomes the opportunity to provide comment to the Department of State Development, Infrastructure, Local Government and Planning regarding the draft issues and opportunities discussion paper for the Wide Bay Burnett Regional Plan review (WBBRP). We provide this submission without prejudice to any additional submission from our members or individual farmers.

Section 5.2 Agriculture and agribusiness

- 1. QFF strongly supports the introductory text of Section 5.2, the proposed regional objective (5.2.1) and the proposed narrative text (5.2.2 a-f).**

However, in addition, it is recommended that specific reference be made to the transport infrastructure solutions required to transport cane from the Maryborough and Sunshine Coast areas to the Isis Mill for processing following the anticipated closure of the Maryborough Sugar Mill (Link to Section 5.5 Transport).

- 2. QFF does not support the regional policy 5.2.2 g and mapping proposal 5.2.2 j and recommends rewording to refer to both Important Agricultural Area (IAA) and Priority Agricultural Area (PAA).**

QFF does not support the use of Priority Agricultural Area (PAA) mapping to designate areas in the Regional Plan to be protected from development under the Planning Act. The discussion paper correctly states that: 'The State Planning Policy (SPP), as the pre-eminent land use planning policy instrument for the state, is an important component of the Queensland planning framework. The SPP comprehensively expresses the state's interests (see Figure 3) in land use planning and development.' Further the discussion paper states: 'Priority Agricultural Areas (PAAs), (defined in the *Regional Planning Interests Act*) provide additional controls at a regional scale'.

The SPP is very clear in requiring agricultural land to be protected from development as follows:

(1) Agriculture and agricultural development opportunities are promoted and enhanced in important agricultural areas (IAAs).

(2) Agricultural Land Classification (ALC) Class A and Class B land is protected for sustainable agricultural use by:

(a) avoiding fragmentation of ALC Class A or Class B land into lot sizes inconsistent with the current or potential use of the land for agriculture

(b) avoiding development that will have an irreversible impact on, or adjacent to, ALC Class A or Class B land

(c) maintaining or enhancing land conditions and the biophysical resources underpinning ALC Class A or Class B land.¹

The SPP also provides a definition of important agricultural areas (IAA) for strategic and regional planning:

Important agricultural areas (IAAs) means an important agricultural area as identified in the Queensland Agricultural Land Audit and shown in the SPP IMS as an IAA or identified by a local government in a local planning instrument as an IAA, based on a localised study. Note: An IAA is defined in the Queensland Agricultural Land Audit as an area that has all

¹ State Interest - Agriculture. State Planning Policy July 2017 p.30

the requirements for agriculture to be successful and sustainable, is part of a critical mass of land with similar characteristics, and is strategically significant to the region or the state.

Therefore, the regional plan should use the IAA designation to map areas that include ALC Class A and Class B land for protection from development under the Planning Act and, in addition, the PAA designation for management of conflict with resource activities under the RPIA. The reasons that PAA is not an appropriate designation for protection of agricultural land under the Planning Act are as follows:

1. PAA/PALU, as defined in the RPIA, does NOT protect agricultural land from development but requires resource activities that seek to operate in the PAA to coexist with the identified priority agricultural land use (PALU). The PAA designation provides owners of agricultural land in a PALU with the right to negotiate with resource proponents to reach agreement on coexistence arrangements.
2. The concept of coexistence as used in the RPIA is not appropriate to development under the Planning Act.
3. PAA/PALU is based on land use criteria and not the quality of the land. This means that land must have been used for agriculture (PALU) for the RPIA provisions to apply. This also means that potential agricultural land (land suitable for future agricultural development) identified in the Agricultural Land Audit is not protected by the PAA designation.
4. PAA is not recognized or defined by the Planning Act and the SPP. The proposed approach in the draft regional plan to use the PAA term for a different purpose, ie to protect agricultural land under the Planning Act, will lead to confusion with its use under the RPIA and create even further complexity to an already fragmented approach to the protection of agricultural land in Queensland.

Regional plans must include both approaches to the protection of agricultural land. The WBBRP must follow the approach set out in the State Planning Policy that requires the protection of ALC Class A and Class B land mapped as IAA from development defined under the *Planning Act*, and separately include the designation of PAA/PALU to manage resource development under the RPIA.

3. The assessment benchmarks 5.2.2 n and 5.2.2 p should be reworded to reflect the SPP requirements (2(a)-(c) above) for the protection of ALC Class A and Class B land.

The SPP is the pre-eminent land use policy instrument for the State and particularly for development regulated by the Planning Act. Therefore, it is imperative that regional plans are consistent with the SPP. It is not sufficient that land fragmentation alone is restricted on ALC Class A and Class B land, but that irreversible development and development that would impact on the productive capacity of this land is also addressed by assessment benchmarks.

Assessment benchmarks for PAA/PALU should be separate and specific for resource development under the RPIA.

Section 5.9 Renewable Energy

4. QFF supports the narrative and policies for the further development of renewable energy facilities in the region and the emphasis placed on the avoidance of conflict with areas identified as existing and potential agricultural land.

It is further emphasized that areas designated as agricultural land should be those mapped in the Agricultural Land Audit as Important Agricultural Area (IAA) and ALC Class A and Class B land.

Section 5.10 Waste Management and Resource Recovery

- 5. QFF supports the narrative and policies for waste management and resource recovery in the region and recommends an additional policy to remove disincentives to on-farm composting activities and facilities in local planning schemes.**

Local planning schemes include the processing of organic waste material to manufacture soil conditioners in the definition of 'high impact industry' without exception with the result that on-farm composting and spreading requires an expensive impact assessment approval process. QFF recommends that a regional plan policy should encourage planning schemes to amend the threshold for 'manufacturing soil conditioners' to exempt small-scale production of less than 200 tonnes per year or where the area of composting operations is less than 2000m².

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

Yours sincerely

Dr Georgina Davis
Chief Executive Officer