



QUEENSLAND
FARMERS'
FEDERATION

Shaping SEQ 2023 Update

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Government and Planning

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A photograph of a rural landscape featuring a green grassy hillside, a white water tank, and several trees against a clear blue sky. A diagonal teal graphic element is present in the bottom right corner.

The united voice of
Queensland agriculture

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Our members

- Canegrowers
- Cotton Australia
- Queensland Fruit & Vegetable Growers
- Nursery & Garden Industry Queensland
- eastAUSmilk
- Australian Cane Farmers Association
- Queensland United Egg Producers
- Turf Queensland
- Queensland Chicken Meat Council
- Pork Queensland
- 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
- Queensland Oyster Growers Association
- Lockyer Water Users Forum

About the Queensland Farmers' Federation



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

We are a member-based organisation representing the interests of peak agriculture industry organisations (both state and national). Through our members, QFF represents more than 13,000 primary producers across the cotton, cane, horticulture, dairy, nursery and garden, poultry, pork, and intensive animal industries.

We unite the sector to engage in a broad range of economic, social, environmental, and regional issues through advocacy, policy development, and project activity. We work with the government of the day on behalf of industry, farmers, and the community to provide powerful representation and contribution to the policy direction, sustainability, and future growth of Queensland's agriculture sector.

Our Council of member representatives and policy committees set the strategic priorities for policy development and advocacy, while our Executive Board ensures our corporate governance.

QFF draws on the expertise and industry knowledge of our members, and through our commitment to collaboration and considered policy development, we lead Queensland's agriculture sector towards a strong future, ensuring our members are ahead of the game and have a voice at the table on the issues that matter to their members.

Shaping SEQ 2023 Update

QFF welcomes the opportunity to provide comment On the Draft Shaping SEQ 2023 Update.

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

Position

The South East Queensland Plan Update 2023, building upon its predecessor from 2017, sets out a planning framework for both regional and rural areas. Comprising of five overarching themes—Grow, Prosper, Connect, Sustain, and Live—this 50-year plan requires a commitment to long-term, forward-thinking planning strategies. The forecasted expansion of the region will have substantial implications to housing, the economy and the evolution of industries, notably the agricultural sector.

While QFF supports the overall themes and goals of the SEQ Plan Update, there is a lack of focus on the agricultural industry in key sections. Rural prosperity, sustainability, and the protection of agricultural spaces is mentioned briefly within some theme principles, however, there remains a notable gap in agricultural planning frameworks. The importance of safeguarding the agricultural industry extends beyond supporting rural and farming communities as it holds immense economic significance for South East Queensland and the regions food security. Considering the compounding

challenges the industry is facing with the increase in extreme weather conditions, safeguarding agriculture must be a priority within the SEQ Plan.

To address these concerns, QFF has provided detailed feedback on suggested inclusions and amendments to the Plan's Update. These can be summarised as:

- QFF cautions against falling back on agricultural land buyback initiatives as a solution to future land use demand.
- QFF highlights that the SEQ Update needs to carefully consider and account for the competing land use demands the renewable energy sector will soon pose using reliable datasets.
- QFF calls for a more precise definition of intensive agricultural production areas within RLRPA.
- QFF calls for the inclusion of *potential* agricultural land in Priority Agricultural Areas (PAA).
- QFF expresses concern about the incremental expansion of RLA and stresses the importance of avoiding encroachment on agricultural land and the increased conflicts that arise when urban encroachment impedes on agricultural enterprises ability to operate effectively.
- QFF calls for the SEQ Update to recognise the neglect on rural roads and its impact on safety, transport and food security. The infrastructure framework within the Plan needs to refocus on repairing and maintaining existing infrastructure, particularly road networks. QFF stresses urgency in addressing road infrastructure issues in the face of extreme weather conditions.
- QFF highlights the dependence of the agricultural sector on water availability and reliability. QFF communicates the need for a catchment-by-catchment approach in ShapingSEQ water planning.
- QFF urges the Regional Plan to consider rural water security with future increase in renewable energy development and other competing demands for water.
- QFF supports the "Response to Resilience policy maturity framework." QFF encourages flexibility in resilient initiatives and adaptation strategies across different communities and acknowledgement of the need for support for farmers to continue to build resilience.
- QFF calls for better integration of rural and agricultural areas in economic planning as well as recognition of the economic significance of the agricultural industry.
- QFF calls for continued government support for agritourism and economic diversification opportunities for farmers
- QFF calls for a more detailed implementation plan for Recycling Enterprise Precincts (REPs), including more widespread initiatives to help both general public and rural communities to reduce landfill waste.

Land use demand

The SEQ Update rightfully highlights the critical importance of ensuring an adequate supply of land to address the housing market challenges SEQ currently faces. QFF supports the Plan's statement that the housing and land use challenges must be informed by transparent data and rigorous consultation. Any land use changes will require a high degree of consultation with a variety of stakeholders and careful policy alignment. Any changes must also account for the extraordinary growth and market transformations that will unfold with the arrival of the Olympic Games in Brisbane in 2023. QFF stresses that the use of agricultural land buyback initiatives as a response to these housing market issues is not and will never be a sustainable solution. Land buybacks would only be damaging to the Agricultural industry, as well as Queensland's economy and food security as a whole. Other industries of growth, such as the burgeoning renewable energy sector, will pose the same competing demands on land use in the coming years. The heightened demand and emergence

of new competitors for land use should not to a relaxation of provisions safeguarding agricultural land or potential agricultural land from encroachment.

The Urban Encroachment provisions outlined in Part 8 of the Planning Regulation 2017 play a vital role in protecting agricultural industries. These provisions act as a safeguard against incompatible land uses that could potentially impede or cause long-term harm to agricultural activities. It is noteworthy that in the current SEQ Update, industries such as agriculture and renewable energy have not been adequately considered in regards to encroachment. There is a noticeable absence of agricultural spaces in encroachment protection regions (p. 118), particularly those areas that must be safeguarded from encroachment due to their special role in supporting the regional economy. QFF is particularly concerned regarding urban fringe areas where the encroachment of urban development is either ongoing or a looming concern. QFF advocates for the comprehensive integration of agriculture into the entire regional plan, rather than relegating it to later chapters as an afterthought, which are primarily focused on defining agricultural land categories.

Land use categorisation

Part B of the SEQ framework – Regional Growth Patterns – allocates all land in South East Queensland into 3 categories – Regional Landscape and Rural Production Area (RLRPA), Urban Footprint (UF) and Rural Living Area (RLA). Chapter 5 of the Plan also identifies Priority Agricultural Areas (PAA). QFF emphasises that PAA should not just be inclusive of high value ag land (p.262) but all existing and potential agricultural land. UF land use expansion in particular should work parallel to the State Planning Policy, avoiding irreversible impacts on or adjacent to Agricultural Land class A or B. Any changes to these land use classifications, including key principles, should go through a rigorous consultation process with industry bodies.

RLRPA

QFF underlines the necessity for a more precise definition of intensive agricultural production areas within the RLRPA. Currently, these zones are categorised merely as important agricultural land without sufficient detail. QFF advocates for the inclusion of intensive agricultural land, its associated production areas, and newly designated agritourism development zones within this classification. Furthermore, QFF maintains that the RLRPA should not be utilised to expand Urban Footprint (UF) designation areas for residential growth. Addressing principle 4 of the RLRPA, QFF stands firm in our belief that the RLRPA should be extended to encompass *potential* agricultural land use, allowing for a comprehensive approach to future growth areas within the RLRPA framework.

RLA

QFF does not support incremental expansion of RLA category out of existing rural development land use. Any future rural living development should be in land areas of existing development, to align with encroachment provisions outlined within the regional plan.

It is critical that the expansion of either category avoids encroaching upon land with agricultural potential. The principles of the Rural Living Area (RLA) framework allow for some interpretation, as there is no explicit inclusion of land with the potential for agricultural production. Although the concept of potential agricultural land is mentioned in the introductory blurb, the RLA framework also needs to be amended to incorporate this into its guiding principles.

UF

QFF maintains that the principles under UF do not account for the protection of agricultural land. The removal of the previous principle 7k from the 2017 plan, which pertained to 'minimising impacts on natural resources', means there are now no principles relating to protection of agricultural land within the Urban Footprint framework.

QFF firmly oppose the reclassification of potentially high-value agricultural land as 'underutilised land' to facilitate urban expansion objectives under UF Grow outcomes. This categorisation poses a significant concern, particularly in light of the anticipated expansion over the next 25 years.

Infrastructure and Connect

QFF recognises the comprehensive planning efforts dedicated to the development of infrastructure in the Shaping South East Queensland Plan. QFF supports the ongoing initiatives aimed at enhancing these structures, especially within Urban Footprint areas. The theme 'Connect' undeniably plays a significant role in the context of infrastructure development. While QFF understands the importance of focusing on new infrastructure, it's equally crucial to incorporate long-term planning that addresses the enhancement of existing infrastructure, particularly road networks. The SEQ Update primarily concentrates on the expansion and growth of infrastructure, with limited attention to the quality and maintenance of existing infrastructure i.e. as roads. The agriculture industry in particular has been urging movement in infrastructure repairment recently. The huge neglect on rural roads and in regional areas is a critical issue which has been at the forefront of many stakeholders advocacy the past year. Road quality is important for safe rural and farm transport, as well as the safe and on-time transport of food and equipment to communities. Efficient transport networks for dispatch and movement of stock to markets is also vital for regional food security.

In light of increasing extreme weather conditions around the state, the recent years of natural disasters and flooding have decimated road and rail infrastructure and left farmers struggling. In May this year, the Rural Roads Alliance called for a \$5.5 billion fund to support a rural roads recovery program¹. Programs such as this would prevent the supply chain from slowing down due to weakening road infrastructure, and aid in ensuring food moves beyond the farmgate. This was also highlighted in the review of the National Transport Regulatory Reforms 2019 – which highlighted how the increasing use of heavy vehicles, whether it be for livestock, food or machine transport (incl. renewable energies), will continue to impact already damaged roads. QFF urges the state government to focus immediate and future infrastructure planning heavily around these road safety issues. Further, the SEQ Update needs to refocus infrastructure planning to include this within their framework – the focus around infrastructure cannot just be drawn to the Olympic Games 2032. Element 2 of RECs (p.98) needs to be amended to include investment in existing infrastructure and support. Repairs to existing infrastructure will take years, factoring in the increase of heavy vehicle transport that will come with the outlined development in the SEQ Update. The Productivity Commission has also highlighted a need for a coordinated approach along the supply chain in regards to these infrastructure challenges. QFF have always supported on farm resilience and acknowledge that farmers already do a lot for their own businesses, however transport and freight related issues are out of their control to a certain degree.

Responding proactively to the infrastructure requirements on farms is imperative, particularly in ensuring that the next generation of farmers can optimise time and meet the burgeoning demands of the supply chain. Infrastructure developments in rural areas is also important to aid in rural connectivity, including digital connectivity to bridge the divide between rural and regional areas as well as businesses and agricultural operations. Farmers are a large component of rural communities

and have the right to have access to both communication and transport infrastructure to an equal standard as Urban Footprint areas. Overall, QFF emphasises the repair and maintenance of current infrastructure should not be overshadowed by the pursuit of growth alone. Striking a balance between growth and infrastructure repair is imperative for sustainable development. QFF strongly advocates for more frequent updates to the State Regional Plans in the future, particularly with regards to infrastructure considerations. Keeping these plans current and responsive to evolving needs and priorities is crucial for effective regional development, long-term sustainability and to ensure that the Plan remains aligned with the dynamic nature of our region's infrastructure requirements.

Water

The agricultural sector in Queensland relies heavily on water availability and reliability. Disruption to water availability and security can result in reduced crop yields, poor soil health, diminished livestock health, and compounds stresses on farming communities. The SEQ Update accounts for water sustainability in theme 'Sustain' element 5 'Water sensitive communities'. QFF supports principle 5.1 of this theme to protect and sustainably manage the region's catchments as well as principle 5.2 to support water sensitive urban design principles in regards to catchment wide water management. This will allow state and local governments to capture total water cycle management planning – this is vital to ensure water is managed in a catchment-by-catchment approach. QFF has always advocated for a catchment-by-catchment approach for water or where irrigated commodities rely on a water allocation and licenses, to ensure farm viability and sustainability. The SEQ Update addresses water supply and security in the theme 'Sustain' element 6, which advocates for protecting the region's drinking water catchments from future development and encroachment. QFF supports this principle and also highlights that regional and rural water security needs to be managed carefully with the development of renewable energies, which infrastructure can require high volumes of water for these large-scale productions (i.e. Hydrogen energy, Hydropower).

QFF stresses the importance of a thorough assessment of water entitlement allocations, especially in regions like Queensland, where water scarcity is anticipated to intensify due to the escalating impacts of climate change. This is even more important for rural water allocations, with the recent lifting of the 1500GL cap on water buybacks, described as a 'devastating scale of water buybacks', estimated to make up a third of water recovery under the revised Murray Darling Basin Plan². QFF supports 'Sustain' element 8 which aims to deliver water planning in line with land use and disaster management planning. If Shaping SEQ is to be the underpinning document for water planning, state and local governments need to achieve a coordinated approach, factoring in both population growth and changing climates, using detailed monitoring measure to water availability and security.

Resilience framework

QFF overall supports the 'Response to Resilience policy maturity framework' and agrees with the overall principle that "there is a clear need to create futures that are disaster-resilient and adaptive to change" (p. 22). The challenge is in enabling local regions to devise and deliver strategies that strengthen communities, businesses and agricultural enterprises, and recognising each region and community may be different. Therefore, QFF is not in favour of a one-size-fits-all but encourages the Plan to allow flexibility in resilient initiatives and adaptation strategies. It is acceptable that some local governments are "at differing levels of maturity in practice, capacity and data/intelligence." (p 22). Risk response will be dependent on various factors, including local government financial constraints, resident demographics, and land use history and policies. In addition, ensuring initiatives such as the Resilient Homes Fund (p.72) is used as a suitable adaptation strategy for the community

is important, but not necessarily a fix-all for every community. Recognition must be given that something stays lost for residents that have relocated from their home to another, safer site.

QFF agrees with element 8.1 and 8.2 of the resilience framework. This strategy is to align with the Queensland Strategy of Disaster Resilience 2022-2027, noting the continued need for rural and agricultural land to be protected within land use planning decisions. QFF also encourages the increased use of foliage and green space, in alignment with element 8.1, within new urban developments to mitigate heatwave and heat considerations. There is clear evidence of the benefit of the inclusion of turf, treescape and foliage to mitigating heat stress in cities and increasing mental health and wellbeing.

Economic Clusters

Natural Economic Resource Areas Map 18, identifies SEQ agricultural land areas, including land classified under Agricultural Land Classification (classes A and B) and Important Agricultural Areas. It underscores the need to balance various land uses while safeguarding the vital role of agriculture in our regional economy. In identifying Regional Economic Clusters (REC), the SEQ Update has a disappointing lack of information on how rural and agricultural areas will factor in and be supported. QFF refers again to a previously mentioned point regarding the omission of rural and agricultural areas in identifying areas of economic significance. The agricultural industry is worth \$23.27 billion in Queensland alone³, and is a huge stakeholder supporting the region economically. Agritourism will not only open doors for increased economic activity but also offer farmers avenues to diversify their income. Agritourism ties in with many themes outlined within the Plan, including 'Live' element 3 – Inspiration from local character – by conserving and working respectfully with natural and local landscapes, as well as working with values of local community. Element 5 – Working with natural systems – also relates to this in respecting and adding to local landscapes. Horticulture and Nursery should also be highlighted as economic supporters in many regional communities. Turf, landscaping, flowers, are just a few of the industries which supply important services in regional areas.

Prosper

The theme 'Prosper' considers identifying locations for Recycling Enterprise Precincts (REPs) (p.92), however the outlined approach is largely theoretical in the Plan's current form. The recent Sunset Review on Waste Reduction and Recycling has also not expanded greatly on these frameworks and how these outcomes will be achieved. QFF urges the inclusion of more detailed outline on how these REPs will be implemented, timelines for construction and programs that will work alongside these developments to foster waste recycling in the general public. QFF strongly advocates for the advancement of initiatives aimed at reducing landfill waste and fostering opportunities within the renewable energy sector. This includes expanding the current pilot program for green waste bins to cover not only the entire Brisbane district but also extending it to other Local Government Areas (LGAs) across Queensland. To effectively promote resource recovery and enhance efficiency, there's a pressing need for additional waste infrastructure and pilot programs involving waste separation. These initiatives can significantly divert materials like metals and organic matter away from landfills.

QFF is an advocate for creating a more circular economy. The evolving energy landscape in Queensland will also require updates to waste regulations that align with the state's shift towards utilising feedstocks for sustainable fuel production. With the growing prevalence of Bio-Gen facilities for renewable energy production, there lies a substantial opportunity to divert more organic waste

away from landfills. Waste disposal has always been a logistical, financial and environmental burden for farmers. By making green and organic waste bins available to both residential communities and producers, the government can accelerate the development of green energy infrastructure. To incentivise and drive initial adoption of these practices, financial incentives such as direct subsidies could prove to be a crucial catalyst.

Summary

QFF overall supports the SEQ update but advocates for the inclusion and consideration of the Agricultural Industry in the outlined sections above. QFF highlights the critical importance of agricultural areas and the protection of these spaces for the state's financial and food security. Any amendments or review to the SEQ Plan should include rigorous consultation with a variety of stakeholders, and work with interacting policies (i.e. State Planning Regulatory Provisions, Regional Planning Interests Act 2014) to best respond to the SEQ community's needs.

Yours sincerely

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