



QUEENSLAND
FARMERS'
FEDERATION

Far North Queensland Regional Plan Review

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The united voice of
Queensland agriculture

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To: Department of State Development, Infrastructure, Local Government and Planning
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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.

Submission

QFF welcomes the opportunity to provide comment on the Far North Queensland Regional Plan review.

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

Position

The Far North Queensland Regional Plan sets out the overarching planning framework for the region's urban and rural communities, mapping the guiding principles for development and land use for the next 25 years. It is important these align seamlessly with state planning and environmental policies and reflect feedback from key stakeholders across regional communities for cohesive and well-informed regional planning strategies.

QFF deeply values the prominent emphasis on agriculture throughout the regional plan, indicating a constructive response to feedback from agricultural stakeholders. Notably, the recognition of agriculture, forestry, and fisheries as major contributors to the regional economy (as seen in sections 5.1.8 and 5.4) is a welcomed contrast to the recent Southeast Queensland Regional Plan Update. The plan's alignment of tourism and circular economy objectives with the agricultural sector underscores

the multifaceted role agriculture can play as a contributor to the wider community, whilst diversifying income for farmers.

While many of the planned developments will manifest at a local level (i.e., waste management), QFF emphasises that regional support remains a necessity in the rollout of these plans. The reality is that many FNQ residents are from rural and remote areas and well-structured outreach and support initiatives at a regional level will be vital. The Regional Plan does not establish any major deviations from other state plans and policies however some issues with terminology do require clarification. QFF want to ensure these land use classifications and the criteria are clear and succinct, to avoid future land use conflicts and ensure 'potential' agricultural land and areas deemed as 'unproductive land' are appropriately assessed for Ag industry use. QFF endorses the focus areas of the Plan and offers the following feedback to be integrated into these frameworks.

'Good quality' agricultural land

The FNQ Regional Plan land classifications create zoning guidelines which continue to serve as a critical base for outlining future development, highlighting priority growth areas and highlighting land parcels which must be safeguarded. It is important there is a consistent approach to land use classification across state plans and that the delicate balance between accompanying the state's expansion, economic growth and the protection of land areas (and industries reliant on these lands) is considered.

Considering this, the discrepancy between the SEQ and FNQ Regional Plans land classification terms needs to be rectified. The reality is the definition of these terms will be crucial in future competing land use conflicts and it is vital they are consistent across associated state policies and plans. The forecasted growth of the region over the next 25 years will undoubtedly raise conflict as local governments attempt to balance the growth of urban and residential areas with the conservation of natural resource and agricultural land pockets. As such, the use of the term 'good quality' agricultural land and its lack of definition within the FNQ Regional Plan is problematic. QFF moves that if this area is intended to meet the same criteria as 'high value' agricultural land, as stated in previous regional plans, that this be altered. Good quality agricultural land is loosely defined and leaves room for interpretation. Further, the mechanisms for good quality agricultural land do not capture the entire sector and require revision, as the exclusion of animal husbandry is not called for.

The pre-existing land use categories, Regional Landscape and Rural Production Area (RLRPA), Urban Footprint (UF) and Rural Living Area (RLA), also further identify agricultural land into priority areas, Priority Agricultural Areas (PAA) for 'high value' agricultural land. QFF has previously emphasised that PAA should not just be inclusive of high value agricultural land but all *existing* and *potential* agricultural land. In another discrepancy, the concept of PAA is excluded from the FNQ Plan entirely, again highlighting the need for consistency across the state regional plans. QFF remains consistent with its recent feedback regarding these classifications:

- 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).
- UF land use expansion in particular should work parallel to the State Planning Policy 2017, avoiding irreversible impacts on or adjacent to Agricultural Land class A or B.
- QFF expresses concern about the incremental expansion of RLA and stresses the importance of avoiding encroachment on agricultural land, highlighting the increased conflicts that arise when urban encroachment impedes on agricultural enterprises' ability to operate effectively.

There is also the need for consideration of 'unproductive' land accounting for agriculture in its land use planning. Many factions of the Ag industry such as piggeries, covered feedlots or protected or hydroponic horticulture, do not require the same type of land and soil as broadacre and sugar systems. Growing global food demand will see the nature of agriculture adapting and intensifying into new systems and it is important for these long-term planning schemes to allow for this type of rural production. These intensive and productive agricultural uses can be located on this unproductive land and should be prioritised when designating land areas.

Land use and Primary Industries

The current Primary Production and Fisheries planning objectives allow room for interpretation. The section objectives and guideline paragraphs need to be amended to state that 'good quality agricultural land *is not fragmented*' from the original '*not severely fragmented*' statement, which insinuates there is room for encroachment and division of this high value agricultural land. In addition, objective 1 needs to be amended to 'agricultural land and *potential agricultural* land is identified and mapped' to ensure that potential land is assessed appropriately before being classified for urban development.

While the previously suggested concept of co-existence has been excluded from the current version of the Plan, the co-location of various goods, services and structures to achieve shared land use is mentioned throughout various sections of the plan. QFF has previously stated that '*consideration of the potential for co-existence has never been applied to the assessment of development defined in the Planning Act and is inappropriate in this context*' and that '*This particularly applies to the concept of coexistence between urban development and agriculture. Development under the Planning Act, whether a reconfiguration of a lot or a material change of use is generally a permanent change and invariably results in the alienation of agricultural land*'. Whilst co-location may be a positive option for services *within* UF areas, QFF stresses again that co-location or co-existence should not be a concept that crosses land use classifications within the Regional Plan. QFF supports land use policy 2.4.2 which outlines how appropriate buffer distances between incompatible services or structures and agricultural operations will be provided through sensitive land use planning in accordance with State Planning Policy 1/92. This is particularly important in light of recent improvisations to the Environmental Protection Act 1994, regarding penalties and provisions of nuisance disturbances. These buffer distances will be important to agricultural producers, in particular intensive animal industries, with the future encroachment of residential blocks in existing production areas. Pre-existing establishments should not be prosecuted or liable for new nuisances resulting from urban development. In addition to this, the Air and Acoustic guidelines within the Regional Plan should be in line with recent feedback to the EPA noise and nuisance regulations update, the objectives need to be amended to be inclusive of all agriculture not just intensive animal farming, as these legislated changes will impact canegrowers and other cropping systems as well. QFF will provide more detailed feedback on this point in the upcoming consultation of the Act.

The land use policies within the Primary Industries section of the Regional Plan, as well as its aligned principles, are well developed in regard to these zones. QFF is supportive of the below guiding concepts;

- 5.4.1 - Sites and corridors for infrastructure that supports agricultural development, are identified, maintained and protected to support the operation of those facilities and the ongoing operation of agricultural industries.

- 5.4.2 - Threats to primary production from incompatible development are identified and managed through land use planning and where appropriate, by developer established buffers.
- 5.4.3 - Potential conflict between primary industries and urban activities is managed through land use planning and, where appropriate, developer-established buffers.
- 5.4.4 - Areas for permanent or periodic food markets that increase access to fresh produce and support regional and local primary producers and food industries are planned, supported and maintained.
- 5.4.5 - Value adding of primary products is encouraged close to the source of production to diversify farm and local economies and reduce transport requirements.

Rural subdivision

QFF supports the general policies under Rural subdivision and understands the inclusion of 2.6.2 c(ii) regarding boundary re-alignment for compulsory infrastructure, however, highlights it is crucial to work with landholders to ensure this is rarely needed. Compulsory infrastructure should avoid agricultural land where possible and if required, all relevant stakeholders should be consulted heavily and compensated for any agreement settled. Potential adverse impacts highlighted in 2.6 need to also acknowledge the impact fragmentation would have on LGA food security and the economy. QFF does not support the fragmentation of agricultural land however understands some circumstances may be extenuating. In these situations QFF states that any fragmentation of rural land must enhance the agricultural productivity of the broader region, with local impacts minimised. Any unavoidable subdivision of rural land must show a clear net positive for agriculture in the region.

Mitigation of hazards

There are no major issues with the objectives and strategies outlined in the hazard mitigation framework except for a lack of detail. Far North Queensland is vulnerable to a wider range of natural hazards (i.e., cyclones) due to its geographical position. QFF reiterates it would support an approach similar to that mentioned in the feedback provided to ShapingSEQ. Disaster resilience and planning is not a one size fits all approach – FNQ hazard mitigation strategies need to be adaptive to each community's differing geographical locations, climate and disaster risks. As the department has stated, local governments are 'at different levels of maturity in practice, capacity and data/intelligence' and if anything, the hazard mitigation framework within the FNQ Plan seems more inclined to outline a delegation of disaster planning to local governments. It is important these regional frameworks are flexible to allow for a more focused approach within each LGA for disaster resilience and management.

Infrastructure

QFF appreciates the refocus on planning for both new infrastructure *and* existing infrastructure within the FNQ Regional Plan. QFF wholly supports the Regional Plan addressing the importance of maintaining a balance between funding new infrastructure and maintaining existing assets. The maintenance and repair of existing infrastructure (such a roads) is an important consideration in infrastructure planning however QFF acknowledges that new development is also key for the growth of region, including the agriculture industry. QFF supports the demand management initiative described in the Plan's infrastructure section, which attempts to steer expenditure to first address existing infrastructure, rather than 'directing limited resources towards major new or upgraded

infrastructure', something the Southeast Queensland Regional Plan has failed to do. In line with recent feedback provided, QFF highlights the below priorities for FNQ infrastructure funding:

- The recent years of natural disasters and flooding have decimated road and rail infrastructure and left farmers struggling. The National Transport Regulatory Reforms 2019 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 supports the Productivity Commission and the Rural Roads Alliance highlighting the need for a coordinated approach along the supply chain in regard to these infrastructure challenges, and push for government funded programs which would prevent the supply chain from slowing down due to weakening infrastructure, and aid in ensuring food moves beyond the farmgate.
- QFF urges the state government to focus immediate and future infrastructure planning heavily around these road and rail safety issues so the next generation of farmers can meet the burgeoning demands of the supply chain.
- 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.

Infrastructure planning will also capture the tricky issue of transmission lines and the co-location of this infrastructure on agricultural land. As mentioned previously, as well as within the Regional Plan's explanatory notes, the issue of overhead vs underground line needs to be very carefully considered and heavily consulted on with agricultural stakeholders. QFF suggests the addition of an 8th object, 6.1.8 – highlighting the avoidance of infrastructure encroachment and adverse impacts on agriculture where possible.

Renewables

This push for a focus on existing infrastructure repair is not to say that QFF does not support the development of advancing technologies and infrastructure such as renewables simply because they are 'new'. There are many valuable renewable energy infrastructure developments in FNQ at the moment, including the Bio-commodities facility and QSAFI research facility in Mackay, which are contributing to a more sustainable and circular bioeconomy. Given the ShapingSEQ Update provides extensive mapping of *potential* renewable development areas, QFF queries as to why there are no 'renewable energy investigations areas' mapped within this Plan. There are several significant renewable energy projects underway in far North Queensland, such as the Pioneer-Burdekin Hydro, QFF calls for clarification on whether no significant/further renewable development is anticipated in the FNQ region in the coming 10-25 years.

QFF highlights the importance of maintaining a balance between proactively adopting and capitalising on new technological advancements and maintaining on-farm safety and productivity through thorough investigative research and pilot trials for new technologies. This approach ensures that industry can stay in sync with rapid technological developments and also feel safe, confident and encouraged to adopt more sustainable energy options that will not reduce on-farm efficiency. This ensures that safety, innovation, and sustainability unite in a well-informed, forward-looking regional strategy.

Information communication technology

Information communication technology (ICT) is a vital point of future infrastructure planning and is an indispensable tool in bridging urban-rural divide. In rural and remote regions ICT can empower landholders by providing access to information, education and business learning as well as vital resources such as healthcare/telehealth. Connectivity in these areas is also a crucial component in disaster preparedness and response. Whether it be sensors for climate data collection and modelling, disaster response ICT when disaster hits and people are left disconnected, or teleservices after disaster related trauma. ICT is a crucial part in building community resilience in the face of an ever-changing climate. 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. QFF advocates for the inclusion of a rural outreach objective in the land use policies for this section of the Plan.

Water Management

The Far North Queensland Regional Plan 2009-2031, outlines that the plan is designed to implement a stronger, more liveable and sustainable community. This is unattainable without incorporating detailed climate change modelling as the primary driver to help prepare communities for an increase in intense weather events. Water underpins any future development, growth and sustainability of any regional town, and community. Noting that the desired regional outcome is to obtain reliable, safe and adequate water for the community, it is vital that the proposed future requirements for both urban and rural are integrated into the economic costs associated with balancing the demands for irrigation, and urban demands whilst prioritising water efficiency throughout all planning initiatives.

A cohesive framework that includes all planning developments under section 2.5A of the IPA must be upheld to ensure alignment with state legislation, and local government planning policies and development applications under the Integrated Development Assessment System (IDAS) of the IPA.¹ This is paramount to ensure priority infrastructure plans are incorporated into the plan, including the efficient use of rural and urban water resources.

Protection of waterways, wetlands and water quality

The main objective under the protection of waterways is to:

“Protect and improve the physical condition, ecological health, environmental values and water quality of surface water and groundwater systems, including waterways, wetlands, estuaries and waters of the Great Barrier Reef lagoon.”²

It is vital that all waterways are protected, and not diminished or degraded to the detriment of advancement, regional growth and urban development. Having policies is vital to ensure for clear direction, however having policies that override one area, such as an increase in urban development, or an increase in intensive agriculture will only impede the equitable distribution of water and degrade the health of Queensland’s waterways. Policies need to encapsulate a holistic approach of

¹ [Far North Queensland Regional Plan 2009-2031 \(statedevelopment.qld.gov.au\)](https://www.statedevelopment.qld.gov.au)

² [Far North Queensland Regional Plan 2009-2031 \(statedevelopment.qld.gov.au\)](https://www.statedevelopment.qld.gov.au)

the water cycle including policies that protect the recharge of our aquifers, and the health of our flora and fauna ecosystems that inhabit our groundwater. Having a co-joined approach of policy objectives, that are administered under the *Environmental Protection Policy (Water) 1997* (EPP Water) for regional surface water, groundwater and wetlands is vital to help control nutrient run off, including the impacts of fertilisers and pesticides not only into the inland waterways but also into the inshore coral reefs, to ensure the marine ecosystem is also protected.

To get this right now, climate change and the extensive impacts that this will bring, and we are already seeing, we need to prioritise climate change modelling in all facets of our land resources, including mining, tourism and agriculture. Having a cohesive joined up policy approach is vital for the prosperity of Far North Queensland's future. Administering policies where water underpins every sector, every region, every business needs to be done as a collaborative approach, and not done in silos which is how water has been managed up until now, and now it is time to change.

EPP Water and SPP 2/02

"The *Environmental Protection (Water) Policy 1997* (EPP Water) describes the community and government endorsed environmental values, and water quality objectives to be achieved to protect and enhance these values. This requires managing the water quality discharged by urban point sources of wastewater, as well as urban diffuse and rural diffuse stormwater sources."³

Uncomfortable discussions need to be had. Water is the lifeblood of our communities, but it is not an infinite resource, neither is the land in which we inhabit. Policies to reduce the risk of flooding and impacts of natural disasters are not currently working alongside agriculture, natural resource management, or urban development.

Water quality is what will determine the longevity of our water as primary resource, but utilising data that is outdated, will only hinder economic development. Water quality data has already been used in Queensland to help determine funding through remediation, and water efficiency programs. However, incorrect data will not determine what positive changes our agricultural sector has had if 30-year-old data is used, as opposed to up-to-date data, that incorporates a farmers best management practice. This example has occurred and had the potential to hinder a vital water efficiency project, and lead to the demise of a farming community.

Therefore, when referring to the *Environmental Protection (Water) Policy 1997* (EPP Water) it is important that data is current, especially when it comes to consideration of pollution, or farm output into streamflow activities under the *Environmental Protection Act 1994*.

It is also imperative that under the Far North Queensland Plan, as outlined, that local governments identify areas with high probability of acid sulfate soils in their planning scheme. This will not only help identify farming areas at risk but also save on future economic development costs. QFF support the implementation of identifying acid sulfate soils at risk in their planning scheme.

Development in waterway envelopes and wetland or waterway buffer zones

The inclusion of buffer zones is outlined in a catchment-by-catchment basis under existing water plans. This is to ensure that environmental flows are protected and managed in accordance with the

³ [Far North Queensland Regional Plan 2009-2031 \(statedevelopment.qld.gov.au\)p.115](https://statedevelopment.qld.gov.au/p.115)

nearby land use, and proposed encroachment of urban development. Buffer zones ensure that vegetation is protected to reduce streambank erosion and reduce sediment flow. Under the *Water Act 2000*, bulk water schemes identify environmental flows to ensure the availability of water and water quality for water dependent ecosystems and sustain environmental values and ecological processes. QFF supports the future protection and integration of waterway buffer zones, into the water planning process, which also requires a cohesive policy approach across all sectors and town planning.

Waste management

Waste disposal has always been a logistical, financial and environmental burden for producers. QFF strongly advocates for the advancement of initiatives aimed at reducing landfill waste and fostering opportunities within the green energy sector. 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. Both SEQ and FNQ State Plan's need to account for the development of this new infrastructure in their waste management frameworks. QFF can appreciate the Plan's strategy to place landfill and resource recovery facilities in stable areas and away from areas that will potentially disturb the public. Contrary to the above push for a regional focus on *existing* infrastructure repair, in this space a heightened focus on new green infrastructure is warranted, as current waste infrastructure and planning is not working. In the recent Sunset Review of Queensland's Waste Reduction and Recycling Act – the department stated Queensland had not met its goals and was still behind the national average for waste reduction and recycling targets. For the Plan to effectively promote resource recovery and enhance efficiency, there's a pressing need for additional waste infrastructure and pilot programs involving waste separation.

It is time for the department to commit and stop stalling on rolling out efficient waste systems across the state, such as the green waste bin program. This would align with strategy 6.4.A and 6.4.B and C in the FNQ Plan - avoiding waste generation in the first instance and recognising waste as a resource first before disposal. Strategy 6.4.E of the Plan also addresses fostering and encouraging local solutions of waste management. QFF highlights it is critical these programs are extended to both regional and rural communities to be effective.

Summary

The Far North Queensland Regional Plan can be commended on its forward thinking and industry inclusive approach to land use planning. There is need for cohesion in particular sections across state plans and increased involvement of the department in infrastructure and waste management. QFF welcomes further discussions and consultation regarding the Far North Queensland Regional Plan.

Yours sincerely

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Queensland Farmers' Federation



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