

QFF MEMBERS

Australian Prawn
Farmers Association

CANEGROWERS

Cotton Australia

Growcom

Nursery & Garden
Industry Queensland

Qld Chicken Growers
Association

Qld Dairyfarmers'
Organisation

**ASSOCIATE
MEMBERS**

Queensland Chicken
Meat Council

Flower Association of
Queensland Inc.

Pork Queensland Inc.

Fitzroy Food & Fibre
Association

Pioneer Valley Water
Co-operative Limited

Central Downs
Irrigators Limited

Burdekin River
Irrigators Association

Emerging Primary
Industries Groups

- Biological Farmers
of Australia
- Queensland
Aquaculture
Industries
Federation

26th February 2010

Rachel Burgess-Dean
Manager, Environment Regulation Branch
Natural Resources and Environment Division
Department of Environment and Resource Management
PO Box 15155
City East QLD 4002

Dear Ms Burgess-Dean,

Queensland Farmers' Federation (QFF) provides this submission in response to the Department of Environment and Resource Management (DERM) *draft State Planning Policy: Air, Noise and Hazardous Materials review*.

Through our membership QFF represents the interests of 14,000 farmers in the intensive agricultural industries in Queensland. Agriculture contributes over \$13 billion to the Queensland economy and employs over 60,000 people.

QFF and its member organisations are strongly committed to and have invested heavily in sustainable agriculture, and welcome the opportunity to contribute to this review, to ensure that planning policies are formulated in such a manner as to allow agriculture to remain a profitable and productive industry in Queensland.

As a starting point QFF would like to acknowledge support for Australian Pork Limited's submission to this review. Further QFF highlights that the Queensland Chicken Growers Association is supportive of the use of the principles of reverse amenity issue as implemented in the policy document.

Reverse Amenity:

QFF welcomes the development of a policy which embodies the concept of reverse amenity and hence the requirement for local government to take it into account when considering applications for development near pre-existing industries which may appear to be incompatible with the development under consideration.

Until now this has become a significant issue for agricultural operations particularly as development pressure increases and encroachment occurs with the farm operator bearing the brunt of complaints and pressure to cease or modify farm practices. This would apply not only to operations which are listed as environmentally relevant activities (ERA's) under the Environmental Protection Act but other agricultural activities such as horticultural production, dairy farming and irrigation.

QFF is however concerned that the sections relating to intensive animal industries are not as clear in their intent as appears to be the case for other industries. The detail regarding the layout of infrastructure seems to be more about conditions being placed on an operation see Schedule 3 tables.

In reference to reverse amenity, QFF believes it is not clear whether intensive agricultural industries need to make changes when there is a reverse amenity issue i.e. is it the farm or the sensitive use that would be required to make the changes.

QFF is supportive of any policy instrument that discourages encroachment on areas zoned as rural. However QFF seeks clarity on whether this is actually the case in this regard.

ERA singled out for attention:

QFF questions why intensive animal industries that are already classified as an ERA are singled out in the draft policy. QFF is of the view that existing ERA's are already providing a high level of information for compliance purposes. This should be taken into account otherwise this policy may overburden intensive animal industries by triggering subsequent regulations. It is QFF's understanding that many legislative instruments already regulate intensive animal industries and therefore the need for more would be unjustified but may yet be unintended consequence of this policy if conferred.

Separation distances:

The issue of separation distances is one that was challenged by intensive animal industries with the introduction of the provisions made for Environmental Regulation 2008, 'Environmental Emission Profiles'. QFF recommends that separation distances should be modelled on the existing extensive consultative work undertaken by intensive animal industries.

A blanket separation distance of five kilometres would have a significant effect on the future development of intensive animal industries businesses. The five kilometres figure has no bearing on the size of the operation or the nature and its likely impacts. This is a significant concern as this could have serious implications for the development of new farms and QFF strongly opposes such an instrument. Previous work done by intensive animal industries has delivered comprehensive and robust guidelines to deal with these dynamic situations and this work should be taken into account.

Zone based planning:

QFF supports and accepts that the draft policy does not adopt a zone based approach to reflecting the draft policy outcomes in local planning instruments for intensive animal industries activities. QFF believes this is the right way of acknowledging that agricultural industries need a different approach to those used in traditional planning decisions.

Inappropriate trigger – Material change of use:

The draft Policy applies to a material change of use for an intensive animal industry that is assessable development, and proposed within five kilometres of land zoned primarily for a sensitive use. QFF asserts that if this is about encroachment and reverse buffers then why is it triggering a material change of use when that is already captured under the ERA assessment process.

Concluding remarks:

The concept of reverse amenity provided it is applied appropriately has the capacity to have a significant bearing on the future of agriculture in South East Queensland. QFF believes there is a need to clarify the primary role of Government with respect to enhancing existing agricultural enterprises and fostering innovation through the planning process.

Agricultural production and processing are long-term commercial activities which require significant investment. Investors in the agricultural sector require a secure policy environment where they can invest with confidence over the medium to long term.

- Overall agricultural cost structures must be considered in policy and planning. Input costs such as electricity and water impact strongly on the economic viability of agricultural enterprises. Land values are impacted by market forces and tend to push intensive agriculture in particular into more marginal areas.
- Agriculture requires access to critical infrastructure (water, transport, processing) to service current needs and facilitate future expansion which needs to be recognised in planning and policy documents.
- Strong, viable rural communities result from a viable agricultural sector. The role of rural towns as valuable service centres must be acknowledged and supported.

QFF appreciates the opportunity to provide input into this draft State Planning Policy and our organisation would be willing to provide further information to the department if required.

Yours sincerely



Gary Sansom
President