



10 February 2017

The Hon. Jackie Trad MP
Deputy Premier
Minister for Infrastructure, Local Government and Planning; Minister for Trade and Investment
c/- State Interest Feedback
Planning Group
Department of Infrastructure, Local Government and Planning
PO Box 15009
CITY EAST QLD 4002

Via email: planningpolicy@dilgp.qld.gov.au

Dear Deputy Premier

RE: Review of the Planning Regulation, State Planning Policy and State Development Assessment Provisions

The Australian Sugar Milling Council (ASMC) is the peak industry organisation for raw sugar milling in Australia. The ASMC represents some 95 per cent of Australian raw sugar production. There are 24 sugar mills in Australia, owned by eight companies. These sugar mills produce raw sugar, 80 per cent of which is directly exported.

The sugar industry has a long history of production in regional areas of Australia, and contributes to the social and economic wealth of many regional centres in Queensland and northern New South Wales.

The Australian sugar industry remains globally competitive primarily through its highly efficient logistics system, including transport and storage. The sugar industry has invested in infrastructure including growing, processing, transport and storage, over a long period of time to build an efficient and cost-effective system. Competition for land from urbanisation, industrial uses, mining and forestry reduces the sugar industry's competitiveness and puts at risk the value of infrastructure investment. The ASMC supports policies to protect good quality agricultural land from changes to other uses. These policies need to consider the existence of physical infrastructure (such as for irrigation, processing and transport) and social infrastructure (communities, skills and supporting services).

ASMC supports the agriculture state interest in the draft State Planning Policy, and in particular the recognition of the supporting infrastructure and the need to avoid fragmentation of agricultural land to maintain efficiencies. ASMC supports the submission made by the Queensland Farmers Federation made as part of this review. However, we are not confident that the planning legislation more broadly can actually protect good quality agricultural land in the way it is described in the draft State Planning Policy.

The many pieces of legislation addressing the protection of good quality agricultural land and the various classifications of agricultural land are confusing. Further, there are a very large range of state interests, and no evidence of a process for prioritising these state

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interests for any particular parcel of land, making these policies open to interpretation. The State Interest Guideline for agriculture contains model codes and provisions, but these are not mandated.

The lack of statutory protection for good quality agricultural land in the State Planning Policy does not maintain the level of protection for agricultural land that was provided by the now lapsed SPP1/92 and the Strategic Cropping Land and Regulation. Only part of the protection was carried through to *Regional Planning Interests Act 2014* and the associated regulations for areas identified and mapped as Priority Agricultural Areas (PAAs).

As a result, while new resource development activities seeking to operate in PAAs need to meet assessment criteria ensuring no material loss of land and no threat to continued agricultural use, other changes of land use, such as urban expansion or industrial use, are no longer required to meet these requirements.

Under the *Planning Act 2016*, there are no provisions to offset the loss of good quality agricultural land. The cumulative impacts of loss of productive land in the catchment of a processing facility reduces the efficiency and value of the facility, and with on-going losses can result in the facility becoming unviable. ASMC suggests that if a proposed development cannot be placed in another location, that land of equivalent productivity within the catchment of the facility needs to be provided as the offset for the loss of agricultural land. These provisions are required regardless of whether the change is for resources, urban, industrial or other activities.

The recent loss of prime agricultural land in the Burdekin to a large scale solar farm is an example of the inconsistency resulting from the confusing array of planning legislation and classification of agricultural land. The loss of 340 ha of prime sugarcane production land not only reduces the throughput of the local mill, but it diminishes the value of associated infrastructure, including cane transport and irrigation infrastructure for the surrounding farms. Such losses reduce the efficiencies in one of the most productive sugarcane growing regions in the world. ASMC supports the Queensland Farmers Federation position on the need for a state code for assessing large scale solar schemes in the State Development Assessment Provisions, as described in their submission on 20 January 2017.

If you have any queries or wish to discuss this further, please contact me on 3231 5000, or email dominic.nolan@asmc.com.au

Yours sincerely

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