

27 November 2018

Chief Executive Officer
Attention: Strategic Planning Unit
Western Downs Regional Council
PO Box 551
DALBY QLD 4405
By email: strategic.planning@wdrc.qld.gov.au

Amendment 1 to the Western Downs Planning Scheme

Dear Madam or Sir

Cotton Australia is the key representative body for Australia's cotton growing industry.

While Queensland's cotton production is highly variable, the State's 600 growers often produce between 1 million and 1.5 million bales each year. The value of that production ranges between \$500 million and \$900 million (including the value of cotton seed) farm gate annually.

In 2016-17 our Western Downs growers represented 76.5% of the state's cotton farms and were the region's second most important commodity. Their cotton crop contributed \$532 million to the \$3.8 billion generated by agriculture in this region which itself represented 27% of Queensland's total gross value of agricultural production.

We welcome the opportunity to speak on behalf of cotton growers, in relation to the proposed Amendment 1 to the Western Downs Planning Scheme. Of most concern is that the changes would enable land zoned High Impact Industry to be located next to land zoned Rural.

Cotton Australia notes that the current definition of High Impact Industry [Schedule 1 of the Western Downs Planning Scheme] as:

"Premises used for industrial activities that include the manufacturing, producing, processing, repairing, altering, recycling, storing, distributing, transferring or treating of products and have one or more of the following attributes:

- potential for significant impacts on sensitive land uses due to offsite emissions including aerosol, fume, particle, smoke, odour and noise
- potential for significant offsite impacts in the event of fire, explosion or toxic release
- generates high traffic flows in the context of the locality or the road network
- generates a significant demand on the local infrastructure network
- the use may involve night time and outdoor activities onsite controls are required for emissions and dangerous goods risks"

While Amendment 1 would reframe these dot points to instead refer to thresholds that must be complied with, the inference remains that permitted activities conducted in this zone would have 'potential for significant impacts....due to offsite emissions'. As a result, this change would in turn make it possible for such activities to be undertaken near to land where food, fibre or foliage production occurs.

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Cotton Australia also notes that such an outcome would also be contrary to the intent of The Darling Downs Regional Plan. As per page 2 “PALUs (Priority Agricultural Land Uses) within the PAA (Priority Agricultural Area) will be recognised as the primary land use and given priority over any other proposed land use.”

Furthermore, the modifications allowing this situation would be contrary to the overall outcomes set out for lands the Rural zone code [established under Part 6 Zones; 6.1(8)(d)]. To be specific, when applying the ‘Tables of Assessment’ [Part 5, 5.2] and the ‘Categories of development assessment’ [Part 5, 5.3 inclusive] so that High Impact industry activities to be located on lands adjacent to that zoned Rural:

- the productive capacity of the land would be diminished [contrary to the outcome sought by 4(ii) of the Rural zone code]; and
- the protection all lands zoned rural in that precinct enjoys from alienation and fragmentation would be lost [contrary to the outcome sought by 2.of the Rural zone code].

In Cotton Australia’s view rather than putting at risk the \$3.8 billion agricultural businesses generate for the Western Downs region, Council should apply the following approach:

- High Value Agricultural Land is always given the priority over other land uses; and
- Changes to a zone current classified as Rural should only ever be a last case alternative that is fully considered on a case-by-case basis.

If you would like further information on this submission please contact Michael Murray on michaelm@cotton.org.au or 0427 707 868.

Yours sincerely,



Michael Murray, General Manager
Cotton Australia