

NSW Agriculture Commissioner

26th February 2021

Re. Options for a NSW Agricultural Land Use Planning Strategy

Regional Development Australia Southern Inland (RDASI) would like to thank the Commissioner for the opportunity to comment on the issue of land use planning.

Australia is extremely fortunate to have some of the best agricultural land in the world, producing produce of the highest quality. For too long, the value of this land has not been recognised, and financial gain has been put ahead of the need to be able to feed our growing population.

RDASI's aim is to drive innovation, growth and development in Southern Inland NSW. However, we believe this growth and development cannot be short sighted. The agricultural industry is key to our entire region, and it has a significant input into various other industries such as freight, tourism and food manufacturing. We believe it needs to be protected and supported and that rural regions expand in a sustainable and sensible manner. We must ensure there is sufficient high quality, sustainably managed agricultural land available in regions surrounding towns and cities to support the growing trend towards circular economies, urban food/reduced food miles, and provision of a local food system (food security).

With urban development encroaching on our valuable rural land, we are witnessing firsthand, people with little attachment or knowledge of farming buy houses or small acreages in close proximity to productive farms. As well as the potential for land conflict, these housing developments replace prime agricultural land forever. Small acreages and subdivisions can also result in the loss of productive agricultural land, particularly when owners who have little understanding about how to operate a farming enterprise, manage weeds and look after the land, become the landholders.

We strongly believe that a Land Use Planning Policy should be developed by the NSW Government, however, we raise concerns that its adoption will be voluntary. We question whether a voluntary policy will have enough participation to achieve the desired outcome; to protect agricultural land. State-wide conformity should be the goal to help to ensure consistency in land planning across NSW.

Notably, the proposed changes and policy will have a significant impact on the regions and the landholders it affects. It therefore needs an extensive and broad reaching consultation process, and an in-depth look at the broader implications. We understand that stakeholder feedback has been sought during the Right to Farm Policy Review, but we believe feedback must also be sought on a draft Land Use Planning Policy.

We also note that it is largely being looked at as a stand-alone solution, when the reality is that agriculture is an integral part of a number of systems with other invested stakeholders.

When it comes to the permitted use of agricultural land as described in the Options Paper, this is a very complex and emotionally charged topic, with a highly diverse group of stakeholders. Consultation with the community, landholders and relevant organisations is essential.

It is also important to note that RDASI has been involved in the land mapping consultations, hosted by NSW Department of Primary Industries - Agriculture (DPI) in Goulburn in 2019. However, no feedback or follow up has since then been provided as to the progress of these maps and intended use. Further, attendance at these sessions was disappointing and failed to attract a representative

cross-section of the community. When consultation does occur again, greater effort should be made to engage with key stakeholders and keep them up to date following the engagement.

Our submission focuses on **Issue 1: Long term availability of agricultural land**

Option 2. Monitoring and Reporting of Loss of Rural Land

We strongly support this option and believe it will be essential to monitor and report changed uses and losses of agricultural land. Particularly once a Land Use Planning Policy is implemented, the monitoring and reporting of loss of rural land will tell us whether the Policy is being implemented successfully. As the old adage goes; if you don't measure, you can't manage.

As well, this will allow land that can be regenerated to be identified.

Option 3. Education

Whilst we support the upskilling of local and Council planners, RDASI believes that each Council needs a dedicated agricultural support officer; someone who can provide the training needed for planners, advise them on agricultural matters and provide feedback back to the NSW Government about planning processes and improvements needed.

We also believe that farmers should be at the forefront of this education and consulted throughout the upskilling process.

Option 4a-4c

RDASI support option 4b, which proposes mandatory considerations in the planning framework and a map of SSAL in Schedule 1 in the PPRD SEPP. We do not believe it should be left to Councils to decide upon SSAL, but rather, this should be mapped by the NSW Government, particularly given the process has already begun. Mapping, managed by one central agency, will provide certainty and consistency for Councils. Allowing Council to choose whether they adopt a map of SSAL and guidelines from the NSW Government could lead to inconsistency across the state. What NSW needs is clear, concise and consistent guidelines, not greater ambiguity and confusion.

Mapping SSAL will not be a simple task as the definition of state SSAL should not be a one size fits all approach. Instead, local circumstances need to be taken into account.

We also agree that stronger planning controls be incorporated in considering developments on land neighbouring SSAL. This reflects the need to avoid fragmentation, which weakens the connection and linkages involved in having a series of viable farms in one area. It also increases the possibility of conflict.

Option 5

We support this option to prohibit zone changes or non-agricultural uses on SSAL. However, we believe this should go one step further. Whilst mapping may identify SSAL, efforts also need to be made to protect the rural land in between. Simply protecting SSAL is not enough, if developers are going to be continued to allow to build on other rural farm land.

The NSW Government should also consider rehabilitation of land to return to agriculture.

Option 6a and b:

RDASI supports Option 6a, whereby Councils have to obtain agreement from the DPI to rezone SSAL to a non-rural zone. The criteria for allowing rezoning must be clearly set out to avoid any grey areas or uncertainty. The entire purpose of mapping SSAL is to protect it, and there is little point in undertaking this exercise if exemptions are going to be made on a regular basis.

However, in saying this, stringent regulations can have a significant impact on landholders, where a change of use can strangle any sale potential on a substantial block of land. It is therefore important to conduct in-depth consultation with landholders and other relevant representative organisations before deciding upon SSAL.

Yours sincerely,



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