

20th September 2013

The Hon. Jeff Seeney MP
Deputy Premier and Minister for State Development, Infrastructure and Planning
Department of State Development, Infrastructure and Planning
PO Box 15009
City East
Brisbane, QLD, 4002

Submitted via email: DDRRegionalPlan@dsdip.qld.gov.au

Dear Deputy Premier,

Re: Chamber of Commerce and Industry Queensland submission on the draft *Darling Downs Regional Plan*

The Chamber of Commerce and Industry Queensland (CCIQ) welcomes the opportunity to provide feedback to the State Government on the draft *Darling Downs Regional Plan* (the regional plan).

CCIQ is the peak business and industry association in Queensland, representing over 25,000 businesses across all industry sectors in the State. Many of these businesses operate within the Darling Downs region. As part of our regional representation commitments CCIQ released a South West Queensland Business Priorities Report in May 2013 based on an extensive consultation process with local businesses (report attached for information). Accordingly, CCIQ is well placed to provide feedback to the State Government on the draft regional plan and the priorities, challenges and opportunities for businesses in this region.

Planning issues are of fundamental importance to the economic wellbeing of businesses within the Darling Downs region. However, one of the key issues raised by businesses is that existing planning schemes are restricting development and increasing business costs. Addressing this business concern must be a key priority and consideration when finalising the draft State Planning Policy (SPP) and the draft regional plan to ensure planning schemes do not negatively impact on business viability, regional growth or future investment.

Key priority areas for Darling Downs businesses

CCIQ undertook an extensive consultation process in the Darling Downs region during the development of our South West Queensland Business Priorities Report. During this consultation, businesses identified a number of regional strengths, weaknesses, opportunities and threats which must be managed appropriately to ensure a positive future for businesses in this region. CCIQ identified 8 key regional priorities to drive economic growth and investment which included:

- Improving the overall business operating environment;
- Delivering key regional infrastructure to secure a strong future;
- Balancing competing interests between existing and emerging industries;
- Reducing the red tape and compliance burden on local businesses.

CCIQ urges the State Government to consider our South West Queensland Business Priorities Report and the identified regional priorities when finalising the regional plan.

Overarching feedback in relation to the planning framework

It is vitally important that state and regional planning schemes are streamlined to reduce red tape and complexity for businesses and deliver consistency, transparency and efficiency within the overarching planning vision. This must include a coordinated approach across all levels of government to deliver a meaningful, integrated planning system that will encourage joint ownership and shared accountability with respect to the implementation of planning instruments across the state. Importantly it will provide much needed certainty for the business community in relation to investment and expansion decisions.

It is critical for business certainty, and consequently confidence, to ensure state planning and regional policies are synergised in terms of both content and timing. Businesses have raised concerns about whether draft regional plans can be successfully finalised until the SPP is approved and publically released. Rationally this would seem required to ensure streamlining of state and regional planning instruments, and that all matters determined to be of state interest are considered when developing and finalising the regional plan.

CCIQ urges the State Government to position these matters at the forefront of decision-making when finalising the SPP and respective regional planning instruments.

Overarching feedback in relation to the draft Darling Downs Regional Plan

Businesses are concerned about the limited focus of the draft plan. Darling Downs businesses are of the view that the regional plan primarily focuses on “land use” or “land zoning” matters, resulting in a plan that fails to encompass a big picture, long-term strategic planning approach to anticipate future economic, business and community needs.

CCIQ are pleased that the plan includes a focus on business priorities and economic growth with key motivators including driving the region’s economic diversity and opportunity, facilitating tourism pursuits and avoiding the introduction of additional unnecessary regulation. However, the draft plan itself fails to provide a broad strategic planning approach that satisfies the objective of supporting industry investment and business growth opportunities. In particular businesses expressed concern that the two regional outcomes and four regional policies primarily focused on land-use interactions between the resource and agricultural industries without recognising the diversity of existing and emerging sectors, and on creating certainty around the development of towns.

Subsequently, as a regional plan, CCIQ believes it fails to go far enough to deliver the desired regional outcomes and drive local investment and opportunities. Developing regional outcomes and regional policies under each of the state’s interests as identified under the SPP may assist in delivering a stronger foundation for successful businesses and industries by addressing key regional issues and bottlenecks impacting the local economy.

Concerns have also been raised in relation to the area defined as the Darling Downs within the draft regional plan, with businesses and communities located in some areas (ie Maranoa Regional Council and Balonne Shire Council regions) potentially being unaware that they have been captured by the draft regional plan. More broadly, CCIQ continues to receive feedback from businesses in all areas about their lack of awareness of the plan’s development or subsequent consultation process. It is important that wide-spread consultation processes have been undertaken within all areas to ensure all landholders and businesses have the opportunity to provide feedback on the new statutory planning scheme

and on proposals that could potentially impact on their livelihoods and future investment decisions.

Managing the interaction between the agriculture and resource sectors

Agriculture and mining are the two key industries within the Darling Downs region. The region's agriculture industry is a major contributor to Queensland's economy, and will play a key role in the State Government's goal of doubling the state's food production by 2040. The region has also emerged as one of the state's leading regions for resource and energy exploration and development, potentially playing a key role in the state's future energy security.

The key challenge for the State Government is managing the co-existence of these two highly important industries, as well recognising the ongoing importance of the full range of highly competitive existing industries (which includes supply chain and value-add sectors to the resource and agriculture sectors) and providing opportunities for emerging and future industries.

CCIQ is supportive of finding a balance between mining and agricultural activities, with mitigation activities put in place to ensure primary producers and other industry sectors alike continue to have access to land and resources for development.

Whilst CCIQ maintains this high level position, our members have raised a number of concerns in relation to agricultural land-use and whether the plan will provide sufficient level of protection to this sector specifically:

- Businesses are concerned that the establishment of Priority Agricultural Areas (PAAs) within the draft plan (in which agriculture will be identified as the priority land use) will not be sufficient in protecting prime agricultural land. The identified PAAs are smaller than those identified under the strategic cropping land framework and exclude large areas of productive agricultural land. There are concerns surrounding the rights of land holders in areas not located within the defined PAAs, with no additional protections offered in the draft plan than exist currently.
- Concerns have also been raised in relation to the "co-existence criteria" and whether it will have the desired effect of ensuring an approval for any proposed resource development does not materially impact or threaten the ongoing viability of agricultural production. The four PAA Co-existence criteria appear to provide loopholes in favour of the resource industry if they can show there is no reasonable alternative for their activities. It is essential that any criteria put in place finds the right balance between mining and agricultural activities, delivering mutually beneficial arrangements from an equal footing.

Whilst the regional plan has a role in providing certainty for development and investment for industry broadly, CCIQ believes that the management of the interactions and specific issues relating to land, water and environmental and social impacts is best dealt with outside of the regional planning process. Additionally it is our key recommendation that the regional plan express broad high level priorities non-specific to particular industries but rather put in place a priority statement that provides for '*all current and emerging industries of economic significance to the region continue to grow with certainty and investor confidence*'.

Housing and liveable communities

The draft regional plan aims to provide greater certainty for investment in the development of the region's towns while also accommodating compatible resource activities. Concerns have been raised by communities regarding the undertaking of mining activities close to regional towns. The establishment of Priority Living Areas (PLAs) and the subsequent consideration in the state's assessment of proposed resource activities within these defined areas of community expectations as defined by the relevant local government may be a step in the right direction to addressing these concerns.

Businesses in the Darling Downs region have also raised concerns about peri-urban encroachment on prime agricultural land and the associated impact on food security and the ability of the industry to double the state's food production by 2040. This issue must also be considered within the regional plan, as the loss of prime agricultural land should be of state interest.

Further consideration is also required of accommodation supply and affordability in the Darling Downs region. Strong population growth associated with the rapid expansion of the local resource sector, in addition to the increase in the number of non-resident or FIFO/DIDO workers has resulted in a low supply of affordable housing and short term housing options.

Transport and Infrastructure

Businesses in the Darling Downs region have reported to CCIQ for a number of years that existing infrastructure is impeding business confidence and investment. Particular concerns raised by businesses include:

- The lack of connectivity between regions, with infrastructure projects required to increase regional, national and international connectivity;
- Poor quality road infrastructure that is impeding commercial connectivity;
- Inadequate public transport systems throughout the region;
- Lack of coordination in delivering key regional infrastructure;
- The transport system (including air, rail and road freight) is at or exceeding capacity;
- Need to significantly upgrade information, communication and technology (ICT) infrastructure to help drive business innovation.

Significant infrastructure development is required in the region to ensure demand can be met from growing industries including agriculture and resources and to cater for and facilitate population and economic growth. Particular infrastructure projects sought by Darling Downs businesses include the Toowoomba Second Range Crossing, improving road and rail freight networks, rollout of the broadband network and further expanding the region's aviation services around the regional centres of Toowoomba, Roma, Warwick, Dalby and Chinchilla.

CCIQ is supportive of developing regional outcomes and regional policies under the state interest of transport and infrastructure in the regional plan to ensure a long term infrastructure planning approach is established in the region. This will help drive economic and regional growth by providing signals to the business community on where infrastructure development will occur moving forward.

Additional feedback in relation to the draft Darling Downs Regional Plan

CCIQ would like to provide the following additional feedback for consideration during the finalisation of the draft regional plan:

- A key message being received by businesses in the region is the need to expand the economic base to enhance the resilience of the local economy. State Government support is important to sustain business confidence, encourage growth in emerging industries, ensure infrastructure meets demand and that the education system is delivering appropriately skilled people to take advantage of the opportunities in a timely manner. The regional plan should subsequently include a focus on facilitating broader economic development and this will be achieved primarily in ensuring flexibility and a future focus within the regional plan.
- There are concerns across the region surrounding the ability of industry to attract and retain skilled workers, in particular due to a strong trend towards the loss of skilled workers and university graduates from the area. Businesses attributed this to a lack of knowledge and appreciation of the opportunities that exist within the region and perceptions about the liveability and attractiveness of the region. The regional plan therefore must:
 - facilitate the development of social and economic infrastructure to attract and retain a skilled workforce and business investment; and
 - address critical infrastructure priorities which currently act as a barrier to greater intra and inter regional connectivity and access to market opportunities.
- The business community also stressed the importance of maintaining the quality and sustainability of existing environmental resources. In particular the importance of maintaining water quality, including underground aquifers, was raised as a priority due to the significance of water supply to the agricultural sector. Accordingly CCIQ supports the inclusion of a priority which specifically aims to ensure that development does not adversely affect environmental resources such as water and underground aquifers.

Overall, CCIQ believes the state's planning framework must take a 'big picture' approach, with longer term strategic planning key to facilitating future and emerging industry and community needs and ensuring planning and action in response to emerging opportunities and constraints. Incorporating industry issues and priorities into the final regional plan will ensure greater certainty of outcomes for regional businesses, governments and local communities.

CCIQ welcomes the opportunity to provide feedback to the draft regional plan. If you have any questions regarding this correspondence, please contact Senior Policy Analyst Leanne Connell on (07) 3842 2227 or email lconnell@cciq.com.au.

Yours sincerely



Nick Behrens
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Att: South West Queensland Business Priorities Report: May 2013