



Coffs Harbour Greens
Coffs Harbour
NSW 2450

29/05/19

To: Coffs Harbour General Manager
CC: Councillors

Submission on the Draft Rural Lands Chapter 5

On behalf of the Coffs Harbour Greens, thank you for the opportunity to comment on the Intensive Plant Agriculture (IPA) Discussion Paper.

The draft Discussion Paper highlights several environmental and social issues surrounding the industry that a significant number of local community members have raised for many years.

These issues have been repeatedly raised at community meetings, by media outlets and discussed in private as awareness of the impacts associated with this highly intense system of agriculture is laid bare.

The Coffs Harbour Greens support Council's 2036 Growth Management Strategy to reduce land holder conflict, waterway pollution, SIMP degradation whilst maintaining agricultural productivity.

We support the discussion paper Option 5.2 to implement a planning Gateway process to amend the 2013 LEP so IPA developments are permissible with consent. We also support the discussion paper Option 5.3 that Implements an Exception Clause.

The following points set out in our submission to support why we support the above options based on Greens principles of ecological sustainability and social justice.

Giving Voice to the Voiceless

As the discussion paper highlights, scientific analysis of Bucca Bucca Creek and Hearn's Lake has revealed off-farm consequences associated with IPA's.

Coffs Harbour Council's Eco-Health Reports support the Southern Cross University evidence that our creeks and rivers have, in general, a very poor health check.

These creeks and rivers are essential for ecosystem health and wellbeing flowing into the SIMP.

Fishers, recreational and commercial, are highly concerned by the poor quality of our coastal estuarine system of fresh water and tidal creeks and rivers.

The viability of future fish stocks are dependent on high quality waterways along our coastline.

IPA has been linked to increased pollution leading to a degradation of Coffs Harbour waterways. For this reason, independent oversight and regulation is needed to best protect waterways from further impacts. Council is well positioned to independently regulate IPA businesses.

Furthermore, the discussion paper raised the importance of reducing vegetation clearing particularly illegal clearing of land. The Coffs Harbour Greens are concerned by land clearing on RU2, R2 or R5 zones and believe it's time for a rethink.



The clearing of land has a range of comprehensive impacts on our environment associated with biodiversity loss, sedimentation deposition in creeks and rivers to downstream impacts on human visitors and local communities.

Council are responsible for implementing the Ecologically Sustainable Development (ESD) principle to develop governance strategies that protect and preserve our environment.

Australia's National Strategy for Ecologically Sustainable Development (1992) defines ecologically sustainable development as: 'using, conserving and enhancing the community's resources so that ecological processes, on which life depends, are maintained, and the total quality of life, now and in the future, can be increased'.

Coffs Harbour Greens believe that local government is best positioned to monitor and oversee developments that risk compromising the ESD principle and therefore require consent from council.

Objection by Industry

We expect industry objection to Council's plans for IPA development with consent.

We are not against IPA businesses and understand the constraints faced by many growers associated with market forces and climate irregularities.

Expansion of IPA needs to be well considered and recognises the economic sustainability of other rural economic drivers such as the visitor economy or property values.

We are concerned by the scale of IPA development and associated impacts on Coffs Harbour's quadruple bottom line.

Many in our community share our concerns and a recent phone call the Water NSW confirmed that water licence applications are increasingly being used by community to raise objections to limit IPA development.

Water licence applications rarely are dismissed by Water NSW but it's worth noting limitations community have to object to IPA development.

We therefore believe that IPA development with consent is urgently needed.

Ecological Education

The draft Rural Lands LGMS Ch. 5 identified that poor agricultural education among non-farmers is a reason for misunderstanding on-farm practices. This seems to have helped lay the foundation for the Right to Farm policy that grant farmers a superior privilege compared to non-farmer rural residents.

As we argued above, primary producers, industry executives, agribusiness investors or anyone who believes modern intensive forms of agriculture are ecologically sustainable seem to lack the land management skills informed by the ESD principle. We believe that the IPA industry as a whole would work better with regulators and community as a whole if farmer's reflected environmental science.

Coffs Harbour Greens would like to see education through conferences and workshops in the ESD principle. This may or may not be mandatory for the IPA industry but we believe education could help reduce land-use conflict and degradation and is worth genuine consideration.



An agricultural levy could be implemented to help offset costs associated with council developing best practices within the IPA industry through education in the principle of ESD.

Final Considerations

Considering Council's Option 5.1 and implementing the Code of Conduct, it appears the code requires to be mandatorily enforced in order to meet Australia's *National Strategy for Ecologically Sustainable Development (1992)*.

We are concerned that voluntary self-regulation by IPA businesses risks becoming irrelevant. We need a governance mechanism that gives community confidence that goals are actionable and prioritise waste management, run-off abatement and high-quality mapped vegetation is sustained.

Community deserve surety that IPA businesses are not degrading our LGA. This goal may work alongside Option 5.4 but as noted seems like a long term plan.

We also recognise the task of sustaining the economic viability of IPA businesses but we question when trade-offs are no longer tolerated by community what assurances will council and the State government make, particularly in light of climate change modelling, that give surety that Option 5.4 is capable of sustaining of our quadruple bottom line.

We believe that DA consent for the IPA industry is a positive step forward in developing a mechanism that can develop high quality IPA businesses.

Small IPA producers may need financial support to meet DA costs.

In finishing, we need a governance mechanism that gives community confidence that our local waterways, vegetation, biodiversity and community safety is prioritised in relation to IPA development and acts to allow community objections.

The opportunities for growers and investors to capitalise through local IPA enterprises can be strengthened by agricultural best practice. Enforcing community expectations through IPA development with consent is not only necessary but urgently required.

We need to set to a benchmark for high-quality environmentally sustainable agricultural production and this draft discussion paper is well on its way to a transparent response to impacts associated with IPA businesses.

Complements to council staff for generating vital discussion on this very important element for inclusion in an overall growth strategy of our LGA.

Coffs Harbour Greens request the inclusion of greater emphasis on the ESD principle with regards to future growth of our LGA and in particular agricultural production.

Kind regards

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