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11th April 2007

Mr Paul Freeman
Panel Secretariat
Central West Independent Review Panel
GPO Box 3415, Sydney NSW 2001

Dear Mr Freeman,

I write on behalf of Greening Bathurst in response to the advertised Notice of the Independent Review Panel, Central West Rural Lands Inquiry.

Greening Bathurst (GB) is a community organization that supports best practice in the management and conservation of vegetation across the Bathurst Regional Council area by advancing the implementation of the Bathurst Vegetation Management Plan (BVMP) and assisting in achieving the vision of the Plan.

GB has been actively participating with Bathurst Regional Council with its land use planning initiatives and is supportive of Council's strategic approach to date that is evident in its recently publicly exhibited draft Rural Land Use Strategy. It recognises that a solid strategic approach to managing the continuing population growth and changing demographics of the Bathurst region is essential if the many things that our community value about living in the region are to be protected and fostered.

GB is aware that Council has the responsibility of having to deal with the pressures of this growth and change to ensure that agriculture and the rural landscape is protected. GB has strongly advocated that Council needs to identify and protect those things that make Bathurst and its region such a great place to live and do business in the face of the pressures of growth and change.

We built our case to Council around the vision, principles, objectives, strategies and recommended actions of Council's own Vegetation Management Plan as well as the linked matters of biodiversity, water quality, and landscape values as they relate to sustainable development. We were very pleased to see these principles, objectives, strategies and recommended actions taking a prominent place in the recently exhibited Bathurst Draft Rural Strategy.

GB holds a clear position that recognises that the important conservation features mentioned above are in most cases best managed on viable farms in those parts of the rural landscape that are in private ownership. It knows that poorly located rural subdivisions, together with indiscriminate subdivision of farms into holdings that are too small, can lead to serious levels of semi urbanisation of the landscape. GB has concerns that such development inevitably can lead to significant amounts of clearing and disturbance when the new landowners establish houses, dams, fences roads and especially the fire breaks that Council requires. We see this ongoing subdivision of farmland as a form of unwanted, unnecessary and unwise urbanisation with an end point being the inevitable loss of the valuable rural landscape along with much of its productive potential.

GB is aware that your Inquiry is looking at these matters across the whole of the Central West region and that the outcomes are very likely to influence the final decisions of our Council in relation to minimum rural lot sizes and subdivision constraints. It wishes to convey a clear position to the Inquiry Panel that recognises that realistic minimum rural lots sizes are an important way for councils to prevent too many houses with their linked disturbances being built across the rural landscape. GB strongly advocates that while options for innovative small lot agriculture may be carefully and thoughtfully provided, the great majority of the rural landscape should be protected from the problems of escalating subdivision and house developments as well as the continuing pressure towards reduction in lot sizes of rural holdings across the region.

To this end, GB would like to make the following further comments in relation to the Inquiry's Terms of Reference.

- **The extent, value and location of agriculture.**

Agriculture is clearly important from a production and employment perspective but also because it creates a unique and valuable rural landscape. This ranges from open cultivation paddocks through semi cleared grazing lands to relatively undisturbed woodlands and forests as well as important riparian corridors. The rural landscape has many important flora, fauna and other conservation values and its sustainable agricultural use can manage these features quite well while protecting the landscape from overdevelopment and industrialisation as well as semi and full scale urbanisation. We see sustainably managed private farmland and our public National Parks as being part of a holistic system that works towards conserving our rural landscape.

- **The key land use planning threats to agriculture's viability.**

GB recognises that urban, commercial and industrial developments inevitably require rural lands to be converted to these uses on the fringes of our cities and towns as they inevitably grow. GB has supported Bathurst Regional Council in its Draft Urban Strategy that generally locates these growth areas sensibly and in sustainable ways that act to consolidate urban form and good urban design. However, GB retains some concerns for some aspects of that Urban Strategy.

GB believes that the greatest land use planning threat to agriculture in fact lies with the long term trend to allow a creeping semi urbanisation of the rural landscape via inadequate planning rules and a lack of strategic direction as to where rural living lots can be allowed. This is seen by GB as both a threat to sustainable agriculture and also to the many important flora, fauna and other conservation features of the rural lands. The core of the threat lies with councils allowing more people, homes and other associated development disturbances to continue to proliferate across the agricultural landscape.

- **The net benefit of agricultural land use in terms of economic, social and environmental outcomes**

Agriculture is important from a production and employment perspective and as earlier outlined above, it provides a host of landscape, flora, fauna and other conservation benefits for the land owner and the wider community. These clearly need protection.

Landholders 'right' to subdivide their land should not be at the expense of the greater economic, environmental and social rights of this and future generations.

The “right” of landholders to subdivide is inconsistent with the protection and encouragement of long term sustainable agriculture. Uncontrolled subdivision fragments land and increases potential conflict between rural residential landholders, hobby farmers, traditional farmers and environmentalists. Conflicts that may arise include the redirection of water flows, transport routes near dwellings, odour, noise, chemical problems from farming practices, control of feral animals and noxious weeds as well as the loss of remnant vegetation with its associated biodiversity.

Subdivisions increase the cost to council (and therefore ratepayers) of providing services to ever more dispersed rural settlements.

Agricultural land that is lost to rural residential development is not easily restored. This has the effect of pushing agricultural production on to more marginal, lower quality land at greater environmental, social and economic cost.

Rural residential development can also increase property values in rural areas, leading to increased pressure to develop land for urban purposes, making it more attractive for farmers to sell and casting doubts about long term farming investment.

Federal and State Government planning policies and instruments strongly and consistently reinforce the development of sustainable agriculture. In the Bathurst region agricultural production is worth \$50 million annually with a considerable multiplier effect to the local economy.

GB believes that local council planning policy should seek to protect this vital source of income and long term investment for all the people of the district rather than enable subdivision as a “right” or “privilege” of the landowner to the detriment of the wider community and to future generations.

- **Advise on a preferred land use planning approach.**

GB continues to support the approach demonstrated by Bathurst Regional Council in its exhibited draft Rural Land Use Strategy. In particular it applauds the opportunities provided to strengthen the communities at its villages and at other carefully selected localities close to the city as well as the intent to cater for horticulture and general agriculture by establishing realistically large minimum lot sizes to protect workable enterprises from further subdivision.

This approach seems to offer sensible opportunities for rural living and innovative small area farms while stopping the trend to allowing creeping urbanisation of the entire landscape. GB supports the concept of allowing for second homes on rural holdings for workers and retiring farmers without creating separate lots that can be later sold to rural life stylers.

It particularly supports the approach of assertively directing rural living away from remnant native bush and other environmentally sensitive lands as well as developing comprehensive control plans for those limited lands that are selected for development. This approach avoids the most important parts of the landscape for biodiversity but also provides a ways to set high standards where development will be allowed.

A sensible approach to locating limited rural living developments as well as specifically excluding areas of conservation values, should also aim to facilitate the rehabilitation potential of already cleared, low conservation value, degraded rural lands. It should also encourage innovative opportunities such as permaculture and organic horticulture.

Whichever approach is finally taken, it is imperative that it very explicitly protects flora, fauna biodiversity and prohibits developments that are not ecologically, socially or economically sustainable.

GB is particularly sensitive to the rising tide of awareness and concern in the community as to the implications of climate change on land use planning. It believes that the rapid pace of change could make many of the proposed Bathurst Regional Council strategies redundant and ineffective. GB suggests that any planning approach recommended by the Inquiry must include a response to this critical issue including climate change models, management proposals and contingency planning for accelerating rates of change.

Reducing the size of rural holdings will minimise opportunities for landholders to participate in the carbon economy fast creeping up on us. There will be a carbon economy and landholders will be able to participate, both through plant and soil bio-sequestration programs.

The other point associated with small lifestyle blocks spread willy-nilly is the extra burden this places on greenhouse gas emissions as the lifestyle people by necessity will do a great deal of vehicle travel, often one person per car and often that car is a 4WD.

Development should be concentrated on the medium to high density options with the city and villages as is exemplified in many cities and towns now world wide. The fact that this type of development has been done badly in the past does not mean those mistakes need to be repeated. Good examples will change public opinion quickly.

In the coming carbon economy a price on carbon will certainly favour local food sources over those transported long distance. This will give a fillip to local production, especially of fruit and vegetables and land which is now orchard land, market gardens or dairy's, should not be subject to further lot size diminishing.

GB alerts the Inquiry to the potential community concerns that are likely to develop as presently small communities come to grips with the social changes that will be evident once the current unmanaged semi urbanisation is strategically focussed at particular localities. There is a clear need to create and manage villages and rural settlement clusters so that they have the facilities and infrastructure needed to build and support healthy, dynamic and functional communities.

The Inquiry needs also to address the difficulties of ensuring reasonable water supplies for these developments as well as the demands for other physical and social services likely to be generated by the changes at selected localities.

- **Advice on establishing minimum lot sizes and/ or subdivision constraints.**

GB points out the importance of using realistic minimum rural lot sizes as a way to stop speculative subdivision and semi urbanisation of the rural landscape. By teaming this with careful selection of where rural living can occur and setting and applying high standards of development controls, councils will have the greatest chance of protecting the rural landscape, productive agriculture and biodiversity. GB has no expertise or view on how these minimum sizes should be established but supports methods endorsed by the Department of Primary Industries to assist councils with this task.

It is critical that with whatever method is used, that the resulting minimum lot sizes be of a scale that effectively deters land speculation based on the likelihood of subdivision and house building. It should be clear from the sizes calculated that these are operating, productive and sustainable farms and not lifestyle blocks.

Thank you for the opportunity to contribute to this important Inquiry. GB would welcome further opportunities for input.

Yours sincerely,

Wayne Feebrey
Chair Greening Bathurst