

# Namoi Regional Job Precinct

Policy Review Report



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## Acknowledgement of Country

We acknowledge Country and pay respects to the Gomeroi/Gamilaroi/Gamilaraay/Kamilaroi people as the Traditional Owners and Custodians of the land and waters on which the Namoi Regional Job Precinct is located. We pay our respect to Elders past, present, and emerging.

We recognise their continued connection to Country and that this connection can be seen through stories of place and cultural practices such as art, songs, dances, storytelling and caring for the natural and cultural landscape of the area.

We also recognise the continuing living culture of Aboriginal people, and the significance of Namoi in that living culture. We recognise the contemporary stories of displacement and the cultural significance of Namoi in the continued journey of self-determination in Australia.



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## Abbreviations used in this Report

Abbreviation	Long form
<b>CBD</b>	Central business district
<b>CSR</b>	Corporate Social Responsibility
<b>DCP</b>	Development control plan
<b>DPHI</b>	Department of Planning, Housing and Infrastructure
<b>DPIRD</b>	Department of Primary Industries and Regional Development
<b>DPIRD–Agriculture</b>	Agriculture and Biosecurity branch of Department of Primary Industries and Regional Development
<b>DPIRD–RDD</b>	Regional Development and Delivery branch of Department of Primary Industries and Regional Development
<b>EEPA</b>	Environment and Food Production Areas
<b>EIS</b>	Environmental impact statement
<b>EPA</b>	Environment Protection Authority
<b>EPI</b>	Environmental planning instrument
<b>FTE</b>	Full-time equivalent
<b>GIFT</b>	Gunnedah Intermodal Freight Terminal
<b>Guideline</b>	Intensive Livestock Agriculture Guideline – Management of Odour
<b>GVAP</b>	Gross Value of Agricultural Production
<b>IPA</b>	Identified Production Areas
<b>LEP</b>	Local Environmental Plan
<b>LGA</b>	Local Government Area
<b>LSPS</b>	Local Strategic Planning Statement
<b>LUCRA</b>	Land Use Conflict Risk Assessment
<b>R&amp;D</b>	Research and development
<b>Regional Plan</b>	New England North West Regional Plan 2041
<b>RJP</b>	Regional Job Precinct
<b>SBC</b>	Strategic Business Case
<b>SEE</b>	Statement of Environmental Effects
<b>SILEP</b>	<i>Standard Instrument—Principal Local Environmental Plan (2006 EPI 155a)</i>
<b>SIP</b>	Strategic Implementation Plan

# 1. Introduction

## 1.1 Purpose of report

The purpose of this Policy Review is to describe the comprehensive planning framework for attracting investment in intensive livestock agriculture and secondary agriculture processing the Namoi Regional Job Precinct (Namoi RJP), NSW. The Namoi RJP aims to explore opportunities for sustainable growth of the intensive agriculture sector by identifying locations for production clusters where amended planning controls can be applied.

This Policy Review Report provides the planning framework review and strategic rationale for proposed amendments to the current planning framework. It describes the need for change to promote investment and support the streamlining of development assessment for intensive livestock agriculture and related uses in the Namoi. This policy review is based on available public information, consultation with stakeholders and technical inputs as described.

This Policy Review Report forms part of a suite of documents (Figure 1-1) that inform the future planning for intensive livestock agriculture and the implementation of the Namoi RJP.

## 1.2 Background

### 1.2.1 Jobs and economic development in Regional NSW

The NSW Government is committed to supporting economic development and job creation in regional NSW. Regional NSW has one of Australia's largest and most diverse regional economies, with an array of industries including agriculture, energy and resources, and strong tourism, service and manufacturing sectors. Across NSW, economic and industry specialisations have arisen from locational or competitive advantages. They also benefit from access to a large, skilled workforce, investment, and the ability to co-locate supporting product or value-add industries and activities.

The purpose of the RJP initiative is to deliver faster planning approvals to provide local councils, regional communities, industry, and businesses with greater confidence around future investment and development. The creation of RJP's aligns with the Department of Planning, Housing and Infrastructure (DPHI) Regional Plans and the Premier's Department and the Cabinet Office's Regional Economic Development Strategies, which set the strategic vision and engine industries for each Functional Economic Region across regional NSW. Namoi RJP aligns with the NSW Government response to recommendations identified by the NSW Agriculture Commissioner in the report *Improving the Prospects for Agriculture and Regional Australia in the NSW Planning System* (Section 3.4). The NSW Government will work closely with local councils to build on the long-term strategic planning work already done at a state and local level, to streamline planning processes and make it easier for businesses to set up or expand.





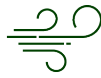
**Intensive Livestock  
Agriculture in the Namoi:  
Policy Review**

*For consumption by all  
interested parties*

**This report provides a  
technical analysis of the  
industry and describes  
strategic opportunities to  
create more clarity within  
the planning framework**

This report explores the strategic importance of intensive livestock agriculture in the region and presents the strategic and statutory planning context of the industry. It includes technical odour modelling which creates contour maps for Identified Production Areas and associated odour risk ratings.

The Policy Review evaluates planning and non-planning measures to provide more development certainty for investors.



**Intensive Agriculture  
Guideline: Management  
of Odour**

*Primarily for use by industry,  
state and local governments*

**This document gives  
industry specific assessment  
guidance that aims to reduce  
conflict between land uses,  
allowing industry to grow  
and the amenity of homes to  
be protected**

This tool supports development applications and gives assistance to prospective investors in managing land use conflict through a standardised risk assessment. This also embeds the mapping of the Identified Production Areas.



**Strategic  
Implementation Plan**

*Primarily for use by state  
and local governments*

**This is a roadmap for  
implementing various  
recommendations from the  
Policy Review**

This document recognises that there are various factors that influence implementation of the outcomes of this program of work. It allows a staged delivery of all the recommendations that have flowed on from the Policy Review.

It relies on partnerships working together to ensure that industry will thrive while ensuring long term triple-bottom sustainability is supported for residents in the Namoi.



**Namoi RJP  
Discussion Paper**

*For consumption by all  
interested parties*

**A legal document which  
outlines the 'Explanation of  
Intended Effect' of changes  
to planning legislation, for  
the purpose of consultation**

This document outlines the intended changes to planning legislation to implement the Namoi RJP.

It recommends a new clause be introduced to relevant Local Environmental Plans to require consideration of the Namoi RJP Intensive Livestock Agriculture Guidelines in future relevant proposals within the Identified Production Areas.

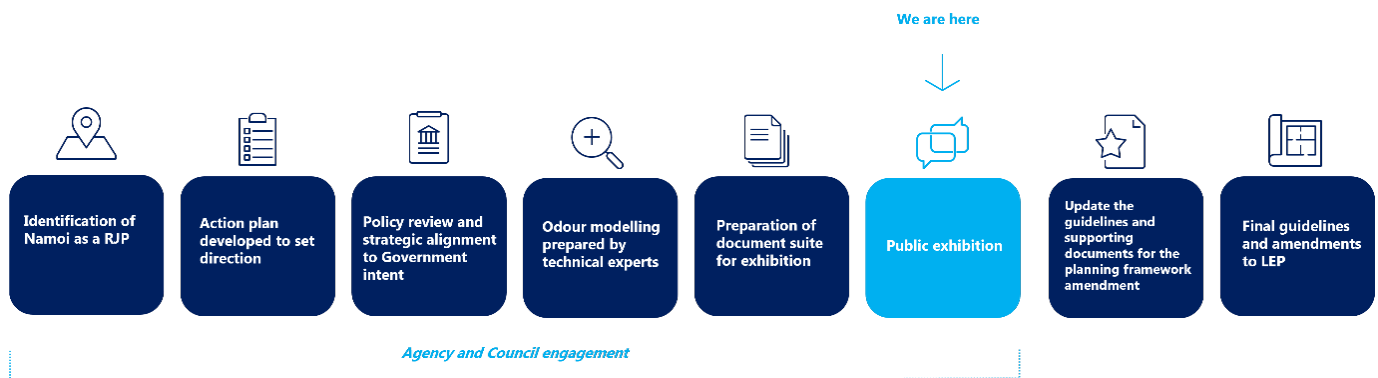
**Figure 1-1. Namoi RJP suite of planning documents**

### 1.2.2 Regional Job Precincts Initiative

Driven by the Department of Primary Industries and Regional Development (DPIRD), RJPs aim to tailor planning reform to support regional economic development and engine industries to create jobs in regional NSW. Locations cover a diverse range of locations and investment opportunities and were selected based onsite suitability and potential to deliver economic benefits to their regions.

The RJPs initiative is an extension of the Special Activation Precinct program and is an important part of the NSW Government's 20 Year Economic Vision for Regional NSW and are delivered through the Snowy Hydro Legacy Fund.

As illustrated in Figure 1-2, the Regional Job Precincts follows a staged approach to formulating improvements to the planning framework based on strategic analysis and technical evidence.



**Figure 1-2. RJP Process**

(Source: Department of Primary Industries and Regional Development)

### 1.3 Report structure

Table 1-1 describes the structure of this report.

Table 1-1. Report structure

Sections	
1.	<b>Introduction</b> Purpose of Report, background overview of economic development in Regional NSW, overview of the Namoi RJP initiative, and locational description of the Namoi Region.
2.	<b>Namoi RJP</b> Description of the Namoi RJP and the desired outcomes, overview of intended vision and key characteristics of the key investigation areas.
3.	<b>Strategic context</b> Overview of key strategic issues, industry feedback from the Agricultural Land Supply Assessment studies, and overview of strategic context.
4.	<b>Planning framework review</b> Analysis of the need for change and potential for streamlining the planning framework. Description of the spatial analyses carried out to inform the Namoi RJP planning framework. Description of the recommended statutory and strategic planning framework and supporting measures to support intensive agriculture and secondary processing.
Appendices	<b>Appendix 1: Agriculture Land Supply Assessment</b> Review of agriculture land supply and demand for intensive livestock agriculture and secondary processing industries. <b>Appendix 2: Review of current planning framework</b> Description of the issues and options for amending the current planning framework <b>Appendix 3: IPA boundary maps</b> Maps showing the boundaries of Identified Production Areas. <b>Appendix 4: Intensive Livestock Agriculture Odour Modelling Report</b> Technical report describing strategic odour modelling and methodology for investigation areas 1-6. <b>Appendix 5: Industrial Precincts Air, Noise and Odour Report</b> Technical report describing assessment of air, noise and odour constraints for investigation areas 7 and 8.

## 2. Namoi RJP

### 2.1 Vision for Namoi RJP

Namoi RJP is one of the NSW's leading food producing regions with a well-established intensive agriculture sector, primarily poultry (meat and layer) production, and feedlots. The agriculture industry in this region is growing rapidly, driven by major macro trends including rising global demand for safe and reliable agrifood, particularly in rapidly developing markets across Asia.

The Namoi Region is set to benefit further from opportunities to support the sustainable growth of the intensive livestock agriculture sector and livestock production.

However, the region's existing production advantages alone will not be enough to ensure its future success, with many global producers and Australian agricultural centres seeking to tap into the market potential of agriculture. Competition to attract investment in value adding agricultural investment is fierce. An increasingly uncertain production climate and volatile market conditions will also continue to impact the long-term viability of higher cost/less efficient producers.

To fully capture the potential of agricultural production in the Namoi Region and its potential to support sustainable economic development for the region, the Namoi RJP aims to establish a comprehensive and forward-thinking planning framework. The goal is to make the Namoi Region an attractive location for investment, while preserving important environmental and cultural values, optimising the use of resources and enhancing liveability and resilience.

The Namoi RJP focuses on the region's strengths in the agriculture industry by identifying locations for production clusters where amended planning controls can be applied that will support the sustainable growth of the intensive livestock agriculture sector and secondary agricultural industries. The Namoi RJP builds upon the long-term strategic planning work already carried out at both the State and local levels, as highlighted by the NSW Agriculture Commissioner (Section 3.4).

To achieve the vision, the objectives for the Namoi RJP planning framework are:

- Identifying and safeguarding areas suitable for agriculture and related uses, while preventing encroachment from incompatible land uses;
- Encouraging investment in processing industries and investigation areas that promote industry growth without compromising the region's amenity;
- Implement an innovative approach to intensive livestock agriculture planning to deliver greater consistency and speed, thereby increasing the confidence of producers and investors;
- Promoting diversification within the agriculture and agribusiness sectors, facilitating a transition away from mineral industries, and capitalising on domestic and international opportunities; and
- Unlocking investment and growth opportunities that can generate economic stability and create jobs for regional economies.

### Vision

The innovative planning framework will achieve the vision for the Namoi RJP by:

- Providing investor certainty through upfront strategic planning aligned with engine industries (intensive livestock agriculture and processing);
- Identifying locations for production clusters where amended planning controls can be applied to minimise land use conflict; and
- Providing appropriate level of certainty and flexibility in the planning framework to enable maximising of regional value-adding and supporting efficient supply chains.

## 2.2 Location

The Namoi Region is in the New England North West Region of NSW and consists of five Local Government Areas, including Gunnedah Shire, Gwydir Shire, Liverpool Plains Shire, Tamworth Region and Walcha Shire. It comprises eight investigation areas focused on intensive livestock agriculture and secondary processing (Figure 2-1), comprising:

- **Six regional intensive agriculture primary investigation areas:** Intensive livestock agriculture in the context of the Namoi RJP will primarily focus on established strengths in poultry meat and layer farming sheds, livestock feedlots and the emerging protected cropping industry with compatible and complementary uses supported where appropriate. These primary investigation areas are in the rural (primary production) areas of the region.
- **Two secondary investigation areas with a focus on industrial and agricultural processing:** These secondary investigation areas are envisaged to include secondary intensive agribusiness such as the processing of primary produce, freight, logistics, value-add agribusiness, manufacturing of food products and industries and services that support intensive agriculture. These secondary processing investigation areas will be located within or in closer proximity to urban centres in comparison to the primary investigation areas.

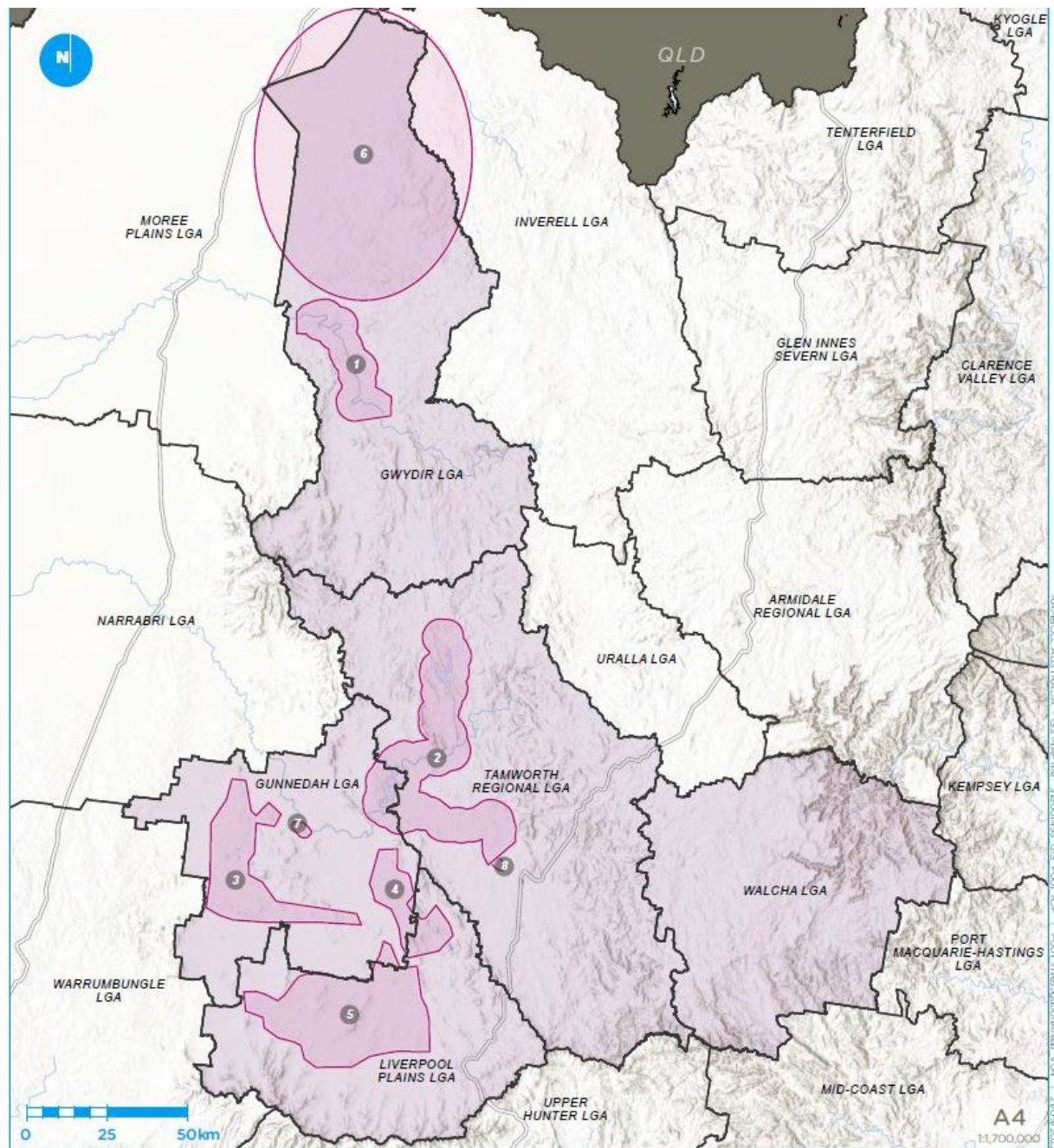
Namoi RJP investigation areas were identified based on an analysis of intensive livestock agriculture performance criteria, as described in Section 4.2.2. Investigation areas cover a total area of approximately 35,474 sq km<sup>1</sup> (and is home to a population of 92,274 people).<sup>2</sup> It is one of the most productive agricultural areas in NSW, with well-established extensive livestock, dryland and irrigated cropping operations, and large poultry and beef industries. The region is also one of the state's important mining districts.

A detailed description of the investigation areas is provided in Table 3-3 in Section 3.5.

<sup>1</sup> Ibid.

<sup>2</sup> Australian Bureau of Statistics (2021) Data by Region [<https://dbr.abs.gov.au/>], ABS Website, accessed 16 March 2023. Total calculated from each Local Government Area.





**Legend**

- Investigation area
- Local Government Area within project



Figure 2-1. Namoi RJP Locality Plan – Investigation areas



### 3. Strategic context

This chapter provides strategic land use policy considerations to support relevant planning authorities to:

- Implement an innovative approach to planning to support investment in intensive livestock agriculture in areas identified as being potentially suitable; and
- Assess development applications for odour sensitive uses within land identified as being potentially suitable for intensive livestock agriculture.

#### 3.1 Supporting investment in economic development

##### 3.1.1 Analysis of Namoi agriculture sector

###### **Intensive livestock agriculture**

The Namoi Region is a key producer of intensive agriculture, including beef, lamb, and poultry in NSW. These industries are rapidly growing, driven by major macro trends including rising global demand for safe and reliable agrifood, particularly in rapidly developing markets across Asia. The Namoi Region is set to benefit further from opportunities to support the sustainable growth of the intensive agriculture sector and livestock production.

The Namoi Region's agricultural and agribusiness industries are recognised at both a State and local government level as being critical to the economic prosperity of the State. Like much of regional Australia, trends such as an increase in global food demand, a declining and ageing population, technological advancements and environmental sustainability are creating noticeable shifts in Namoi's rural economy.

Gross Value of Agricultural Production (GVAP) is a key measure of agricultural activity. GVAP is the value placed on recorded production of agricultural commodities at wholesale market prices. It is also referred to as the Value of Agricultural Commodities Produced. The GVAP for the Namoi Region increased by \$245M (24%) over the 5-year period from 2016 to 2021, with the total value of agricultural production lifting from \$1.024 billion to \$1.269 billion.

The largest growth sector in 2016-2021 was broadacre crops, lifting from \$435 million to \$609 million (an increase of \$173 million) and slaughtered livestock which increased from \$493 million to \$553 million (additional \$60 million). This growth resulted in a shift in the Region's dominant production sector from slaughtered livestock to broadacre cropping, though total livestock activities remain greater than broadacre cropping with a total GVAP of \$620 million in 2021.

Namoi's agricultural economy is driven by three key sectors – poultry (meat), livestock (predominantly beef) and broadacre crops. These three sectors have clear upstream and downstream implications for other secondary intensive agricultural industries that require land and floorspace.

The Secondary Intensive Agricultural Land Supply Assessment (Agriculture Land Supply Assessment) for the Namoi RJP provides an overview of the intensive livestock agriculture industry and a detailed consideration of the land uses associated with the industry and processing precincts in Area 7 (Gunnedah) and Area 8 (Tamworth). The Agriculture Land Supply Assessment is provided in Appendix 1. Key market findings of the Agriculture Land Supply Assessment include:

- Local secondary intensive agricultural activity is dominated by livestock processing and a small agriculture-related manufacturing sector, the latter recording minimal growth in the past decade.
- The Namoi Region currently includes approximately 5.7 million poultry meat chickens. The chicken industry has grown rapidly (35.1%) over the period between 2016 and 2021 with the industry largely concentrated around Tamworth. Meat chickens are contract grown in large sheds, typically averaging 3,000sqm in size and can house 18-19 birds per square metre depending on the size of the commercial operator.
- The poultry (meat industry) indicates a clear growth sector in the Namoi agricultural industry. An additional 500-600 meat sheds would be needed to meet the full processing capacity of the approved Baiada Oakburn Poultry Processing Plant expansion. The development consent for expansion of the Oakburn Poultry Processing Plant (reference: SSD-9394, 18/12/2020) includes:
  - Poultry processing facility – capacity to process up to 3 million birds a week
  - Protein Recovery Plant – capacity to render up to 1680 tonnes of finished product per week.
- Growth in beef processing is expected to be more limited without an uptick in the capacity of the local feedlot sector.

While there has been sustained and ongoing growth in the agricultural sector in New England North West as a whole, this is largely due to the growth in the value of broadacre grains, hay and extensive livestock. By contrast, ABS data indicated stagnation and even rapid decline in some intensive agriculture sectors in the region between 2011 and 2016, which speaks of a vulnerability, signalling that growth in intensive agriculture, even if it seems well established in a region, should not be taken for granted.

### **Poultry sector**

The total poultry sector is a significant contributor to Namoi's regional economy delivering a value of ~\$112.5 million in 2021 (ABS, 2022), which consisted of meat production (broiler) at ~\$99.8 million and egg production of \$12.7 million, representing 8.9% of the total regional GVAP.

The broiler sector is logistically sensitive, requiring processing plants and farms to be in relative proximity (approximately 200 kilometres) and therefore driving the formation of hubs or centres of production. In the Namoi, the Tamworth LGA accounts for 93% of regional broiler production with secondary services (e.g. processing plants) also located in Tamworth.

The approved new facility, the Oakburn Poultry Processing Plant, is located immediately west of Tamworth Regional Airport. The facility will dramatically increase production output of the region and improve efficiencies for the company and, in doing so, increase the demand for locally produced/farmed birds. It is estimated that an additional 500-600 sheds will need to be developed within the Namoi Region to enable the future processing facility to operate at full capacity. It is estimated that this projection will generate another 240 direct jobs (full time equivalent (FTE)) on farms and significant employment opportunities for support services.

## Beef sector

The beef sector is one of the most significant contributors to the Namoi economy, delivering a production value of ~\$405 million in 2021, approximately one-third of GVAP (ABS, 2022). The regional beef sector is predominantly extensive grazing supported by an intensive feedlot sector utilising local grain production as a fodder source.

The Namoi Region currently hosts around eight feedlots, including two large operations, Elders' 20,000 head 'Killara' and JBS's 35,000 head 'Caroona'. Owing to the vertical integration of these businesses, these two operations supply to a mix of local and interstate abattoirs ('Killara' to Teys Australia in Tamworth and 'Caroona' to JBS in Ipswich). The Namoi also includes a range of smaller feedlot operations, scaling up to around 1,000-5,000 head. Beef feedlot operations are concentrated around the Gunnedah and Liverpool Plains regions, with close access to grain silos in the Gunnedah-Werris Creek corridor, and the feed processing plant and abattoir facilities in Tamworth.

Intensification of production through feedlot operations represents the clearest pathway to achieving significant additional scale that would support further intensive secondary production (e.g. processing, feedstocks/supplements, and other supply chain opportunities). The industry also includes substantial local value adding, through the Teys Australia 150,000 head per annum abattoir located at Tamworth that processes around 25% of cattle produced in the region.

### 3.1.2 Regional strengths and challenges

The New England North West has a number of strengths for intensive agribusiness including:

- A strategic location between the growth areas of South East Queensland and Sydney;
- Growing regional cities and strong strategic centres that provide high level services, quality housing, a rural lifestyle and a stable workforce;
- New intermodal rail hubs that will enable more efficient transport of goods to ports;
- Critical mass of livestock to support intensive feedlot operations, regional abattoirs and processing and manufacturing businesses;
- Extensive areas of suitable and competitively priced land across a range of climate zones;
- Proximity to one of Australia's premier grain growing areas and source of protein;
- Support within local and state government for intensive agribusiness;
- An attractive alternative for intensive agribusinesses to relocate out of metropolitan and peri-urban areas; and
- A mature supply chain in extensive livestock production (meat abattoirs and meat product manufacturing, oil and fat manufacturing, grain milling, freight and logistics) that can be leveraged to support the intensive agribusiness sector.

Intensive livestock agriculture in New England North West faces a number of challenges, such as:

- The animal industries sector is experiencing rapid change in terms of intensity, scale, technology, and management techniques;
- Clustering of production facilities near to processing centres is vital to the long-term sustainability of the industry;
- There is strong competition for intensive agribusiness investment between regional communities across Australia that face similar population, employment and economic growth issues; and
- Intensive agribusiness has become increasingly vertically integrated, which places pressure on businesses, particularly small growers, outside the integrated supply and value chains. Vertical integration also means that the supply chain tends to be clustered in a number of key locations, rather than being distributed among a number of centres, which can result in

isolated disruptions having significant supply chain issues compared to a more balanced and dispersed network.

## 3.2 Key strategic planning issues

### 3.2.1 Overview

Industry feedback from the two largest intensive agriculture sectors in Namoi (i.e. poultry and beef) suggest that growth is challenged by a range of factors, with water availability, labour shortages and onerous (perceived) environmental approval pathways the principal challenges. A constraints and preference analysis suggests there is still significant capacity for the expansion of the local poultry and beef sectors. However, this is contingent on planning agencies' approach to odour and buffer requirements from sensitive receivers.

The key issues and opportunities identified as part of the market sounding interviews conducted as part of the Agriculture Land Supply Assessment (Appendix 1) include:

- **Water** – Water is the most significant constraint determining where a facility will be located and the extent a facility can expand. This constraining factor presents an opportunity to integrate circular technologies within the investigation areas to assist in managing water demand, availability, use and reuse of water.
- **Planning** – In response to the perception that the planning framework and associated modelling is overly onerous, complex, and costly, Namoi RJP provides opportunities to increase certainty for applicants and decision-makers. Odour and proximity to sensitive receivers are a primary constraint to future growth. Odour modelling is used to identify locations where intensive livestock agriculture presents less of risk of land use conflict.
- **Labour** – A key constraint is labour shortages and skills in processing sectors and its downstream activities. The location of farms in remote areas and availability of housing cause additional constraints to the attraction and retention of workers to rural areas.
- **Energy and utilities** – Energy and utilities are not a major inhibitor. Consideration and integration of circularity across business and sectors should be a key consideration as part of the Namoi RJP.
- **Competitor regions** – There is a growing focus and transition to areas that facilitate streamlined planning pathways for agricultural industries. One example is South East Queensland that utilise a code-based development application assessment process to streamline development assessment and processing times. The Namoi RJP should explore the development and integration of a similar streamlined code-based assessment process for development on land where the odour modelling deems intensive livestock agriculture is suitable.
- **Council and community support** – Community support varies between industries and locations. The variations in levels of support between industry is based on community awareness and availability of information, especially in relation to economic and social value of an industry. Provision and access to information to the community will be important in obtaining and maintaining community support for intensive agricultural industries.

Key strategic considerations associated with intensive livestock investment in Namoi Region are described in Figure 3-1.

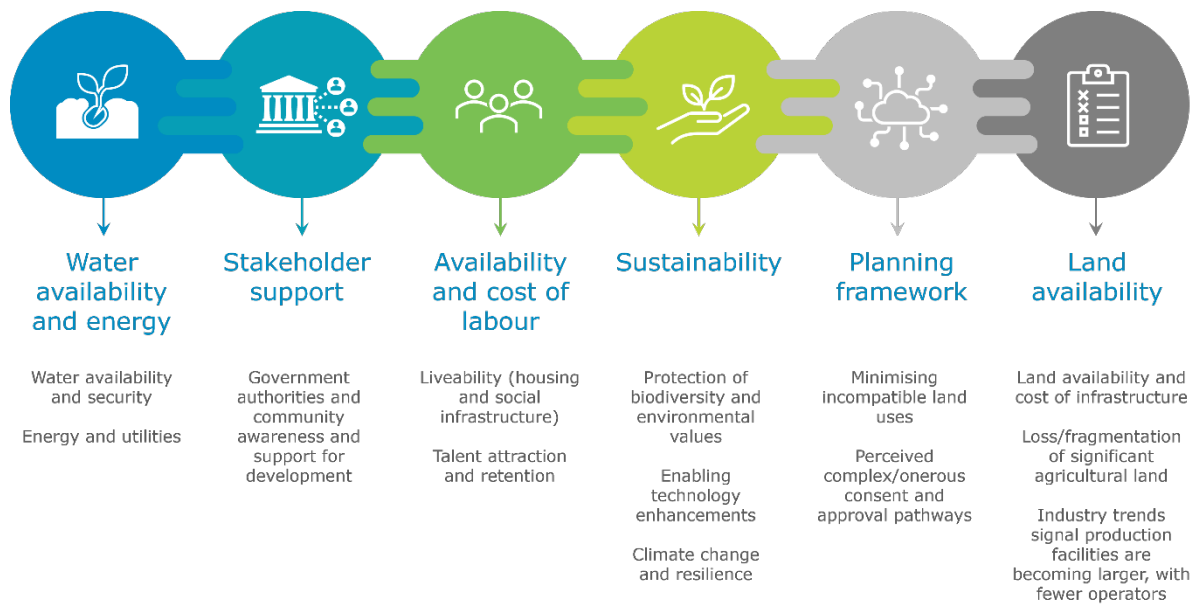


Figure 3-1. Key issues for supporting intensive livestock agriculture in the Namoi Region

The following subsections explore the relevant considerations for establishing tailored amendments to the planning framework for Namoi RJP.

### 3.2.2 Water supply

#### Regional water strategies

To improve the security, reliability, quality, and resilience of NSW's water resources, DPHI in partnership with Water NSW, local councils and Aboriginal communities, local communities and other stakeholders are currently preparing and finalising 12 new regional water strategies. These regional water strategies aim to plan and manage the water needs in each NSW region over the next 20 to 40 years and address each region's particular challenges, needs and opportunities, while aligning with the broader policy and strategic planning context around water in NSW. A secure water supply is essential for intensive agribusiness and is a threshold issue that can constrain industry growth in the Namoi Region.

The final strategies developed over 2020 to 2023 are adaptive, with inbuilt review processes to ensure each region has an effective and relevant plan in place for future water management.

Of relevance to the Namoi RJP is the Namoi Regional Water Strategy (June 2023) and the Gwydir Regional Water Strategy (November 2022). The Namoi Regional Water Strategy is a long-term regional water strategy guiding the NSW Government to best address the water-related challenges to support a liveable and prosperous Namoi Region. The Gwydir Regional Water Strategy comprises a strategy and implementation plan with 22 prioritised actions to help improve the Gwydir Region's readiness to adapt to a more variable climate.

Regional water plans outline a number of solutions (actions) that can be built on to support the delivery of healthy reliable and resilient water resources for the region. The actions outline the need for:

- Additional government involvement and investment;
- Investigatory studies to understand the current water conditions and level of water security required;
- Improvements to the access of information for the public;
- Further water modelling;
- Protection and remediation of high priority areas; and
- Better understanding of the status of licensing in the region.

The strategies recommend coordinated management of these risks and challenges via a whole-of-government approach to water security with additional consultation and engagement with local communities and First Nations people.

### **Water demand**

For the Namoi RJP, water is considered the primary barrier to investment and expansion and secure access to water is critical to the functioning and success of the proposed industries. It is understood that some LGAs within the Namoi RJP have better access to water than others.

Key characteristics of the water demand for intensive livestock agriculture and processing in Namoi include:

- **Water sources:** Typically, intensive livestock agriculture water supply is sourced via groundwater, while secondary processing industries rely on secure potable water, typically sourced from town water supplies.
- **Water efficiency:** Water efficiency in intensive livestock agriculture can vary depending on the management practices employed. Implementing water-saving technologies such as efficient watering systems, water recycling, and manure management systems can help optimise water usage. Similar to agricultural processing industries, water efficiency in livestock processing industries can be improved through the implementation of water recycling, reuse, and efficient cleaning practices.
- **Water demand:** Seasonal or climatic conditions influences water demand in intensive livestock agriculture. During dry periods, animals may require additional water for hydration and to compensate for reduced pasture availability. In comparison, water demand for livestock processing industries is consistent throughout the year.
- **Sustainable practices:** Both intensive livestock agriculture and processing need to adopt sustainable practices to minimise water usage, implement efficient technologies, and effectively manage wastewater to reduce their environmental impact and ensure the responsible use of water resources.

### **Securing water for intensive livestock agriculture and processing**

The actions and recommendations of the regional water strategies are considered outside of the scope of the Namoi RJP and planning framework. However, to align with and support the implementation of the regional water strategies, the Namoi RJP should include further consideration of water availability to support targeted industries and locations.

The planning framework must include consideration of appropriate development controls, guidelines and matters for consideration to encourage water efficiency and appropriate siting to support the efficient management and reuse of water in the region.



For intensive livestock agriculture, feedback received during the preparation of this report is that the groundwater water supply in most areas within Namoi RJP are fully committed/allocated. This would mean that the only method to obtain secure water supply is to purchase water off the market. The groundwater market is a cap system, and the Namoi Region is one of most highly utilised groundwater systems in NSW (Department of Climate Change, Energy, the Environment and Water, *pers comm*).

### 3.2.3 Stakeholder support

New intensive livestock agriculture development applications are often contested due to fears that adverse impacts will cause the surrounding amenity to decline. Simply complying with regulation is often not enough. Gaining broad social acceptance (i.e. a 'social licence' to operate) occurs outside the formal permitting or regulatory processes. It requires stakeholders to invest in trust-based relationships based on timely and effective communication, meaningful dialogue, addressing concerns whenever possible, and ethical and responsible behaviour.

In return for this investment, intensive livestock agriculture can:

- gain credibility and legitimacy for its presence and activities;
- build a reputation for acting responsibly and genuinely striving for good performance;
- reduce the risk of costly delays in regulatory approvals due to opposition; and
- protect business reputation as the result of an unforeseen event.

Building social licence can also have material benefits, particularly in reducing the cost and time associated with establishing a development. Lack of understanding and knowledge of contemporary intensive animal husbandry infrastructure and operations, for example, can lead to opposition and conservative responses by communities.

### 3.2.4 Availability and cost of labour

Intensive agribusiness requires strong labour markets and skills along with transport efficiencies and costs (with minimal pinch points that limit the size of transport that can be used). The *Namoi Workforce Attraction and Retention Strategy* provides a series of recommendations for local government to work with other stakeholders with the aim for "*attraction and retention of new workers to build new capability, capacity for industry growth and to ensure the delivery of essential services to the community*" (ProjectsJSA for Namoi Unlimited, October 2023).

### 3.2.5 Promoting sustainable intensive livestock agriculture

Sustainability related matters, such as climate resilience, sustainable and ethical work practices, and resource reuse, will be increasingly important to protect the industry from extreme climatic events. Such issues need to be addressed both across the industry and region as well as for individual operations.

Intensive livestock agriculture has been associated with several environmental challenges, including soil degradation, water depletion, and greenhouse gas emissions, which have adverse effects on the region's environment, biodiversity, and economy. Therefore, it is crucial to adopt sustainable practices that promote resilience, environmental protection, and circularity to mitigate these impacts and promote long-term sustainability.

The region's growing population and the increasing demand for food and other agricultural products necessitate the adoption of sustainable practices that ensure efficient resource use and waste reduction. Sustainable practices such as water conservation, renewable energy, sustainable waste management, ethical work practices can help achieve these goals, leading to more sustainable, resilient, and productive agriculture in the region. Consumer demand for sustainably

produced products is increasing, and this trend is expected to continue in the future. Therefore, the planning framework must integrate sustainable practices that meet the market demand for sustainably produced products, promoting economic growth and social welfare.

Climate change poses significant risks to intensive livestock agriculture, including increased frequency and intensity of extreme weather events such as droughts, floods, and heatwaves. These events can have severe impacts on crop yields, livestock production and farm income. By adopting climate resilient practices, farmers can minimise these risks and maintain productivity in the face of changing climatic conditions. Climate resilient practices include sustainable soil health management, water management and risk-based zoning, which can improve farm productivity, enhance biodiversity, and reduce greenhouse gas emissions. In addition, by adopting climate resilient practices, farmers can contribute to global efforts to mitigate climate change by reducing emissions and promoting sustainable land use practices.

### 3.2.6 Planning framework and land availability

#### Impact assessment matters

A review of recent applications for local and State significant intensive livestock agriculture development applications was carried out. The key matters considered in the associated impact assessment of intensive livestock agriculture development proposals are described in Table 3-1. These matters indicate the priorities for the Namoi RJP to address to streamline the assessment and decision-making for intensive livestock agriculture development applications in the Namoi. Of the key considerations, minimising land use conflict, particularly because of odour emissions from intensive livestock agriculture operations, is the most significant in terms of supporting investor and community confidence.

**Table 3-1. Impact assessment matters for consideration (intensive livestock agriculture)**

Key issues	Other issues
<i>Significance of issue is typically common for all proposals requiring detailed technical assessment</i>	<i>Significance of issue typically reflects local conditions or are subject to standard management/mitigation responses</i>
Odour	Groundwater
Air quality ( <i>dust</i> )	Amenity ( <i>visual</i> )
Traffic	Land use conflict
Noise	Vermin control
Water use and stormwater management	Biosecurity
Surface water management ( <i>particularly impacts from effluent</i> )	Animal welfare
Waste management ( <i>particularly from manure and deceased animals</i> )	Social
Soils ( <i>degradation and excessive nutrients</i> )	Economic
Contamination ( <i>particularly relating to effluent management for cattle feedlots</i> )	Hazards ( <i>particularly bushfire risks and/or chemical storage</i> )
Biodiversity	Landscaping
Heritage	Safety and security
Cumulative impacts	Greenhouse gas emissions and climate change

### Minimising land use conflict

Encroachment by urban, peri-urban development and rural dwellings in proximity to existing intensive agriculture enterprises and processes (or future suitable locations for these uses) effectively 'sterilises' the surrounding land because of odour buffer distance requirements. For agriculture to continue to be a vital part of the regional NSW economy and for the long-term liveability of settlements, impacts of animal industries on sensitive uses need to be appropriately balanced.

Consultation with industry and government stakeholders has identified amenity impacts on dwellings resulting from odour emissions as the primary factor in determining suitability of land for intensive livestock agriculture. Intensive livestock agriculture operations will usually be compatible with other forms of agricultural production and are unlikely to preclude or unreasonably limit their operation or expansion.

Appropriate management of odour is a significant contributor to identifying sufficient land, minimising land use conflict, reducing complexity in the planning framework, and garnering community support (social licence to operate). As a result, odour is a key barrier to achieving long-term certainty both for operators (operational certainty) and for residents (certainty of amenity). Providing greater certainty in assessment and decision-making for intensive livestock agriculture development encourages ongoing industry investment.

One of the best means to minimise land use conflict is for intensive livestock agriculture farms to contain as much of the separation distance within the property boundary as possible. The requirements of the draft *Intensive Livestock Agriculture Guideline – Management of Odour* recognise that, although desirable, it will not always be possible for an intensive livestock agriculture farm to contain all odour emissions within the farm boundary. However, it is recognised that production facilities can be responsibly established, managed, and operated without adversely impacting on sensitive uses through careful siting, design and ongoing management.

Conducting up-front strategic odour modelling and utilising technical outputs to inform site selection supports achieving good planning outcomes that minimise risk of land use conflicts. Further, protecting land identified as being potentially suitable for intensive livestock agriculture from encroachment of future sensitive receptors, provides a long-term solution to ensure primacy of rural productive uses within the RU1 Primary Production land use zone.

### 3.3 Council collaboration

Regular collaboration with councils has been undertaken throughout the duration of the project, with the purpose of:

- Providing regular updates regarding status of the Namoi RJP project; and
- Establishing an understanding of the councils' appetites for change, future visions, opportunities and challenges with respect to intensive livestock agriculture production and processing in the region.

In both online meetings and in-person workshops, a number of key matters were raised. Figure 3-2 contains a summary.

These matters and their suggestions have not only been considered in this Policy Review Report but will also be further considered as part of testing statutory planning options.



Figure 3-2. Matters raised during council collaboration

### 3.4 Agriculture Commissioners Report

The *Improving the Prospects for Agriculture and Regional Australia in the NSW Planning System – A Report by the NSW Agriculture Commissioner* (NSW Agriculture Commissioner, 2021) (referred to as the 'Agriculture Commissioners Report') proposes short- and long-term measures to improve planning outcomes for agriculture producers, investors, and land regulators, as well as to increase certainty for nearby residents about the nature of those operations. The proposed measures are intended to assist councils in managing their planning and conflict-management functions.

The strategic direction for Namoi RJP reflects the recommendations made by the NSW Agriculture Commissioner in the report *Improving the Prospects for Agriculture and Regional Australia in the NSW Planning System – A Report by the NSW Agriculture Commissioner* (NSW Agriculture Commissioner, 2021) and the NSW Government Response to those recommendations.

In response to the Agriculture Commissioner's recommendations, the NSW Government stated that *'implementing this Response will help provide confidence to landholders, smooth the way for the rollout of the Roadmap and deliver on NSW Government commitments to address land use conflict for farmers whilst supporting sector growth'*.

Figure 3-3 describes the relevant recommendations of the NSW Agriculture Commissioner for improving the prospects for agriculture and regional Australia in the NSW planning system. Notations are included reflecting the response from NSW Government to the recommendations.

The Commissioner made a number of recommendations directed at adjusting the planning system in NSW to improve the regulatory environment for the agriculture sector and reduce land use conflicts involving agricultural and neighbouring operations. A summary of the key planning control recommendations from the Agriculture Commissioners Report and options for consideration for the Namoi RJP are provided in Table 3-2 below.

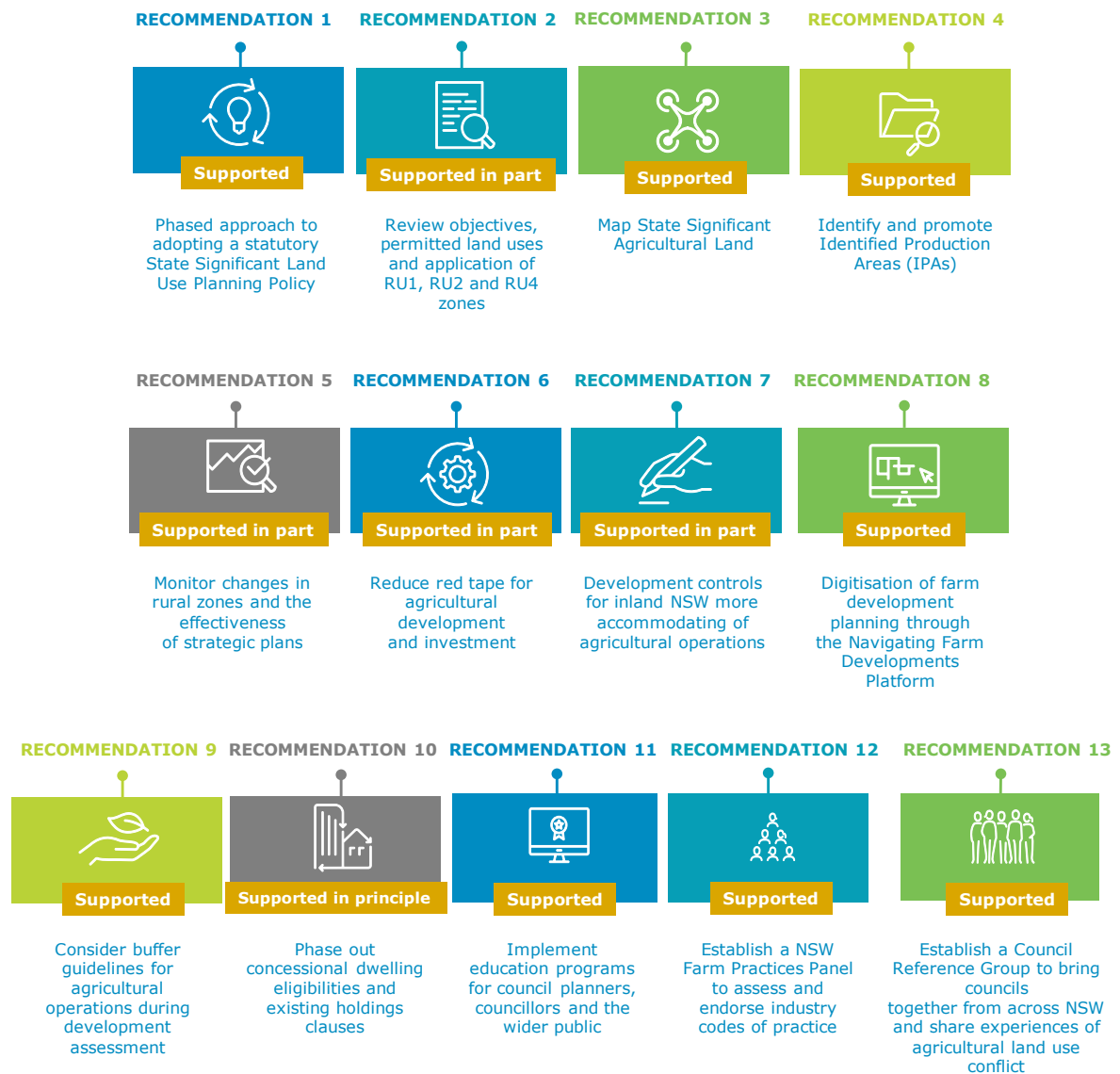


Figure 3-3. Agriculture Commissioner recommendations



Table 3-2. Key planning control recommendations from the Agriculture Commissioners Report

Issue	Agriculture Commissioner Recommendations	Options for the Namoi RJP
<b>Creation of Identified Production Areas (IPA).</b>	<i>(4) 'The NSW Government should identify and promote Identified Production Areas (IPAs) to build on existing and potential comparative advantages of different regions to promote agricultural investment and growth. Department of Primary Industries (DPI) should consult with relevant industries and councils on their development goals for agriculture and how IPAs could be implemented across NSW.'</i>	<ul style="list-style-type: none"> <li>Utilise investigation area mapping (Section 4.2.2), augmented by odour modelling prepared by Todoroki Air Sciences to identify IPAs within the Namoi RJP.</li> </ul>
<b>Legacy dwelling eligibilities.</b>	<p><i>(10) 'The NSW Government should require councils to improve the integrity and effectiveness of their rural zoning arrangements by phasing out concessional dwelling eligibilities and existing holdings clauses in the rural zones and provide appropriate support to do so.'</i></p> <p><i>'An IPA could <u>introduce a sunset provision to extinguish legacy dwelling eligibilities</u>, reducing the risk of future fragmentation and constraints on growth that councils cannot presently control. It is difficult for councils to know how many legacy dwelling eligibilities exist or where they are located. These legacy caveats can compromise the value of otherwise sound strategic planning and decision-making by councils.'</i></p>	<ul style="list-style-type: none"> <li>Consider a legacy dwelling entitlement sunset provision in the LEP to the effect that any land holder with an existing dwelling eligibility on a concessional allotment or existing holding could be given a period to submit a development application before the eligibility is extinguished.</li> </ul>
<b>Minimising incompatible land uses.</b>	<i>'To minimise the potential for nuisance complaints or conflict arising between incompatible land uses, an IPA planning regime could restrict incompatible land uses (e.g. residential or tourism developments).'</i>	<ul style="list-style-type: none"> <li>Apply 'reverse buffers' and 'agent of change' provisions to the IPA in the relevant EPI to prevent undesirable land uses being proposed within the intensive livestock agriculture buffers (e.g. residential, commercial, solar energy, agritourism).</li> <li>Consider including buffer guidance in the Intensive Livestock Agriculture Guideline or similar policy for application. Buffer provisions should apply various buffers distances that reflect the sensitivity of the receptor. For example, residential, school or hospital development is set back further than commercial or industrial developments.</li> <li>Buffers to also be considered for the secondary processing precincts to limit sensitive receiver encroachment and intensification as well as sterilisation of land.</li> </ul>

Issue	Agriculture Commissioner Recommendations	Options for the Namoi RJP
<b>Consistent buffer requirements.</b>	<p>'(9) The NSW Government should require councils to <u>consider buffer guidelines</u> for agricultural operations in relevant development application approval process.'</p> <p>'An IPA could <u>incorporate stricter buffer requirements or "reverse buffers"</u> to help minimise nuisance complaints or conflict between incompatible land uses. Reverse buffers as applied in other jurisdictions such as British Columbia in Canada, avoid new developments involving sensitive receptors in agricultural buffer zones. This means there is mutual recognition by both the producer and neighbour of the importance of the buffer.'</p>	<ul style="list-style-type: none"> <li>• Apply 'reverse buffers' and 'agent of change' provisions to the IPA in the relevant EPI to prevent undesirable land uses being proposed within the intensive livestock agriculture buffers (e.g. residential, commercial, solar energy, agritourism).</li> <li>• Consider including buffer guidance in the Intensive Livestock Agriculture Guideline or similar policy for application. Buffer provisions should apply various buffers distances that reflect the sensitivity of the receptor. For example, residential, school or hospital development is set back further than commercial or industrial developments.</li> <li>• Buffers to also be considered for the secondary processing precincts to limit sensitive receiver encroachment and intensification as well as sterilisation of land.</li> </ul>
<b>Fast-tracking development and consent pathways.</b>	<p>'The development approval process can involve lengthy delays and significant costs for applicants. To help assist and accelerate investment in IPAs, development controls could be established to use the <u>fast-track development</u> and <u>exempt and complying pathways</u>.'</p>	<ul style="list-style-type: none"> <li>• Leverage up-front strategic guidance and technical assessment to support development assessment by applicants, as well as improving timeliness of decision-making by authorities (supported by intensive livestock agriculture guidelines to assist design, assessment, and operation)</li> </ul>
<b>Streamlining integrated development processes.</b>	<p>'The approval process for designated development could be expedited by simplifying the content of environmental assessments to target triggers relevant to a specific site.'</p>	<ul style="list-style-type: none"> <li>• Streamlined development assessment by utilising up-front technical reports.</li> </ul>
<b>Strengthen RU1 zone for productive land uses.</b>	<p>'The purpose of the RU1 Primary Production zone could be strengthened by the inclusion of mandatory objectives such as to:</p> <ul style="list-style-type: none"> <li>• ensure the productive capacity and resource base for agriculture is recognised and managed for long-term agricultural production.</li> <li>• allow the development of processing, service and value-adding industries related to agriculture and primary industry production.</li> <li>• allow for non-agricultural land uses that will not restrict the use of other land in the locality for agricultural production.</li> <li>• minimise the fragmentation and alienation of agricultural resource lands.</li> <li>• prevent dispersed rural settlement to ensure it does not inhibit agricultural production and create unreasonable or uneconomic demands for the provision of public infrastructure or services.</li> <li>• minimise conflict between land uses, particularly between agricultural land uses and other incompatible or competing land uses.'</li> </ul>	<ul style="list-style-type: none"> <li>• Strengthen zone objectives within the Namoi RJP LEPs to encourage productive uses in rural areas and minimise land use conflict.</li> </ul>

Issue	Agriculture Commissioner Recommendations	Options for the Namoi RJP
<b>Refine land use definitions to support intensive livestock agriculture.</b>	<p><i>The Agriculture Commissioners Report notes the need for consistent and easily interpreted agricultural land use definitions to apply across NSW. The definitions in the Standard Instrument SEPP [State Environmental Planning Policy] do not adequately capture all land uses relevant to agriculture and they do not comprehensively describe potential agricultural structures and activities. The ambiguity and or absent land use definitions create inconsistency and equity concerns for cultural business across the State.</i></p> <p>(6) 'The NSW Government should seek to reduce red tape for agricultural development and investment by:</p> <ul style="list-style-type: none"> <li>• DPIE working with DPI to investigate and revise the suitability of definitions of the following terms in the Standard Instrument - Principal Local Environmental Plan [abridged list]: <ul style="list-style-type: none"> <li>- Horticulture</li> <li>- Dairy</li> <li>- Farm building</li> </ul> </li> <li>• Inclusion of the following definitions: <ul style="list-style-type: none"> <li>- Essential farm infrastructure</li> <li>- Intensive farming (outside of livestock agriculture, such as insect farming)</li> <li>- On-site rural workers' dwellings</li> <li>- Poultry hatchery</li> <li>- Responsible farming practice</li> <li>- Small on-farm abattoirs or onsite processing facilities.</li> </ul> </li> <li>• DPIE working with DPI to provide clarity and guidance on how ancillary development for agriculture works in the planning framework, with specific examples.' </li></ul>	<ul style="list-style-type: none"> <li>• Option to further define in the Intensive Livestock Agriculture Odour Guideline and distinguish between other agriculturally associated land uses (not listed in Agriculture Commissioners Report) such as meat and layer poultry farming to assist in the streamlining of agricultural land uses deemed to be lower risk and manageable via appropriate controls and development conditions.</li> <li>• Option to tie in NSW Farm Practices Panel to assist in the ongoing review of definitions.</li> </ul>
<b>Code of practice to support farmers.</b>	<p><i>One of the recommendations in the Agriculture Commissioner Report is the development of a Farm Practices Panel. This is a concept whereby DPI-Ag will work with industry to develop a code of practice, where if an applicant demonstrates compliance with the code of practice, it could provide defence against land use conflict complaints.</i></p> <p>(12) – 'The NSW Government should establish a NSW Farm Practices Panel which would assess and where satisfied, endorse industry codes of practice, and in doing so advise all interested parties on what operating practices associated with land use conflict are 'normal' and should be acceptable.'</p>	<ul style="list-style-type: none"> <li>• There is an opportunity for this recommendation and development of code of practice project to tie in with the Namoi RJP project.</li> <li>• Opportunity for the endorsed codes to provide a robust and consistent base for consent authorities to formulate development approval conditions.</li> <li>• Opportunity for code of practice to complement environmental planning instruments (EPIs) and provide detailed guidance on how to comply with clauses and conditions.</li> <li>• Opportunity that the code of practice be referenced within an EPI as a matter of consideration to give it statutory weight. For consideration by applications.</li> </ul>

### 3.5 Relevant planning strategies

The *New England North West Regional Plan 2041* (the Regional Plan) outlines a 20-year strategic land use planning framework for the region that aims to protect and enhance the region's assets and future sustainability planning including the consideration for the need for housing, jobs, infrastructure, healthy environment and connected communities. The Regional Plan also notes a number of challenges for the region, notably climate change, resilience and ageing population. Implementation of the Regional Plan is via Local Strategic Planning Statements (LSPS) and manifests in local environmental plans (LEP) and development policies of local authorities.



A key collaboration activity identified within the Regional Plan is to facilitate intensive livestock agriculture within the Namoi RJP and to:

- Identify intensive agribusiness clusters with fit-for-purpose planning controls supported by a streamlined assessment process;
- Support, diversify, and activate opportunities in the intensive livestock agriculture sector and foster collaboration between all levels of government; and
- Utilise structure planning to develop a logical planning and development horizon.

The Regional Plan refers to the Namoi RJP throughout the document. A number of comments and opportunities of note are raised within the Regional Plan. A key overlapping thread between each of the LGAs is the identified opportunity to encourage diversification in agriculture, horticulture, and agribusiness to grow these sectors and harness domestic and international opportunities.

Key opportunities of note include for the Namoi RJP to protect intensive livestock agriculture, strengthen and expand food processing industries to manage agricultural by-products and waste, and leverage the existing transport networks available within the region (such as Tamworth and Gunnedah Airports and rail and roads). It also raises the importance and need for careful consideration of potential land use conflicts with respect to both existing and future uses.

The key references to the Namoi RJP and the vision under each LGA are outlined below:

- **Gunnedah**
  - *Gunnedah's economy continues to attract and support industries including a thriving commercial, arts, cultural and retail service sector as well as value adding industries in manufacturing and processing.*
  - *Continue to develop logistics, freight and transport infrastructure, such as the Gunnedah Airport, to encourage new industry opportunities throughout the region and within the Namoi Regional Job Precinct.*
- **Gwydir**
  - *Continue to develop access and logistics infrastructure on appropriate sites to encourage new industry opportunities, throughout the region and also within the Namoi Regional Job Precinct.*
  - *Promote the development of employment lands, including those associated with the Namoi Regional Job Precinct.*
- **Liverpool Plains**
  - *Support the development of employment lands.*
  - *Leverage the existing Werris Creek Intermodal Hub and the ongoing development of access and logistics infrastructure.*

- *Liverpool Plains LGA is easily accessible to Sydney and Newcastle. Better transport connections to Sydney and Newcastle will support future economic opportunities.*
- *The sustainable and effective management of water resources to enable drought-proofing.*
- **Tamworth**
  - *Protect the viability of and promote intensive agriculture clusters and the opportunities of the Namoi Regional Job Precinct.*
  - *Encourage opportunities for innovation in Agribusiness.*
  - *Support the development of the Tamworth Global Gateway Park, associated employment precincts and supporting infrastructure.*
  - *Maximise the opportunities for Tamworth Regional Airport.*
  - *Support the development of the regional recycling facility at Goddard Lane.*
- **Walcha**
  - Continue to develop access and logistics infrastructure within the Namoi Regional Job Precinct.
  - Raise the area's profile and awareness of employment, business development and lifestyle opportunities, particularly for younger people.
  - Foster resilience and diversification in the agricultural industry.
  - Support the sustainable and effective management of water resources to enable drought-proofing.

This report explores the opportunities and considerations raised within the Regional Plan. The vision for each respective LGA and land uses referenced in the Regional Plan should be considered in the proposed structure and design of the options for a streamlined planning framework located within the investigation areas as well as any broader regional strategic planning approach. The Standard Instrument Local Environmental Plan does not define agribusiness and therefore the use of the definition within the Regional Plan is useful for guidance only.

New England North West is a declared region under section 3.2 of the *Environmental Planning & Assessment Act 1979 (EP&A Act)*. A regional strategic plan must be prepared for the region to guide land use planning and establish a framework for detailed land use plans, development proposals and infrastructure funding. Section 3.5 of the EP&A Act provides guidance on the making and review of regional strategic plans. There are no defined periods in which a regional strategic plan must be reviewed, except for the Six Cities Region. The New England North West is not part of the Six Cities Region and therefore it is at the Minister's discretion when the plan is to be reviewed. Presently, the Regional Plan is reviewed on a five-yearly basis, with the next review scheduled for 2027.

Table 3-3 provides a description of the six regional intensive livestock agriculture investigation areas, including relevant considerations and envisaged land uses according to the Regional Plan and relevant local strategic planning statements.



Table 3-3. Overview of Namoi primary and secondary investigation areas and envisaged land uses

Investigation Area	Local Government Area	Brief Overview	Future agriculture vision (expressed under relevant Local Strategic Planning Statement and the New England North West Regional Plan 2041 (Regional Plan))
<b>Primary Investigation Areas - Regional Intensive Agriculture</b>			
<b>Area 1</b>	Contained within <b>Gwydir Shire Council LGA.</b>	Located approximately 150km north of Tamworth in the south of the Gwydir Shire Council LGA. Area 1 encompasses the localities of Yagobe, Gineroi Crossing, Gineroi and Bagheet.	<b>Gwydir LGA LSPS:</b> Agricultural base is expected to underpin new and emerging industries, intensive agriculture, agribusiness, horticulture, greenhouse horticulture, green industries, and renewable energy generation. Foster sustainable farming practices. The co-location of industries has potential to use existing by-products and waste materials to create new products and services. Facilitate appropriate smaller-scale renewable energy projects using biowaste, solar, wind, hydro, geothermal or other innovative storage technologies. <b>Regional Plan – Gwydir:</b> <ul style="list-style-type: none"> <li>Promotion of circular economy initiatives - reuse and recycling of materials within the agricultural industry.</li> <li>Develop access and logistics infrastructure on appropriate sites to encourage new industry opportunities, within the RJP and region more broadly.</li> <li>Promote employment lands, including those associated with the Namoi RJP.</li> <li>Encourage diversification of agriculture, horticulture, and agribusiness - grow these sectors and harness domestic and international opportunities.</li> <li>Attract a vibrant, youthful, flexible, and mobile workforce.</li> <li>Identify and promote wind, solar and other renewable energy production opportunities.</li> </ul>
<b>Area 2</b>	Largely contained within <b>Tamworth Regional Council LGA</b> with some encroachment into <b>Gunnedah Shire Council LGA.</b>	Located in the Tamworth Regional Council LGA and Gunnedah Shire Council LGA, north-west of Tamworth. Area 2 encompasses the township of Manilla and cattle feedlot and a number of existing chicken farms on the borders of Manilla. It also includes the localities of Wimborne, New Mexico, Borah	<b>Tamworth LGA LSPS:</b> Tamworth is the centre for the production and processing of beef, lamb, and poultry products. To support agriculture and reduce land use conflicts the LSPS highlights actions to: <ul style="list-style-type: none"> <li>Require Land Use Conflict Risk Assessment (LUCRA) as part of development controls for dwellings not associated with agricultural operations and all non-agricultural related</li> </ul>



Investigation Area	Local Government Area	Brief Overview	Future agriculture vision (expressed under relevant Local Strategic Planning Statement and the New England North West Regional Plan 2041 (Regional Plan))
		<p>Crossing, Keepit, Carroll Gap, Somerton, Bective, Long Island, Appleby, Moore, Gidley, Hallsville and Byamee.</p> <p>Area is well supported by rail, road, and air networks.</p>	<p>development especially in identified intensive agricultural clusters.</p> <ul style="list-style-type: none"> <li>Make provision for Manilla and Kootingal growth and development and investigate planning controls to underpin 'Poultry' intensive agriculture precinct. It is noted that there is an approved medicinal cannabis facility (Cann Pharmaceutical) at Kootingal.</li> </ul> <p><b>Regional Plan – Tamworth Regional:</b></p> <ul style="list-style-type: none"> <li>Maximise the opportunities for Tamworth Regional Airport.</li> <li>Protect the viability of and promote intensive agriculture clusters and the opportunities of the Namoi RJP.</li> <li>Encourage opportunities for innovation in agribusiness.</li> <li>Support the development of the Tamworth Global Gateway Park, associated employment precincts and supporting infrastructure.</li> <li>Support the development of the regional recycling facility at Goddard Lane.</li> <li>Support appropriately located wind, solar and other renewable energy production opportunities, as well as battery storage facilities.</li> <li>Encourage water sustainability.</li> </ul>
<b>Area 3</b>	<b>Gunnedah Shire Council LGA</b>	<p>Located 50-100km west of Tamworth in the Gunnedah Shire Council LGA.</p> <p>Area 3 encompasses the localities of Marys Mount and Milroy.</p>	<p><b>Gunnedah LGA LSPS:</b> Value-added manufacturing industries strategically located to ensure ready and cost-effective access to the regional freight network, utility infrastructure, skilled labour and export markets.</p> <p>Processing facilities and related forestry industries.</p> <p>Farming and intensive livestock agriculture including poultry, pig farms, cattle, and sheep feedlots.</p> <p>Niche businesses specialising in local food products are becoming more common as an opportunity to value-add to traditional agriculture.</p> <p>LSPS notes the protection of plantation forestry processing facilities and related forestry industries from encroachment of incompatible land uses.</p> <p><b>Regional Plan – Gunnedah:</b></p>

Investigation Area	Local Government Area	Brief Overview	Future agriculture vision (expressed under relevant Local Strategic Planning Statement and the New England North West Regional Plan 2041 (Regional Plan))
			<ul style="list-style-type: none"> <li>Support development of employment lands, through the preparation of an Employment Lands Strategy and an Economic Development Strategy.</li> <li>Encourage diversification in agriculture, horticulture and agribusiness to grow these sectors and harness domestic and international opportunities.</li> <li>Continue to develop logistics, freight, and transport infrastructure, such as the Gunnedah Airport, to encourage new industry opportunities throughout the region and within the Namoi RJP.</li> <li>Promote the development of appropriately located wind, solar and other renewable energy technologies including biowaste opportunities.</li> <li>Retain biodiversity through protecting the existing koala population, Biodiversity Offsets Scheme under the <i>Biodiversity Conservation Act 2016</i> and increasing tree canopy coverage.</li> <li>Implement place-based planning principles to build more liveable communities for residents.</li> </ul>
<b>Area 4</b>	Covers both <b>Gunnedah Shire LGA</b> and <b>Liverpool Plains Shire LGA</b> .	Located less than 50km from Tamworth in the Tamworth Regional Council LGA. Area 4 comprises no existing cattle feedlots or chicken farms in this area.	For <b>Gunnedah LGA LSPS</b> : See Area 3 comments above.
<b>Area 5</b>	Largely contained within <b>Liverpool Plains Shire Council LGA</b> with some minor encroachment into <b>Gunnedah Shire LGA</b> .	Located 50-100km south-west of Tamworth in the Liverpool Plains Shire Council LGA. Liverpool Plains Shire is situated on some of the most productive agricultural land in NSW, with rich soils underlain by extensive groundwater resources. Area 5 encompasses two existing cattle feedlots and includes the localities of Nardu, Spring Ridge, Colly Blue, Yannergee and Windy.	<p><b>Liverpool Plains Shire LGA LSPS</b>: High-value agriculture and value-adding in agricultural product manufacturing.</p> <p>Harness opportunities associated with growing global connectivity and international trade agreements through proximity to Port of Sydney, Port of Newcastle, Tamworth Regional Airport, and the Inland Rail.</p> <p>Supporting development of new and innovative development that is complementary to agriculture, (nature and farm-based experiential tourism, restaurants, cellar door, farm-stay, and eco-tourism on or near productive agricultural lands subject to not compromising the primary productive use of land for agriculture).</p> <p>Prioritise new value-added manufacturing (food processing, packaging, and manufacturing) and related transport facilities.</p> <p><b>Regional Plan – Liverpool Plains Shire</b>:</p>

Investigation Area	Local Government Area	Brief Overview	Future agriculture vision (expressed under relevant Local Strategic Planning Statement and the New England North West Regional Plan 2041 (Regional Plan))
			<ul style="list-style-type: none"> <li>Diversify agriculture, horticulture, and agribusiness - grow sectors and strengthen domestic and international opportunities, direct exports associated with local industries.</li> <li>Support development of employment lands.</li> <li>Leverage existing Werris Creek Intermodal Hub and ongoing development of access and logistics infrastructure.</li> <li>Identify and encourage wind, solar and other renewable energy production opportunities.</li> <li>Implement sustainable and effective management of water resources to enable drought-proofing.</li> </ul>
<b>Area 6</b>	Contained within <b>Gwydir Shire Council LGA</b> Note: encroachment into Inverell Shire LGA and Moree Plains LGA are excluded from this analysis.	Located 200-250km north of Tamworth in the Gwydir Shire Council LGA. Area 6 comprises some existing cattle feedlots and the localities of Boonal, Humptybung, Mungle, Yallaroi, Tikitere and Croppa Creek.	For <b>Gwydir LGA LSPS</b> : See Area 1 comments above.
<b>Secondary Investigation Areas – Industrial and Secondary Agricultural Precincts</b>			
<b>Area 7</b>	<b>Gunnedah Shire Council LGA</b>	Gunnedah Industrial Area Area 7 comprises: <ul style="list-style-type: none"> <li>Gunnedah Regional Saleyards is the fourth largest selling centre of cattle in NSW (GSC, 2019). A recent Master plan (2019) and recent funding to upgrade facility will improve facilities for future demand.</li> <li>Existing tannery that has recently undergone operational upgrades.</li> <li>Coal loading facility (Whitehaven Coal have a refinery in the area). It is noted that Gunnedah Council</li> </ul>	For <b>Gunnedah LGA LSPS</b> : See Area 3 comments above.

Investigation Area	Local Government Area	Brief Overview	Future agriculture vision (expressed under relevant Local Strategic Planning Statement and the New England North West Regional Plan 2041 (Regional Plan))
		have been approached by a commodity and grain company use the facility.	
<b>Area 8</b>	<b>Tamworth Region Council LGA</b>	<p>Tamworth Global Gateway Park and existing Baiada processing facility on Oxley Highway.</p> <p>Area 8 comprises:</p> <ul style="list-style-type: none"> <li>Tamworth Regional Airport.</li> <li>Baiada broiler (meat) chicken hatchery.</li> <li>Proposed new Baiada processing plant near the airport. It is noted that Baiada have an issue with water supply and cannot build the new processing facility near the airport (where they currently have a rendering plant) until this is resolved. It is also noted that Baiada also have an old facility in town that is in the process of closing. Their intent is to transfer operations to the site at the airport.</li> <li>Existing abattoir and Thomas Foods processing (beef and sheep processing).</li> <li>Global Gateway Park – A recent development by Council to facilitate business and industrial development. This forms from the new intermodal facility being built in that location.</li> <li>Existing Water Treatment Plant.</li> </ul>	<p>For <b>Tamworth LGA LSPS</b>: See area 2 comments above.</p> <p>The LSPS outlines that the proximity of grain, livestock, feedlots, sale yards and processing facilities to Tamworth provide a competitive advantage for the producers of the sector. Further expansion can be promoted through appropriate master planning and precinct planning controls, especially at the Tamworth Global Gateway Park, located west of Tamworth.</p> <p>Action PR2 to development and implement a structure plan and infrastructure strategy for the Tamworth Global Gateway Park to align with the Tamworth Regional Airport Master Plan.</p>
<b>Other areas</b>			
<b>NA</b>	<b>Walcha Shire LGA</b>	<p>It is noted that Walcha Shire forms part of the Namoi RJP area, however, is not allocated a specific investigation area. Despite this, the Regional Plan identifies a number of opportunities and focus initiatives for the Walcha LGA including, but not limited to:</p> <ul style="list-style-type: none"> <li>Encouraging diversification in agriculture, horticulture and agribusiness to grow these sectors and harness domestic and international opportunities;</li> </ul>	

Investigation Area	Local Government Area	Brief Overview	Future agriculture vision (expressed under relevant Local Strategic Planning Statement and the New England North West Regional Plan 2041 (Regional Plan))
		<ul style="list-style-type: none"> <li>Continued development of access and logistics infrastructure within the Namoi RJP;</li> <li>Expansion of nature-based adventure, cultural tourism places, and food and wine opportunities;</li> <li>Leveraging the proposed Rural Enterprise Zone and new wind, solar and other renewable energy production opportunities;</li> <li>Raising the local area's profile and awareness of employment, business development and lifestyle opportunities, particularly for younger people;</li> <li>Fostering resilience and diversification in the agricultural industry; and</li> <li>Supporting sustainable and effective management of water resources to enable drought-proofing.</li> </ul>	

### 3.6 Case studies

During the project, a number of case studies have been reviewed. The key takeaways and opportunities identified through these case studies have been outlined below.

#### **South Australia - Greater Adelaide Environment and Food Production Areas (EFPAs)**

- Protection of land used for primary production - The *Planning, Development and Infrastructure Act 2016* implemented provisions that prohibit land division applications to create one or more additional allotments within EFPAs while also prohibiting use of subdivided land for dwellings (or hotels/motels) on 'land used for primary production'. These provisions were reviewed after being implemented for five years and it was concluded that the clauses and mapping have been successful in protecting prime agricultural land surrounding metropolitan Adelaide from urban encroachment. An opportunity presents itself for the Namoi RJP to implement such an approach based on the strategic odour modelling undertaken by Todoroski Air Sciences as an evidence base to identify the prime areas of agricultural land.

#### **South East Queensland - Rural Activities Code**

- Tailored and industry specific development 'codes' to streamline development - A code-based assessment and processing approach has successfully facilitated Western Downs Regional Council Planning Scheme in significantly reducing the assessment and processing times for specified development that demonstrates compliance with the respective assessment benchmarks under the applicable codes and is permissible within a specified zone or mapped area. This case study demonstrates that a codes-based development assessment process could be implemented and supported by industry-specific guidelines to streamline development assessment and timelines. Such an approach could be applied to investigation areas where the strategic odour modelling deems intensive livestock agriculture most suitable.
- Standard conditions of consent - Western Downs Regional Council also utilise standardised conditions appropriate for intensive animal industry developments. These standard conditions, which focus on providing outcome-based conditions rather than prescriptive conditions, reduces compliance burdens and allows for innovation and improvement for applicants. Integration of such an approach within the Namoi RJP planning framework would support council development assessment and conditioning, ensure consistency across LGAs, further streamline assessment timelines, and assist in managing and monitoring development against their conditions of consent.

#### **Victoria Planning Provisions - Buffer provisions for land use compatibility**

The State of Victoria implements requirements via planning provisions to manage buffers, including:

- Clause 53.10 'Uses and activities with potential adverse impacts' - This clause sets out the threshold distances that apply to industry and warehouse land uses with potential off-site impacts that may cause offence or unacceptable risk to the locality if not appropriately designed and situated. The clause operates through the zones and buffer area overlay maps and ties them to the referral provisions in the Victoria Planning Provisions.
- Clause 44.08 'Buffer Area Overlays' - This clause is used to prevent incompatible use and development. It can apply to areas affected by the potential off-site impacts of industry, warehouse, infrastructure, or other uses. This buffer overlay mapping complements clause 53.10 by ensuring that land use and development around existing industries are appropriate.



The application of such buffer clauses backed by supported mapping within an environmental planning instrument (i.e. LEP) should be considered to assist in preventing the intensification and encroachment of undesirable land uses within the investigation areas. This approach is consistent, and can be tied in with, the Agriculture Commissioner's Report which recommended the NSW Government require councils to consider buffer guidelines and apply agent of change principles for agricultural operations in relevant development application approval process so that established buffers are considered in neighbouring development decisions.

A reverse buffer approach, restricting sensitive receivers will be investigated. This clause could be designed to provide matters for consideration to ensure amenity and operational integrity are protected. Detailed review of buffers within or external to IPAs should be undertaken. Buffer mapping and integration into environmental planning instruments within the Namoi RJP is consistent with Recommendation 9 of the Agriculture Commissioner's Report. To ensure consistency with the Agriculture Commissioner's recommendation, the buffer clause should be drafted to also guide enforcement and respond to complaints made by sensitive receivers.

The Agriculture and Biosecurity branch of DPIRD (DPIRD-Agriculture) has prepared the 'Buffer Zones to Reduce Land Use Conflict with Agriculture – An Interim Guideline' (November 2018). At the time of drafting, and as part of the NSW Government's response to the Agriculture Commissioner's Report, DPIRD-Agriculture is reviewing and updating the guideline.

## 4. Planning framework review

### 4.1 Intent of planning framework

Under the existing legislative framework, good design and appropriate outcomes can be achieved, allowing development to deliver innovation and site-specific solutions. However, there is opportunity for improvements to development application processes to promote an increase in intensive livestock agriculture and processing and seek to better balance between community and market interests while mitigating land use conflicts. A review of key gaps under the current planning framework is provided in Appendix 2.

Building upon the vision for Namoi RJP (Section 2.1), the principles to guide implementation of the Namoi RJP under the existing planning framework are illustrated in Figure 4-1.



Figure 4-1. Vision for the Namoi RJP planning framework

The challenge for the planning framework is to deliver flexibility for innovation, support a variety in the scale and intensity of activities and land uses envisaged and provide the certainty for applicants while addressing the following:

- The need to treat development of intensive livestock agriculture and processing industries with a high level of rigour to appropriately manage risk of land use conflict and to ensure outcomes are in the public interest.
- The varied nature of types and scales of intensive livestock agriculture and processing facilities, and the need for consistency of assessment requirements and decision-making.
- The need to minimise risks and potential impacts on sensitive land uses without limiting the ability to develop intensive and low amenity activities.
- Alignment of development assessment with the requirements of other approvals and approved methods.

### Improving the Prospects for Agriculture and Regional Australia in the NSW Planning System

*"... the two main sources of land use conflict are accelerating – increasingly intensive production practices and an expanding urban footprint accommodating this population growth. To meet the agriculture growth target and achieve the regional development that will result, the NSW Government will need to plan more assertively and explicitly for agriculture."*

*"... land use conflict and problems facing agriculture in the planning system warrant strong policy responses."*

Daryl Quinlivan,  
NSW Agriculture Commissioner, July 2021

Savings in time and up-front capital investment can be used by investors to value-add or for incorporation of innovative processes to strengthen business capacity and enhance sustainability and longevity across the region. Adequate up-front evidence base and an appropriate level of development control are essential to support streamlined assessment. By undertaking land use analysis, technical assessment and structure planning, land use conflicts are more likely to be mitigated and best use of land available would be realised. Detailed technical studies would inform the development of a tailored planning framework and ensure land uses and development occurs in the right locations for each precinct.

Front-loading of the legislative framework involves:

- Up-front evidence providing confidence in the planning framework to deliver good planning outcomes, particularly to ensure development adequately addresses key conditions and mitigates environmental impacts.
- Formulating planning controls that facilitate the efficient delivery of land for agricultural development in areas where it is spatially and environmentally appropriate.
- Establishing development conditions, parameters and generate comprehensive land use and design principles, which manifest (as appropriate) in the provisions of the relevant LEPs, including (where relevant) master plans and development control plans (DCPs).
- Coordination of essential infrastructure planning and delivery to provide infrastructure and services when and where they are required as the precincts develop over time.
- Meaningful consultation and engagement with the key market groups and the community to make sure the intensive agricultural and secondary land uses are located, designed and managed sustainably and provide confidence for ongoing industry investment.

Based on the feedback from government stakeholders, industry and detailed consideration of existing planning framework, there is a range of options for consideration to give effect to the vision for Namoi RJP. These options include a number of different planning instruments, education and decision support mechanisms. Figure 4-2 illustrates the four components of the recommended framework for the Namoi RJP. These components would need to align in an integrated and holistic framework to support the vision for Namoi RJP.

Each of the four elements of the Namoi RJP planning framework are described in Sections 4.2 to 4.5.

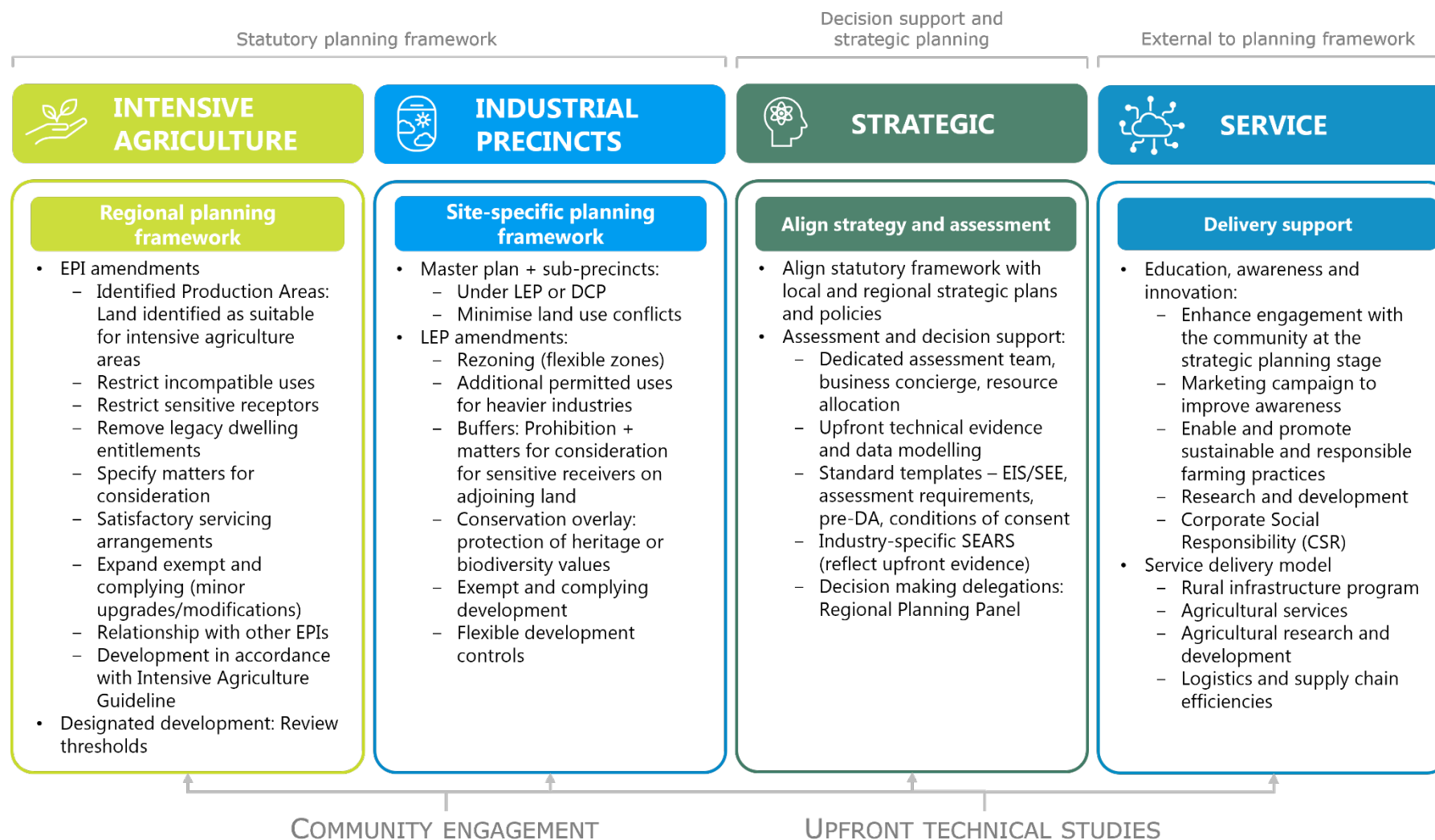


Figure 4-2. Components of recommended planning framework

## 4.2 Intensive livestock agriculture

This section describes the approach to improve the planning framework for intensive livestock agriculture production facilities in the Namoi RJP.

### 4.2.1 Initial planning framework

Based on discussions with stakeholders during the preparation of this report, well-planned, designed and operated intensive livestock agriculture activities do not tend to generate significant conflicts with sensitive receptors. During consultation, stakeholders suggested that typical causes of conflict generated by intensive livestock agriculture operations include:

- **Poor siting** of intensive livestock agriculture facilities relative to sensitive receptors;
- **Encroachment of sensitive receptors** into buffer areas of intensive livestock agriculture facilities; or
- **Poor operational and management practices** of the intensive livestock agriculture facility.

After evaluation of framework options and reflecting the Agriculture Commissioner's Report recommendation for a stronger response, the recommended approach is to apply protections for intensive livestock agriculture through LEP provisions combined with development guidelines based on strategic odour modelling.

Figure 4-3 illustrates the relationship between the causes of land use conflict for intensive livestock agriculture and potential planning framework mechanisms.

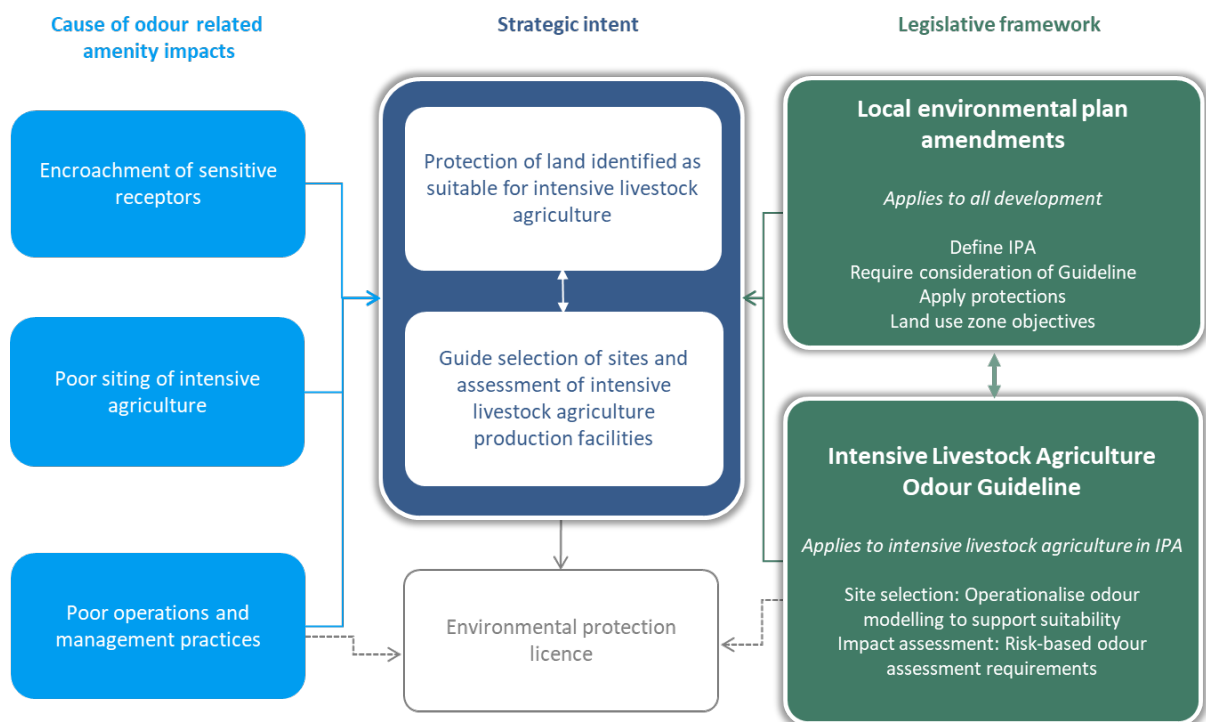


Figure 4-3. Management of amenity impacts by planning framework

It is recommended that the initial planning framework (minimum recommended change) required for the Namoi RJP involves establishing IPAs and giving effect to an Intensive Livestock Agriculture Odour Guideline. Other options for increasing the level of protection, development

guidance and decision-making support are presented in this Planning Policy Review report for the consideration of individual councils and state agencies.

The intention is that the Namoi RJP framework provide the basis for local changes to local environmental plans, delivered by DPHI and local councils. This report describes the overarching framework intent as well as optional planning mechanisms for the consideration of DPHI and local councils when drafting LEP amendments.

Figure 4-4 illustrates the relationship between changes to local environmental plans and the Guideline (see Section 0), including the optional location-specific protections (see Section 4.2.3) for land identified as being potentially suitable for intensive livestock agriculture (see Section 4.2.2).

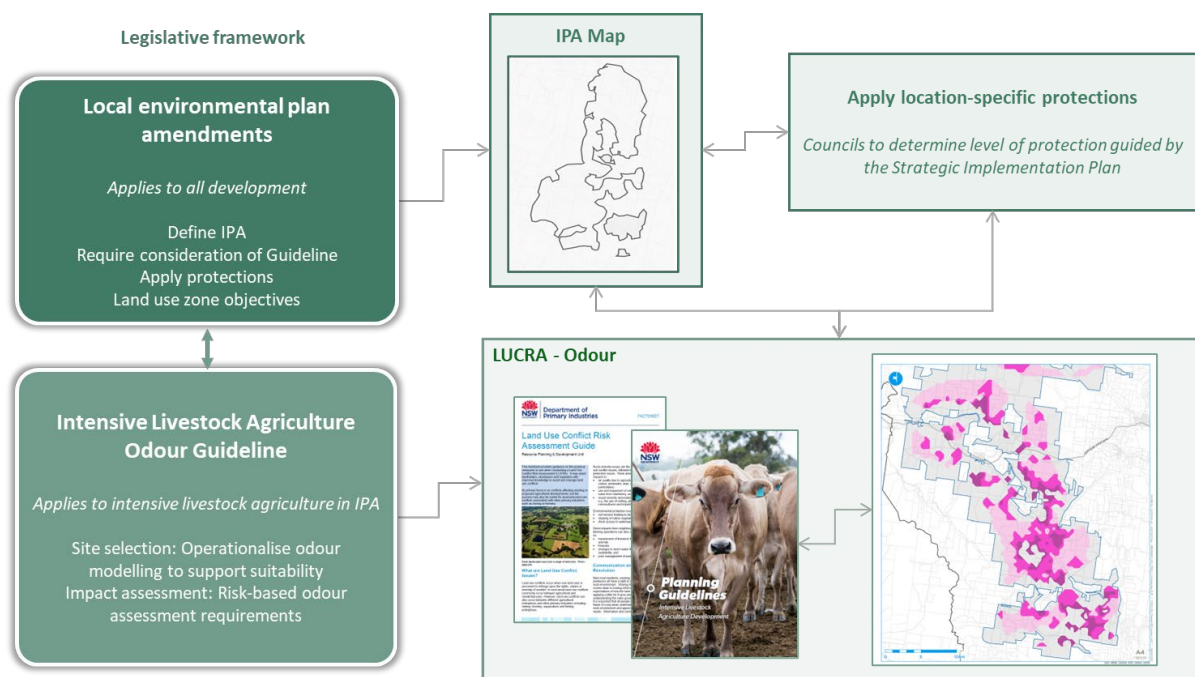


Figure 4-4. Application of legislative framework

#### 4.2.2 Suitability of land for intensive livestock agriculture

This section describes the strategic assessment carried out to identify land that is suitable for intensive livestock agriculture. This provides strategic evidence for introducing planning mechanisms that provide for intensive livestock agriculture as the preferred land use.

##### Rationale

The Agriculture Commissioner recommends IPAs be identified and promoted to 'build on existing and potential comparative advantages of different regions to promote agricultural investment and growth' (Section 3.4). The industry collaboration carried out during preparation of this report reinforced the competitive advantages of the Namoi RJP for intensive livestock agriculture. The vision for the Namoi RJP is to establish a planning framework that supports development goals and attracts investment in intensive livestock agriculture.



The proposed Namoi RJP planning framework adopts Agriculture Commissioners Report Recommendation 4 to establish IPAs, which are targeted towards land that is suitable for intensive livestock agriculture, considering:

- High level spatial analysis of biophysical characteristics, access to infrastructure, transport services, power supply, processing facilities, markets, and skilled labour; and
- Strategic odour modelling.

The surrounding liveability, prosperity and infrastructure contributes to the attraction and retention of labour to support intensive livestock agriculture as well as processing industries.

In developing IPAs, consideration was given to ensuring sufficient land was captured to support the establishment of new farms of a size consistent with market expectations. To protect suitable land for intensive livestock agriculture, the IPA boundary could include sufficient land required for farming, and for buffers to protect against encroachment of sensitive receivers. As recommend by Todoroski Air Sciences in their development of the strategic odour modelling, the IPAs account for the suitability of all cases when assessing the land against amenity impacts and the suitability of land for development, not just the worst case.

When considering suitable land for intensive livestock agriculture use, and the delineation of the IPA boundary for each investigation area, land that cannot be used for feedlots or poultry farms should be taken into consideration. For example, unsuitable land may include steep land, public land, waterways and so forth.

Identifying land suitable for intensive livestock agriculture will, in turn, encourage and protect non-agricultural housing in suitable areas outside of those areas. The development of land for intensive livestock agriculture will encourage food security, climate resilience, and productivity.

It is important to establish an IPA boundary option with the view to balance the need for suitable land (discounting unsuitable land for other constraints), and the need to avoid unreasonable restrictions on existing land holdings. The development of IPAs provides the basis for land application for the Intensive Livestock Agriculture Guidelines, a preferred planning solution discussed in section 0. IPA mapping will identify land that is readily available for intensive livestock agriculture and protect identified land from residential encroachment.

### **IPA identification**

In this context, the IPAs for the Namoi Region should comprise areas that are suitable for intensive livestock agriculture. Accordingly, a staged approach to identifying the priority land where intensive livestock agriculture is best located has been adopted.

The IPAs are a product of combining:

- Investigation area mapping: based on physical constraints and industry standards for investment in intensive livestock agriculture.
- Odour modelling: Bespoke modelling of land suitability based on location of dwellings within the investigation areas and calculating the buffers required to those dwellings using a combination of Level 1 analysis for beef feedlots and Level 2 analysis for meat poultry farms.

The approach taken for mapping IPAs in the Namoi Region is illustrated in Figure 4-5.

IPA boundary maps are provided in Appendix 3.

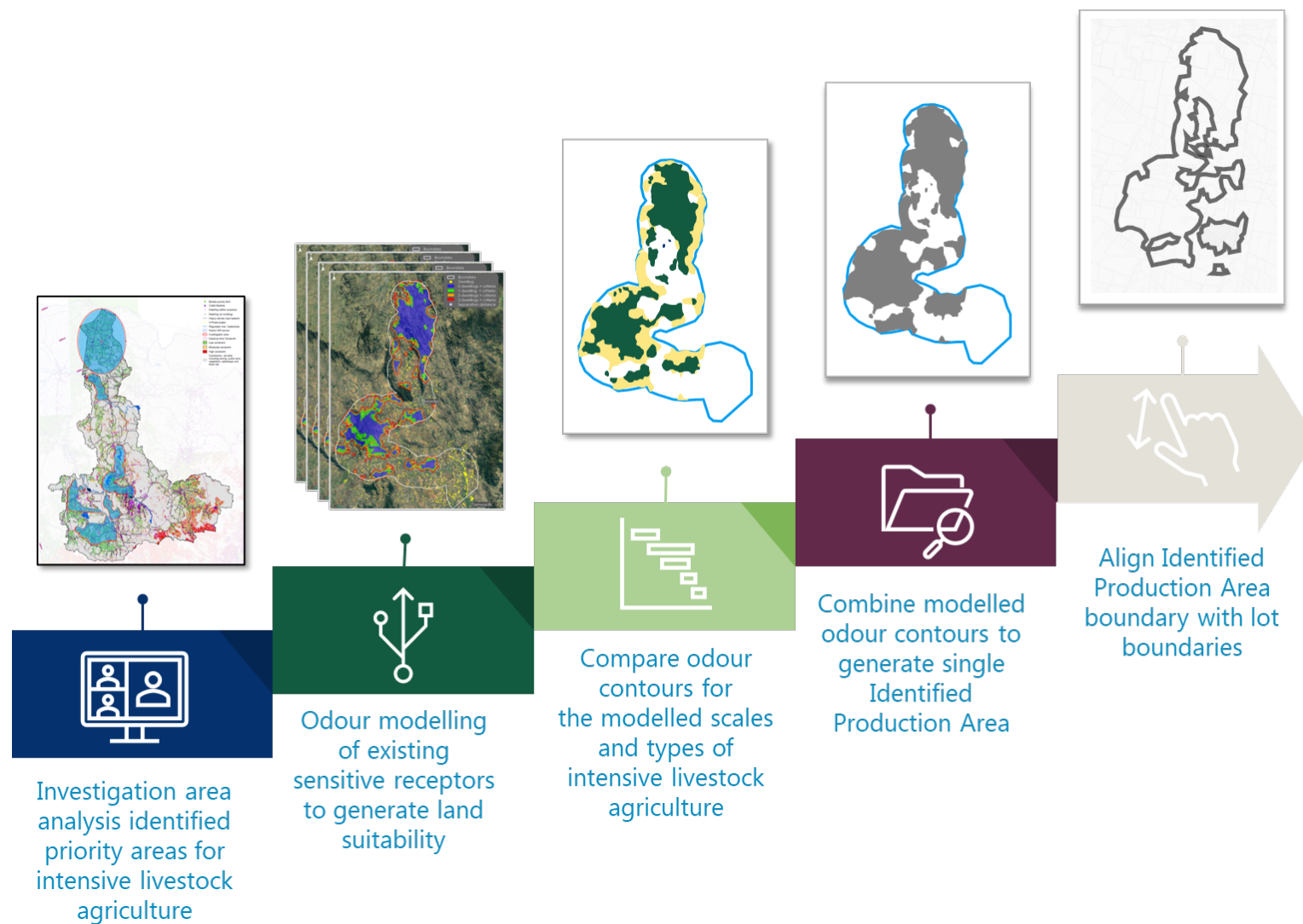


Figure 4-5 Approach to mapping Identified Production Areas in the Namoi RJP

### Investigation area mapping

The investigation areas were mapped by the Regional Development and Delivery branch of DPIRD (DPIRD-RDD) in consultation with specialist agricultural scientists, key State and local government agencies and industry representatives. Alongside the investigation area mapping, a number of opportunities for growth in the agribusiness sector within the Namoi Region were identified, which concludes that there is a reasonable prospect that an expanded intensive agribusiness industry would attract additional investment in the value chain and circular economy.

It is highlighted that the region cannot solely rely on their existing production advantages to ensure future success, considering the growing pressures from:

- Growing number of global producers and Australian agricultural entities entering the agricultural market; and
- Increasing uncertainty in production climate and volatile market conditions – resulting in impacts to the long-term viability of higher cost/less efficient producers.

Investigation area mapping for intensive agriculture (primarily intensive animal husbandry, poultry sheds and feedlots) establishes the basis for further technical studies (i.e. odour modelling). Mapping of the six identified preliminary investigation areas is based on spatial analysis of various constraints, previous studies, and consultation with industry. The steps adopted to map intensive agriculture investigation areas are as follows:

- Step 1: 'No-go' areas: areas where intensive agriculture is prohibited, or the land constraint is of such significance that intensive agriculture development is untenable. For this purpose, land with a significant tree canopy cover was not included in the preliminary investigation areas.
- Step 2: Thresholds that comprise a sliding scale of constraint for intensive livestock agriculture, such as slope, area of land, ownership (e.g. Crown land). For example, areas that are between 10% and 20% slope but held in ownerships of less than 100ha is not considered a suitable site for intensive livestock agriculture. Conversely, land that falls outside the Step 1 no-go areas and is between 10% and 20% slope but held in ownerships greater than 300ha may be suitable. A multicriteria analysis of land ownership and slope was undertaken to generate a comparative ranking (red, amber and green) of land depending on its level of constraint with regard to slope and ownership size (Figure 4-6 and Table 4-1). The thresholds were established based on discussion with industry representatives and review of recent State Significant development applications for intensive agriculture.
- Step 3: Locations of established intensive agriculture (poultry sheds and cattle feedlots) and areas with access to water supply were mapped. Other factors that support intensive livestock agriculture but are not fatal flaw constraints were mapped, including access to a water supply, three-phase power and roads capable of supporting B-double heavy vehicles.
- Step 4: A high level assessment of potential sensitive receivers, particularly the potential for dwellings were mapped and analysed.

The key constraints that were used to identify and refine the preliminary investigation areas include: planning zones, land tenure, flood hazard, irrigation water access, slope, property size, three-phase power, road capacity, vegetation, and sensitive receptors (Table 4-2).

		Slope		
		<10%	10-20%	>20%
Land ownership	<100 ha			
	100-300 ha			
	>300 ha			

Figure 4-6. Investigation area mapping – Step 2 multicriteria assessment framework

Table 4-1. Investigation area mapping – Step 2 mapping criteria and thresholds

Criteria	Threshold	Constraint	Data
Land ownership	<100 ha	High	Rating address Data provided by councils
	100-300 ha	Moderate	
	>300 ha	Low	
Slope	<10%	High	NSW SEED Portal
	10-20%	Moderate	
	>20%	Low	

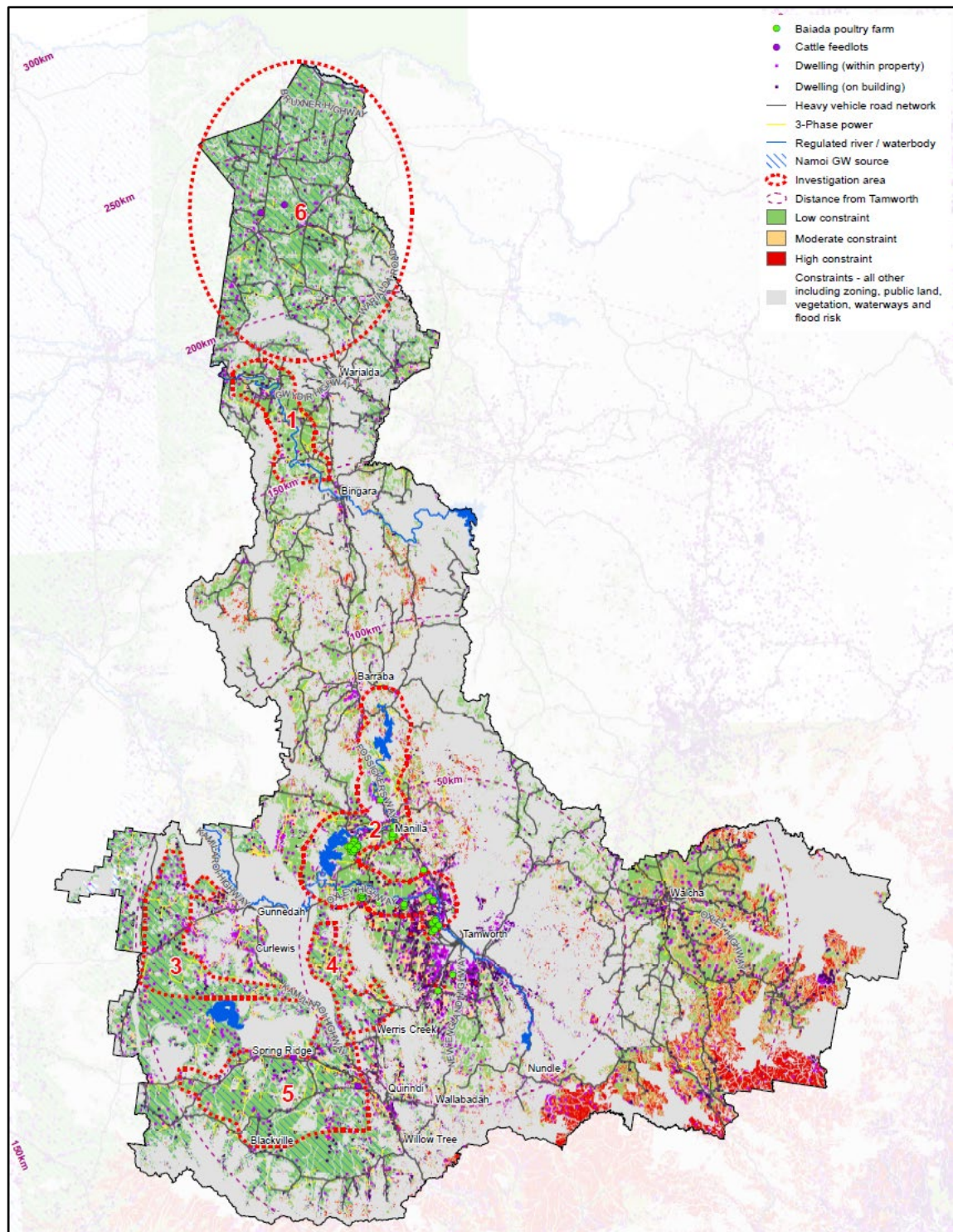
**Table 4-2. Investigation area criteria**

Criteria	Thresholds	Data source
<b>Planning zones.</b>	<ul style="list-style-type: none"> <li>• RU1 Primary Production</li> <li>• RU4 Primary Production Small Lots</li> <li>• E3 Productivity Support</li> </ul>	NSW SEED Portal
<b>Land tenure.</b>	Only land in private ownership (all public estate land excluded)	NSW SEED Portal
<b>Flood hazard.</b>	Exclude all land affected by 1 in 100 year flood extent	NSW SEED Portal
<b>Irrigation water access.</b>	<p>Exclude land greater than five kilometres from a surface water source</p> <p>Eastern Great Artesian Basin Gunnedah-Oxley Basin Murray Darling Basin Groundwater Source</p>	DPHI Water
<b>Slope.</b>	Less than 10% slope (preferred)	NSW Elevation Data Service
<b>Property size.</b>	Greater than 300 hectares (preferred)	NSW Spatial Collaboration Portal
<b>Power generation, transmission, and distribution (three-phase power).</b>	Access to three-phase power	Essential Energy
<b>Road capacity.</b>	Suitable for B-double trucks	Transport for NSW
<b>Vegetation.</b>	<ul style="list-style-type: none"> <li>• Substantially cleared land</li> <li>• Category 2 regulated land under the <i>Local Land Services Act 2013</i></li> </ul> <p>Must not be category 2-vulnerable regulated land or category 2-sensitive regulated land under the <i>Local Land Services Act 2013</i></p>	<p>NSW SEED Portal</p> <p>State Vegetation Type Map: Border</p> <p>Rivers Gwydir/Namoi Region Version 2.0. VIS_ID 4467) excluded land was identified as having vegetation types: forests, woodlands, shrublands, wetlands</p>
<b>Sensitive receivers (dwellings).</b>	No specific thresholds	NSW Spatial Collaboration Portal (address points)

Source: Namoi RJP Action Plan, RMCG



Figure 4-7 shows the investigation areas derived from the analysis of physical and spatial criteria.



Source: Namoi RJP Action Plan, RMCG

Figure 4-7. Namoi RJP investigation area mapping



### Strategic odour modelling

Todoroski Air Sciences Pty Ltd conducted strategic odour modelling, using reverse amenity techniques to determine optimal buffers between dwellings and intensive livestock agriculture farms of various sizes (Appendix 4). The modelling generated maps indicating land suitability based on odour factors, classified by the number of existing dwellings affected. The IPAs are then mapped for each investigation area, and a proposed planning framework applied to safeguard suitable lands within the Namoi RJP.

The benefits of strategic odour modelling to initiate development assessment of intensive livestock agriculture are:

- 1) identifying land where there is reduced risk of odour related amenity impacts;
- 2) increased certainty for farmers, local communities, and government regarding future land uses; and
- 3) provide confidence for farmers, local communities, and government that production facilities of certain types and scales are suitable where odour modelling indicates, such locations are also likely to avoid amenity impact associated with air quality and noise.

In addition to utilising odour modelling during site selection, it is recognised that production facilities can be responsibly established, managed, and operated without adversely impacting on sensitive uses through careful siting, design, and ongoing management.

The odour modelling undertaken by Todoroski Air Sciences Pty Ltd for the Namoi RJP refines the intensive livestock agriculture investigation areas established under the Namoi RJP Action Plan. The modelling provides a data-driven evidence base for identifying land within the investigation areas that is suitable for intensive livestock agriculture based on odour impacts and proximity to existing dwellings.

The odour modelling process employed a technique known as reverse amenity modelling to identify appropriate buffers for odour emissions. This technique enables the calculation of the optimal distance between dwellings and intensive livestock agriculture farms of varying sizes to minimise amenity impacts.

The modelling was carried out for the following farm sizes:

- Beef cattle feedlot farm: 999 head and 2,000 head;
- Meat chicken farm: 400,000, one million and two million birds;
- Layer chicken farms: one million birds (Note: little constraint was identified for layer chicken farms, so other sizes were not considered).

The following modelling approaches were adopted:

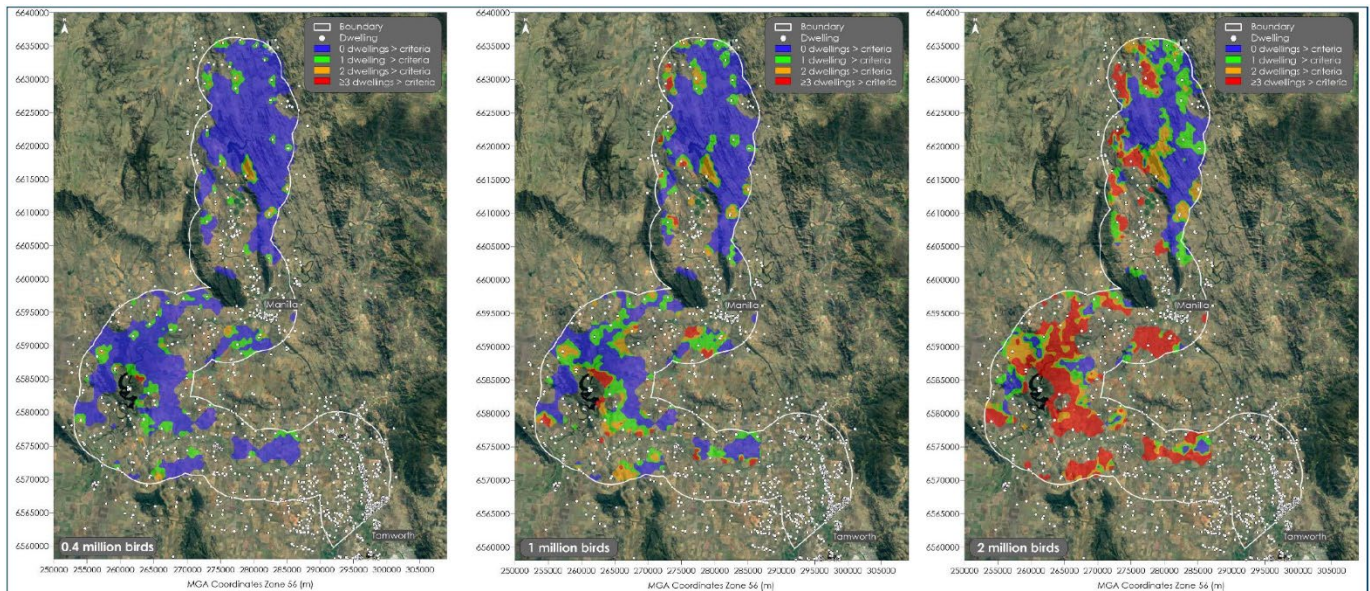
- 1) Conservative 'Level 1' impact assessment modelling of the six intensive livestock agriculture investigation areas for feedlots and poultry (meat and layer) farms;
- 2) 'Level 1' impact assessment modelling identified that more detailed 'Level 2' modelling was needed for assessing meat poultry farms;
- 3) 'Level 2' modelling was based on locally obtained chicken farm data.

The outcome of the modelling is a series of maps consolidating the buffers for all dwellings, which identify land that is suitable for intensive livestock agriculture based on odour factors. The mapping presents the 'Level 1' modelling for cattle feedlots and the 'Level 2' modelling for poultry farms (examples provided in Figure 4-8 and Figure 4-9) for different farm types/sizes. The mapping identifies:

- 1) Areas of land that can be developed without adverse amenity impacts on existing dwellings;
- 2) The number of existing dwellings that may be impacted by the development of a specific farm size on the land.

As illustrated in Figure 4-8 and Figure 4-9 (examples only), the model generates the following categories of land suitability for intensive livestock agriculture:

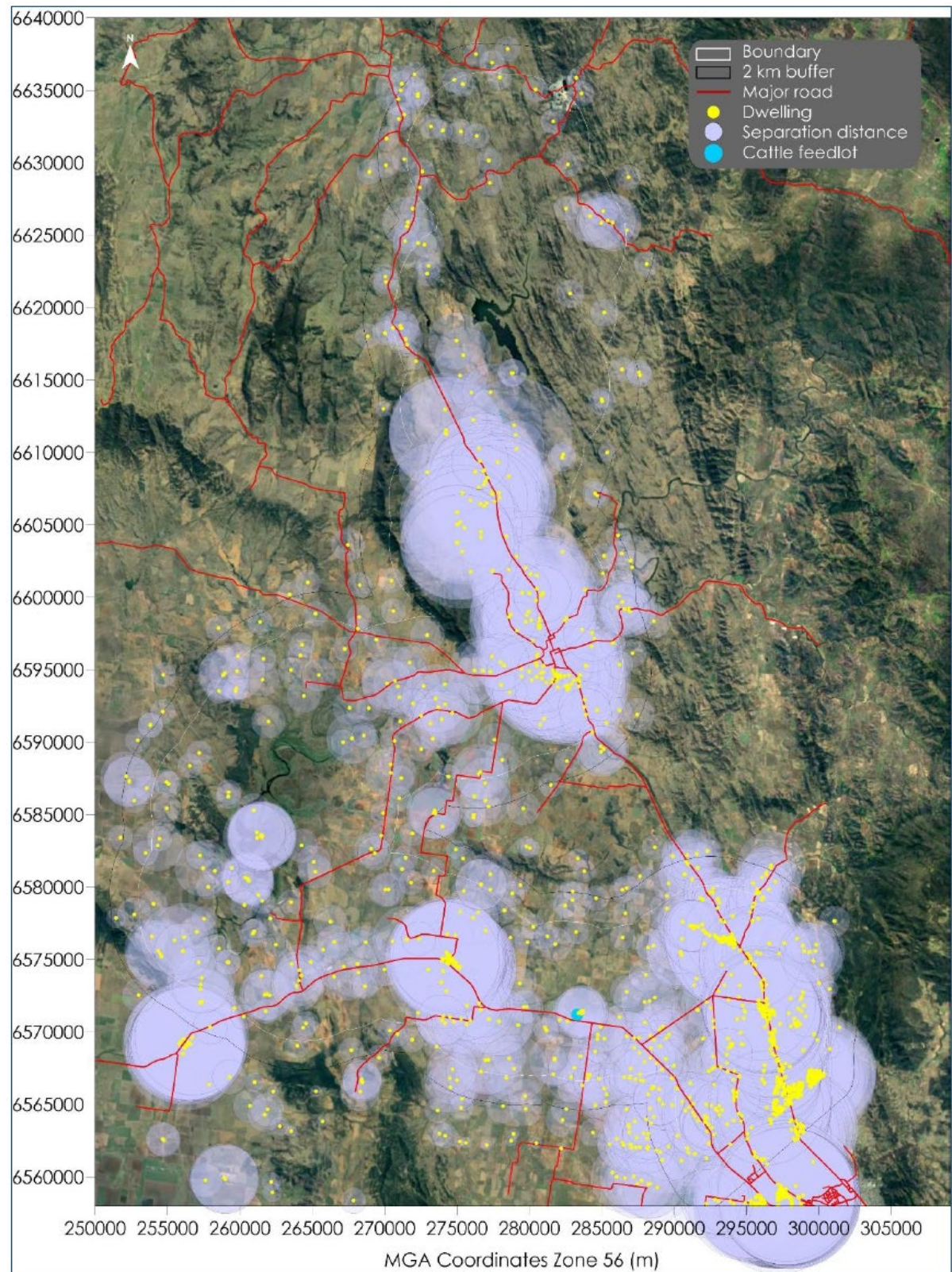
- Blue – land affected by no existing dwellings;
- Green – land affected by one existing dwelling;
- Orange – land affected by two existing dwellings;
- Red – land affected by three existing dwellings.



Source: Todoroski Air Sciences, 2024

Figure 4-8. Level 2 Strategic odour modelling of poultry (meat) farms in Investigation Area 2





Source: Todoroski Air Sciences, 2024

**Figure 4-9. Level 1 Strategic odour modelling of 1000 head beef feedlots in Investigation Area 2**

The results of the strategic odour modelling map show the generally unconstrained<sup>3</sup> land upon which significant intensive livestock agriculture operations can be sited without undue impact on existing receptors in the surrounding area. The maps provided can be used to identify suitable land where such farms can operate, and where reduced risk of odour amenity impact is evident. The maps also identify the areas of high constraint, where intensive livestock agriculture should not be located based on existing dwelling clusters.

As the farm sizes increase, the available space in which these farms are suitable is likely to diminish without associated property acquisition. For this reason, if viable commercial scale intensive livestock agriculture farming is to continue and have scope to grow, it is crucial to protect suitable farming land via a tailored planning framework. The ongoing suitability of this land for intensive livestock agriculture relies on limiting residential encroachment upon the most suitable land. It is important that land identified by odour modelling as being suitable for intensive livestock agriculture be protected for viable large-scale intensive livestock agriculture.

As new development occurs in the IPAs, the odour model would need to be updated over time. Model ownership and process for updating to ensure accuracy and relevance for ongoing decision-making is critical.

#### **4.2.3 Suggested legislative amendments**

Amendments to the relevant LEPs are proposed for two key purposes:

- 1) Identify and protect land that is identified as being suitable for intensive livestock agriculture based on strategic odour modelling. Under the proposed planning framework, the central land use planning role of each LEP establishing land use zoning, permissibility, principal development standards (including minimum lot sizes for rural subdivision) and local provisions is retained. It is proposed that additional provisions be introduced enhancing intensive livestock agriculture safeguards within IPAs, against potential encroachment from sensitive receptors. Provisions would aim to ensure consent authorities are satisfied that appropriate measures will be taken so that new development within an IPA do not adversely affect the development and operation of intensive livestock agriculture as the preferred land use.
- 2) Require consideration of the Intensive Livestock Agriculture Odour Guideline to assist site selection and mitigation of land use conflicts. The guideline will be a matter for consideration under the relevant local environmental plan for intensive livestock agriculture development in the relevant investigation area. The consent authority will be required to be satisfied that the development is consistent with the relevant provisions of the guideline.

Within these two purposes, the proposed framework enables local councils to determine the degree of protection for land within the IPA. The methods of protection generally include either applying reverse buffer provisions (Section 0) or limiting the permissibility of sensitive land uses, such as dwellings (Table 4-3). It is recommended that DPHI and Councils consider the potential amendments to LEPs in light of the strategic context presented in Section 3 and apply amendments to each Local Government Area that aligns with local considerations.

<sup>3</sup> Note: Site-specific assessment of environmental, social and other impacts (including site-specific odour modelling) is required as part of any development application.

Table 4-3. LEP amendment options for consideration

Options for LEP amendment	Intent
Application of IPAs.	Applies to land illustrated on the IPA map. Clarifies that the IPA identifies land on which the predominant and preferred land use is intensive livestock agriculture.
Land use zone objectives (RU1 – Primary Production).	Include specific objectives of the IPA in relation to preserving the potential for land to be used for intensive livestock agriculture.
Application of Intensive Livestock Agriculture Guideline.	This clause provides specific reference to application of the Intensive Livestock Agriculture Odour Guideline within IPAs. Requires development applications to be prepared in a manner consistent with the Intensive Livestock Agriculture Guideline.
Development within a buffer area.	Applies minimum buffer provisions (separation distances) between an existing farm and/or new sensitive receivers such as dwelling house, dual occupancy (attached), tourist and visitor accommodation, agritourism etc. to consider whether a specific buffer clause is required in LEP. May be covered by including Clause 8.7 below with reference to non-agriculture development.
Minimum lot size for Identified Production Areas.	Consider review of minimum lot size in IPAs that reflects a suitable size to contain separation distances within lots, subject to strategic justification of lot sizes.
Erection of dwelling house on land in IPA.	To minimise the risk of encroachment of sensitive land uses, consider removing the application of existing clauses relating to 'erection of dwelling houses on land in certain rural and conservation zones' within IPAs.
Reverse buffers or matters for consideration for sensitive land uses (relating to impact of odour on non-agriculture development).	Consider requiring consideration of the Guideline for development of non-intensive livestock agriculture land uses, specifically for residential and other sensitive receivers, within IPAs. Establishes a statutory basis for assessing suitability of development applications for sensitive land uses within IPAs.  Refer to Section 0 for description of buffer provisions.
Additional permitted/prohibited land uses.	Consider specifying land uses that are not encouraged in IPAs. Limits the types of sensitive uses that would otherwise be permitted in RU1. Such uses may include farm stay accommodation, tourist and visitor accommodation, function centres, group homes, dual occupancies, community facilities, secondary dwellings.



#### 4.2.4 Buffer provisions

The primary method for ensuring appropriate separation of odour-emitting land uses and sensitive land uses is the application of buffers to physically remove the two land uses from each other's impact zones.

The application of buffers should be considered within a LEP to prevent the intensification or encroachment of land use potentially incompatible with intensive livestock agriculture within the IPA. Sensitive land uses to odour from intensive livestock agriculture typically include residential accommodation such as dwelling houses, dual occupancies, tourist and visitor accommodation; and agritourism.

Buffer provisions are consistent with the Agriculture Commissioner's Report which recommended the NSW Government require councils to consider buffer guidelines and apply 'agent of change' principles for agricultural operations in relevant development application approval processes so that established buffers are considered in neighbouring development decisions.

The buffer provision options, for consideration as part of formulating LEP amendments, include:

- **Buffers:** The distance from sensitive receptors (e.g. dwellings) that an intensive livestock agriculture production facility may be sited. The options for establishing buffers include:
  - Specified (minimum) distance to ensure suitable buffer distances are maintained.
  - Assessment of the proposed development, using site-specific odour modelling (conducted in accordance with approved methods) to determine appropriate separation distances.
- **Reverse Buffers:** The purpose of reverse buffers would be to protect existing intensive livestock agriculture operations from potential conflicts arising from new developments, such as complaints about odour or noise, or concerns about biosecurity.
  - In the context of intensive livestock agriculture, reverse buffers would involve development standards that establish separation distances or buffer zones to delineate acceptable uses in proximity to intensive livestock agriculture operations.
  - These regulations may prohibit or restrict certain types of new developments (e.g. dwellings) within a specified distance from the agricultural operation.
- **Agent of Change provisions:** The purpose of agent of change provisions is to ensure that new dwellings do not impose undue burdens on existing intensive livestock agriculture operations and promote responsible development that considers the pre-existing conditions of the area.
  - When applied to intensive livestock agriculture, agent of change provisions would typically require new dwelling developments near existing intensive agriculture livestock operations to implement measures that mitigate potential conflicts such as odour, noise, or traffic.
  - The responsibility would fall on the new sensitive receptor to manage any negative impacts resulting from the proposed development on the existing intensive livestock operations.

DPIRD-Agriculture has prepared the '*Buffer Zones to Reduce Land Use Conflict with Agriculture – An Interim Guideline*' (November 2018). At the time of drafting, and as part of the NSW Government's response to the Agriculture Commissioner's Report, DPIRD-Agriculture is reviewing and updating the guideline. This guideline update should inform the consideration of buffer provisions in the Namoi RJP.



#### 4.2.5 Namoi Intensive Livestock Agriculture Odour Guideline

##### Overview and intent

There is little guidance to farmers and local government with respect to the information necessary for a development application for a new or upgraded intensive livestock agriculture development. This can cause significant time delays in progressing applications, particularly during the early stages of site selection and establishing assessment requirements.

It is recommended that a guideline be prepared that guides development assessment of intensive livestock agriculture in the Namoi Region based on strategic odour modelling. The Namoi RJP Intensive Livestock Agriculture Odour Guideline (the Guideline) provides a framework for site selection and risk assessment for intensive livestock agriculture development and supplements existing *Planning Guidelines Intensive Livestock Agriculture Development*. By adhering to the principles, objectives, and risk assessment approach described in the Guideline, decision-makers can make informed, transparent, and consistent decisions that support the sustainable growth of intensive livestock agriculture while protecting the environment, animal welfare, and the interests of local communities.

The Guideline is the mechanism that implements the findings of the odour modelling. It does this by utilising the modelling to inform a land use conflict risk assessment during the site selection stage of development applications, reflecting the scale and type of intensive livestock agriculture as well as the proximity to dwellings.

Other impacts, such as biodiversity, heritage, soils and transport<sup>4</sup> are subject to site-specific assessments for each proposal and will be guided by the *Planning Guidelines – Intensive Livestock Agriculture Development*.

##### Statutory weight of Guideline

The weight given to the Intensive Livestock Agriculture Odour Guideline under an environmental planning instrument or DCP can vary depending on the specific planning framework and the provisions of the guidelines in question.

Environmental planning instruments, such as LEPs, are statutory planning instruments to guide land use and development within a Local Government Area. With the introduction of the *Standard Instrument—Principal Local Environmental Plan (2006)* (SILEP), a consistent and coordinated approach to planning matters has been adopted across the State, with the flexibility to account for local issues. LEPs carry a certain amount of legal weight, and override provisions in other planning documents, such as DCPs.

DCPs are documents created by local councils that provide detailed planning and design guidelines for specific areas or types of development within the Local Government Area. While DCPs do not carry the same legal weight as LEPs, they are considered important supplementary documents to an LEP. They provide more specific guidance on development standards, design principles, and other local considerations that may not be adequately addressed in the broader LEP.

In the context of guiding intensive livestock agriculture, if an LEP specifically addresses intensive livestock agriculture and provides reference to a guideline for its development, it would carry more weight than a chapter in a DCP. This is because the LEP is a higher level, legal planning instrument, while the DCP is a local-level document providing more localised guidance that can be varied.

<sup>4</sup> See Table 3-1, Section 3.2.6, for description of other matters for consideration for intensive livestock agriculture development applications.

However, the weight given to the Guideline would depend on the specific language used, the statutory context, and the decision-making process of the relevant planning authority. On balance, the preferred approach is to pursue a Guideline that is approved by relevant authority (DPHI) and is given statutory weight by amendments to the relevant LEP.

### Objectives and desired outcomes

The Guideline aims to achieve the following objectives and desired outcomes:

- 1) Informed decision-making:
  - a) Improve awareness and understanding of intensive livestock agriculture among decision-makers and stakeholders.
  - b) Support efficient development assessment processes by providing strategic evidence to support site selection and risk assessment.
- 2) Transparent assessment and consistent decision-making:
  - a) Incorporate regional priorities and odour modelling into assessment and decision-making processes
  - b) Ensure transparency in the assessment of risks associated with siting of intensive livestock agriculture developments

### Site selection and risk assessment

For a proposed intensive livestock agriculture production facility (poultry farm or beef feedlot) to locate with the IPA area, the Guideline would provide the basis for determining whether the location is suitable considering proximity to dwellings not on the land subject to the proposal.

The Guideline implements odour modelling to ensure appropriate siting of intensive agriculture development according to type of facility and production volume.

The primary evidence base to support this is the odour modelling undertaken as part of the Namoi RJP project. Section 4.2.2 describes how the strategic odour modelling is used to identify the IPAs. The content of the guideline would provide more nuanced guidance that reflects the various scales and types of intensive livestock agriculture developments.

Development applications for intensive livestock agriculture would utilise the odour modelling to guide site selection. The Guideline establishes a framework for preparing a land use conflict risk assessment for odour, consistent with the requirements of the *Planning Guidelines Intensive Livestock Agriculture*. The odour contours provide an indication of the potential odour impacts on existing dwellings of farms of various types and scales, thereby providing greater certainty earlier in the development process regarding suitability of proposed siting for avoiding odour impacts.

The odour contours and land use conflict risk assessment process described in the Guideline is to be utilised to inform:

- Early stage site selection and planning by proponents (via pre-development application engagement).
- Strategic planning by relevant planning authorities.

Strategic odour modelling demonstrates that selecting a site inside an IPA and that aligns with this Guideline is more likely to receive support of the relevant assessment authorities. However, the IPA boundary does not restrict development applications for intensive livestock agriculture that are outside or extend beyond IPA boundaries. Development applications for intensive livestock agriculture on land outside the IPA boundary would be required to demonstrate site suitability based onsite specific odour modelling following EPA requirements.

### Model verification and sustainment

A key step in utilising the model to support evaluating the suitability of land for an expansion or new intensive livestock agriculture development is to verify the accuracy of dwellings identified in the model for each development application. Where the dwellings in proximity of the land under review have changed (increase or decrease) this needs to be accounted for in the Land Use Conflict Risk Assessment or the modelling would need to be updated (via site-specific modelling or a model update).

The odour model would be maintained centrally by a suitable government agency with an appropriate mandate for retaining relevant specialist knowledge and the capacity to provide specialist support to proponents, relevant planning authorities and the wider community.

Access to the model may be provided through a dashboard or spatial tool that enables the user to select the size, type, and location of a proposed farm to evaluate land suitability. Additionally, to support streamlined assessment, the model data may be shared with proponents to support modelling of proposed intensive livestock agriculture development.

## 4.3 Processing and industry investigation areas

*This section describes the approach to improve the planning framework for secondary agriculture processing and related rural industries in identified precincts in Gunnedah and Tamworth.*

### 4.3.1 Location

The Namoi RJP includes two proposed (2) secondary processing and industry investigation areas focusing on focus on industrial and agricultural processing.

These secondary processing and industry investigation areas are envisaged to include secondary intensive agribusiness such as the processing of primary produce, freight, logistics, value-add agribusiness, manufacturing of food products and industries and services that support intensive livestock agriculture. During several in-person agency workshops with government agencies and with both Gunnedah Shire Council and Tamworth Regional Council, it was identified that the two secondary investigations areas of Gunnedah and Tamworth are at varying stages in developing their strategic policies, future planning and understanding of envisaged land uses. The following sections provide recommendations for the planning framework to facilitate development of these precincts for industrial and agricultural processing land uses.

### 4.3.2 Supporting secondary processing precincts

Secondary processing precincts would include land uses such as processing of primary produce, freight, logistics, value-add agribusiness, manufacturing of food products and activities that support local intensive livestock agriculture. It is important the precinct land use strategy reflect a sound economic position based on leveraging local production and industry advantages.

Evidence-based and place-based analyses of constraints and opportunities are a central element to streamline planning pathways in the secondary processing precincts. Planning solutions are then tailored to the circumstances and the vision for each precinct. Where an integrated planning framework is required for effective layout of land uses and designing appropriate controls, a precinct master plan may apply a defined area and a visionary land use strategy developed.

The analysis of secondary processing precincts is supported by the Agricultural Land Supply Assessment, Atlas Economics (Appendix 1) and the Air, Noise and Odour Industrial Precincts Technical Report, Todoroski Air Sciences (Appendix 5).

Where an LEP, master plan and DCP are proposed for a defined agriculture precinct (e.g. secondary processing precinct), Figure 4-10 describes the related content of each plan in the context of the Namoi RJP.



Figure 4-10. Planning hierarchy

Under this hierarchy, land within a defined secondary processing precinct would be defined within the respective LEPs and new provisions within each LEP would apply to development within the mapped areas. Land within the Namoi RJP is zoned to align with the most suitable and best use land uses, which enables the intensification of industry that is envisioned for these areas.

Local provisions under the LEP would provide more flexibility for development that specifically targets intensive livestock agriculture across the RJP while considering the impacts on, and from, adjacent existing and future environments. Proposed amendments to the LEPs would introduce new or amended LEP provisions for land within the Namoi RJP.

Development within a defined secondary processing (industrial) precinct, could be supported by:

- Preparation of a master plan or structure plan based on comprehensive suite of technical studies, which provides an integrated strategy for development within the Namoi RJP investigation areas;
- Requirement for each DCP to be consistent with the master plan;
- Requirement under the relevant environmental planning instrument for development to be consistent with the relevant master plan.

### 4.3.3 Tamworth Investigation Area 8

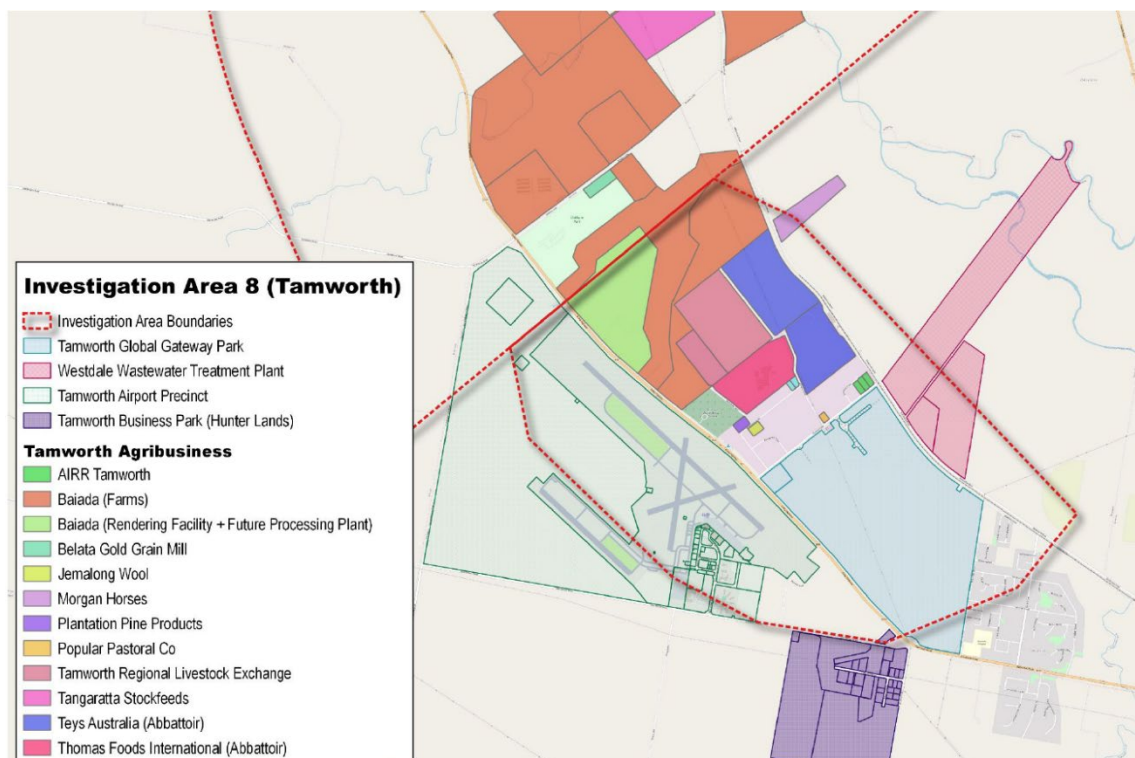
#### Existing conditions

Investigation Area 8 currently comprises a mix of existing industrial and processing land uses. The area is well serviced by road transport with direct access to the Oxley Highway and Wallamore Road. Tamworth Regional Airport is adjacent to the precinct. Existing residential areas are located to the south east, with scattered rural dwellings to the north east opposite Wallamore Road.

*Area 8 benefits from its proximity to the Taminda Industrial Area (a 239 ha industrial and employment precinct) and Tamworth Central Business District (CBD) immediately east of the precinct which comprise a critical mass of businesses and service providers, including several major agribusinesses (e.g. Baiada's existing processing plant, Allied Pinnacle's grain mill, FPM Cereal Milling Systems flour mill, Ridley Agriproducts manufacturing plant, etc).*

Atlas Economics – Agriculture Land Supply Assessment

Existing land uses in the investigation area are illustrated in Figure 4-11.



Source: Agriculture Land Supply Assessment, Atlas Economics

Figure 4-11. Investigation Area 8: Existing land uses

Tamworth Regional Council has initiated the development of the Tamworth Global Gateway Park and Tamworth Intermodal Freight Terminal (246 hectares), which occupies a large portion of the investigation area.

The components of the development include:

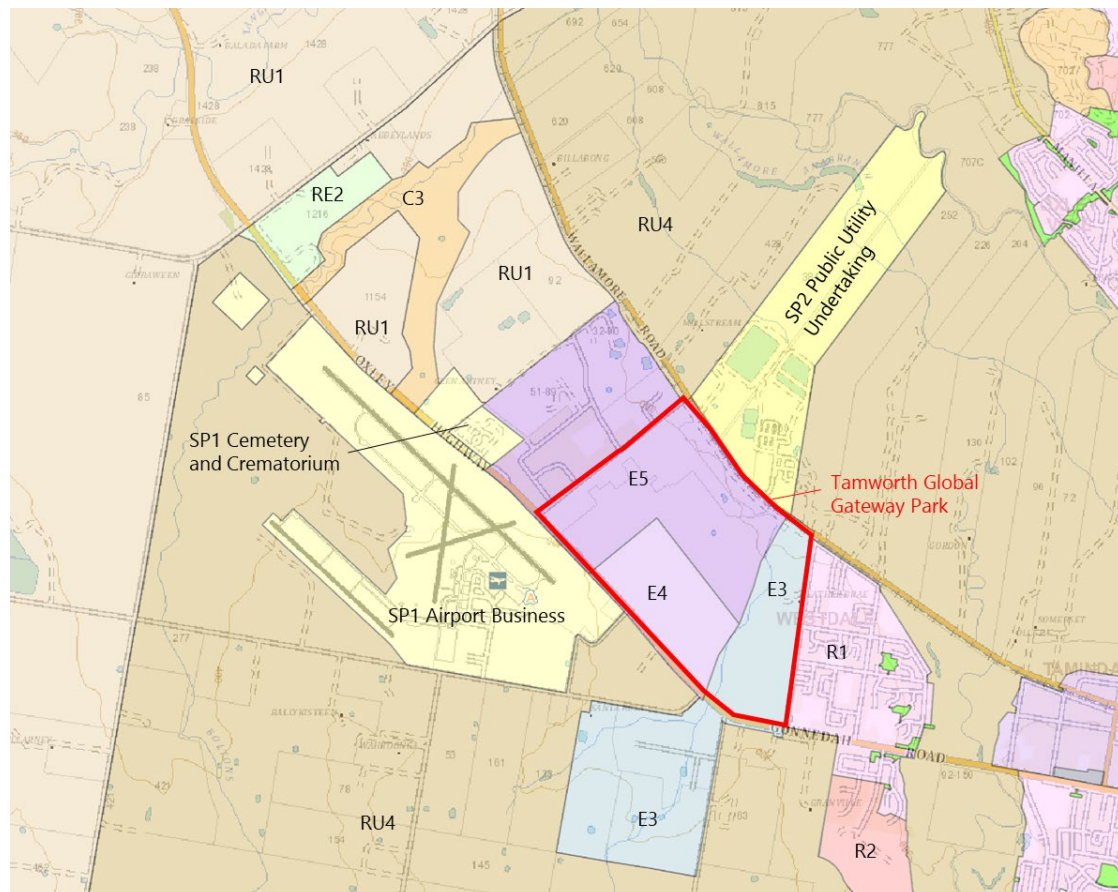
- *Tamworth Global Gateway Park – Council owns the site and is solely responsible for delivering the new industrial and business area.*



- *Tamworth Intermodal Rail Line – Transport for NSW is overseeing the reactivation of 5 km rail line between West Tamworth and Westdale, delivered by John Holland Rail.*
- *Tamworth Intermodal Freight Facility – Qube Holdings was chosen through an Expression of Interest process to build and operate the facility to be located in a section of the Tamworth Global Gateway Park adjacent to the rail line. (source: Tamworth, nsw.gov.au)*

### Current zoning

The current land use zones in investigation area 8 and the location of the Tamworth Global Gateway precinct are illustrated in Figure 4-12.



Source: DPHI, Planning Portal, 2023

Figure 4-12. Investigation Area 8: Current land use zoning

### Potential land uses

Based on the Agriculture Land Supply Assessment (Atlas Economics) and this planning analysis, the following potential land uses may be appropriate for locating in investigation area 8:

- Logistics and freight
- Agricultural produce industry
- Livestock processing
- Plant processing
- Livestock saleyards
- Natural textile manufacturing
- Food production
- Prepared animal and bird feed manufacturing



- Circular economy and waste recovery
- General agribusiness and farm supplies
- Controlled environment horticulture
- General and heavy industry
- Automotive repair and sales, equipment hire and depot
- Recreation facilities (existing Oakburn Park).

The Tamworth Regional DCP outlines that the aim of the Precinct is to support a wide range of compatible general and heavy industrial land uses such as import/export freight and logistics, manufacturing and food production that service the local and regional community and the intermodal/airport facility. It is also noted that a recent approval was also granted to Teys for a 2MW solar development directly to the north of their primary abattoir site. Atlas Economics' report noted that civil works for Stage 1 of the precinct is complete with pre-sales exhausted.

### **Recommended planning framework**

To date, several meetings and workshops have been held with Tamworth Regional Council and key government agencies to understand the status and vision for the investigation area 8 and assist in identifying the potential value add as part of the RJP project.

The analysis of the land supply and planning framework undertaken to date identified that:

- Tamworth Regional Council's strategic policy documents are well progressed with a LEP review currently underway;
- A site-specific Tamworth Global Gateway Park chapter already exists within the existing Tamworth DCP which clearly outlines Tamworth Regional Council's character statement, vision for the area and the type of land uses that are sought to be integrated;
- Much of the land within the investigated Tamworth Processing and Industry Precinct has been accounted for under the future Tamworth Global Gateway Park and Tamworth Intermodal Freight Terminal with limited unaccounted land available;
- Tamworth Regional Council have already undertaken rezoning to provide for the expansion of the Global Gateway Park to support industrial uses and intermodal facilities; and
- Tamworth Regional Council noted the importance of protecting the existing and future industrial uses from the encroachment of sensitive receivers because of legacy dwelling entitlement provisions within the Tamworth Regional LEP.

The current planning framework and associated development applications comprise a comprehensive assessment of the current conditions and future land uses envisioned for investigation area 8. There is limited remaining land available for new development that is not already incorporated into either recently approved planning approvals or the Global Gateway Park planning framework. Considering the mitigation measures and development controls incorporated into the current planning for investigation area 8, there is limited scope for the RJP to protect and enhance the future planning for industrial and agricultural processing.

It is recommended that the RJP not pursue a precinct planning approach for investigation area 8, instead relying upon the existing process that has been commenced by Tamworth Regional Council.

#### 4.3.4 Gunnedah processing and industry investigation area 7

##### Existing conditions

The Gunnedah investigation area 7 currently comprises a mix of land uses as illustrated in Figure 4-13, benefiting from direct access to both the Oxley and Kamilaroi highways and from an existing freight rail siding.

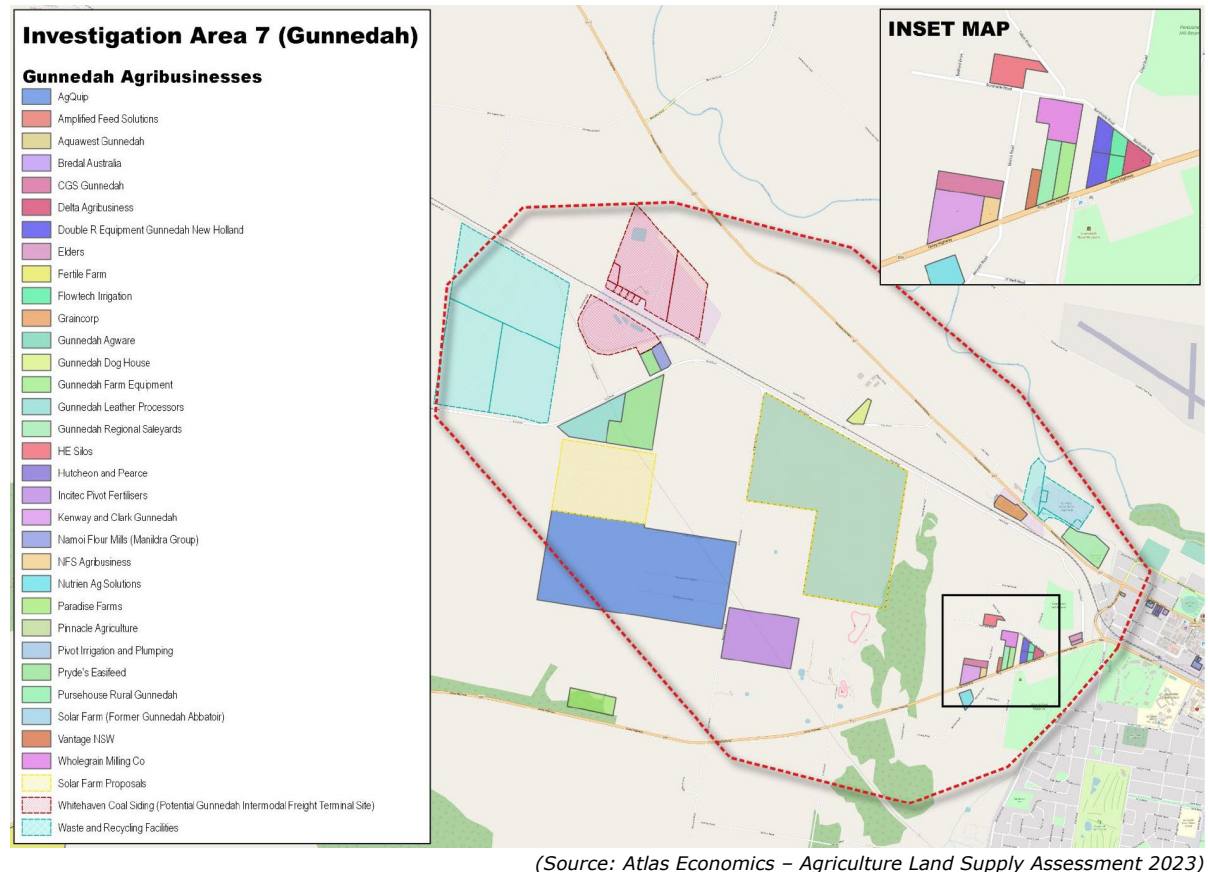
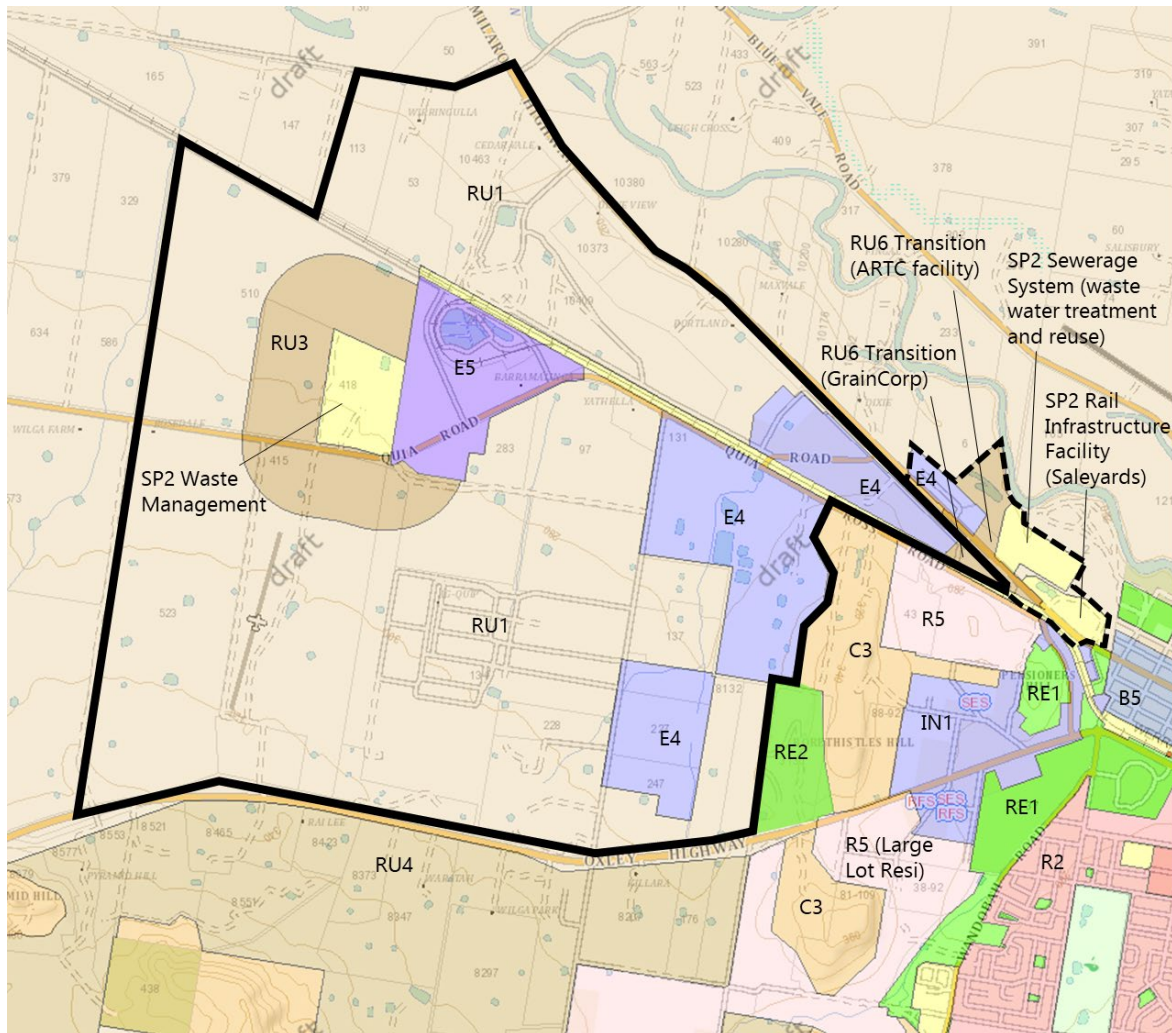


Figure 4-13. Investigation Area 7: Existing land uses

## Current zoning

The current land use zones in investigation area 7 are illustrated in Figure 4-12.



Source: DPHI, Planning Portal, 2023

Figure 4-14. Investigation Area 7: Current land use zoning

## Potential land uses

Based on the Agriculture Land Supply Assessment (Atlas Economics) and this planning analysis, the following potential land uses may be appropriate<sup>5</sup> for locating in the Gunnedah investigation area 7:

- Logistics and freight
- Agricultural produce industry
- Livestock processing (abattoir)
- Plant processing
- Livestock saleyards
- Grain processing and storage
- Food processing – niche/artisan products
- Prepared animal and bird feed manufacturing
- Fertiliser manufacturing

<sup>5</sup> To evaluate appropriateness of locating in the precinct, these identified land uses would need further consideration with respect to proximity (e.g. potential to general amenity or land use safety impact) to sensitive receptors (e.g. dwellings).

- Leather manufacturing
- Circular economy and waste recovery
- General agribusiness and farm supplies
- Controlled environment horticulture
- General and heavy industry
- Automotive repair and sales, equipment hire and depot
- Small businesses
- Community festival/events.

### **Recommended planning framework**

To date, several meetings and workshops have been held with Gunnedah Shire Council and key government agencies to understand the status and vision for the Gunnedah investigation area 7 and assist in identifying potential value adds that can be supported within the RJP project. An outline of the planning framework elements for the precinct is illustrated in Figure 4-2.

The analysis of the land supply and planning framework undertaken to date identified the following key issues:

- Gunnedah is a major producer of broadacre crops and livestock (beef) and comprises a notable food processing and agriculture-related manufacturing sector with the area experiencing opportunities for dual cropping in agriculture production.
- Gunnedah demonstrates strong opportunities for value-added manufacturing and circular economics due to its strategic location near regional freight networks, key road networks and other regional hubs such as Tamworth with its airport.
- A Strategic Business Case (SBC) was prepared in May 2022 by Gunnedah Council for the development of the Gunnedah Intermodal Freight Terminal (GIFT). Gunnedah Council is currently in the process of negotiating with industry before preparing a Final Business Case for consideration by the NSW Government. This new intermodal terminal presents significant opportunities for the Gunnedah precinct providing direct access to the Port of Sydney and international export markets.
- As described in the Agriculture Land Supply Assessment (Appendix 1):
  - The precinct comprises approximately 350 allotments with much of the area (approximately 55% based on aerial imagery) zoned yet undeveloped or underdeveloped.
  - General market activity indicates that the overall industrial and rural markets are performing well with local agents noting growing levels of confidence from local businesses and investors. It was also noted that several existing agribusinesses are proposing to upgrade to expand upon current facilities.
- The LGA comprises a lower population and therefore lower prevalence of sensitive receivers in contrast to that of the larger regional hubs which means that there is less risk of encroachment to key land for processing and industry.
- Gunnedah Council also noted that the LGA has high availability of ground water. However, it noted that additional investigations would be required to understand the current quantity and status of groundwater available.
- The precinct comprises strong existing value-add manufacturing and processing industries that can expand, supporting other industries and supporting circular economy land uses.

These findings demonstrate a strong opportunity, through the Namoi RJP project, to expand upon and support existing processing and industrial land uses within the Gunnedah Processing and Industry Precinct. Accordingly, it is recommended that the Namoi RJP include establishing a master plan and development control plan update to support the long-term realisation of an integrated processing and industrial precinct.

An initial analysis of the potential air, noise and odour impacts for Gunnedah Processing and Industry Precinct has been carried out by Todoroski Air Sciences. The report concludes that:

- Modelling indicates high risks for air, noise and odour where sensitive receptors are co-located with industrial land uses, which highlight the need for separation (i.e. buffers) between industry and sensitive land uses.
- Most of the industrial zones show much lower risks in general where sensitive land uses are assumed to be no longer present.
- Future industrial uses in high risk areas would need to have relatively low emissions and be regulated per relatively strict controls on air, noise or odour emissions. Similarly planning controls to limit or to gradually phase out residential use in the highlighted high risk areas can be done in parallel to also help minimise future land use conflicts. The results indicate that without such mitigation and regulation in place there may be impacts in the highlighted receptor areas outside of the RJP. (Source: Todoroski Air Sciences, 2024.)

It is recommended to introduce planning controls to limit the encroachment of sensitive receivers within and immediately surrounding the investigation area.

To initiate the master planning process, technical investigations would be required into key constraints and opportunities. Such studies may include, but not limited to:

- Transport and access
- Air, noise and odour
- Economic sustainability and land use strategy
- Water supply
- Infrastructure and utilities
- Biodiversity, heritage and soils
- Flooding and water management
- Land use safety.



## 4.4 Strategic and assessment

*This section describes strategic and assessment solutions recommended to support intensive livestock agriculture in the Namoi RJP.*

### 4.4.1 Aligning strategic planning framework

The Agriculture Commissioner's Report highlights strategic planning as an important element to minimise the conflict between agriculture and urban areas. Together with the proposed statutory planning framework, strategic plans should reflect the preference of intensive livestock agriculture in IPAs and implement principles to minimise land use conflict. This includes reducing the expansion of urban development into productive agriculture land and instead utilising serviced land near or within existing townships.

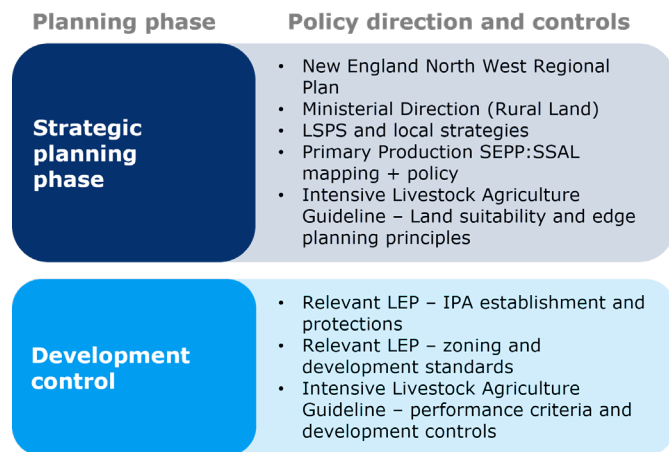


Figure 4-15. Namoi RJP strategic planning considerations

Consideration would also need to be given to land that is outside the defined Namoi RJP areas that may need to grow to support the increased employment within the agriculture sector. Sectors may include housing and social infrastructure, education, healthcare, and public spaces.

Local and regional strategies must reflect modelling that has been carried out and identifies only certain lands suitable for intensive livestock agriculture by concentrating urban development in other areas. Figure 4-15 illustrates the key relationship between strategic planning and direction setting through development control. In this framework the Intensive Livestock Agriculture Guidelines plays a dual role to guide planning strategies to align with land suitability and edge planning principles.

Strategic plans must highlight the need to identify and protect important locations for intensive livestock agriculture, considering factors such as access to infrastructure, environmental constraints, and compatibility with neighbouring land uses.

Namoi councils should consider an edge planning approach to defining the interface between urban and agricultural production areas, which involve defining the edge of urban areas, promoting increased densities within townships and guiding treatment/use of the interface between agriculture and urban development.



#### 4.4.2 Assessment and decision-making support

##### Potential measures for consideration

Assessment and decision support measures that assist with efficiency of preparing, assessing, and deciding on applications for development consent are described in Table 4-4.

**Table 4-4. Potential assessment and decision-making support solutions**

Recommended solution	Description
Dedicated assessment team, business concierge, resource allocation.	<ul style="list-style-type: none"> <li>The capacity of local councils in the Namoi RJP to process development applications is limited by the availability of staff. Councils, however, desire the retention of assessment and decision-making.</li> <li>Establish specialist team/panel/repository to: <ul style="list-style-type: none"> <li>Manage repository of data, knowledge and practices in intensive livestock agriculture, with view to enhancing collective knowledge of council planners;</li> <li>Undertake assessments of intensive livestock agriculture proposals;</li> <li>Targeted training of council staff;</li> <li>Decision-making reference information (policy directions, evidence base, legal advice).</li> </ul> </li> <li>Establishing case management support for the Namoi RJP (i.e. business concierge) to assist and guide applicants through all stages of the development consent process, from initial discussions through to determination applications.</li> </ul>
Standard templates – statements of environmental effects (SEE), pre-development application consultation requirements, access to data and up-front evidence.	<ul style="list-style-type: none"> <li>Pre-lodgement application template drafted by DPHI in consultation with councils.</li> <li>SEE templates to clearly articulate the expectations for content and quality of development applications, building on the up-front evidence and aligned with the Intensive Livestock Agriculture Guideline.</li> <li>Align standard templates and pre-lodgement advice with intensive livestock agriculture e-Planning portal (refer also to description of 'Navigating Farm Developments planning portal initiative' below).</li> </ul>
Maintain/update odour model.	<ul style="list-style-type: none"> <li>Over time the spatial distribution of dwellings and intensive livestock agriculture facilities is likely to change. Further technological advancements may be made that reduce odour emissions.</li> <li>As the current odour modelling is based on current locations of sensitive receptors and current approved methods, the model should be subject to regular updates.</li> <li>The frequency of updates is dependent on the level of change in the investigation areas.</li> </ul>
Up-front technical evidence and data/modelling.	<ul style="list-style-type: none"> <li>Adequate up-front evidence base and an appropriate level of development control are essential to support streamlined approval pathways.</li> <li>Detailed technical studies would inform the development of a tailored planning framework and ensure land uses and development occurs in the right locations for each precinct.</li> <li>Up-front investigations potentially reduce the burden on investors wanting to expand or start-up businesses.</li> <li>Investigate the alignment with Future Foods initiative (University of NSW) and opportunities to align convenient access to information relating to suitability of land.</li> <li>Team within a State Government department who has ownership of the odour model and is responsible for ensuring the data informing the model is current.</li> </ul>

**Navigating Farm Developments planning portal initiative**

DPIRD–Agriculture, in conjunction with the DPHI e-planning team, have commenced a project that seeks to develop a tool to provide preliminary application support and assistance to farmers in navigating the planning framework. The development of an e-Planning portal is consistent with recommendation 8 of the Agricultural Commissioner’s report.

The tool allows farmers to identify their respective lot/s, outline the proposed land use (e.g. poultry farm) and help farmers place their developments in the least constrained areas of their properties.

The tool is broadly based on the Victorian model called ‘Navigating Farm Developments’. It is intended to be integrated into the existing e-spatial viewer/planning portal to streamline and amalgamate information systems. Once a proponent sites their development in the tool, the information will automatically populate the application form and the portal would generate and issue a summary report outlining zones, permissibility, key items that the applicant would need to consider (e.g. flooding, fire etc), identifies key council/s and government agencies that should be consulted.

The tool aims to provide initial guidance on development, key land constraints and assist the applicant in identifying the key matters that would need to be considered/addressed as part of an application.

This project will not alter or impact council processing or assessment of applications. It is important to minimise the number of places applicants need to look to find information.

## 4.5 Delivery initiatives

### 4.5.1 Awareness, education and innovation

#### Public engagement strategy

Meaningful consultation and engagement with the key market groups and the community contribute to intensive agricultural and secondary land uses being located, designed, and managed sustainably and provide confidence for ongoing industry investment.

Initial and ongoing consultation is required to implement the changes to the planning framework and to support streamlining of consent pathways. Leveraging engagement and exhibition of strategic documents (including this report) to potentially reduce exhibition requirements for straightforward individual applications later in the process.

Consultations with councils indicates:

- Where meaningful community consultation is conducted regarding the intensive livestock agriculture strategies and proposals, development applications typically receive fewer submissions;
- Typically, submissions are made when community believes there has been deficient modelling, the development is in close proximity or will impact amenity;
- Intensive livestock agriculture development applications receive mostly localised submissions (i.e. within two kilometres); and
- Community does not typically consider increased vehicle movements and associated impacts in submissions.

Feedback was also received that some communities consider that proposed intensive livestock agriculture that does not go through the designated development process is 'unregulated'.

Changes to the planning framework are not designed to reduce assessment requirements or deregulate proposals. Instead, the proposed streamlining is focused on leveraging up-front strategic plans, technical assessment and procedural efficiencies.

It is recommended that changes to the planning framework be reviewed, with public consultation, after five years.

#### Marketing and messaging

Effective marketing of the intensive livestock agriculture industry in the Namoi Region of NSW is crucial for promoting economic growth, creating jobs, and attracting investment. To achieve this, collaboration between councils, institutions, and businesses is required to develop effective marketing strategies and materials that highlight the benefits of the industry. Effective marketing can help promote sustainable economic growth and ensure a bright future for the community.

*People's contrasting perspectives on the function of rural areas have a significant effect on the perception of a nuisance and the ability to achieve compatibility.*

*While most farmers consider the rural area to be a place of business, many non-farm residents believe the rural area is a place that offers a lifestyle of open space, peace and quiet.*

Quote from: Guide to Edge Planning – Promoting Compatibility Along Agricultural-Urban Edges, British Columbia Ministry of Agriculture, Canada

One of the primary constraints facing councils in the Namoi Region is the limited resources available for marketing the benefits of the intensive livestock agriculture industry to the community and economy. To address this, collaboration between councils, other government agencies, institutions, and businesses is required to develop effective marketing strategies and materials that highlight the benefits of the industry.

Marketing material should also communicate the importance of the intensive livestock agriculture industry for the economic development of the Namoi Region. Tourism is often seen as a more attractive economic driver for local authorities, but effective marketing needs to communicate that the intensive livestock agriculture industry is a real source of income and jobs for the community.

It is recommended a combined marketing strategy and prospectus be developed that encourages investment in the Namoi Region, which is to be based on an evidenced economic positioning statement. Marketing needs to convey a positive message that the NSW planning system for intensive livestock agriculture in the Namoi Region is streamlined and there is strong government and community support. Materials should emphasise that the Namoi Region is a viable and attractive option for investment in the intensive livestock agriculture industry, with advantages such as good roads, water supply, suitable land and access to processing facilities.

#### **4.5.2 Service delivery model**

##### **Infrastructure delivery**

Intensive livestock agriculture development requires public infrastructure to support the transportation of animals, feed, and other supplies, as well as the distribution of the products produced by these facilities. Some of the public infrastructure required to support intensive livestock agriculture development includes:

- **Transportation infrastructure:** Livestock facilities require transportation infrastructure to transport animals, feed, and other supplies to and from the facility. Developments use roads, highways, railroads, and ports to move goods over long distances. Quality of roads also contribute to the connectivity to labour markets.
- **Water and wastewater infrastructure:** Intensive livestock agriculture facilities require secure water supply and wastewater infrastructure to support animal care and waste management, including water treatment facilities, wastewater treatment plants, and irrigation systems.
- **Energy infrastructure:** Livestock facilities require a reliable source of energy to power equipment, maintain temperature control, and provide other necessary services.
- **Communication infrastructure:** Intensive livestock agriculture facilities require communication infrastructure to support operations and enable access to information.
- **Emergency services infrastructure:** Livestock facilities require emergency services infrastructure to respond to accidents, fires, and other emergencies. Quality of roads contribute to the response times for emergency services.
- **Market infrastructure:** Intensive livestock agriculture facilities require market infrastructure to distribute products to consumers. This may involve the use of meatpacking plants, cold storage facilities, and transportation infrastructure to move products to markets.

Future development of intensive livestock agriculture depends on access to infrastructure and services, labour, access to processing capacity. IPAs identified in this report are remote from existing urban areas where existing infrastructure (utilities, transport and support services) is less available.

Industry consultation suggests that some larger operations can provide essential infrastructure onsite, reducing reliance on public infrastructure. Establishing onsite infrastructure to supply energy, water, and waste management for intensive livestock agriculture requires careful planning and consideration of:

- Location in relation to public infrastructure proximity to infrastructure can impact the cost of installation and maintenance;
- Scale of the facility and relative cost of associated infrastructure compared to production output (up-front capital cost and ongoing maintenance costs);
- Regulations governing necessary permits and approvals; and
- Technology available and integration of onsite infrastructure with the overall operation of the facility to optimise efficiency and minimise environmental impacts.

To support intensive livestock agriculture, the planning approach would involve the coordination of essential infrastructure planning and delivery to provide infrastructure and services when and where they are required as the precincts develop over time. A two stage approach may be appropriate:

- 1) Interim servicing strategy to ensure essential infrastructure is available for individual developments or precincts (funded and delivered through works-in-kind agreements).
- 2) Long-term servicing strategy for the entire Namoi RJP (funded through developer contributions).

It is recommended that an infrastructure delivery plan be prepared to support implementation, which assesses services infrastructure, transport infrastructure, water cycle management infrastructure, and social infrastructure and open space requirements for the region and each Local Government Area.

It is suggested that an LEP clause is considered that requires the consent authority to be satisfied that services that are essential for the proposed development are available or that adequate arrangements have been made to make them available when required. Example wording can be found in clause 6.2 Public utility infrastructure of *Albury Local Environmental Plan 2010*.

### **Research, development and training**

Research and development (R&D) can drive innovation in the industry by developing new technologies and improving production techniques. Private sector companies can invest in R&D to develop new products, machinery, and techniques that can help to improve productivity and efficiency in the industry. This can also help to reduce costs and increase competitiveness in the market.

Other measures that private sector companies can take to support the growth of the intensive livestock agriculture industry in the Namoi Region include investing in training and education for workers, providing financing for businesses and infrastructure projects, and supporting community development initiatives. By working closely with the public sector and other stakeholders, the private sector can help to create a sustainable and thriving intensive livestock agriculture industry in the Namoi Region.

Innovation, training and research into a range of industries can provide a future for young people and for reskilling in the intensive livestock agriculture industry and retain talent in regional towns:

- Education and training programs that are focused on the skills required for the intensive livestock agriculture industry, such as apprenticeships, vocational training, and agricultural science courses at universities.
- Incentivise businesses to provide employment opportunities/training for local or younger generations in the intensive livestock agriculture industry. This can include infrastructure funding/contributions, tax incentives, grants for businesses that hire younger workers, and support for businesses that are investing in new technology and innovation in the industry.
- Initiatives to promote regional towns and the opportunities available in the intensive livestock agriculture industry, including marketing campaigns that highlight the benefits of living and working in regional towns, as well as initiatives that support community development and engagement.

### Intensive livestock agriculture networks

Networking of operators can create opportunities for collaboration and knowledge sharing within the industry. Private sector companies can support industry associations and organisations that promote networking and collaboration between operators. This can help to identify new market opportunities, share best practices, and increase the overall competitiveness of the industry.

It is recommended that an innovation network be established with the view to coordinating and marketing of intensive livestock agriculture and processing in the Namoi RJP. This would be modelled on the theory of a 'virtual innovation district' and would operate as a link between industry and government to support marketing and strategic planning for intensive livestock and processing in the Namoi RJP.

Potential elements of an innovation network for intensive livestock agriculture in the Namoi RJP may include:

- **Digital platforms:** The network operates through online platforms, such as virtual communities, webinars, discussion forums, and collaborative spaces, where stakeholders can connect, share knowledge, and collaborate on projects.
- **Knowledge sharing:** The network should involve and engage a diverse range of stakeholders, including farmers, researchers, policymakers, industry associations, suppliers, and other relevant parties. The network would facilitate the exchange of information, research findings, best practices, and market insights related to intensive livestock agriculture. This enables stakeholders to stay updated on the latest developments, learn from each other's experiences, and access relevant resources.
- **Collaboration and partnerships:** Stakeholders within the network collaborate on research projects, pilot initiatives, and technology adoption. They may form partnerships to jointly develop and implement innovative solutions, leveraging each other's expertise and resources. Logistics support and delivering freight efficiencies can help to reduce costs and improve the

In the context of intensive livestock agriculture, a virtual innovation district, or innovation network, refers to a collaborative ecosystem that brings together stakeholders from various sectors to drive innovation, knowledge exchange, and technological advancements in the industry. Unlike a physical innovation district, which is a geographic area with a concentration of businesses, research institutions, and other organisations, a virtual innovation district operates primarily through digital platforms and virtual collaborations.

It brings together farmers, researchers, technology providers, industry associations, policymakers, and other relevant parties to collectively address challenges, explore new solutions, and promote sustainable practices in intensive livestock agriculture.



efficiency of supply chains. Private sector companies can invest in logistics infrastructure such as transportation, warehousing, and distribution systems that can support the industry's growth. This can also help to improve access to markets, reduce transportation costs, and improve the reliability of supply chains.

- **Technology adoption:** The network should focus on promoting the transfer and adoption of innovative technologies and best practices in intensive livestock agriculture. This can involve showcasing successful case studies, providing training and technical assistance, and facilitating access to funding or grants for technology adoption. Stakeholders can share information about emerging technologies, conduct virtual demonstrations, and provide guidance on their implementation. There is potential to:
  - Explore circular economy opportunities, such the use of biomass generated by feedlots and poultry farms, as well as transition to 'closed loop' economy.
  - Encourage sustainable management practices and technological advancements to enhance climate and economic resilience.
- **Policy and regulatory advice:** The network may engage in policy discussions and advisory efforts to shape regulations and policies that support the growth and sustainability of intensive livestock agriculture.
- **Coordination of supply chains:** The network should foster collaboration along the value chain, from input suppliers to processors and distributors. This can include digital technologies to link farmers with markets, facilitating supply chain coordination, exploring new market opportunities, and promoting sustainable and traceable production practices. The network may engage in coordinating large operators to support long-term planning and suitable siting of production facilities such as poultry and feedlots. This would support the staging of demand and supply associated with the expansion of processing facilities. This coordination involves bringing together the major stakeholders in the intensive livestock agriculture industry, including producers, processors, logistics companies, and government agencies. Coordinating the staging of demand and supply associated with the expansion of processing facilities is important to:
  - Ensure that there is a steady supply of products for processing and that the processing facilities are operating at maximum efficiency;
  - Ensure that sufficient planning for new and expanded feedlots and poultry farms is undertaken to match the demand of processing facilities.

Coordination of supply chains would involve working with producers to plan their production schedules and ensuring that they have the necessary resources and infrastructure to meet the demands of the processing facilities. It also involves working with logistics companies to ensure that products are transported efficiently and at the appropriate times.
- **Networking and events:** The virtual district organises networking events, webinars, workshops, and conferences to facilitate connections among stakeholders and provide opportunities for learning, collaboration, and showcasing innovative practices and technologies.

Such a network would need to be moderated and funded by an appropriate regional or State agency. It is recommended that a pilot project be established under the Namoi Unlimited, with the support of DPIRD. Sufficient resource allocation would be required to coordinate and maintain the relationships and information received.

Initially, the terms of reference for this virtual innovation network may include only priority elements required to support Namoi RJP planning framework, with other roles and functions introduced in the longer term. Initial priority functions may include:

- Knowledge sharing and stakeholder engagement.
- Market and value chain integration.
- Coordination of supply chains and planning framework advisory.

## Appendix 1 Agriculture Land Supply Assessment

[insert Atlas Economics Report]

## Appendix 2

### Review of current planning framework

## Review of current planning framework

Issues associated with the current planning framework with respect to intensive livestock agriculture that were identified through investigations and collaboration with government agencies and councils during preparation of the Namoi RJP project are described in Table A.

Table A. Review of current planning framework

Issues associated with current planning framework	Planning framework options for consideration
Need for a robust and forward-looking statutory planning framework to maximise regional value adding and promote efficient supply chains	<p>Provide investor certainty through up-front strategic planning aligned with engine industries (intensive livestock agriculture, intensive plant agriculture and processing) as evidence base for planning controls and consent pathways.</p> <p>Identify locations for production clusters based on modelling of environmental risk, where amended planning controls can be applied to minimise land use conflict</p> <p>Utilise up-front technical evidence to support faster approvals for targeted intensive agricultural development in a manner that minimises impacts</p> <p>Provide appropriate level of certainty and flexibility in the planning framework to enable maximising of regional value-adding and supporting efficient supply chains</p>
Planning framework can do more to manage land use conflicts	<p>For areas that could support intensive livestock agriculture, undertake technical studies to reduce burden on applicants and reduce development assessment timeframes, such as sensitive receptor mapping and odour modelling.</p> <p>Establish IPAs areas based on up-front technical investigations:</p> <ul style="list-style-type: none"> <li>• Implement planning provisions to encourage location of intensive livestock agriculture in those areas</li> <li>• Protect priority areas from encroachment by sensitive or incompatible land uses.</li> </ul> <p>Tailoring zones and other planning controls (e.g. reverse buffers) to preference intensive livestock agriculture over other non-agricultural development. This could include mandated controls within the priority areas.</p>
Perception that assessment and decision-making processes are inconsistent or uncertain, limiting the attractiveness of Namoi RJP for investment	<p>Need to streamline assessment for development Assessment and decision support through such initiatives as:</p> <ul style="list-style-type: none"> <li>• Reducing the assessment and evaluation timeframes by front-loading resolution of precinct-wide issues and impacts and potentially entering into a partnership approach with other government agencies to provide other approvals/licences in a timely manner</li> <li>• Business concierge services to support small, medium and large operators to navigate planning approval pathways</li> <li>• Improving access to planning or technical specialist resources for local councils to carry out assessments</li> <li>• Independent, reliable up-front technical evidence and data/modelling that decision-makers can rely upon for decision-making</li> <li>• Standard templates and assessment guidelines – EIS/SEE, assessment requirements, pre-development application, conditions of consent to improve understanding of assessment requirements</li> <li>• Review statutory thresholds that trigger more onerous consent pathways, including designated development and State significant development</li> <li>• Consider amending decision-making delegations, such as deferring consents for intensive livestock agriculture to Regional Planning Panel.</li> </ul>
Risk of legacy dwelling eligibility and intensification of dwellings impacting on	<p>For priority intensive livestock agriculture areas:</p> <ul style="list-style-type: none"> <li>• Amend LEP provisions to remove legacy dwelling eligibility</li> <li>• Limit dual occupancies and agritourism development purposes</li> <li>• Consider buffer areas to protect operational integrity of secondary agricultural land uses, while allowing compatible productive land uses</li> </ul>



Issues associated with current planning framework	Planning framework options for consideration
feasibility of intensive livestock agriculture	<ul style="list-style-type: none"> <li>• Incorporating matters for consideration in LEPs that require sensitive receivers nearby to secondary agricultural land uses to assess amenity and implement design or siting responses.</li> <li>• Limitations on complying development in buffer areas.</li> <li>• Specify minimum lot sizes in IPAs.</li> </ul>
Service delivery model are required to support planning framework	<p>To improve the delivery of public services, infrastructure, and support to farmers and rural communities through leveraging the strengths of the private sector, civil society, and government. A service delivery model can be applied to agricultural areas to improve the delivery of public services, infrastructure, and support to farmers and rural communities.</p> <p>Service delivery for the Namoi RJP would sit outside the planning framework, however, is an important contributor to investment attraction. Options include:</p> <ul style="list-style-type: none"> <li>• Agricultural services: Mobile clinics, field visits, and digital platforms to disseminate information and training on modern farming techniques, market information, financial services and access to agricultural inputs (supply chain).</li> <li>• Agricultural research and development: Research and development institutions work closely with farmers to develop and disseminate technologies and innovations.</li> <li>• Logistics and supply chain efficiencies: Establishing networked supply chain management and coordinating freight network with major operators/organisations (e.g. ports, road/rail operators, intermodals and processing facilities).</li> <li>• Rural infrastructure: Rural infrastructure such as roads, bridges, irrigation systems, and markets are important in ensuring that farmers have access to markets, and their products are transported efficiently.</li> </ul>
Some areas are experiencing high level of objection to intensive livestock agriculture, causing delays in planning approvals	<p>Support for farmers to improve its social licence to operate is required via a joint approach between government and industry. The following strategies may improve acceptance of intensive livestock agriculture in Namoi RJP:</p> <ul style="list-style-type: none"> <li>• Engage with local communities and civil society organisations.</li> <li>• Enhance engagement with the community at the strategic planning stage (which may provide opportunity to necessitate targeted engagement for individual applications).</li> <li>• Marketing campaign to improve awareness of the importance of intensive livestock agriculture to the regional economies and how the establishment of intensive livestock agriculture areas can encourage and protect housing in suitable areas.</li> <li>• Enable and promote sustainable and responsible farming practices to improve environmental management of intensive livestock agriculture facilities, including small to medium enterprises.</li> <li>• Invest in research and development to develop new technologies and practices that minimise the environmental impact of its operation, such as water efficiencies, soil, and odour management.</li> <li>• Consider implementing Corporate Social Responsibility (CSR) programs that demonstrate its commitment to social and environmental responsibility, which could include community development initiatives and environmental conservation projects.</li> </ul>

Issues associated with current planning framework	Planning framework options for consideration
<p>Planning framework needs to respond to the unique characteristics of each precinct and LGA, including the capacity of the individual councils to implement the planning framework. The mechanisms adopted for each LGA should reflect the characteristics of each precinct and council.</p>	<p>Addressing State/regionally significant urban planning matters through a regional framework approach ensures the planning process considers the broader implications of the issue and the potential impact on the wider community. State planning authorities have the resources, expertise, and authority to make decisions that consider the long-term effects of development on the State as a whole. State plans also provide a coordinated approach to planning, avoiding duplication and inconsistency between different local plans.</p> <p>However, addressing locally significant urban planning matters through local plans ensures that the planning process considers the specific needs and characteristics of the local community. Local planning authorities have a better understanding of the local context, community needs, and expectations. This allows local authorities to make decisions that are tailored to the local context and that consider the unique characteristics of the area.</p> <p>The Namoi RJP framework must clearly reflect the significance of the matters for consideration and establish a framework that aligns at the State, regional and local planning levels.</p>

## Appendix 3 IPA boundary maps

[Insert IPA Boundary maps]

## Appendix 4

### Intensive Livestock Agriculture Odour Modelling Report

[Insert TAS Report]



## Appendix 5

### Industrial Precincts Air, Noise and Odour Report

[Insert TAS report]