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20L032

28 February 2020

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Draft Planning and Design Code Consultation

Livestock SA represents sheep, beef cattle and goat producers in South Australia, and as one of the largest industries in relation to land area grazed in this State, it is essential that their views are included in making changes in the State's planning system. The area of grazing land operated by beef cattle/sheep businesses has been estimated to be almost 50 million hectares, more than half the total area of South Australia (ABARE-BRS 20101).

In November 2019, Livestock SA made a submission on Phase Two (Rural Areas). As Phase Three (Urban Areas) covers a significant part of rural South Australia, particularly in terms of agricultural production including livestock, we would like to reiterate those points that were made in that submission that are also very pertinent to Phase Three.

- **Definitions need clarified**

It is pleasing that the new Planning and Design Code has been drafted with the intent to support primary industries. In the case of most sheep, beef cattle and goat producers, this is mainly broadacre production, or to use the planning land use term, "farming" as the definition in the draft Code is that "farming means cropping, grazing or low intensity animal husbandry." It is noted that in the draft Code there are also definitions of cropping and low intensity animal husbandry, but not grazing and we seek further clarification on these land use definitions as well as the zone definitions.

- **Consistency with other legislation**

In considering changes to the Planning and Design Code, it will be necessary to ensure the Code is compatible particularly with two pieces of new legislation being developed by the State Government – the new Biosecurity and Pastoral Acts.

- **Minimum size for farming**

There is enough evidence that the indiscriminate fragmentation by land division of rural properties rarely, if ever introduces any beneficial value adding or increased intensity in land uses that supports increased production. In our submission we pointed out that this land division not only creates a class of quasi-rural living land, but introduces threats such as weeds, pests, and bushfire - and unfortunately this summer there has been a major bushfire in the Adelaide Hills.

- **Conflict between primary production industries**

It is essential that it is recognised in the Code that there are a range of primary production enterprises and in some instances, there are conflicting interface issues between these. There

appears to be no mention in the draft State's planning rules of how to protect these from other than urban development. In particular, there needs to be mention of how to handle conflict between broadacre agriculture (which livestock is a large part of) and horticulture/viticulture.

- **Changing practices**

The new Code needs to be flexible enough to be easily changed to readily allow for changes in practices. For instance, many livestock producers have or are moving to containment or confinement feeding as a strategic farm management activity with both economic and environmental advantages. This has become more necessary in the current drought conditions, and now also as a result of the bushfires. On Kangaroo Island, containment feeding has become a necessity where fences and other infrastructure has been destroyed together with any feed.

As indicated in our submission, we felt it was a messy arrangement splitting councils that produce livestock in this State into two different lists. It is hoped that this will not result in conflicting requirements for livestock producers.

Phase Three (Urban Areas)

Since the closing date for comments on Phase Two, the State Planning Commission has provided an Update Report. This includes a section on the Peri-Urban Zone. As this is supposedly to capture a range of primary production land use and value adding activities, perhaps it would be more appropriate to call this the "Peri-Rural" Zone? Regardless of what new name is chosen, Livestock SA's concerns remain that for broadacre livestock production, this has already been virtually squeezed out of this zone, with a resultant loss of economic production for the State.

The geographical placement of physical boundaries for the Peri-Urban Zone are also likely to create conflict.

In relation to conflict between primary production industries, Livestock SA is aware that some rural councils listed as part of Phase Three such as Barossa and Light Councils are grappling with this issue but they are struggling on how to resolve this without previous broadacre cropping and livestock properties becoming defunct due to inappropriate development of viticulture and horticulture on neighbouring properties.

There are several potential options that have been suggested including introducing buffer standards, the need for any proposed change of land use from farming to horticulture/viticulture to require public notification, or to rezone affected land to rural living. This issue does appear to have been covered in the draft Planning and Design Code, where it is stated on page 708, that "*horticulture is located and conducted on land that has the physical capacity of supporting the activity and manner that **avoids adverse interface conflicts with other land uses.***" Further clarification and explanation are required on what is required for anyone considering new horticulture or viticulture plantings where this will replace broadacre agriculture and next to neighbouring existing broadacre agriculture.

Yours Sincerely,



Andrew Curtis