



Your strong and independent  
voice for livestock producers

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### **Draft Planning and Design Code – Phase Two (Rural Areas)**

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).

The intent of the changes in the State's planning system is to simplify the process which hopefully will lead to efficiencies. The proposed portal to assess possible development proposals sounds good.

While has been difficult to get an understanding of the proposed changes, particularly given the sheer size of the documents, the publication on "Frequently Asked Questions" has been useful to understand the process, the jargon and what is proposed.

Unfortunately, there has only been limited consultation, but what has been provided was appreciated.

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.

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

In this submission, issues and concerns raised by members from various parts of the State are outlined in the following discussion. It has not been possible within the time constraints to ask the total Livestock SA membership for comment.

#### **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. To the contrary, it often creates a class of quasi-rural living land, which presents many problems for primary industries including increases in land values beyond reasonable financial accessibility of farmers to buy and add-to farm holdings and introduces threats such as

weeds, pests, bushfire and generally improper land management, including often in relation to rural planning zone.

While it is difficult to place a minimum size for land division for primary production across the State, it has been suggested that perhaps there should be minimum allotment sizes for Rural Zones within each council to ensure the establishment and maintenance of land holdings of sufficient size to be able to meaningfully contribute to primary production. While it is understood that this is the current situation and that there will be no change, this needs to be communicated to councils and other interest stakeholders.

### **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. We are not sure if these are addressed in the Code. There appears to be no mention in the draft State's planning rules of how to protect these from other than urban development.

There needs to be mention of how to handle conflict between broadacre agriculture (which livestock is a large part of) and horticulture/viticulture. Currently land used for broadacre use can be planted/developed for grapes or horticulture crops without any planning approvals. If we are to protect and grow existing broadacre agriculture and to avoid conflict with other agricultural pursuits, there needs to be policies ensuring that with any change in agricultural use it is the responsibility of the landowner changing the land use.

Livestock producers need to have biosecurity plans in place, to ensure that biosecurity requirements are fulfilled both on farm and during the transport of livestock between properties and feedlots, including to slaughter and live export. Good biosecurity practices prevent the spread of infectious disease and invasive pests or weeds between farms as well as protecting Australia from diseases and weeds that occur overseas. A strong biosecurity framework is critical to help grow and support South Australia's primary industries, protecting our reputation for exceptional food, wine and wool, and maintaining and increasing a market advantage for producers in international and domestic markets. A livestock producer's biosecurity rating, as well as their quality assurance, can quickly be affected by changes to neighbouring land use that are not correctly managed.

Current infrastructure (such as shearing sheds, stockyards, hay and implement sheds), and any expansion, replacement or new build required by livestock producers should also not be affected by a neighbouring agricultural change in land use.

In some areas of the State, there are also concerns about the impact of forestry on broadacre farming. For example, AgKI (the peak agricultural organisation on Kangaroo Island) is concerned about large-scale forestry on the Island which has led to the loss of viable agricultural land, a significant effect on water availability for agriculture, and increased numbers of both feral pests (pigs and cats) and overabundant native species (kangaroos, wallabies and possums).

AgKI is also concerned that viable agricultural land must not be lost to carbon planting, biodiversity planning and any other form of widescale planting in the Rural Zones. We must however allow producers to continue to plant shelter belts, and to plant on degraded land (for improvement). AgKI want the proposed Rural Zone to continue to be used only to produce food and fibres, with other

zones in Kangaroo Island to provide the opportunity for carbon planting, biodiverse planting and wider-scale planting.

### **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.

And as South Australia faces more drought conditions, producers need to provide more supplementary feeding for their livestock. Containment feeding is also often or commonly used in drought or adverse seasonal conditions (it is also gets used in really wet times too).

Containment feeding aims to promote animal health and welfare while preserving ground cover and land condition across the majority of the property. This is achieved by confining livestock to a small area where they are fed a total ration. Successful containment feeding relies on good site selection, an appropriate mob/herd size and stocking density, and the provision of appropriate nutrition.

This is a strategic farm management activity often carried in response to seasonal conditions, and is usually short-term in nature, as opposed to permanent feedlots. Containment feeding may need to be included as an acceptable “low intensity animal husbandry” activity. It is a good land management practice aimed at reducing land degradation. If this practice is to be further encouraged in this State, restrictions need to be kept to a minimum. We would not support any regulations, such as requiring EPA and NRM approvals, that would hinder the use of containment feeding.

In making this submission on Phase Two, because of similarities that will exist for the new Rural Zone, regardless of whether in Phase 2 or Phase 3, Livestock SA wishes to indicate that we may make further comments on Phase 3, and that these comments are likely to also be relevant to Phase 2. It appears to be a messy arrangement splitting councils that produce livestock in this State into two different lists and with two different deadlines for making comments.