

# Australian Chicken Growers' Council Limited



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## South Australian Planning and Design Code Phase 2 Code Amendment for Consultation

The Australian Chicken Grower's Council (ACGC) appreciates the opportunity to comment on this Planning and Design Code Amendment.

The South Australian chicken meat industry has undergone considerable expansion in the last 15 years, with the number of birds grown and processed increasing by over 230 percent since 2004. SA is now a major national supplier of chicken meat, and with demand remaining strong, the state's industry has a solid future ahead.

During this period of expansion, many new farms were established to the north and east of Adelaide, and the development application processes were for the most part reasonably smooth, and certainly easier than for most interstate chicken farm developments over the same period.

These developments have taken place in Councils covered by both the DPTI document ***Planning and Design Code Phase Two (Rural Areas) October 2019*** and the very recent ***Planning and Design Code Phase Three (Urban Areas) October 2019***; such Councils include Wakefield and Loxton-Waikerie (Rural Areas) and Adelaide Plains, Alexandrina, Murray Bridge and Mid Murray (Urban Areas). Within these documents, the Intensive Animal Husbandry and Dairies Overlay is brief and simplistic, as the State Planning Commission intends for such developments to be performance assessed. In both documents, Intensive Animal Husbandry and Dairies is not specifically listed in *Table 3 – Applicable Policies for Performance Assessed Development*, and falls within the catch-all category of *All other Code Assessed Development*.

ACGC is concerned about this, as it seems a backward step from the current system, through which a development application that complies with a local government Development Plan and is supported by referral agencies can be quickly approved. The proposed Planning and Design Code will instead put every Intensive Animal Husbandry and Dairies application through a performance assessment, which will probably add to the time and expense of the process.

In addition, applicants will need to notify neighbouring landholders in writing and the general public through placement of an on-site sign, and this is bound to result in submissions from people who are against intensive livestock farming or the consumption of animal proteins, extending the assessment process even further.

The Performance Assessment process would be more efficient if rural industries had been consulted during the drafting of the Accepted Development Classification Criteria and Deemed to Satisfy /

Designated Performance Outcome Criteria, and ACGC hopes that these can still be modified according to industry advice. Examples are provided below:

### **Water tank: Accepted Development Classification Criteria**

*2 The tank is part of a roof drainage system.*

For biosecurity reasons roof drainage water can't be used in a broiler shed, as the water may be contaminated by wild bird faeces, presenting a biosecurity risk.

*3 Total floor area - not exceeding 15m<sup>2</sup>.*

On a hot day, a single shed at peak bird density will use around 100,000 litres of water in its evaporative cooling and drinking systems: it is not practical to hold such a volume in tanks with 15m<sup>2</sup> floor areas. Broiler farms typically use tanks of around 130,000 litres capacity, which may have diameters of 8.6 metres, and floor areas of 58 square metres each.

Intensive Animal Husbandry and Dairies should be an exception to these two criteria.

### **Excavation and Filling. DTS 8.1 Design in Rural Areas (Earthworks)**

*DTS / DPF 8.1 - Development does not involve either:*

- (a) excavation exceeding a vertical height of 1m;*
- (b) filling exceeding a vertical height of 1m; or*
- (c) a total combined excavation and filling vertical height of 2m or more.*

With modern poultry sheds being 160 - 180 metres long, and a typical bank of 12 x 1 sheds requiring a levelled earthworks pad of perhaps 400m x 200m, it will not be possible to achieve DTS 8.1 (a), (b) or (c) in many chicken growing parts of South Australia.

Although Intensive Animal Husbandry developments are intended to be performance assessed, in which case allowance for non-compliance with DTS 8.1 might be made, it would be more efficient if Intensive Animal Husbandry and Dairies was an activity excluded from these criteria.

### **Restricted Classes of Development: Dwelling within the Limited Dwelling Overlay**

A dwelling in the Rural Zone is a restricted development '*except where it is a replacement dwelling*'.

It is imperative that chicken farm managers live adjacent to their farms in order that emergencies can be quickly dealt with. Where there is more than one chicken farm on one allotment, or a chicken farm is large enough to require a manager and assistant manager, more than one dwelling will be required.

### **Dwellings DTS/DPF 5.2**

*A secondary dwelling on an allotment is:*

- (a) located within 20 metres of an existing dwelling on the same allotment;*

This is not practical where two chicken farms are established on one allotment and separated by a 1000 metre biosecurity buffer, and not practical where one staff member will be off shift and trying to sleep while the other staff member may be using vehicles or alarms around their dwelling.

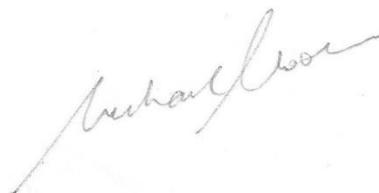
It would be useful if the Planning and Design Code recognised the need for well separated supplementary housing under such conditions.

General comments on the Code:

1. With the removal of an equivalent pathway to the current Category 1 option, developers will be expected to provide evidence of compliance with performance criteria, and this may require independent consultants gathering data and writing reports on such matters as likely noise and traffic levels, modelled odour distribution patterns, depth/quality of groundwater and so on. Such reports may be requested due to the Accredited Professional assessor not understanding the region or the industry sufficiently, and for a development that would have qualified as Category 1 under the present system, these reports would represent needless cost and delay.
2. ACGC is concerned about the intention to use the Accredited Professionals Scheme for development application assessments, as there is no guarantee that the registered professionals within this scheme will have an adequate working knowledge of the district or area in which a development is proposed, let alone the intended type of farming. Mapping software and aerial photographs are useful, but are not enough by themselves to properly assess a farming development application. A familiarity with the site and its locality is just as important, if not more so.
3. ACGC understands that the new Code will allow the South Australian Environment Protection Authority to act as a ruling referral authority for all Intensive Livestock Husbandry development applications, and not just the ones that cross the EPA's size thresholds for licensing to be required. ACGC can't see why this was considered to be necessary, and how the decision was made without industry consultation. This is poor treatment of industries that are key national suppliers of pork and chicken meat, and very significant to the state's revenue.

It is important that this Code is as practical and useful as possible when it comes into force, and this means that the people and industries most likely to be affected must have their opinions heard and considered.

ACGC intends to make a further submission during the Phase 3 consultation process, and in the meantime is more than prepared to offer further advice to the State Planning Commission.



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