

Submission to the review of the *Review of the NSW Environmental Planning and Assessment Regulation Act 2000*.

Submission by: Heike Herald, Wamboin – Hobby farm

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Thank you for the opportunity to contribute to the review and restructure of the EP&A Regulations.

My husband and I run a hobby farm and we have a selection of animal types that we grow and breed for our own consumption. We do not earn any income from our farm and work as salary earners in unrelated employment. If any changes to the regulations would also start to affect hobby farmers, we would be most disappointed as we do not earn any money proceeds from our endeavours and do not adversely affect the water quality leaving our property. We manage it holistically and in a permaculture rotational-grazing way.

We are part of the Small Farms Network in the Palerang region in NSW and as such we are aware of small-scale farmers who have chosen the path of trying to make a living from their properties and who aim to supply ethical consumers with ethically raised meat and vegetables at farmers markets. I am very aware that they have found the current regulations in regards to especially poultry to be not appropriate and rather prohibitive to entry. Our council (Queenbeyan-Palerang) has asked them to close down any and all of their pasture-raised small batches of meat chickens and ducks unless they apply for the poultry specific designated Development Approval, because they are in the Sydney water catchment though 300km away from Sydney and none of their animal waste even leaves the farm, due to holistic management of the landscape and rotational grazing.

Apart from these applications for raising poultry being prohibitively complex and expensive, they are designed for those farmers who plan to set up intensively reared animal systems. These small-scale farmers rear a variety of animal types in low numbers on a very sustainable basis and asking them to pay for and apply for permits designed to cover enterprises that only set themselves up to supply one mono-culture end product is not comparable or feasible. Their revenue base is much lower and spread across many application processes. Hence, many if not all, are forced to not engage in those activities though their land could easily manage them without any adverse effect to neighbours let alone the Sydney water system.

The current definition of Designated Development in Schedule 3 of the EP&A Regulations means that commercial poultry farms of ANY size within the Shoalhaven catchment are considered to be designated development. Our council equates ANY size with ALL commercial poultry farm operators. So these poor farmers who are operating commercial mixed family farms and want to raise some poultry to complement their land management strategies are prevented from doing so.

I wholly agree with the goal of the Planning Assessment review paper in assisting in managing high impact developments and those developments in environmentally sensitive areas. However, the current definitions in Section 21 of Schedule 1 do not adequately support in achieving this goal due to the following issues:

- There is no definition of a commercial poultry farm, meaning that our council is free to interpret this schedule to apply to all farms (with commercial intent) who have poultry on it no matter the size or grazing method. They seek all these farms to apply for approval.
- There is inconsistent treatment between species. No controls seem to be applied to intensive cattle, sheep or horse operations, though they can cause great environmental impacts and most definitely if not managed holistically - considerably more impacts than well managed small batches of poultry or pigs.
- The definitions have not kept up with modern farming practices. The sizeable number of small-scale farmers across NSW using highly mobile free-range poultry and pig farming operations are bunched up with the few large scale industrial farmers though they pose very little risk to the environment or neighbouring farms.

I would love to see amendments to:

- specifically exclude those farms with less than 500 birds from these designated development applications.
- Consider those poultry farms with 500 to 2000 birds separately from those who raise very large batches.
 - Small-scale farmers need to be able to raise a few batches of about 100 birds at the same time to be able to assure continuity of supply to their ethical consumers.
 - Heritage birds take longer to grow out to marketable size. Instead of a 6-week turn around for the Cornish cross breed available in most supermarkets, the ethically raised free-range birds take approximately 15 to 20 weeks to mature.
 - Farmers are willing to grow and breed these chickens, as the consumer demand is very high for these birds.
 - To supply them they would need to have a larger amount of stock on their property at any time compared to the Cornish cross breed.
 - A new batch of 100 birds being started each week for up to 20 weeks until slaughter would have them have 2000 birds or so on their property.
 - The bird's manures are spread out over many acres if not hectares and improve the soil structure and plant health immediately with no run-off or any manure being piled in large mounds, needing removal and disposal.
 - Farmers utilise a rotational system of grazing, before or after cattle or sheep and the birds are very important to holistically manage the health of the other animals on the property by removing naturally pests in the environment.
 - Batches of up to a 100 birds raised in a free-range system with maremma dogs protecting them day and night and no stationary barn creates a very low environmental burden on the land and in most cases, if not all, it contributes to a healing aspect to the landscape.

Sincerely, Heike Herald

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