

Extracts from Submission prepared by a local farmer.

My land is designated Rural. I knew this when I purchased and acted accordingly - choosing agricultural endeavours over trying to make my land use something it was not allowed to be.

I am an olive farmer. I planted my olives trees over a three-year period (2006-2009) and nurtured them for the requisite years until they began to produce harvest. Some years are better than others – I knew this when I undertook this proposition.

I am a table olive and extra virgin olive oil producer. I have a commercial processing facility with registered commercial kitchen and cellar door. I am able to conduct tours and tastings. I am able to do long lunches; and (although I do not choose to avail myself of the approval) run a café – all based around MY agricultural produce.

I am able to do all of this because I submitted a Development Application to Shoalhaven City Council in 2013. It was not costly, although there were the required professional reports. I was assigned an Assessment Officer and I dealt with him – resolving any issues – his knowledge of LOCALITY being site specific.

Part 1.2

- The NSW Government is seeking comment on proposals **recommended by stakeholders** to: Who are these stakeholders of whom we speak – tourism operators and the NSW Small Business Commission and Service NSW, or farmers???

Many of us, do not believe we need others who feel they know far better than we, of how to manage our land, or manage our livelihoods.

- **reduce land use conflict by providing clearer rules** and better managing environmental and social impacts,
There is no conflict – rules are clear and precise – it is those who seek to exploit any loophole; using (quite often) significant financial outlay to batter down those given the authority to make decisions on behalf of their constituents, by following the same set of clear and concise rules.
- **clarify current planning controls** and expand approval pathways for certain agricultural activities.
Clarification exists – before you purchase make sure the land is fit for the purpose you want; and then follow the rules set down in the relevant to your location LEPs, whether that includes a DA or complying/exempt development. Simple.
- The proposed amendments are **underpinned by the principle of no/ low environmental impact**.
Who decides what the level of this principle is going to be? Who enforces compliance?
Who do I call when, in my view, compliance is not be adhered to?

Please do not tell us to ring our local police – we have tried this – the police do not come, they are simply too busy to cater to neighbourly disputes, especially on a weekend evening. Please do not tell us to contact our local Council when the issues arise - there is no-one capable of dealing with an issue which occurs on weekend, especially of an evening. Council themselves say they simply do not have the resources or funds to do this type of activity.

Imagine, if there were 10 or 15 complaints for 10-15 venues located around a whole local government area – how many do you actually believe would elicit a timely response. Please do not tell us to wait until Monday morning at 9am to contact Council, when the events have been completed, everyone has gone home happy, the property's owners are counting their cash and we still have a headache.....but have to get up, put one foot in front of the other and continue our agricultural activity.

Part 1.3

- farm events – to **remove existing barriers** and support farm events amendments are proposed to introduce a **new definition for 'farm events'**
In essence, this relates to approval to operate large scale events such as weddings and conferences held on rural land.
- Fast track approval pathways, known as exempt and complying development, will also be established for these types of agritourism.
Again, providing a loophole, for developers and commercial operators to take advantage of this process to progress large scale events such as weddings/conferences held on rural land.

Part 2.1

- The planning system seeks to **protect agricultural land and secure it as a resource for food production for future generations.**
PROTECTING AGRICULTURAL LAND AND SECURING IT AS A RESOURCE FOR FOOD PRODUCTION FOR FUTURE GENERATIONS is unlikely to be a consequence of this proposal. A supplementary business of large-scale events such as weddings and conferences held on rural land will soon overshadow any income (and the long hours, hard work and passion that goes with it). The land as an agricultural mecca will be lost in the mists of time. A story to tell our grandchildren and pass down to future generations of when we grew our own food, raised our own livestock – rather than became “producers” of large scale event venues.
- There is scope for the planning framework to better support farmers' ability to innovate and diversify from purely primary production to other forms of value adding or **complementary agribusiness.**
I am not anti-tourism – of any sort – whether “agritourism” or other. I simply believe that certainty is eroded, when rules are not followed through. How large-scale events such as weddings and conferences held on rural land can be seen as complementary agribusinesses has eluded me since I first began my journey on local tourism boards in 2012 and my increased input into primary production. It eludes me still. Value-adding with genuine farm gate activities based on the crops / livestock etc which are located on the farm (as long as zoning permits), have nothing to do with this
- **Agritourism involves visiting a farm** or food related business for enjoyment and education or **to participate in activities and events.**
The broadness of this statement, the non-genuine value adding as the activities are not based on the crops / livestock etc which are located on the farm have nothing to do with this and is simply a means to an end to create the opportunity for large scale events such as weddings and conferences on rural zoned agricultural land.

Part 2.2

- The department has worked with the commission to identify simplified pathways to establish low impact agritourism businesses on farms, including farm stay accommodation, farm tours, roadside stalls, farm events and retail on farms. This work aligns with the department's commitment to reduce red tape and make the planning system easy to use.

It is good that the Service NSW worked with the NSW Small Business Commission. It would have been better had it included farmers and growers at the outset, rather than presenting a document for comment and not promoting the fact. Non-submission of comments by farmers and growers SHOULD NOT be taken as acquiescence or unbridled joy – most simply do not know this document exists.

Agri-tourism may be many of the things listed – but it is NOT a tourism-related experience that connects people with events solely based on “their scenic quality such as weddings” – your words.

And more broadly, true agritourism does allow for regional economies to showcase what's special about a region, its unique GROWING conditions and natural resources and provides a visitor drawcard for which other regional tourism businesses and experiences can benefit (including allowing large scale events such as weddings and conferences on appropriately zoned land).

- Service NSW has conducted research that identified challenges in the current planning regime for **aspirational agri-entrepreneurs**.

And now we come to it – this document is about and for “aspirational agri-entrepreneurs” and not really for the poor farmers no matter how much it attempts to proffer as its *raison d'être* the supposed “support” for “farmers during times of hardship or following natural disaster events”.

Genuine agritourism is NOT about large scale events such as weddings and conferences on zoned rural land. These events contribute NOTHING to the furtherance of agricultural activity, rather they provide a perfect opportunity to destroy that very agricultural activity, which they profess to support.

Part 3.1

- **New land use terms: introducing two new land use terms for farm gate activities and farm events in the Standard Instrument LEP Order.**

Farm events should be events limited to farm activities; and NOT events held on a farm (whether it is actually a working farm or just a very big block of land, may be debatable).

- Proposed new development standards will ensure development is at a scale appropriate for the agritourism or agricultural activity with **minimal impacts** on the surrounding land and amenity. Where these standards cannot be met, a landowner can lodge a development application with the local council.

Who sets the standard or what is minimal or low impact?

NO impact is easy to understand, minimal and low are subjective.

And how is this to be enforced (not even going to bother with repeating the negation of the possible suggestion that impacted persons contact their under resourced own local police or Council).

3.4 Farm events

- The ability to hold **rural events** can allow farmers to diversify and value add to their agricultural business.
Rural events should NOT mean any events held on rural land.
- In addition to the direct benefits to agricultural business, rural events can have a far-reaching supply chain benefit to the surrounding economy. **For example, if a farm can host a wedding, beyond just the hiring of a venue on a farm, the event can result in hiring of local accommodation services, engagement of event services (such as photographers, stylists and transport), food and drink services, supporting services (gift shops, child minding) and facilities services (party hire, mobile toilet hire etc).**
In principle this sounds great for the local economy – however MANY brides (most significantly for high cost weddings) choose to bring in outside (read, from where the bride originates) operators to assist with planning their wedding. From a time perspective, with constant meet ups between the bride and the other party, it is logical that these would mainly occur where the bride resides.
The number of guests who are so disorganized that they need to use the services of a local gift shop to buy their wedding present would be minimal, if any. Simple logic.
- There are limited land use terms in the planning system that enable **rural events**. Applicants can rely on the definition in the Standard Instrument LEP Order for ‘function centre’ or use the temporary use of land clause in the **Standard Instrument LEP Order (clause 2.8)** to seek development consent. Including a definition for events on farms will **provide greater certainty** around where such development can take place.
Once again, rural events are NOT weddings or functions totally unrelated to the farm activity which is being conducted. This is simply a back door to host weddings and events, nothing more. To suggest it is an adjunct to raising cattle; or growing olives; or keeping of chickens and selling of eggs commercially is plainly ridiculous. There is ABSOLUTELY no correlation between the two.
Std Instrument LEP Order (clause 2.8) provides certainty – to both the applicant as well as to adjoining landowners; neighbouring properties; and the local community IF those orders are upheld.
- It is proposed to introduce a new land use term ‘**farm events**’ into the Standard Instrument LEP Order to allow **events, tours, functions and conferences** on land used for agriculture.
If the events, functions and conferences have NOTHING to do with the crop / livestock that is being grown / produced on the agricultural land then it is NOT related to FARM. FARM events are NOT weddings or functions totally unrelated to the farm activity which is being conducted. This is simply a back door to host weddings and events, nothing more. To suggest it is an adjunct to raising cattle; or growing olives; or keeping of chickens and selling of eggs commercially is plainly ridiculous. There is ABSOLUTELY no correlation between the two.
- Exempt and complying development pathways have been developed to allow streamlined approvals for low scale, **low impact** farm events.
Who sets the definition of low impact?