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Flinders LPS Rural Enterprise Concept Report

Prepared for Town Planning Solutions on behalf of Flinders
Council

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1 Executive summary

RMCG (formerly AK Consultants) have been engaged by Town Planning Solutions Pty Ltd on behalf of Flinders Council to develop the rural enterprise concept for Flinders Council and support a representation to the draft Flinders Local Provisions Schedule for the zoning requirements for the concept. The strategic policy framework for this work was initially developed by Town Planning Solutions and is being progressed through the statutory assessment of the draft Flinders Local Provisions Schedule.

This report summarises our understanding of agriculture on Flinders Island and the potential for encouraging Small Scale Producers, diversification and value adding through revised recommended zoning whilst ensuring the productive resource for agriculture on Flinders Island is not compromised by the recommended changes.

This report is one of two outputs of this project:

Output 1: Enterprise Scale – a stand-alone report which provides the rationale behind the revised zoning recommendations for Flinders. This document has broader application for the Tasmanian Planning Scheme. It builds on AK Consultant's (now RMCG) previous Enterprise Scale Tool to include a Small Scale Producer Category and further develops the characteristics associated with scale, agricultural land and agricultural use. It provides a Glossary and explanatory text for many of the terms and concepts referred to in this document.

Output 2: Flinders Report – this report, there are two aspects to this report:

- Enterprise Scale is utilised to substantiate changes to the Decision Tree to better align the proposed Rural and Agricultural zones with the proposed Primary Production Areas from the Draft Structure Plan.
- Revised Decision Tree and specific new zoning recommendations – Section 7 of this report.

As a result of this review and the application of Enterprise Scale some areas particularly around Whitemark are now recommended for the Rural zone rather than the Agriculture zone. Furthermore, some areas previously proposed for Landscape Conservation have been suggested to be more suited for the Rural Zone.

ACKNOWLEDGEMENT OF COUNTRY

We acknowledge the Palawa people of Trawulwai Nation as the Traditional Owners of the Country that we work on and recognise their continuing connection to land, waters and culture. We pay our respects to their Elders past, present and emerging and the Elders of other Aboriginal and Torres Strait Islander communities. Moreover, we express gratitude for the knowledge and insight that Traditional Owners and other Aboriginal and Torres Strait Islander people contribute to our shared work.

2 Introduction

RMCG (formerly AK Consultants) have been engaged by Town Planning Solutions Pty Ltd on behalf of Flinders Council to develop the rural enterprise concept for Flinders Council and support a representation to the draft Flinders Local Provisions Schedule for the zoning requirements for the concept. The strategic policy framework for this work was initially developed by Town Planning Solutions and is being progressed through the statutory assessment of the draft Flinders Local Provisions Schedule.

Key outcomes of this project (as specified in the brief) are:

1. Development of the rural enterprise concept presented within the flinders structure plan and identification of the likely market within the allied rural sectors;
2. Identification of operational and land use requirements for the market;
3. A report to support representation to the flinders local provisions schedule to progress these strategic outcomes; and
4. Expert evidence at any subsequent hearings before the tasmanian planning commission.

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- Output 2: Flinders Report – this report, there are two aspects to this report:
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3 Planning Process

3.1 BACKGROUND

The draft *Flinders Structure Plan 2016* (Structure Plan) was developed to identify the strategic future for Flinders Island and the Furneaux group. The Structure Plan consolidates the long-term Council strategies for population attraction and economic diversification to improve the resilience and sustainability of Flinders.

3.2 DRAFT STRUCTURE PLAN

The Draft Structure Plan provided four strategic outcomes:

1. Protect the core economy related to the grazing industry
2. Diversify rural land not required exclusively for grazing
3. Support nature-based tourism potential
4. Maintain and enhance quality of life (ie improve liveability).

The Draft Structure Plan explored how these outcomes could be progressed.

A rural enterprise concept was put forward through the Draft Structure Plan which was designed to facilitate greater opportunity for uses within a rural setting associated with agricultural pursuits and agritourism opportunities.

The Key outcomes of the Structure Plan were recognition of:

- The need to expand the operational basis of the rural sector on Flinders, particularly relating to downstream processing of product and establishment of complimentary industries
- Existing problems caused by low population levels and housing availability and affordability problems on Flinders
- Long-term population attraction and economic diversification strategies of Council will need a response through the planning scheme to support their implementation
- The limitations population and housing problems are having on the future expansion of the rural and other sectors
- The need to grow population and economic activity
- That establishment of strategic planning program to facilitate expansion and diversification of the rural enterprise sector is necessary.

To assist with providing a greater diversity of uses, the Draft Structure Plan put forward a two-tiered primary production zoning system; Primary Production Area 1 and Primary Production Area 2.

3.3 TASMANIAN PLANNING SCHEME - FLINDERS LPS

The two proposed Primary Production zones from the Draft Structure Plan were translated across to the proposed zoning structure of the Tasmanian Planning Scheme (TPS) through Flinders' Local Provisions Schedule (LPS) which was prepared and submitted to the Tasmanian Planning Commission (TPC) for endorsement. The draft LPS proposed the following:

- Primary Production Area 1 to be translated to the Agriculture Zone
- Primary Production Area 2 to be translated to the Rural Zone
- The Blue Rock Precinct to be translated to the Rural Living Zone.

However, the TPC weighted the outputs from the Agricultural Land Mapping Project higher than Councils' strategic planning. Because of this, areas that Council proposed to be zoned Rural for strategic purposes are now being proposed to be zoned Agriculture. There is concern, from Council that this will potentially limit the future productive potential of these areas for diversification.

The Draft LPS for Flinders was put out for its statutory public exhibition phase in May to August 2021. It is Councils' intention to submit a representation to the LPS for the public hearing, which will occur on 8, 9 and 10 February 2022. In preparation for Council's representation, RMCG (formerly AK Consultants) have been engaged to review the State Government Agricultural Land Mapping Project on Flinders for compatibility with the land use requirements of the Rural Enterprise Concept focusing particularly on the Primary Production Area 2. The specific areas considered include land near or within, Palana, Killiecrankie, Emita, and Whitemark, as well as other areas along the west coast and a small area near Lady Baron.

As a result of this review and the application of Enterprise Scale some areas particularly around Whitemark are now recommended for the Rural zone rather than the Agriculture zone. Furthermore, some areas previously proposed for Landscape Conservation have been suggested to be more suited for the Rural Zone.

4 Agriculture on Flinders

4.1 PREVIOUS WORK

AK Consultants (now part of RMCG) have previously described the nature and distribution of agriculture on Flinders in 2010 and in 2019 through Agricultural Profile Reports. An additional comparative report was also produced to compare the two profiles and discuss any changes or trends. Prior to these profiles there have also been salinity projects funded under the Natural Heritage Trust and the National Action Plan for Salinity, as well as work undertaken for individual farming clients on Flinders Island. RMCG have also undertaken projects on Flinders Island with the most recent being Southern Farming Systems October 2021, The Flinders Island Productivity Group - a group case study, Healthy Productive Soils.

The information gleaned from the previous project work, and published reports (such as Dimmock 1957, Soils Report) have been used to provide a summary snapshot of agriculture in the Flinders Municipality.

4.2 PRODUCTIVE AREAS

Based on information contained in the previous work some key characteristics of the agriculturally productive areas are:

4.2.1 LAND AREA

Approximately half (46,600 ha) of the island is under agricultural production, with dryland pasture supporting beef cattle grazing being the dominant enterprise.

4.2.2 LAND CAPABILITY

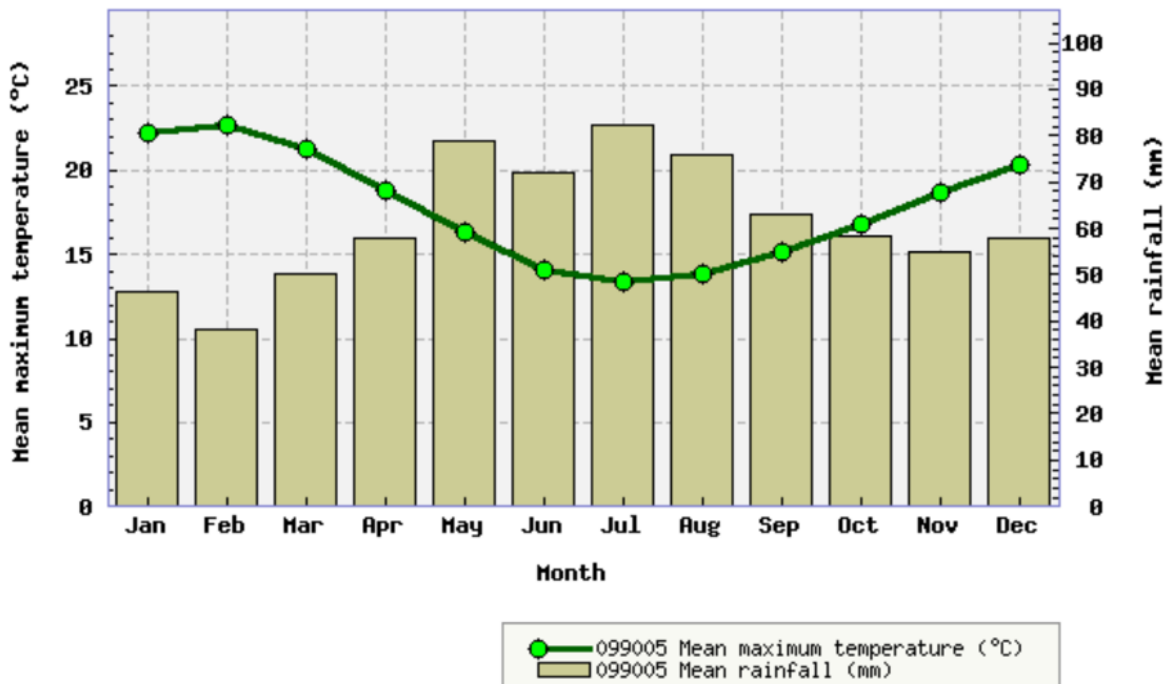
Most of the land with potential agricultural use is in Land Capability Class 5 (43,442ha - 93%). There is very little (2,135ha) Class 4 land and no Prime Agricultural Land (Classes 1–3). The Class 4 land is mainly around Emita and Killiecrankie. Class 5 Land Capability is described as 'unsuitable for cropping, although some areas on easier slopes may be cultivated for pasture establishment or renewal and occasional fodder crops may be possible. The land may have slight to moderate limitations for pastoral use. The effects of limitations on the grazing potential may be reduced by applying appropriate soil conservation measures and land management practices' (Grose 1999). Class 4 Land Capability is described as 'land primarily suitable for grazing but which may be used for occasional cropping. Severe limitations restrict the length of cropping phase and/or severely restrict the range of crops that could be grown. Major conservation treatments and/or careful management is required to minimise degradation' (Grose 1999).

4.2.3 SOILS

The island's soils are highly variable, ranging from acidic sandy loam over Podosols and poor draining sodic Kurosols, to sandy, alkaline Calcarosols and shallow Rudosols with limited organic matter. This variability and its impact on pasture and subsequent meat production and profitability, present a range of soil management challenges to maintaining their economic and environmental sustainability. One key consideration is the challenge and cost of bringing farming inputs and technologies to the island. The inputs and management options are market driven. This results in a greater emphasis to achieve economies of scale to be able to justify the inputs.

4.2.4 CLIMATE

Flinders Island has a Mediterranean like climate with rainfall throughout the year and relatively mild winter temperatures as show by the graphed Bureau of Meteorology data form Flinders Island airport, Whitemark. These climatic conditions are well suited to year-round pasture productivity.



4.2.5 FARM BUSINESS LAND AREAS

It is common for land parcels that are adjoining and farmed by the same business to be rated together and identified with a unique Property Identification Number (PID). AK Consultants (2019) analysed the areas of land associated with each PID, assuming that each PID represents a unique farming business. This will not always be correct; however they believed the number of farming businesses comprising more than one PID to be small. They found 25% of PIDs are greater than 100ha, 75% of PIDs are less than 100ha and 59% are less than 40ha. The 25% represents approximately 115 PIDs and these occupy 82% of the pasture area.

4.2.6 ESTIMATED VALUE OF AGRICULTURAL OUTPUT (EVAO)

From ABS (2016) data, the total number of farm businesses in the Municipality is 51, and the total EVAO for the Municipality is \$22.3m indicating an average EVAO of \$437,255. This level of production is moderate and suggests that these farm businesses are viable. Since 2015 the ABS has increased the minimum value of EVAO a farm business needs to produce to be captured in the data. Previously the EVAO was \$5,000, this was increased to \$40,000.

Based on the number of PIDs, (463) from the Cadastre, there are many 'farms' producing very little primary production income and the majority of these are not captured in the ABS data. However, given the average EVAO (\$437,255) and the number of farming businesses (51) compared to the number of PIDs (115) it is also likely that the commercial scale farming businesses are comprised of more than one PID.

Beef followed by sheep farm business activities are the dominant type of agricultural activities on the island, producing an income of greater than \$40,000. It is highly likely that all the 51 farm businesses included in the ABS data have land areas greater than 100ha, are comprised of multiple titles and potentially several PIDs.

4.2.7 EMPLOYMENT

Based on ABS data 2015/16 there are 89 people employed in agriculture alone accounting for 22% of the employment in the Municipality.

4.2.8 IRRIGATION

Water availability for irrigation is a key factor in determining the potential agricultural uses of a parcel, particularly for intensive high value products. This resource can be in the form of winter storage in dams, or direct pumping from bores or streams. There is very little irrigated agriculture in the Municipality and this situation is unlikely to change due to the limitations of remoteness and limited high value cropping options. There is, however, some potential for irrigation development and/or drought proofing based on water availability (both groundwater and surface water).

4.2.9 LIVESTOCK

Grazing of pastures and fodder crops is the main agricultural use of land (based on the geographical extent and the value of agricultural output). Flinders Island is a key contributor to the Tasmanian red meat industry, producing approximately 15% of beef and 9% of sheep meat products in the state annually. Fodder and crops for hay (such as cereals) are commonly part of a pasture renovation program, with the ultimate aim of facilitating more productive pasture for grazing.

4.2.10 BROADACRE CROPS

The area of land used for broadacre crops is currently very small; most of the land is for cereals for hay. Expansion of broadacre cropping is unlikely, due to:

- Lack of local markets, and the cost of freight for relatively low value produce to be transported to the mainland of Tasmania or Victoria
- Lack of machinery contractors and agronomic support services
- Marginal Land Capability (mainly Class 5 land)
- Limited water for irrigation.

4.2.11 HORTICULTURAL CROPS

Horticultural cropping is constrained by the same issues as broadacre cropping. Although the value of produce (per tonne) is higher, the costs and logistical issues of freight are dis-incentives to production.

4.2.12 ORCHARD FRUIT AND VINES

There are two small vineyards with a total area of 6.5ha. There are areas of land well suited to vines, based on the temperatures and frost risk; however, wind exposure near the coast would need to be managed with wind breaks (pers comms, Richard Smart, 30 November 2010). Water requirements per hectare for vines are lower than for most other crops, so water resources are less of a constraint. However, distance from markets and freight costs are important constraints to growth in these activities. Development of such an enterprise would require significant investment and motivation from individuals, and large-scale development seems unlikely.

4.2.13 NURSERIES, CUT FLOWERS AND TURF

Other than a very small-scale nursery, there are no known current activities in these markets in Flinders. Development of these activities seems unlikely due to the constraints from isolation and markets. However, there may be scope to further service a small local demand.

4.2.14 PLANTATION FORESTRY

Plantation forestry offers landowners similar advantages to cattle grazing, such as low labour input by the landowner, however, the costs of freight to transport timber from the islands to Tasmania or Victoria is likely to be a major constraint. In addition, favourable soil types and annual rainfall are marginal. There has been no recent plantation development on the island and the majority of the previously established plantations have now been harvested and not re-established. Based on the limitations this is unlikely to change.

5 Small Scale Producers

5.1 SPROUT TASMANIA

Sprout Tasmania¹ conducted a survey of 'Small Scale Producers' in March 2021. The 138 respondents from 25 out of 29 municipalities were self-selected in terms of whether they defined themselves as Small Scale Producers. The Sprout survey results² show the highest number of participants were from the Huon Valley, followed by the West Tamar and Launceston municipalities. There was only one participant from Flinders.

As part of this project a site visit was undertaken in October 2021 including interviewing six Small Scale Producers. The interviews were structured around specific questions. For consistency, selected Sprout questions were used (with permission) ie Q5, Q8, Q10, Q12, Q19, Q20, Q22, Q23, Q25, Q26. An additional two questions which were not in the Sprout Survey were asked about existing and potential land use conflict. See Appendix 3 for the Producer Questionnaire adapted from the Sprout Survey.

The Sprout Survey was designed to understand the regulatory burden for small scale producers in Tasmania and capture data on the economics and production to ascertain the contribution of Small Scale Producers to the rural economy. Hence the purpose was not necessarily to characterise or define Small Scale Producers. Only those questions that are relevant to this project were reproduced for the Flinders interviews. Future collaboration with Sprout will provide opportunity for further data gathering on small scale producers.

5.2 SPROUT TASMANIA SURVEY RESULTS

The collated responses to the Sprout survey were requested from and provided by Sprout (Jennifer Robinson) for selected questions relevant to the Flinders Producer questionnaire. Their support is acknowledged and appreciated.

72% are conducting their farming business on less than 40ha and of these almost half are conducting their farming business on less than 8ha. 10% had land areas greater than 200ha.

63% reported employing greater than or equal to 2 but less than 5 Full Time Equivalents (FTE) and a further 34% reported employing greater than or equal to 1 but less than 2 FTE. 12% reported employing less than 1 FTE and 14% reported employing more than 5 FTE.

With outliers excluded, the turnover (equivalent of Gross Income) ranged from \$5 000 to \$350 000 with 43% of respondents deriving more than 50% of their household income off-farm. Some (18%) reported making a loss. 6% reported a total Gross Income from the farming business of more than \$250 000. 62% reported a Gross Income of less than \$45 000.

Most (89%) respondents describe themselves as established business with 70% looking to grow their business and 50% looking to invest more than \$100 000 in the next 5 years.

The dominant Small Scale Producer activity is livestock grazing, followed by vegetables/market gardens. Keeping poultry for eggs and berry fruits are also common small scale producer activities.

One third engage in agritourism with 17% providing accommodation or on farm experiences and one quarter are value adding their products.

¹ Sprout Tasmania is a non-profit organisation set up in 2011 to foster and support the state's start-up growers and producers.

² Available on line at https://d3n8a8pro7vhnmx.cloudfront.net/sprout/pages/634/attachments/original/1623800392/SPROUT_Survey_Results_P3.pdf?1623800392

Direct sales to customers were the most common sales outlet, followed by direct sales to local hospitality outlets (eg restaurants).

58% are recognised by the Australian Taxation Office as a Primary Producer, 84% have an ABN and 54% are registered for GST.

In summary, the Sprout Small Scale Producer survey results add valuable data to assist with characterisation. The survey respondents are not necessarily representative of all self-selected Small Scale Producers and information on their motivations for participating is not available. A large proportion of the survey respondents only partially meet the characterisation criteria for Small Scale Producers described in this document. The majority of the respondents are probably better characterised as aspiring Small Scale Producers as the income generated from production is not sufficient to support the labour inputs. Anecdotal evidence indicates that Covid restrictions have precipitated an escalation in Small Scale Production interest (pers.comms. 14/12/21 Jennifer Robinson, Sprout Tasmania).

5.3 CHARACTERISTICS OF SMALL SCALE PRODUCERS FOR FLINDERS ISLAND

It is difficult to draw conclusions based on the limited data for characterising Small Scale Producers on Flinders Island. The Enterprise Scale report, Sprout survey data, our interviews with select businesses on Flinders Island and our knowledge of agriculture in Tasmania provides the following key characteristics. Small Scale Producers:

- Show commercial intent in primary production
- Have a marketing strategy
- Are business focused with production decisions made on economic principles
- Seek economies of scale by working with other small scale producers to share marketing and resources. However, on Flinders Island it is difficult to achieve sufficient critical mass to sustain any long-term cooperation;
- Could be viable in time, potentially through cooperative arrangements, higher value products, downstream processing, complementary food, recreation, hospitality, tourism or value adding; and
- Off-farm income may always need to be a portion of the total household income.

If running livestock, then the current carrying capacity is likely to be at least the average DSE/ha for their area. They are likely to have at least 0.5 FTE for the primary production component of their farm business. Their target Gross Income is generally between \$40,000 and \$300,000 from the farm business activities. Total household income is generally derived from several income streams of which primary production is one. Primary production income often comprises less than 50% of total household income and often off-farm income is necessary to support the primary production, particularly in the early stages of the business or when diversifying.

The land areas associated with Small Scale Producers is dependent on the farm business activity. For livestock producers the target area is generally 40–80ha in one or two titles. For other activities the target land area associated with the farm business activities is generally, 8–40 ha in a single title.

Water for irrigation is likely, but it depends on the farm business activity and the region. On Flinders Island water for irrigation is less likely. The cost of developing irrigation water resources is likely to be one of the limiting factors in the choice of farming activity for Small Scale Producers.

The land and/or water resources associated with the farm business may have the capacity to contribute to a 'commercial scale' farm business depending on the degree of constraint. Some constraints are likely, as often there are clusters of titles with these characteristics due to historic development patterns. Residences on the majority of adjacent titles is likely and there is often low connectivity to unconstrained titles.

Small Scale Producers are recognised by the ATO as a Primary Producer. Livestock producers will have a PIC and be registered for NLIS and LPA. All producers are likely to be registered for GST and they would be part of QA schemes, depending on the products they produce and the market requirements.

Small Scale Producers often prefer to live on the title as this facilitates improved productivity and assists with security. There are often lifestyle and sustainability reasons for living on the title, in addition to operational reasons. On Flinders Island this is particularly relevant due to the housing shortage. As demonstrated by Town Planning Solutions (January 2021) additional dwellings are necessary in the first place to support population growth. Town Planning Solutions (January 2021) anticipates a dwelling demand of 32.3 dwellings per year of which one dwelling is allocated to the Rural Enterprise concept. The demand and supply study currently being undertaken for Flinders Island as part of the Northern Regional Planning Project should build on the assumptions made by Town Planning Solutions (January 2021) and provide more information on supply and demand.

Further work is required to understand how Small Scale Producers may fit within the tourism sector. Projects such as 'Opening the Gate'³, the Department of State Growth Tasmanian Agritourism Sector Regulatory Process Mapping (Tasmanian Government Tender 3402) and the 'Islander Way'⁴ which are running concurrently could provide valuable information and lead to synergies.

Further work is required to consider the likely scope of uses under the Tasmanian Planning Scheme, which may be part of a Rural Enterprise of which the Small Scale Producer is a subset. This project has focussed on the agricultural aspect of Small Scale Producers, however, it is likely that the Small Scale Producers fits better in the Agri-tourism sector where the 'destination' is the drawcard and the agricultural production is simply value adding to the total package.

The smaller scale agricultural operations (Small Scale Producers, Hobby Scale and Lifestyle Scale) are not suited to the Agriculture zone and are recommended for the Rural zone or Rural Living zone for Lifestyle Scale. On Flinders Island, Small Scale Producers may be more suited to the Rural Living zone, depending on the overall 'package' of uses. Generally, a dwelling is likely to be a necessary component of Small Scale Producers and on Flinders Island, based on the housing shortage it is an essential component of the overall 'package'.

³ The 'Opening the Gate' project is being undertaken by Optimum Standards as lead consultancy firm as part of an Australian Government funded Recovery for Regional Tourism Program which is part of the COVID-19 Relief and Recovery Fund. It is an initiative to assist farmers, food producers and existing agritourism business explore opportunities to diversify, value add and connect with visitors. See <https://www.optimumstandard.com/opening-the-gate>

⁴ The Islander Way project is a 2-year Flinders Council project aimed to co-design the future of tourism with and for the community using regenerative tourism principles. See <https://www.flinders.tas.gov.au/islander-way-project>

6 Future Agricultural Opportunities

From the knowledge gained from previous work, the site visit for this project and interviews with six growers for this project future agricultural activities on Flinders Island can be summarised as follows:

- Grazing with cattle is expected to continue to be the major land use, because the combination of Land Capability, remoteness, freight costs, contractor and labour resources, and lack of developed irrigation water resources that limit diversification. Whilst the livestock mix may change depending on markets, livestock operations are expected to continue to be the major land use.
- Farm businesses with land areas greater than 100ha are most likely to remain the dominant contributors to the Municipal's agricultural output based on the predominant land use for agriculture
- Vines on the island are limited to 6.5ha in area according to Land Use Mapping. There are other Small Scale Producer activities such as garlic, capers, olives, lettuce for the fresh market and egg production which are not reflected in the ABS data. Most of these activities are very small scale. Some also value add, such as Flinders Island organic olive oil and the Butter Factory winery. Some are existing commercial scale livestock farms seeking to diversify (for example Brymworth Farm growing organic garlic).
- While there are areas suitable for specialised crops such as vines and garlic, establishment will depend on the motivations of the people in the business. The motivations are often driven by a principal desire for the people in the business to be based on the island for other reasons, rather than selecting the island as a place of choice for growing specialised crops.
- The establishment costs for specialised crops at a viable scale requires a high level of capital and investors are more likely to be attracted to Flinders Island for other reasons
- There is potential for Small Scale Producer activity as a complimentary activity to a tourism, hospitality or recreation venture or to supplement household income. Small Scale Production on Flinders Island should be viewed through the lens of complimentary opportunities rather than as a primary contributor to the EVAO of Flinders Island.

7 Flinders Specific Guiding Principles

Based on Enterprise Scale, the Draft Structure Plan, agriculture on Flinders, and the characteristics of Small Scale Producers, some key guiding principles were identified for use on Flinders Island.

The hierarchy of guiding principles are presented below in order of priority to ensure the current economic activity is not jeopardised by any proposed changes which are designed to facilitate additional economic activity.

7.1 PRESERVING THE PRODUCTIVE RESOURCE

The main economic activity for land based productive use is pasture based agricultural activity at a commercial scale. This can be maintained by adhering to the following guiding principles.

- Land with the potential to contribute to a commercial scale farm business needs to be protected for commercial scale agricultural use
- Pasture based agricultural activities need to be protected where they have the potential to contribute to commercial scale agricultural use
- Existing and potential irrigation water resources need to be protected for agricultural use, with the priority being commercial scale use
- Land that has basalt derived soils and/or Class 4 Land Capability needs to be protected for agricultural use with the priority being commercial scale.

7.2 ENCOURAGING SMALL SCALE PRODUCERS, DIVERSIFICATION & VALUE ADDING

Based on the information from the six grower interviews for this project there are three pathways evident on Flinders currently for investment in small scale producer activities:

- Existing commercial scale livestock producers on Flinders seek value adding or diversification opportunities
- Lifestyle appeal or historical connections that attracts investors who then seek to make use of the land they have purchased; and
- Locals seeking to service a local market.

The principal drivers for diversification and value adding on Flinders are generally not driven by active consideration of the economics or risk management strategies. Generally, there are lifestyle factors which generate the initial concept. A high investment of capital is generally required and those ventures which stem from an existing viable farm business or have access to ongoing investment are more likely to persist and succeed.

The following are recommended as guiding principles for identifying land and areas to encourage Small Scale Producers, diversification and value adding:

- 'Rural' land in proximity to established settlement areas;
- Titles in single ownership with less than 40ha of pasture, that are not well connected to land with commercial scale characteristics and which have an existing dwelling; and/or
- Land with other features or access to other features (eg beach access, views, natural values).

8 Revised Decision Rules

8.1 OVERVIEW

In response to further development of the Enterprise Scale concept for Flinders and to assist with the implementation of the Draft Structure Plan, the Decision Rules for the application of the Agriculture and Rural Zones under the Flinders Local Provisions Schedule (LPS) of the Tasmanian Planning Scheme (TPS) have been amended.

The key change to the Decision Rules has been the inclusion of a provision to consider local strategic planning as an influence of the final zoning decision. This is in line with guidelines RZ 3 & AZ 6 of the *Guideline No 1 – Local Provisions Schedule (LPS): zone and code application* document which was produced by the State Government to assist Councils with the application of the LPS.

Further suggestions and observations have also been made for areas that are currently proposed to be zoned Landscape Conservation Zone. The areas identified are currently zoned Rural under the existing Flinders Planning Scheme 2000 and have characteristics that would be suited in the Rural zone under the TPS, based on the guiding principles defined in 6.2 of this report.

8.2 THE METHOD

There are four steps to this assessment:

- Step 1 – Title and area characterisation
- Step 2 – Reviewing Council's proposed Zoning based on the Structure Plan zoning recommendations.
- Step 3 – Applying the Decision Rules
- Step 4 – Appropriate zone determination.

The approach used in this project is designed to protect the current and future potential productive agricultural capacity of the land (including irrigation water resources). It also considers Council's strategic planning.

The methodology provides for the analysis of the characteristics of each title associated with each area requested for review to determine appropriate zoning. Decision Rules were developed as guidance and to ensure consistency with the Zone Purposes as set out in the Local Provisions Schedules. The steps taken to complete the assessment for each title/site are described in more detail as follows.

8.2.1 STEP 1 – TITLE AND AREA CHARACTERISATION

These characteristics provide a snapshot of a title's agricultural capacity and potential constraints for agricultural use. This generally provides strong indication as to the zone a title is most suited to. Whilst some of these characteristics were included in the Agricultural Land Mapping Project (ALMP), the majority of that analysis was undertaken as a GIS exercise. In this more detailed analysis local knowledge and context is applied in a case-by-case assessment rather than an automated GIS analysis based on generic rules. Whilst less objective than the automated GIS analysis, it allows consideration of specific site factors that are not easily incorporated when applying a generic rule set.

For titles being assessed the following characteristics are considered:

- ALMP identified constraint level
- Size (ha)
- Ownership (individual or with adjacent or nearby titles)

- Evidence of agricultural activities on the title from imagery available on LIST
- Mapped Land Use. Mapped Land Use is available on the LIST. There is a 'Live' layer that is based on Land Use Mapping completed in 2015. The 'Live' layer provides some areas that have been updated since 2015.
- Land Capability. Published Land Capability as per the *Land Capability Handbook 1999*, by DPIPWE. All available Land Capability Mapping is available on the LIST. This is generally at a scale of 1:100,000.
- Enterprise Suitability. Utilisation of DPIPWE's enterprise suitability mapping for various crops grown in Tasmania. Available on the LIST
- Irrigation water resources. Existing water resources, including water allocations, existing dams and proposed dams are considered. Available on LIST
- Enterprise Scale. Enterprise Scale analysis and the associated definitions were first developed in 2012 for Northern Tasmania Development in response to a request for clarification of the methodologies and tools and their application in understanding agricultural potential for planning purposes. In this project Enterprise Scale has been developed further and a range of characteristics including current enterprise activities, Land Capability, irrigation water resources and connectivity were analysed at the holding level enabling the characteristics of titles to be classified into four broadly defined categories; 'Commercial', 'Small Scale Producer', 'Hobby' and 'Lifestyle'⁵.
- Natural Values. Residual native vegetation is considered, mapped threatened vegetation communities and threatened flora and fauna records are also considered. Available from LIST.
- Natural Assets Code. Whether the title or adjacent titles has been mapped by Council under the Natural Assets Code is considered.
- Existing dwelling. Whether the title has an existing dwelling. Building points are used. Available on the LIST.
- Onsite reserve. Any existing onsite reserves are considered. Available on LIST.
- Adjacent reserve. Any existing adjacent reserves are considered. Available on LIST.
- Adjacent land use. Evidence of adjacent agricultural activities on adjacent titles from imagery available on LIST.

Individual characteristics are then considered in conjunction with the general context of the area to assist with recommending a consistent zoning pattern.

8.2.2 STEP 2 – REVIEWING COUNCIL'S PROPOSED ZONING

The next step is reviewing Council's proposed zoning and consider the rationale behind the proposed zoning based on the Draft Structure Plan and further supportive work completed through Enterprise Scale Concept development and Flinders specific application of Enterprise Scale. A site visit was also conducted in October 2021 to ground truth desktop assumptions.

8.2.3 STEP 3 – APPLYING DECISION RULES

The Decision Rules have been developed to assist with determining a title's suitable zone. These decision rules are designed to be consistent with the zone purposes and the LPS Guidelines. The Decision Rules are based on a conservative approach, with all titles first being considered for their suitability for being included in the Agriculture Zone before suitability for inclusion in the Rural Zone is considered.

⁵ As defined in RMCG Jan 2022, *Enterprise Scale*.

Once data for the title characteristics has been assembled the characteristics are assessed against the Decision Rules in Table 7-2 to assist with determining the most appropriate zone (Agriculture or Rural). The zoning principles identified in Table 7-1 are also considered to assist with ensuring zoning consistency.

The Agriculture zone is selected if:

- Decision rules provide a comprehensive case that the Ag Zone is more appropriate
- There is not sufficient justification for removing the title from the Ag Zone and that was the initial recommended zone
- It is to provide a consistent zoning pattern.

The Rural zone is selected if:

- Decision rules provide a comprehensive case that the Rural Zone is more appropriate.
- It is in line with strategic planning
- It is to provide a consistent zoning pattern.

8.2.4 STEP 4 – APPROPRIATE ZONE DETERMINED

The characteristics considered in the analysis of the previous three steps are synthesised to provide the most appropriate zoning recommendation for the title. Once the most appropriate zone for each site has been determined a brief summary is compiled which incorporates the key considerations and Decision Rules utilised to provide justification for the proposed zone each assessed title.

Table 8-1: Zoning Principles

CHARACTERISTIC	DESCRIPTION
Consistency of land use patterns.	Titles that have characteristics that are suitable for either the Rural or Ag Zone (based on State – Zone Application Framework Criteria) should be zoned based on surrounding titles with the primary aim of providing a consistent land use pattern. For planning purposes, a consistent zoning pattern is preferable to fragmented zoning patterns.
Adjacent titles owned by same entity to be included in the same zone when possible.	Adjacent titles under same ownership are most likely farmed in conjunction. By zoning these titles under the same zone, land holders will have consistency of Planning Scheme permitted uses. However, current land use practices should also be considered as there may be instances where titles under same ownership are utilised for differing land uses which are more appropriately zoned differently. This will also potentially be the case for larger titles where split zoning might be appropriate. Plantations on land farmed in conjunction with mixed farming operations are more likely to be converted to an alternative agricultural use. Hence if the majority of the holding is in the Ag Zone then the preference would be for the title supporting plantation to also be in the Ag Zone.
Split zoning of titles to only occur in exceptional circumstances.	Split zoning is only to occur on titles that have significantly divergent agricultural potential. This will generally only occur on larger titles.

Table 8-2: Decision Rules

USE	RATIONALE	AGRICULTURE ZONE	JUSTIFICATION	RURAL ZONE	JUSTIFICATION	FURTHER CONSIDERATION	ALTERNATE ZONE
Strategic Planning – Support for Implementation of the Draft Structure Plan.	<p>Further areas suitable for the Rural Zone to align with the Primary Production Area 2 as identified in the Draft Structure Plan.</p> <p>This is to assist with the promotion of Small Scale Producer activity in the Municipality.</p>	<p>Yes (if meeting one or more criteria):</p> <ul style="list-style-type: none"> Can contribute to a commercial scale farm business Is well connected to land with Commercial scale characteristics Has existing or potential water resources for agricultural activities Land has basalt derived soils and/or is mapped as Class 4 land or better. 	Mapped as Unconstrained in the ALMP.	<p>Yes (if meeting two or more criteria):</p> <ul style="list-style-type: none"> Is within the areas targeted for the Primary Production 2 Area as defined in the Structure plan, and Is within proximity to an established settlement area, and/or Single ownership with an area of less than 40ha Is poorly connected to land with Commercial scale characteristics Has natural values. Has an existing dwelling 	Per Guidelines RZ 3 & AZ6	<p>Class 4 land to be retained in the Ag Zone.</p> <p>Targeting areas within close proximity to settlements may result in some holdings with commercial scale characteristics being zoned Rural. This will not impact on their ability to continue to farm the land.</p> <p>Land currently earmarked for the Landscape Conservation Zone, may be more appropriately zoned Rural.</p>	
Forestry Activities on majority of title – Including:	<p>Forestry is “no permit required” in both the Rural & Ag Zone under certain conditions. However, the Ag Zone has stricter provisions on resource development activities which in some cases require discretionary approval or prohibit the use all together.</p> <p>Land with limited potential for future development of an agricultural enterprise will preferably be zoned Rural.</p> <p>Zoning will aim to reflect a consistent land use pattern.</p>	<p>Yes (if meeting one or more criteria):</p> <ul style="list-style-type: none"> If on Prime Ag Land If surrounded by Ag land If farmed in conjunction with an agricultural enterprise If plantation over pasture that is likely to be converted back to pasture after harvest If there is a potential dam site on a named stream and upstream from existing or potential agricultural activity. 	Mapped as Unconstrained in the ALMP.	<p>Yes (if meeting one or more criteria):</p> <ul style="list-style-type: none"> If on Class 6 or 7 Land, or land that is limited due to site characteristics If owned by a forestry company If owned by a private land holder and is adjacent to other forestry or Rural Zone titles If under private timber reserves and unlikely to be converted to an alternative agricultural use Adjacent land is also primarily used for forestry activities State forest and/or Future Production Forest. 	Per Guidelines RZ 1 & RZ 3.	<p>Forestry activities on Class 4 or 5 land should be assessed case by case. Surrounding land, ownership and likely future uses should be considered before determining appropriate zone.</p> <p>Impacts of future subdivision and development should be considered. There are less strict subdivision provisions in Rural Zone than Ag Zone.</p>	
Irrigation Resources or use.	Irrigation water resources are important to agricultural productivity, diversifying and risk management.	<p>Yes:</p> <ul style="list-style-type: none"> If existing irrigation resources If there is potential to develop irrigation resources that could be utilised for Commercial scale agricultural activities. 	Agriculture Zone Purpose & as per guideline AZ 1.	<p>Yes:</p> <ul style="list-style-type: none"> If there is no potential to develop irrigation resources that could be utilised for Commercial scale agricultural activities. 	Per Guidelines RZ 1, RZ 3, AZ 4 & AZ 6.		
Residual Native Vegetation/ Minimal Use on majority of title.	Extensive areas of native vegetation generally indicate some limitations to productive use and may indicate natural values.	<p>Yes:</p> <ul style="list-style-type: none"> If farmed in conjunction with a Commercial scale agricultural enterprise (eg. broadacre dryland grazing enterprise) If a Conservation Covenant is covering area of concern and surrounding land is utilised for agriculture. 	Mapped as Unconstrained.	<p>Yes:</p> <ul style="list-style-type: none"> Fragmented ownership of titles Land Use 2015 Layer (LIST) maps as minimal use No evidence of land being utilised for agricultural activities anywhere on the title Poor site characteristics and Land Capability (Class 5, 6 or 7) on majority of title If under a Conservation Covenant and not managed in conjunction with an agricultural enterprise If the risks to natural assets are high and the land has marginal agricultural potential and it is determined that the Forest Practices Code will not provide sufficient protection of the natural assets. 	Per Guidelines RZ 1, RZ 3, AZ 4 & AZ 6.	<p>Local knowledge of areas is an important consideration. It is also important to note that by zoning these areas as Rural, they are not precluded from future agricultural development unless protected by a Code (Natural Assets Code) whereas the Ag Zone is exempt from this code.</p> <p>Potential of future subdivision and development should also be considered. There are less strict subdivision provisions in Rural Zone and Natural Assets Code still allows for some clearing.</p>	Environmental Management Zone or Landscape Conservation Zone.

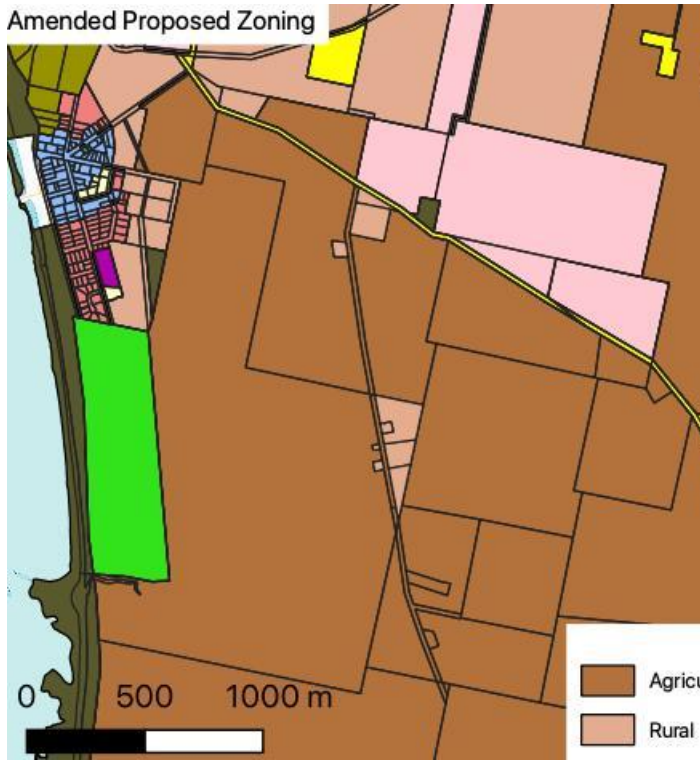
USE	RATIONALE	AGRICULTURE ZONE	JUSTIFICATION	RURAL ZONE	JUSTIFICATION	FURTHER CONSIDERATION	ALTERNATE ZONE
Extractive Industries.	Extractive industries (mining, quarries) are a Permitted Use in the Rural Zone, but are Discretionary in the Ag Zone.	Yes: <ul style="list-style-type: none"> If on Prime Agricultural Land If surrounded by agricultural land and there is no connectivity with other land suitable for the Rural Zone. 	Mapped as Unconstrained.	Yes: <ul style="list-style-type: none"> If not on Prime Agricultural Land and has connectivity with other land that will be zoned Rural If on an isolated title from rest of Rural estate but is an operation of regional significance. 	Per Guidelines RZ 3.		
Resource Processing.	Resource Processing is a Permitted Use in the Rural Zone, but is Discretionary in the Ag Zone.	Yes: <ul style="list-style-type: none"> If on Prime Agricultural Land If surrounded by agricultural land and there is no connectivity with other land suitable for the Rural Zone. 	Mapped as Unconstrained.	Yes: <ul style="list-style-type: none"> If not on Prime Agricultural Land and has connectivity with other land that will be zoned Rural If on an isolated title from rest of Rural estate but is an operation of local and/or regional significance. 	Per Guidelines RZ 3.		
Unmapped Titles.	Individual titles or small clusters of titles that were excluded from the Land Potentially Suitable for Agriculture layer that are surrounded by titles that are included in Ag Zone.	Yes: <ul style="list-style-type: none"> If surrounded by land that will be zoned as Agriculture and subject title has characteristics that could be included within Agriculture Zone If farmed in conjunction with adjacent agricultural land If it provides a more consistent zoning pattern. 	Per Guidelines AZ 1, AZ 4 & AZ 7.	Yes: <ul style="list-style-type: none"> If Sustainable Timber Tasmania (STTAS) land (formerly Forestry Tasmania) or Crown owned land If has little or no agricultural potential and is adjacent to land with similar characteristics that could also be zoned Rural. 	Per Guideline RZ 3.	All STTAS land is to go into the Rural Zone. It may be appropriate to zone adjacent land as Rural also. However, potential for future development that is allowable within the Rural Zone should be considered and the potential impacts this could have on STTAS land before zoning Rural.	Other zones may apply depending on the characteristics of the subject land and surrounding land.
Potentially Constrained Titles.	Titles that were mapped as potentially constrained (2A, 2B or 3) in the Land Potentially Suitable for Agriculture layer are intended to be flagged for further investigation by Councils to determine which zone (ag or Rural) is more appropriate.	Yes: <ul style="list-style-type: none"> Single titles or small clusters of titles surrounded by unconstrained agricultural land If on Prime Agricultural Land If there is an existing irrigation water supply Titles that are farmed in conjunction with agricultural land If it provides a more consistent zoning pattern. 	Per Guidelines AZ1, AZ 3 & AZ 4.	Yes: <ul style="list-style-type: none"> Adjacent to Rural zoned titles and not utilised for agricultural activities nor directly adjacent to 'commercial Scale' agricultural activities If adjoining a Residential Zone and in a cluster of 3 or more and not utilised as part of an 'commercial scale' agricultural activity If provides for a more consistent zoning pattern. 	Per Guidelines AZ 3, RZ 1 & RZ 3.	Titles with 'commercial scale' agricultural characteristics should be zoned Agriculture where possible. Titles adjacent to Residential Zones that display very constrained characteristics may be more suited to a Residential Zone. A separate assessment of these titles may be required to confirm this.	Rural Living or Low Density Residential.
Prime Agricultural Land.	Prime Ag Land (Land Capability Classes 1, 2 & 3) should be protected where possible and retained in the Agriculture Zone because of its productive potential.	Yes.	Per Guideline AZ 2.	Yes: <ul style="list-style-type: none"> If significantly constrained or other limitations can be demonstrated. 	Per Guideline AZ 6.	Prime Agricultural Land is not a relevant consideration on Flinders Island.	
Public Reserves: <ul style="list-style-type: none"> Conservation Area Game Reserve Historic Site Indigenous Protected Area National Park Nature Reserve Nature Recreation Area Regional Reserve State Reserve Wellington Park RAMSAR Wetland Informal Reserve on Public Land. 	The public reserve estate is designed to conserve and protect public land. This land does not have any agricultural value.	No: <ul style="list-style-type: none"> Unless not appropriate to zone differently. 	Per Guidelines AZ 1 & AZ 6.	Yes.	Per Guidelines RZ 1 & RZ 3.	Where deemed appropriate and as per Guideline EMZ 1.	Environmental Management Zone.

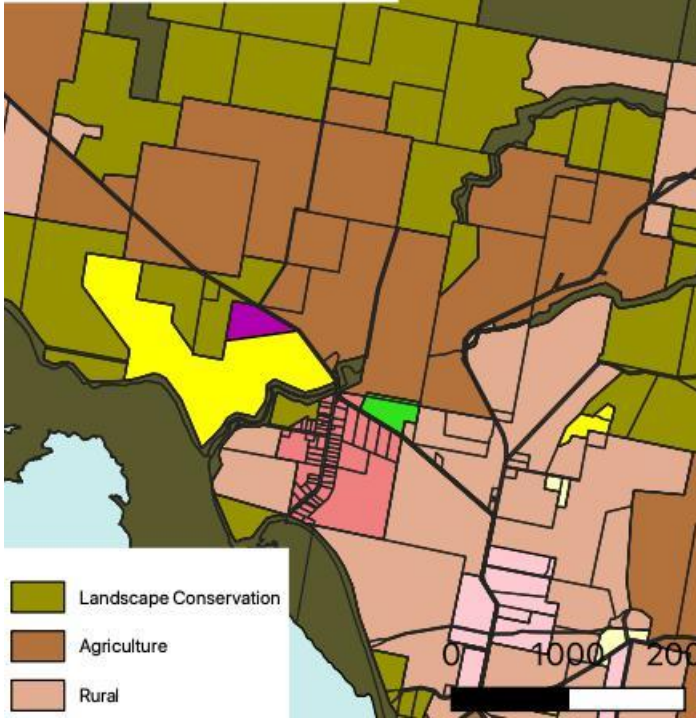
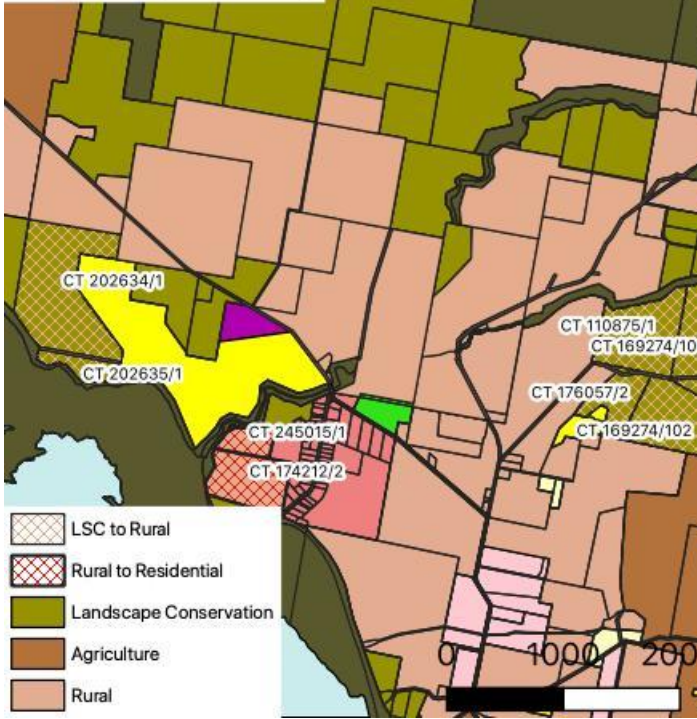
USE	RATIONALE	AGRICULTURE ZONE	JUSTIFICATION	RURAL ZONE	JUSTIFICATION	FURTHER CONSIDERATION	ALTERNATE ZONE
Private Reserves: <ul style="list-style-type: none"> • Conservation Covenant • Private Nature Reserve • Private Sanctuary • Stewardship Agreement • Part 5 Agreements. 	Private reserves existing on privately owned land. Some of these reserves will form part of a Whole Farm Plan so should be considered in context with surrounding land.	No – unless: <ul style="list-style-type: none"> • Managed in conjunction with productive agricultural land • It is to provide a consistent zoning pattern. 	Per Guidelines AZ 1 & AZ 6.	Yes.	Per Guidelines RZ 1 & RZ 3.	Where deemed appropriate and as per Guideline EMZ 1 or LCZ 1 & LCZ 2.	Environmental Management Zone or Landscape Conservation Zone.
Land Capability Class 6 and 7.	Class 6 Land is described as; Land marginally suitable for grazing because of severe limitations. This land has low productivity, high risk of erosion, low natural fertility or other limitations that severely restrict agricultural use. This land should be retained under its natural vegetation cover. Class 7 Land is described as; Land with very severe to extreme limitations which make it unsuitable for agricultural use. (Grose 1999).	Yes: <ul style="list-style-type: none"> • If farmed in conjunction with a 'commercial scale' agricultural enterprise (eg. broadacre dryland grazing enterprise). 	Mapped as Unconstrained.	Yes: <ul style="list-style-type: none"> • If adjacent to other titles proposed to be zoned Rural. 	Per Guidelines RZ 1 & AZ 6.		

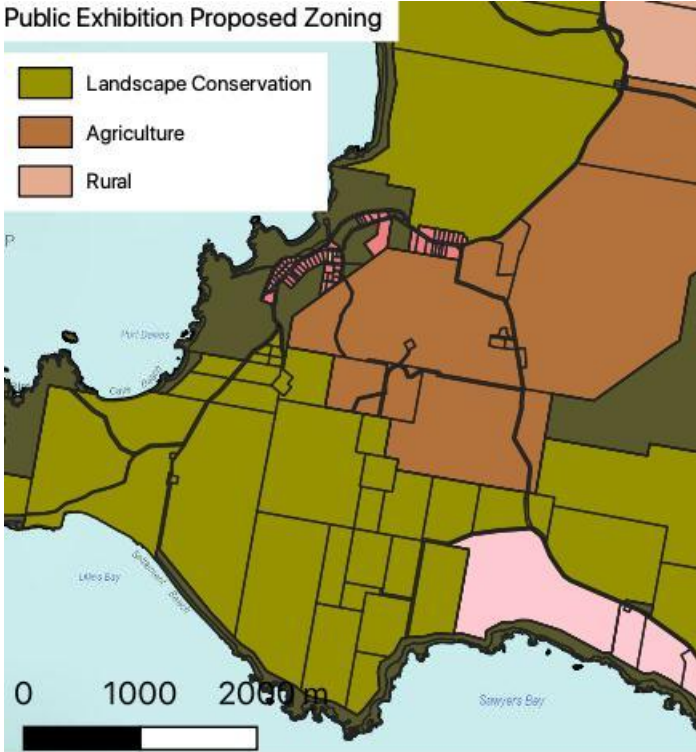
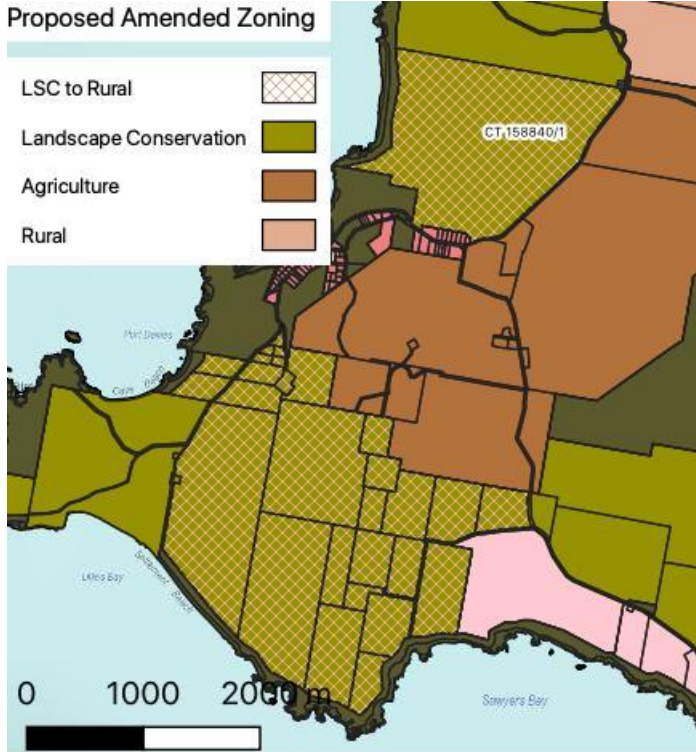
8.3 ASSESSMENT

Table 8-3 shows the current proposed zoning under Flinders LPS of the TPS as shown for public exhibition in May-August 2021. It then shows RMCG's recommended zoning of the areas assessed after the updated decision rules that consider Council's strategic planning have been applied. Observations and recommendations have also been made of areas currently proposed for the Landscape Conservation Zone that may be more suited to the Rural Zone.

Table 8-3: Assessment Areas

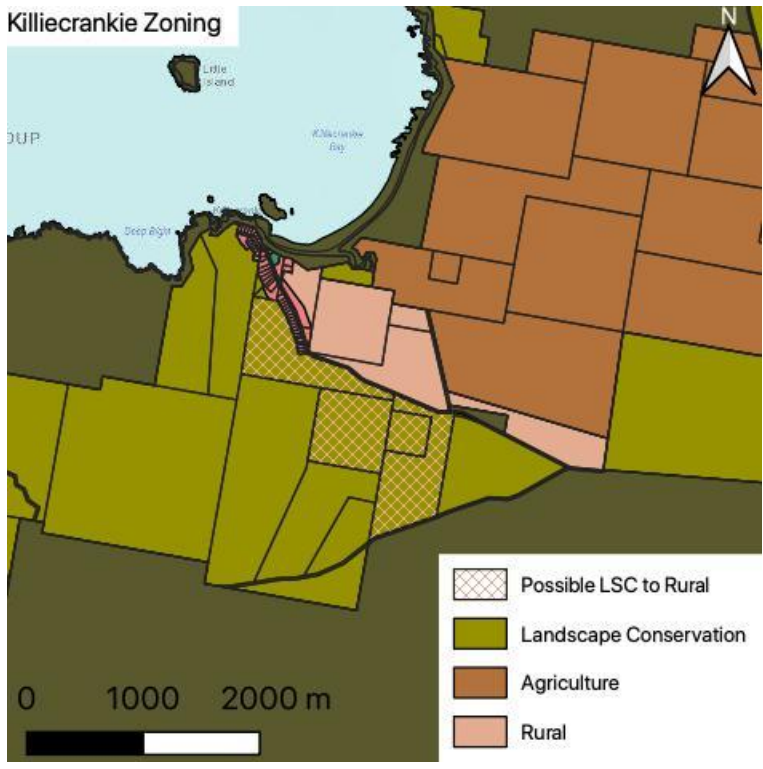
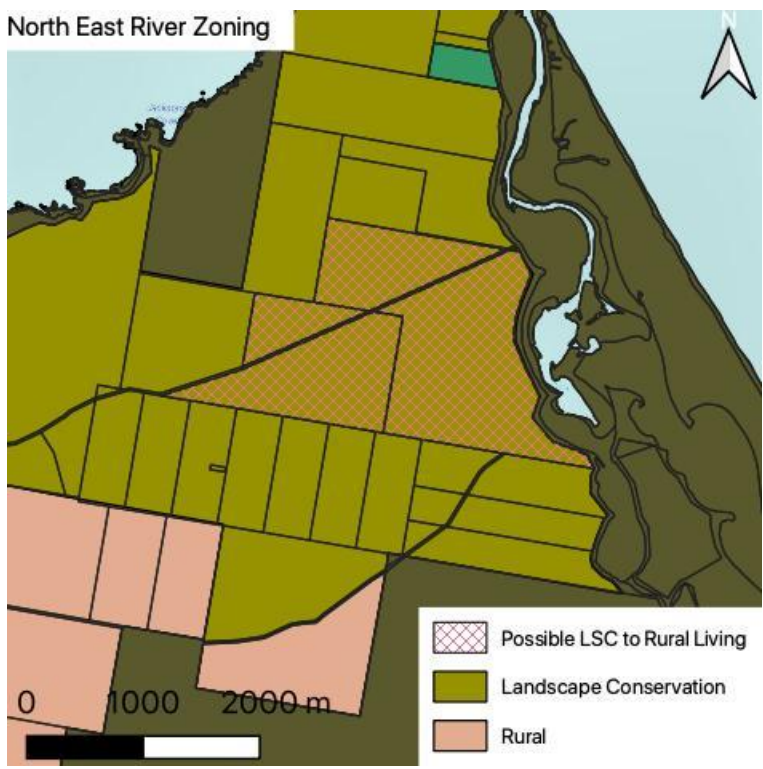
LOCATION	PROPOSED ZONING – AS PER PUBLIC EXHIBITION PERIOD	PROPOSED ALTERNATE ZONING	COMMENTS
<p>Whitemark – South east</p>	<p>Public Exhibition Proposed Zoning</p> 	<p>Amended Proposed Zoning</p> 	<p>Land directly southeast of Whitemark on the southern side of Lady Baron Rd is proposed for the Agriculture Zone. Council has the aim of some of this area to be zoned Rural. However, the majority of this land is utilised for grazing with Commercial scale characteristics and is well connected with other land zoned Agriculture. In our opinion this land should remain zoned Agriculture. However, along Butter Factory Rd there are two clusters of smaller titles with characteristics more suited to the Rural Zone. One of these titles (CT237967/1) is already utilised for small scale wine production and is also where the old butter factory (closed circa 1972) is located. The butter factory is a unique building with tourism development potential. There may be some limited scope for more of these titles to be utilised for related activities. The relevant titles are CT 9254/1, CT 68563/1, CT 141953/1, CT 237967/1, CT 10923/1, CT 7488/2, CT 64802/1, CT 7488/1 & CT 249792/1.</p> <p>Observation</p> <p>Land at Trouser Point Rd proposed to be zoned Landscape Conservation will provide opportunities for housing development, although the proposed zone will limit the opportunities for Small Scale Producer activities to occur. We understand one Small Scale Producer, who has since ceased operation, was located on CT 175294/1. This producer also had a winter take allocation of 3ML from Fotheringate Creek.</p>

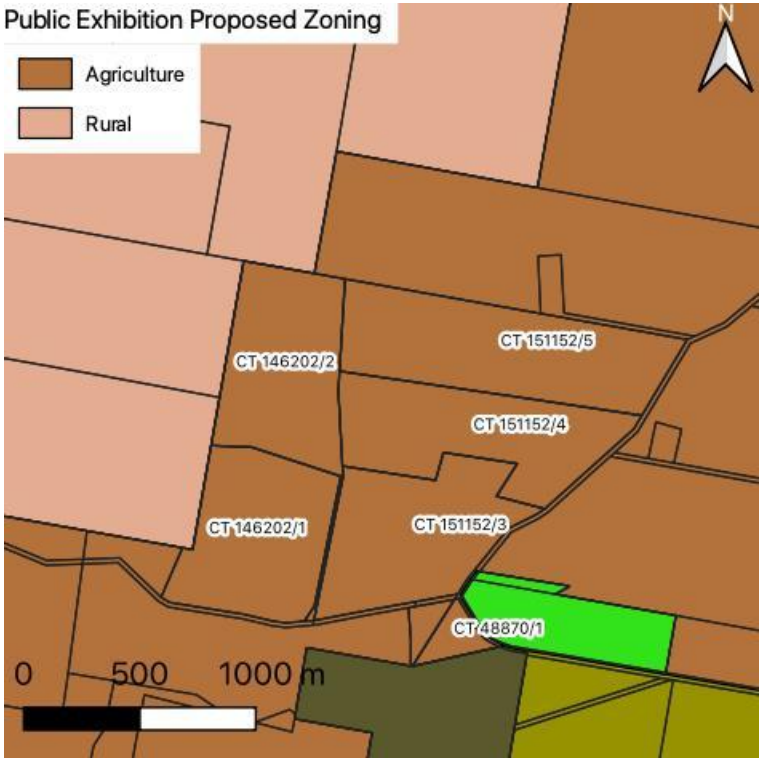
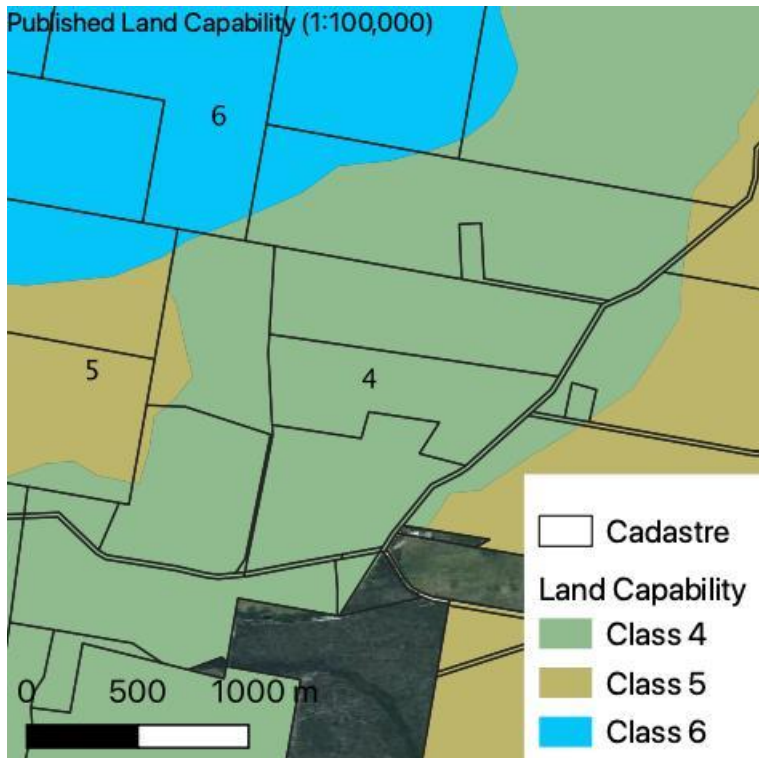
LOCATION	PROPOSED ZONING – AS PER PUBLIC EXHIBITION PERIOD	PROPOSED ALTERNATE ZONING	COMMENTS
Whitemark - North	<p>Public Exhibition Proposed Zoning</p>  <p>Legend:</p> <ul style="list-style-type: none"> Landscape Conservation Agriculture Rural 	<p>Amended Proposed Zoning</p>  <p>Legend:</p> <ul style="list-style-type: none"> LSC to Rural Rural to Residential Landscape Conservation Agriculture Rural 	<p>There is land north of Whitemark near the airport that is proposed to be zoned Agriculture. This land is located along Palana Rd and Memana Rd. It appears feasible that the land directly to the west of the airport and along Memana Rd could go into the Rural zone. While this land is utilised for grazing, there are multiple titles under different ownership. It also does not have connectivity with the rest of the Agriculture zone. Zoning this land Rural, will still allow the land to be utilised for its current activities, if that is the landowner's desire.</p> <p>CT 213669/1 & CT 173164/1 are the two most northern titles recommended for the Rural zone. These titles are under the same ownership as are further two titles to the north. These titles are separated by Palana Road from the northern titles and a visual roadside inspection indicated that these two titles are not as intensively farmed as the two northern titles under the same ownership. While the farm appears to display Commercial scale characteristics, in this instance because of the location and proximity to other titles proposed to be zoned to Rural and Landscape Conservation (LSC), Rural will provide a more logical zoning pattern. Also see further comments below in observations.</p> <p>Observations</p> <p>CT 202634/1 & CT 202635/1 are currently proposed to be zoned LSC. These two titles are also under the same ownership as CT 213669/1 & CT 173164/1. While parts of these titles are covered in native vegetation, some of which is mapped as a threatened community, both have areas that are utilised for pasture for grazing. In our opinion these titles would be more suited to the Rural Zone. This zone will provide protection of the existing native vegetation through the application of the Natural Assets Code and will also ensure that the owner can continue to utilise the pasture area for grazing as part of their overall farming activity. It would also mean the landowner is only dealing with two zones across the holding (Agriculture & Rural), both of which will allow the long term continued grazing use.</p> <p>CT 110875/1, CT 169274/101, CT 169274/102 & CT 176057/2 are a cluster of four titles located on Harleys Rd. These titles are currently proposed for the Landscape Conservation Zone. It is our understanding there is an existing mining lease on one of these titles (CT 176057/2), while a further two titles (CT 169274/102 & CT 169274/101) have been purchased to be utilised as part of an existing Bush Pharmacy operation to be utilised for kunzea production for essential oil. Because of this, these titles appear to more suited to the Rural zone.</p> <p>CT 245015/1 & CT 174212/2 are two titles proposed to be zoned Rural that are completely isolated from any other rural land by alternate zones. It appears feasible that these two titles could be zoned something alternate to Rural or Agriculture, possibly Rural Living or Low Density Residential.</p>

LOCATION	PROPOSED ZONING – AS PER PUBLIC EXHIBITION PERIOD	PROPOSED ALTERNATE ZONING	COMMENTS
<p>Emita</p>	<p>Public Exhibition Proposed Zoning</p> 	<p>Proposed Amended Zoning</p> 	<p>This area was identified in the Draft Structure Plan to go into the Primary Production Area 2 (translated into the Rural Zone). The land in this area that is proposed to be zoned Agriculture is generally associated with grazing enterprises with Commercial scale characteristics. There are also areas mapped as Class 4 land under the Published Land Capability mapping for Flinders. This land should be retained in the Ag zone.</p> <p>Observations</p> <p>CT 158840/1 – this title is proposed to go into the Landscape Conservation Zone. However, the title is clearly utilised for agriculture. It is our recommendation that this title would be more appropriate in the Rural zone. This zone would allow the current activities to continue and ensure the dunes on the western portion of the title would be covered by the Natural Assets Code.</p> <p>Landscape Conservation Zone south of Emita, Wybalenna, east to Palana Rd - Much of this area appears to be pastured, LIST Map does show small areas of threatened vegetation communities.</p> <p>Within this area there are 28 titles, with 15 of these titles are under the same ownership. There are also adjacent titles proposed for the Agriculture zone that are under the same ownership as the 15 titles currently proposed for LSC.</p> <p>In our opinion, there appears scope to zone at least a portion of this area as Rural rather than LSC. This would provide a much-increased area for encouraging Small Scale Producers, while also ensuring protection of natural values through the application of the Natural Assets Code.</p>

LOCATION	PROPOSED ZONING – AS PER PUBLIC EXHIBITION PERIOD	PROPOSED ALTERNATE ZONING	COMMENTS
<p>Lady Baron – Badgers Corner</p>	<p>Public Exhibition Proposed Zoning</p> 	<p>Amended Proposed Zoning</p> 	<p>There is a proposed cluster of Rural zone titles around the intersection of Coast Road and Badger Corner Rd. There is scope to add some titles to this cluster. CT 209407/1 & CT 25190/1 along Coast Rd could be zoned Rural rather than Agriculture. CT 251901/1 already supports a Small Scale Producer activity. CT 25190/1, whilst farmed in conjunction with other titles in the Ag zone, supports a dwelling and for consistent zoning pattern could be zoned Rural.</p> <p>Observations</p> <p>CT 52591/1 on Badger Corner Rd appears to be more suited to the Rural zone rather than the Landscape Conservation Zone. The title has an existing dwelling, is approximately 10ha in area, and is predominantly managed as pasture.</p> <p>CT 25190/2 is proposed to go into the Environmental Management (EM) Zone. However, this title has an existing dwelling, is approximately 4.4ha in area, and is predominantly cleared for pasture. Based on these characteristics, it appears this title would also be more suited to the Rural zone. It could also potentially go into the LSC zone, however this would mean that it is spot zoned.</p>

Table 8-4: Further Observations

LOCATION	ZONING	COMMENTS
<p>Killiecrankie</p>	 <p>Killiecrankie Zoning</p> <ul style="list-style-type: none"> Possible LSC to Rural Landscape Conservation Agriculture Rural 	<p>There may be scope for some of the land south Killiecrankie Rd, adjacent to the village to be zoned Rural rather than Landscape Conservation. These titles are a mixture of cleared land and native vegetation. By zoning these titles Rural, natural values would be protected by the Natural Assets Codes, however, there would more scope for encouraging Small Scale Producers. They would also link with other Rural zoned land, on the northern side of Killiecrankie Rd, where a Small Scale Producer activity already occurs (olives for olive oil).</p>
<p>North East River</p>	 <p>North East River Zoning</p> <ul style="list-style-type: none"> Possible LSC to Rural Living Landscape Conservation Rural 	<p>It is our understanding there is an approved 24 lot subdivision for the old plantation site at North East River. This land is currently proposed to be zoned Landscape Conservation. As there is already an approved subdivision (subject to conditions) it may be more appropriate to consider an alternate zone such as Rural Living to facilitate the constructing of dwellings on the lots. Rural Living would also ensure the Natural Assets Code would still apply to the land and better facilitate opportunities for some Small Scale Producers.</p>

LOCATION	ZONING	COMMENTS
<p>Emita East</p>	<p>Public Exhibition Proposed Zoning</p> 	<p>The 6 labelled titles in the adjacent maps were previously earmarked for the Primary Production Area 2 through the Draft Structure Plan and hence Council initially proposed to zone the titles Rural. This was amended through the TPC review process.</p> <p>At least 2 of these titles have an existing dwelling, and the largest title (CT 151152/5) is approximately 52ha in area. It is our understanding that a horse stud enterprise is conducted on CT 151152/4. These characteristics and the revised Decision Rules do provide scope for these titles to be considered for the Rural zone. However, the below map shows that the majority of the land associated with the titles is mapped as Class 4 land, Land Capability on CT 48870/1 is not mapped. Land Capability Class 4 land is the highest capability on the island and there is only a small area based on the published information. It should therefore be retained in the Agriculture zone. The Agriculture zone will not affect any existing uses conducted on these titles but will ensure that any future proposed developments need to fully consider the agricultural potential of the land and potential impacts. In our opinion, for the land to be considered for an alternate zone to Agriculture, a detailed onsite Land Capability assessment would need to be conducted. If it is demonstrated that the land is actually not Class 4 land, it could be considered for an alternate zone.</p> 

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Appendix 1: Zoning Recommendations per Title

Tables A1-1 to A1-6 lists each individual title associated with each assessed area. For each title the following is provided; volume and folio number, property identification number, constraints mapping under the ALMP, the existing zoning under the *Flinders Planning Scheme 2000*, Council's proposed zoning and RMCG's suggested alternate zoning.

Table A1-1: Whitemark South East

VOLUME	FOLIO	PID	CONSTRAINTS MAPPING	EXISTING ZONING	PROPOSED ZONING	ALTERNATE ZONING
7488	2	6427611	Constrained A	Rural	Agriculture	Rural
64802	1	6427638	Unconstrained	Rural	Agriculture	Rural
249792	1	6427603	Unconstrained	Rural	Agriculture	Rural
141953	1	2553485	Constrained 2A	Rural	Agriculture	Rural
9254	1	6427830	Constrained 2A	Rural	Agriculture	Rural
237967	1	6427582	Unconstrained	Rural	Agriculture	Rural
10923	1	6427590	Constrained 2A	Rural	Agriculture	Rural
68563	1	6427566	Unconstrained	Rural	Agriculture	Rural
7488	1	7148622	Unconstrained	Rural	Agriculture	Rural

Table A1-2: Whitemark North

VOLUME	FOLIO	PID	CONSTRAINTS MAPPING	EXISTING ZONING	PROPOSED ZONING	ALTERNATE ZONING
225624	1	2922826	Unconstrained	Rural	Agriculture	Rural
220373	1	2922826	Unconstrained	Rural	Agriculture	Rural
14670	1	6428286	Unconstrained	Rural	Agriculture	Rural
155427	1	2922818	Unconstrained	Rural	Agriculture	Rural
156154	1	2922826	Unconstrained	Rural	Agriculture	Rural
213527	1	2922818	Unconstrained	Rural	Agriculture	Rural
212657	1	3291421	Unconstrained	Rural	Agriculture	Rural

VOLUME	FOLIO	PID	CONSTRAINTS MAPPING	EXISTING ZONING	PROPOSED ZONING	ALTERNATE ZONING
213669	1	6428622	Unconstrained	Rural	Agriculture	Rural
225625	1	2922826	Unconstrained	Rural	Agriculture	Rural
225623	1	2922826	Unconstrained	Rural	Agriculture	Rural
9508	1	2922818	Unconstrained	Rural	Agriculture	Rural
173164	1	2829496	Unconstrained	Rural	Agriculture	Rural
252433	1	2922818	Unconstrained	Rural	Agriculture	Rural
39638	1	2922818	Unconstrained	Rural	Agriculture	Rural
249830	2	2922826	Constrained B	Rural	Agriculture	Rural
245335	1	3291413	Unconstrained	Rural	Agriculture	Rural
176057	2	9228686	Unconstrained	Rural	Landscape Conservation	Rural
110875	1	2597023	Unconstrained	Rural	Landscape Conservation	Rural
169274	101	3355990	Unconstrained	Rural	Landscape Conservation	Rural
202634	1	6428622	Unconstrained	Rural	Landscape Conservation	Rural
169274	102	3356002	Unconstrained	Rural	Landscape Conservation	Rural
202635	1	6428622	Unconstrained	Rural	Landscape Conservation	Rural
245015	1	7525344	Unconstrained	Rural	Rural	Low Density Residential or Rural Living
174212	2	3565410	Unconstrained	Rural	Rural	Low Density Residential or Rural Living

Table A1-3: Emita

VOLUME	FOLIO	PID	CONSTRAINTS MAPPING	EXISTING ZONING	PROPOSED ZONING	ALTERNATE ZONING
158840	1	3588989	Unconstrained	Rural	Landscape Conservation	Rural
46257	1	1741812	Constrained 2A	Rural	Landscape Conservation	Rural
148463	1	2718710	Unconstrained	Rural	Landscape Conservation	Rural
148463	2	2718729	Unconstrained	Rural	Landscape Conservation	Rural
247507	2	2718737	Unconstrained	Rural	Landscape Conservation	Rural
230523	1	3494923	Unconstrained	Rural	Landscape Conservation	Rural
245660	1	6424218	Unconstrained	Rural	Landscape Conservation	Rural
245661	1	6424218	Unconstrained	Rural	Landscape Conservation	Rural
204615	1	6424218	Unconstrained	Rural	Landscape Conservation	Rural
204617	1	6424218	Unconstrained	Rural	Landscape Conservation	Rural
245389	1	6424218	Unconstrained	Rural	Landscape Conservation	Rural
237342	1	6424795	Constrained A	Rural	Landscape Conservation	Rural
245385	1	6424832	Unconstrained	Rural	Landscape Conservation	Rural
245386	1	6424832	Unconstrained	Rural	Landscape Conservation	Rural
234726	1	6424832	Unconstrained	Rural	Landscape Conservation	Rural
204614	1	6424832	Unconstrained	Rural	Landscape Conservation	Rural
245381	1	6424832	Unconstrained	Rural	Landscape Conservation	Rural
245382	1	6424832	Unconstrained	Rural	Landscape Conservation	Rural
245419	1	6424832	Unmapped	Rural	Landscape Conservation	Rural
245387	1	6424832	Unconstrained	Rural	Landscape Conservation	Rural

VOLUME	FOLIO	PID	CONSTRAINTS MAPPING	EXISTING ZONING	PROPOSED ZONING	ALTERNATE ZONING
245384	1	6424832	Unconstrained	Rural	Landscape Conservation	Rural
46257	5	7664176	Unconstrained	Rural	Landscape Conservation	Rural
46256	8	7716036	Constrained 2A	Rural	Landscape Conservation	Rural
46256	6	7777541	Constrained 2A	Rural	Landscape Conservation	Rural
46256	9	7840133	Constrained 2B	Rural	Landscape Conservation	Rural
46256	7	7840141	Constrained 2A	Rural	Landscape Conservation	Rural
46257	4	7840168	Constrained 2A	Rural	Landscape Conservation	Rural
46257	3	7851780	Constrained 2A	Rural	Landscape Conservation	Rural
46257	2	7851780	Constrained 2A	Rural	Landscape Conservation	Rural

Table A1-4: Emita East

VOLUME	FOLIO	PID	CONSTRAINTS MAPPING	EXISTING ZONING	PROPOSED ZONING	ALTERNATE ZONING
151152	3	2883169	Unconstrained	Rural	Agriculture	Agriculture
151152	5	2781285	Unconstrained	Rural	Agriculture	Agriculture
151152	4	2781277	Unconstrained	Rural	Agriculture	Agriculture
146202	2	2689622	Unconstrained	Rural	Agriculture	Agriculture
48870	1	7777525	Unconstrained	Rural	Agriculture	Agriculture
146202	1	2689614	Unconstrained	Rural	Agriculture	Agriculture

Table A1-5: Lady Baron – Badgers Corner

VOLUME	FOLIO	PID	CONSTRAINTS MAPPING	EXISTING ZONING	PROPOSED ZONING	ALTERNATE ZONING
209407	1	9334026	Unconstrained	Rural	Agriculture	Rural
25190	1	7305309	Constrained 2B	Rural	Agriculture	Rural
25190	2	7305296	Unmapped	Rural	Environmental Management	Rural
52591	1	6430570	Unmapped	Rural	Landscape Conservation	Rural

Table A1-6: Killiecrankie

VOLUME	FOLIO	PID	CONSTRAINTS MAPPING	EXISTING ZONING	PROPOSED ZONING	ALTERNATE ZONING
50506	3	7716060	Unconstrained	Rural	Landscape Conservation	Rural
112866	1	1506679	Unconstrained	Rural	Landscape Conservation	Rural
112866	2	1760175	Unconstrained	Rural	Landscape Conservation	Rural
103038	2	1506660	Unconstrained	Rural	Landscape Conservation	Rural

Table A1-7: North East River

VOLUME	FOLIO	PID	CONSTRAINTS MAPPING	EXISTING ZONING	PROPOSED ZONING	ALTERNATE ZONING
237440	1	3068115	Unconstrained	Rural	Landscape Conservation	Rural Living
159958	1	3068115	Unconstrained	Rural	Landscape Conservation	Rural Living

Appendix 2: Proposed Primary Industry Zones under the Draft Structure Plan

Figure A2-1 shows the proposed zoning that was put forward under the Draft Structure Plan. When considered against the Agriculture and Rural zones of the Tasmanian Planning Scheme the intention was for the Primary Production Area 1 to directly translate to Agriculture, while Primary Production Area 2 was to be directly translated to Rural.

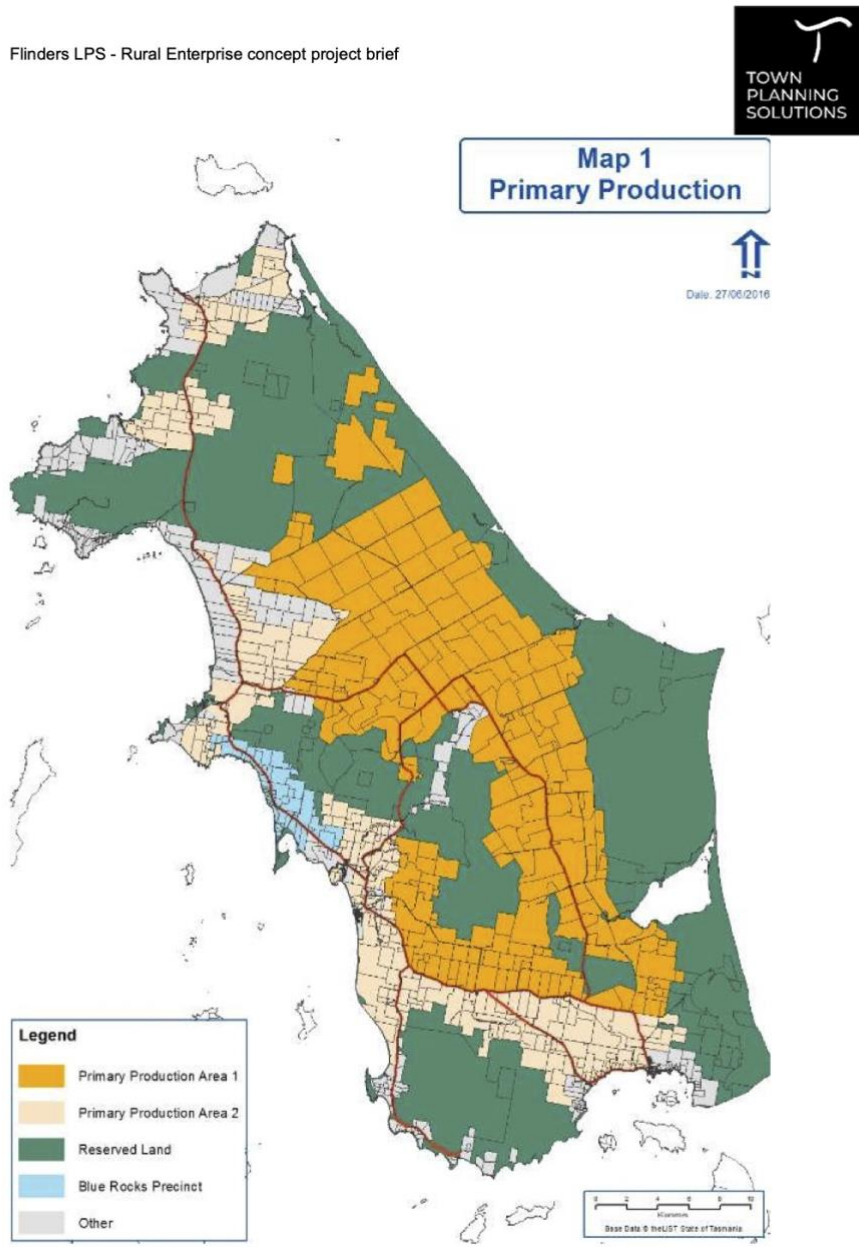


Figure 1 – Flinders Structure Plan Primary Production Areas

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Figure A2-1: Draft Structure Plan Primary Production Areas

Appendix 3: Producer Questionnaire

The following questions have been adapted from the Sprout Small Scale Producer Survey. To simplify data collation the Sprout Survey Question number has been included in brackets (eg. (SQ5)). Note there is space at the end to elaborate on your answers. Please consider the pre-COVID environment and base your answers on that period rather than the previous 12 months if COVID conditions affect your answer.

Please elaborate where you have done this.

Data will be de-identified prior to being published or utilised for research purposes

Name (Optional)	
Preferred contact: (phone/email) (Optional)	
Name of closest town (Optional)	
QUESTION	ANSWER
A. (SQ5) What is the total area (in hectares) that you own/lease? (To calculate acres to hectares, divide the number of acres by 2.5)	
B. In the last 12 months has your business employed any-one other than yourself? If yes please describe the type of employment casual / contractor / permanent staff, etc	<ul style="list-style-type: none"> ▪ Employed a casual <input type="checkbox"/> ▪ Employed one or more permanent part-time or full-time staff <input type="checkbox"/> ▪ Employed a contractor for on farm tasks <input type="checkbox"/> ▪ Employed an apprentice or trainee <input type="checkbox"/> ▪ Hosted an internship <input type="checkbox"/> ▪ Hosted a farm exchange member (including WWOOFA/HelpX) <input type="checkbox"/> ▪ Hosted school and/or TasTAFE work experience student/s <input type="checkbox"/> ▪ None of the above <input type="checkbox"/>
C. (SQ8) How many people were engaged (including yourself and any business partners, in any capacity), last year, in the production of food from the land you manage? (Please provide this figure as a total 'Full-Time-Equivalents (FTE)' For example, one full time person is 1.0 FTE.	
D. (SQ10) What was your total turnover from food production for the year ending 2020?	<ul style="list-style-type: none"> ▪ Made a loss <input type="checkbox"/> ▪ \$1 to \$5,000 <input type="checkbox"/> ▪ \$5,001 to \$15,000 <input type="checkbox"/> ▪ \$15,001 to \$25,000 <input type="checkbox"/> ▪ \$25,001 to \$35,000 <input type="checkbox"/> ▪ \$35,001 to \$45,000 <input type="checkbox"/> ▪ \$45,001 to \$55,000 <input type="checkbox"/> ▪ \$55,001 to \$65,000 <input type="checkbox"/> ▪ \$65,001 to \$75,000 <input type="checkbox"/> ▪ \$75,001 to \$100,000 <input type="checkbox"/> ▪ \$100,001 to \$150,000 <input type="checkbox"/> ▪ \$150,001 to \$200,000 <input type="checkbox"/> ▪ \$200,001 to \$250,000 <input type="checkbox"/> ▪ \$250,001 to \$350,000 <input type="checkbox"/> ▪ \$350,001 to \$500,000 <input type="checkbox"/> ▪ \$500,001 to \$1,000,000 <input type="checkbox"/> ▪ Over \$1,000,000 <input type="checkbox"/>

<p>E. (SQ12) What are your three main enterprises, in order of their contribution to your 'usual' gross annual turnover. (Please rank in order from highest (1) to lowest (3 or more) and please mark the rest as 'not applicable/no')</p> <p><i>Note – please refer to Question H and I for value adding and ancillary businesses. If any of these are one of your three main enterprises please include here in 'other'</i></p>	<ul style="list-style-type: none"> ▪ Livestock grazing (e.g. sheep, cattle, goats) <input type="checkbox"/> ▪ Pigs – free range and/or pastured <input type="checkbox"/> ▪ Pigs – intensive/shedded <input type="checkbox"/> ▪ Poultry – eggs <input type="checkbox"/> ▪ Poultry – meat <input type="checkbox"/> ▪ Poultry – eggs and meat <input type="checkbox"/> ▪ Dairy (incl. cow, goat, buffalo) <input type="checkbox"/> ▪ Orchard fruits <input type="checkbox"/> ▪ Berry fruits <input type="checkbox"/> ▪ Controlled environment horticulture (e.g. tomatoes, capsicums under glass/hot houses) <input type="checkbox"/> ▪ Vegetables/Market gardens <input type="checkbox"/> ▪ Cereal and/or fodder cropping <input type="checkbox"/> ▪ Bees/Honey production <input type="checkbox"/> ▪ Other (describe below) <input type="checkbox"/> <p>.....</p> <p>.....</p> <p>.....</p>
<p>F. (SQ19) How much of your household income is derived off-farm?</p>	<ul style="list-style-type: none"> ▪ None, we have no off-farm income <input type="checkbox"/> ▪ < 20% <input type="checkbox"/> ▪ 21-50% <input type="checkbox"/> ▪ 51 – 80% <input type="checkbox"/> ▪ > 81% <input type="checkbox"/>
<p>G. (SQ20) Where do you mainly sell your produce/products (Please rank in order of dollar value of produce sold to each market type – highest (1)).</p>	<ul style="list-style-type: none"> ▪ Direct to customers <input type="checkbox"/> ▪ Commodity (e.g. livestock to markets) <input type="checkbox"/> ▪ Farmers' markets <input type="checkbox"/> ▪ Local retailers <input type="checkbox"/> ▪ Online <input type="checkbox"/> ▪ Local Co-op/Collective <input type="checkbox"/> ▪ Direct to local restaurants/hospitality industry <input type="checkbox"/> ▪ Local farm gate (own or others) <input type="checkbox"/> ▪ Wholesalers <input type="checkbox"/> ▪ Community supported agriculture (CSA) <input type="checkbox"/> ▪ Retail outlets, incl supermarkets, butchers etc <input type="checkbox"/>
<p>H. (SQ22) What forms of value-adding do you do on-farm (if any)? (Select all that apply)</p>	<ul style="list-style-type: none"> ▪ None <input type="checkbox"/> ▪ Agritourism – on-property accommodation <input type="checkbox"/> ▪ Agritourism – on-property activities <input type="checkbox"/> ▪ Consulting <input type="checkbox"/> ▪ Training/Education <input type="checkbox"/> ▪ Contracting services such as spraying, mulching, plumbing <input type="checkbox"/> ▪ Kennel/Cattery <input type="checkbox"/> ▪ Food/Beverage making (e.g. on-site café/restaurant) <input type="checkbox"/> ▪ Food/Beverage service (e.g. cellar-door) <input type="checkbox"/> ▪ Farm-gate market (on-site or on roadside) <input type="checkbox"/> ▪ Sale of retail food/beverage products <input type="checkbox"/> ▪ Transport/logistics/storage <input type="checkbox"/> ▪ Making food/beverage products <input type="checkbox"/> ▪ Other (please explain below) <input type="checkbox"/> <p>.....</p> <p>.....</p> <p>.....</p>

<p>I. (SQ23) Which ancillary businesses do you operate (if any)?</p>	<ul style="list-style-type: none"> ▪ None <input type="checkbox"/> ▪ Agritourism – on-property accommodation <input type="checkbox"/> ▪ Agritourism – on-property activities <input type="checkbox"/> ▪ Consulting <input type="checkbox"/> ▪ Training/Education <input type="checkbox"/> ▪ Contracting services such as spraying, mulching, plumbing <input type="checkbox"/> ▪ Kennel/Cattery <input type="checkbox"/> ▪ Transport/logistics/storage <input type="checkbox"/> ▪ Other (please explain below) <input type="checkbox"/> <p>.....</p> <p>.....</p> <p>.....</p>
<p>J. (SQ24) Would you say that your business is</p>	<ul style="list-style-type: none"> ▪ New entrant to farming within the last 12 months <input type="checkbox"/> ▪ Developing <input type="checkbox"/> ▪ Growth Phase (diversifying, adding more land, more products or labour) <input type="checkbox"/> ▪ Transitioning (change of product, production method or succession planning) <input type="checkbox"/> ▪ Established (plans for growth) <input type="checkbox"/> ▪ Established (no plans for growth) <input type="checkbox"/> ▪ Winding down the business <input type="checkbox"/>
<p>K. (SQ25) Are you recognised by the Australian Taxation Office as a “Primary Producer”?</p>	<ul style="list-style-type: none"> ▪ Yes <input type="checkbox"/> ▪ No <input type="checkbox"/> ▪ Unsure <input type="checkbox"/>
<p>L. (SQ26) Which of the following business registrations do you currently have?</p>	<ul style="list-style-type: none"> ▪ An Australian Business Number (ABN) <input type="checkbox"/> ▪ Registered for GST <input type="checkbox"/> ▪ A Quality Assurance scheme of any kind <input type="checkbox"/> ▪ Property Identification Code (PIC) <input type="checkbox"/>
<p>M. (SQ29) What are the main challenges you face in your business currently (Please select all that apply, and explain below if you like)</p>	<ul style="list-style-type: none"> ▪ Attracting/keeping staff <input type="checkbox"/> ▪ Freight and logistics – business inputs <input type="checkbox"/> ▪ Freight and logistics – business Outputs/produce/products <input type="checkbox"/> ▪ Red-tape, licences and permits <input type="checkbox"/> ▪ Cost of land <input type="checkbox"/> ▪ Cost of business input <input type="checkbox"/> ▪ Cost / complexity of employing staff <input type="checkbox"/> ▪ Cost of insurances <input type="checkbox"/> ▪ Risk to personal safety <input type="checkbox"/> ▪ Risks to capital/persona; finances <input type="checkbox"/> ▪ Other (please explain below) <input type="checkbox"/> <p>.....</p> <p>.....</p> <p>.....</p>
<p>N. Are there any land use conflict issues with value adding, downstream processing, agritourism affecting your business now? Please elaborate</p>	<p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p>

<p>O. If value adding, downstream processing, agritourism were to increase do you envisage any land use conflict issues affecting your business in the future? Please elaborate.</p>	<p>.....</p>
<p>P. (SQ42) If you have any other comments to make or want to explain anything about an earlier question please elaborate here</p>	<p>.....</p>

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