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**Sent:** Fri, 29 Apr 2022 16:56:19 +1000  
**To:** "Huon Valley Council" <hvc@huonvalley.tas.gov.au>  
**Cc:** "Damian Reardon" <reardonpastoralholdings@gmail.com>  
**Subject:** Representation - Tasmanian Planning Scheme – Huon Valley Draft Local Provisions Schedule (LPS)  
**Attachments:** 8077\_RedSealPlanning\_Huon-LPS\_Submission\_Reardon\_29-April-2022.pdf

Dear Mr Jason Brown  
General Manager

For the attention of the Planning Department.

On behalf of the property owner, please find attached a submission in accordance with Section 35E of the *Land Use Planning and Approvals Act 1993* in relation to land known as Lot 1 Lymington Road, Lymington, specifically:

- PID: 3443659, CT: 204212/1 covers 22 hectares, described as Langdon Hill
- PID: 1922672. CT: 229343/1 covers 11.6 hectares, and
- PID: 1964346, CT: 133699/1 covers 11 hectares,

Kind Regards,

**Trent J. Henderson**

BA(Hons) GCUrbDgn MEP RPIA

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**RED SEAL Urban & Regional PLANNING**

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nipaluna / Hobart, Tasmania

*Red Seal Planning respectfully acknowledge the Traditional Owners of the land, the Muwinina band of the South-East Nation, on which we work and learn, and pay respect to the First Nations Peoples of lutruwita (Tasmania), the Palawa, and their elders, past, present and future.*

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**RED SEAL**  
Urban & Regional Planning

**Huon Valley Local Planning Schedule (LPS)**  
**Submission Section 35E – Land Use Planning and**  
**Approvals Act 1993:**

- Lot 1 Lymington, Road, Lymington, (PID: 3443659, PID: 1922672 & PID: 1964346)

**For: Reardon Consolidated Farms**

BY: TRENT J. HENDERSON

BA(Hons) GCUrbDgn MEP RPIA

Principal Planner

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### Appendix A – Farm Management Plan, by Reardon Consolidated Farms

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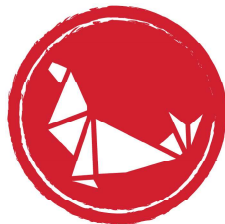
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## Summary

Project:	Huon Valley Local Provision Schedule Planning Submission relating to the land known as Lot 1 Lymington Road, Lymington.
Planning Authority:	Huon Valley Council
Planning Policy:	Section 35E - <i>Land Use Planning and Approvals Act 1993</i>
Current Zoning:	Rural Resource
Proposed Zoning:	Landscape Conservation
Date of Assessment:	April 2022

It is our submission that the decision tree used to determine the delineation of Landscape Conservation Zone and Rural Zone has not examined the existing land use of the site. It is also positioned that the assessment has viewed the site and surrounding area as individual lots, determining that their size, underlying soil quality, and topography of the land, is not agricultural use, and has wrongly been considered not part of the agricultural estate. In doing this the Council has erred to take into consideration lots for farming can be capable of being used for agriculture regardless of ownership.

Therefore, pursuant to Section 35E (3)(b) of the *Land Use Planning and Approvals Act 1993*, the draft LPS should not apply the zone Landscape Conservation in accordance with the provisions of the SPP Part 21, to the land known as:

- PID: 3443659, CT: 204212/1 covers 22 hectares, described as Langdon Hill
- PID: 1922672. CT: 229343/1 covers 11.6 hectares, and
- PID: 1964346, CT: 133699/1 covers 11 hectares,

Instead, the land should be considered for Rural Zone (Part 20 of the SPPs) as this reflects the land use character.

# 1 Introduction

Reardon Consolidated Farms have engaged Red Seal Urban & Regional Planning to review the exhibited documents of the Huon Valley draft Local Provisions Schedule (LPS) in relation to land associated with the farm at Lymington Road, Lymington, specifically land associated with PID: 3443659, PID: 1922672 and PID: 1964346 and the proposal to zone the land Landscape Conservation.

## 1.1 Background

We commend Huon Valley Council (the Council) and its planning staff for the huge quantity of work involved in progressing the LPS to this stage. However, given the extent of work required, it is conceivable that some aspects of the zone mapping are not optimal due to the base data not being specific to each site.

Therefore, pursuant to Section 35E of the *Land Use Planning and Approvals Act 1993* (LUPAA), the following representation is made to assist Council and the Tasmanian Planning Commission (TPC) in implementing zoning by providing onsite clarification for the properties of concern.

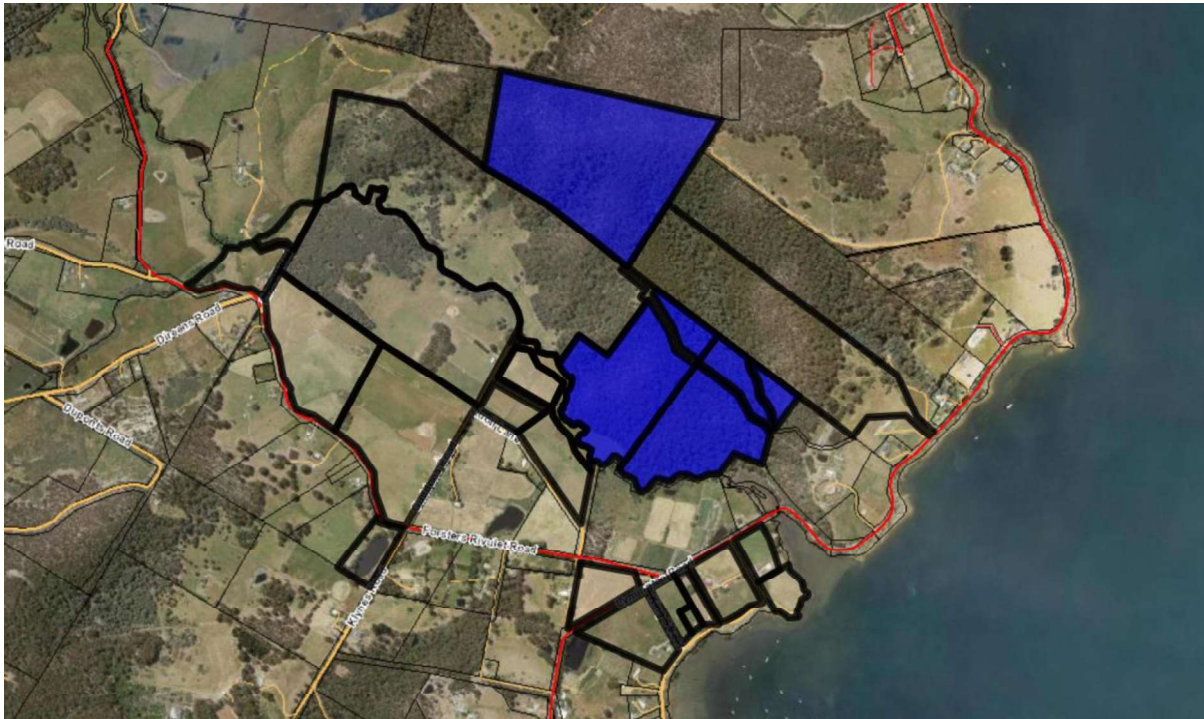
Although most of the farm is to be zoned Rural, the three subject lots are proposed to be zoned 'Landscape Conservation'. However, it is our position that pursuant to Section 35E (3)(b) of LUPAA, the draft LPS should not apply Part 22 Landscape Conservation Zone of the SPPs to the area of land specified, and it should remain zoned Rural Part 20 of the LPS.

## 1.2 Site

The specific area of concern is associated with three lots that form part of a 160-hectare farm (see Figure 1.1a below), lots are in particular:

- PID: 3443659, CT: 204212/1 covers 22 hectares, described as Langdon Hill
- PID: 1922672. CT: 229343/1 covers 11.6 hectares, and
- PID: 1964346, CT: 133699/1 covers 11 hectares.

The government property report associates the use of the site as grazing.



**Figure 1.1a – The farm involves the outlined lots above – the three lots in question are coloured blue, Lyminster. (Source LIST Map)**

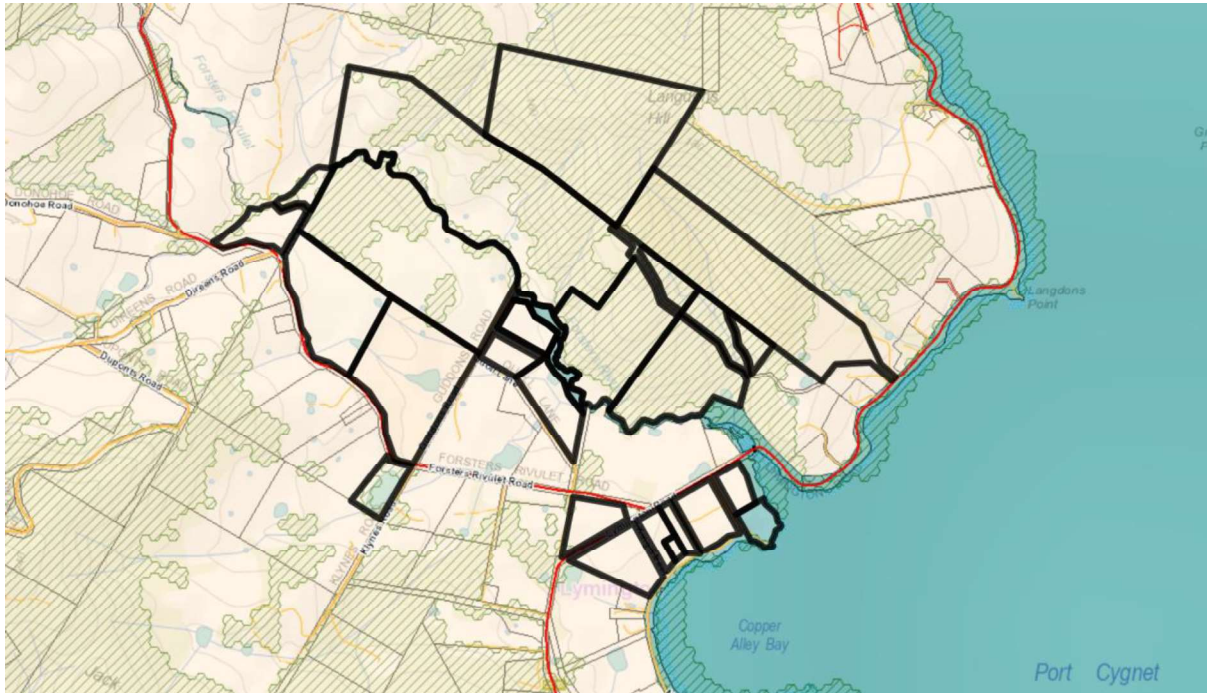
### 1.3 Surrounding

Under the current planning provisions, the site is Rural Resource Zone and is surrounded by Rural Resource Zone, except along parts of Forsters Rivulet, which is zoned Environmental management Figure 1.3a.

In addition to being zoned Landscape Conservation, the entire property is proposed to be subject to the Priority Vegetation Area of the Natural Assets Code.

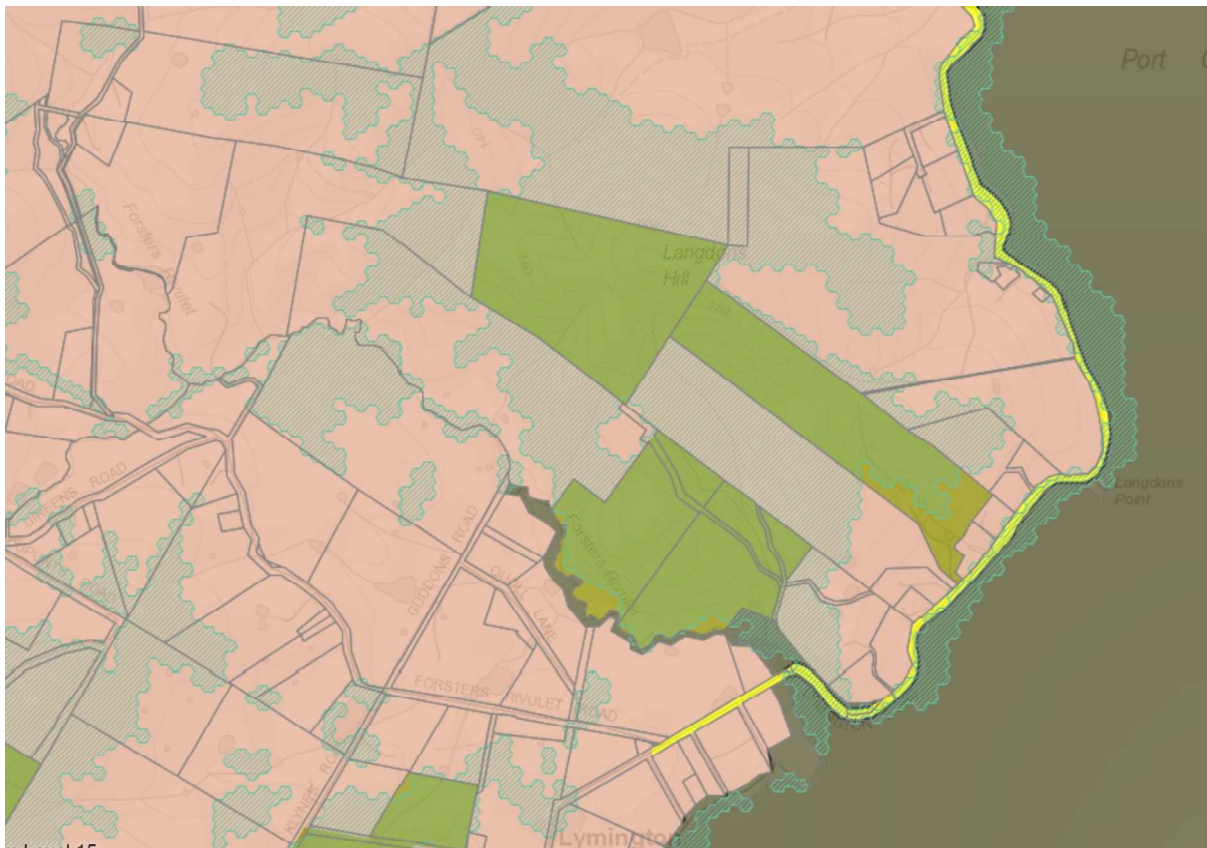
No scenic overlays currently apply or are proposed at this stage.

The Landslide Hazard overlays are to transition across to the LPS in the same alignment.



**Figure 1.3a – Current Interim Planning Scheme Zoning, the site is zoned Rural Resource (light brown) and is subject to the Biodiversity Code (hatched). (Source LIST Map)**

Under the LPS the three lots are to be zoned Landscape Conservation.



**Figure 1.3b – Huon Valley LPS – the subject lots are to be zoned Landscape Conservation (green) with the surrounding area zoned Rural (light brown). Additionally, the sites and farm are also subject to the Priority Vegetation Area of the Natural Assets Code (green hatched). (Source Huon Valley Council LPS Draft Interactive Map)**

## 2 Current Planning Provisions

### 2.1 The Property and Operations

As outlined in Appendix A, the agri-business *Reardon Consolidated Farms* is a family run organisation that has been operating on the site for five generations since the 19th century.

The farm is split into three businesses that are based around three cattle herds and breeds:

- *Reardon Pastoral Holdings* (Damian Reardon) – Speckled Park Cattle,
- *JT & J Reardon* (John Reardon) – Black Angus Cattle,
- *Chassis Investments* (Brian Reardon) – Hereford Cattle,

Despite the three groups, the property is managed as a single entity, with the farm operating holistically over numerous titles that are owned by various other Reardon family members, who all have interest in the agricultural business.

Because of the various ownerships of titles, Council's "decision tree" may be considering the area not as one individual farm but as numerous individual properties with no relationship to each other. However, essentially the operation of this business is putting in practice what the *Agricultural Land Mapping Project - Background Report*<sup>1</sup> for the rural and agricultural zones is seeking to occur; that is, farming operations over titles regardless of the ownership of land.

The Reardon family has been farming this land since the 1800s. The lots in question, otherwise known as the bush blocks on the farm, are only grazed by cattle during the winter months. The grazing cattle are pregnant breeder cows as the property is de-stocked of the previous seasons' yearlings.

By locating the lighter number on the bush blocks, the Reardons provide shelter for their livestock from the cold of the wet valley floor during the winter months. This helps avoid foot rot and cattle losing condition on the damp, often waterlogged, frosty paddocks. Winter rotational razing also provides the pasture paddocks a rest that helps to improve the pasture growth rate and sustainability of the soil and thus the long-term productivity of the farm.

Grazing in winter assists reducing vegetation fuel load, minimising the risk of intense bushfires during summer. The other advantage of winter grazing within the bush blocks is that it provides access to ongoing gorse management.

Again, seasonal grazing of the lots has been practised for several generations with the aerial imagery taken prior to the 1967 bushfires showing where cattle grazing occurred; although, the process is much more sustainable in recent years as it is now barely noticeable from the aerial image.

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<sup>1</sup> Macquarie Franklin, "Agricultural Land Mapping Project: Identifying land suitable for inclusion within the Tasmanian Planning Scheme's Agricultural Zone: Background Report," (Hobart, Tasmania: Planning Policy Unit, 2017).



## 2.2 Impact of the Site & Surrounding Analysis

The Tasmanian State Planning Scheme (SPP) adopts Tasmanian *State Policy on the Protection of Agricultural Land 2009*, to define Agricultural land:

*“...means all land that is in agricultural use or has the potential for agricultural use, that has not been zoned or developed for another use or would not be unduly restricted for agricultural use by its size, shape and proximity to adjoining non-agricultural uses”.*

Agricultural use:

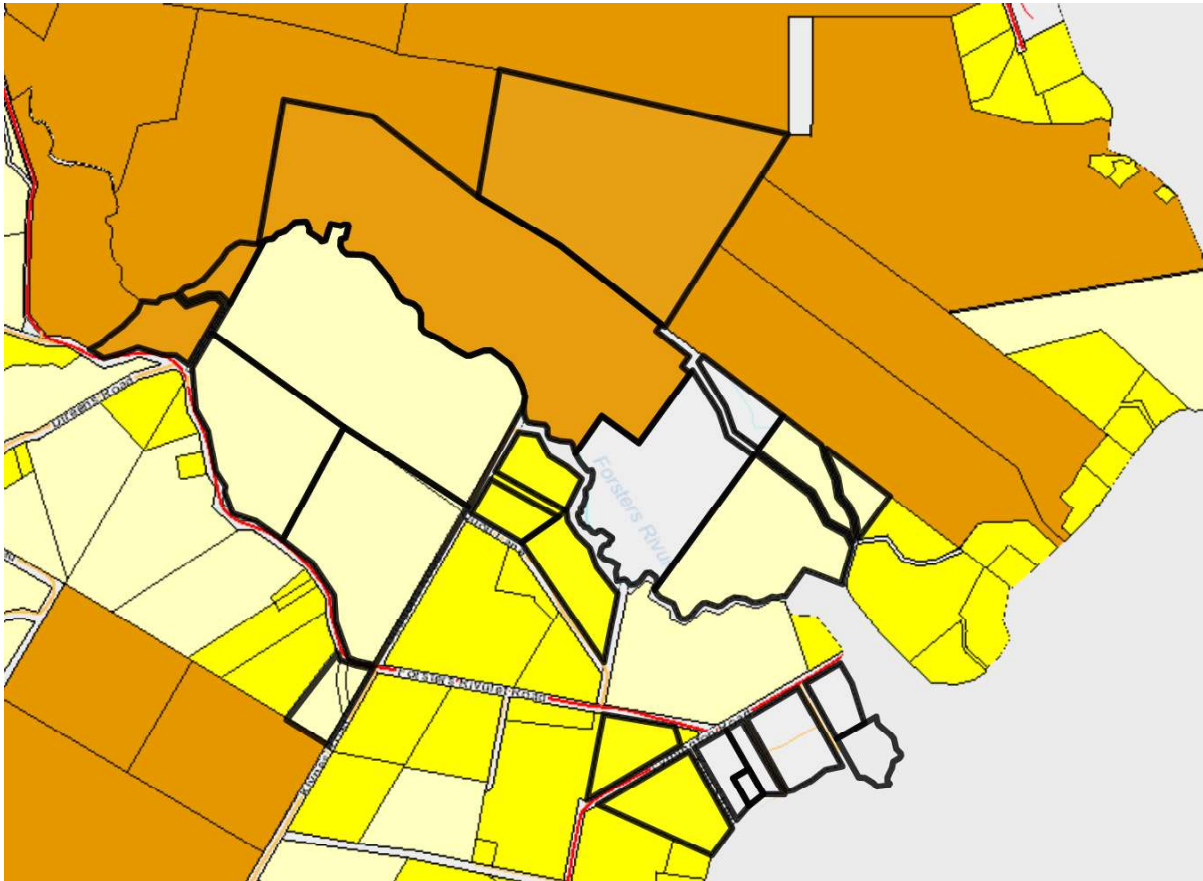
*“...means use of the land for propagating, cultivating or harvesting plants or for keeping and breeding of animals, excluding domestic animals and pets. It includes the handling, packing or storing of plant and animal produce for dispatch to processors. It includes controlled environment agriculture and plantation forestry.”*

Therefore, the purpose of the Rural and Agricultural zones is to prioritise primary industry related business, specifically farming and to minimise conflict with such activities.

This is repeated under the current Interim Planning Scheme’s purpose for Rural Resource and Significant Agriculture Zones. In accordance with this definition, the *keeping and breeding of animals* is an agricultural use and is therefore classified as Resource Development under the Part B.8 Clause 8.2 of the current Scheme, which is the same under Clause 6.2 of the SPP.

In accordance with the Use Tables of the Rural Resource Zone and the Rural Zone, Resource Development is a “No Permit Required” use class, meaning that the use of the land for cattle grazing does not require planning approval under the provisions of LUPAA. It is noted that this was consistent with the previous Port Cygnet Planning Scheme 1988, which had “land used for farming operations” as “Permitted as of Right Development” being a use that could operate without a permit from the Planning Authority.

However, by proposing to zone the three lots Landscape Conservation in the LPS, resource development is a discretionary use class; therefore, it is an activity that has gone from not requiring any form of authorisation from the Planning Authority to being an activity potentially subject to a refusal under Clause 22.3.3 of the LPS. This is even though the *State Agricultural Land Mapping Project - Background Report* has suggested that the land is “Potentially Unconstrained” which generally is assigned to the Agricultural Zone (Figure 2.2a).



**Figure 2.2a – the northern lots to the farm marked as potentially unconstrained Agricultural Land Mapping Project - Background Report. (Source LIST Map)**

It is acknowledged that existing use rights would occur if the land was zoned Landscape Conservation pursuant to Section 12 of LUPAA; however, this does not reflect the dominate use of the land. Additionally, if there is a situation where it is not suitable to graze cattle for consecutive winters for various reasons (bushfire, drought, destocking due to quarantine), then under the new zoning there is concern that the farm would have to undertake a discretionary development application with no guarantee of approval to undertake a practice that has occurred for over a century on the land.

Additionally, it is also noted that the land is subject to the Natural Assets Code, which is an additional impedance on the ability to farm in accordance with the seasonal rotational grazing in practice. This is a particular concern in relation to the proposed Biodiversity Offsets intended to be brought in by Council<sup>2</sup>, which would further hamper the ability to farm.

It is observed that grazing has occurred on the site for a significant period and yet does not appear to have hindered the established native vegetation community mapped under TasVege as a combination of *Eucalyptus obliqua* dry forest or *Eucalyptus globulus* dry forest and woodland. *Eucalyptus globulus* dry forest and woodland is a listed vegetation community listed under the Schedule SA of the *Nature Conservation Act 2002*. There does not appear to be any detrimental impact on the woodland from the seasonal grazing.

<sup>2</sup> HVC, "Supporting Report for the Huon Valley Draft Huon Valley Local Provisions Schedule (LPS)," (Huonville: Huon Valley Council, 2021), pp. 80-81.

## 2.3 LPS Zone Purpose Statements

In regard to the Purpose Statements for the Landscape Conservation and Rural Zones within the LPS, the Rural Zone is more consistent with the characteristics of the land and the historical use of the site.

Although the site was identified as unconstrained agricultural within the Land Suitable for Agriculture Zone, the native vegetation and topography means it is not suitable for transition to Agriculture Zone. Therefore, based on the current land use and the fact that this site is being used for an agricultural use shown by its very longevity to be sustainable, it is submitted that the LPS has erred in zoning this site Landscape Conservation.

As the sites are being used for agricultural use then the land by definition is agricultural land and therefore the zoning is more appropriate to be either Agriculture or Rural under the new Scheme. Additionally, the Agriculture or Rural zones' Purpose Statements are more consistent with the current and historic use of the land, which is in turn consistent with the *State Policy on the Protection of Agricultural Land 2009*.

However, based on the surrounding land proposed to be Rural within the LPS the sites should also be zoned Rural under the new planning scheme.

## 3 Conclusion

The subject land under the LPS is proposed to be zoned Landscape Conservation; however, this does not factor in the established historic agricultural use of the site.

The site is a component of a family operated cattle grazing business that has undertaken agricultural use on the site for generations. Zoning the land Landscape Conservation is inconsistent with the current and historic use of the land, and the *State Policy on the Protection of Agricultural Land 2009*.

Pursuant to Section 35E (3)(b) of the *Land Use Planning and Approvals Act 1993*, the draft LPS should not apply the zone Landscape Conservation in accordance with the provisions of the SPP Part 22 and the *Guidelines No.1 Local Provisions Schedule (LPS): zone and code application*, the land known as:

- PID: 3443659, CT: 204212/1 covers 22 hectares, described as Langdon Hill
- PID: 1922672. CT: 229343/1 covers 11.6 hectares, and
- PID: 1964346, CT: 133699/1 covers 11 hectares,

instead, the land should be considered for Rural Zone (Part 20 of the SPPs) as this reflects the land use character.

## Reference

- AK. "Decision Tree and Guidelines for Mapping the Agriculture and Rural Zones." edited by Michael Tempest and Astrid Ketelaar, 30. Tasmania: AK Consultants, 2018.
- Franklin, Macquarie. "Agricultural Land Mapping Project: Identifying Land Suitable for Inclusion within the Tasmanian Planning Scheme's Agricultural Zone: Background Report." 27. Hobart, Tasmania: Planning Policy Unit, 2017.
- HVC. "Supporting Report for the Huon Valley Draft Huon Valley Local Provisions Schedule (LPS)." 145. Huonville: Huon Valley Council, 2021.
- TPC. "Guideline No. 1 Local Provisions Schedule (Lps): Zone and Code Application." edited by Tasmanian Planning Commission (TPC), 56. Hobart, Tasmania: Tasmanian Planning Commission, 2018.

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## **Appendix A – Farm Management Plan**

Prepared by: Reardon Consolidated Farms

## Introduction

Farming and grazing practises have been conducted by the Reardon family continuously for over 100 years in Lymington. The original farm has expanded since its initial inception back in the 1800's and is currently split between 3 main business entities, comprising grazing and horticulture activities across over 400 acres. This management plan seeks to clarify the farming practises completed by the 3 entities, in particular the cooperation regarding livestock rotations, machinery use and weed management across the Lymington region. This management plan also seeks to outline the importance of the rural zoning of the existing bush runs across Langdons hill in allowing effective rotation management of existing pastures, fire risk management for the region, protection from cattle by risk of flood and shelter for livestock over winter months. The family considers the proposed change of zoning from Rural to Landscape Conservation a restraint of trade for the farming business entities affected.

## Context

4<sup>th</sup> and 5<sup>th</sup> generation family members continue to run the Reardon family farm in Lymington with figures 1 and 2 outlining the family history in the region and the current land holdings under management for;

- Reardon Pastoral Holdings (Damian Reardon) – Speckled Park Cattle
- JT & J Reardon (John Reardon) – Black Angus Cattle
- Chassis Investments (Brian Reardon) – Hereford Cattle

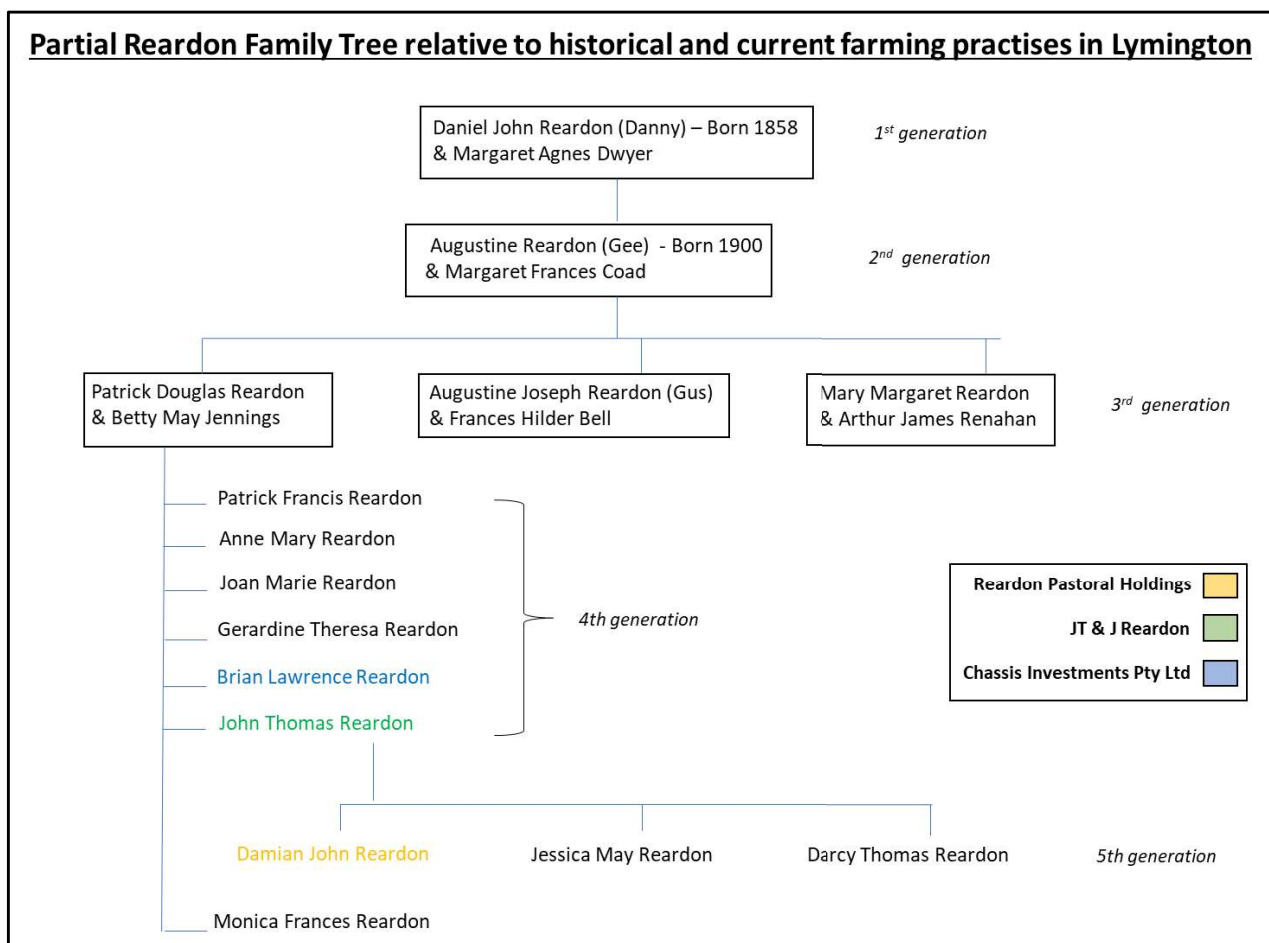


Figure 1 – Reardon family tree relative to ongoing farming practises in Lymington

# Reardon Consolidated Farms - Farm Management plan

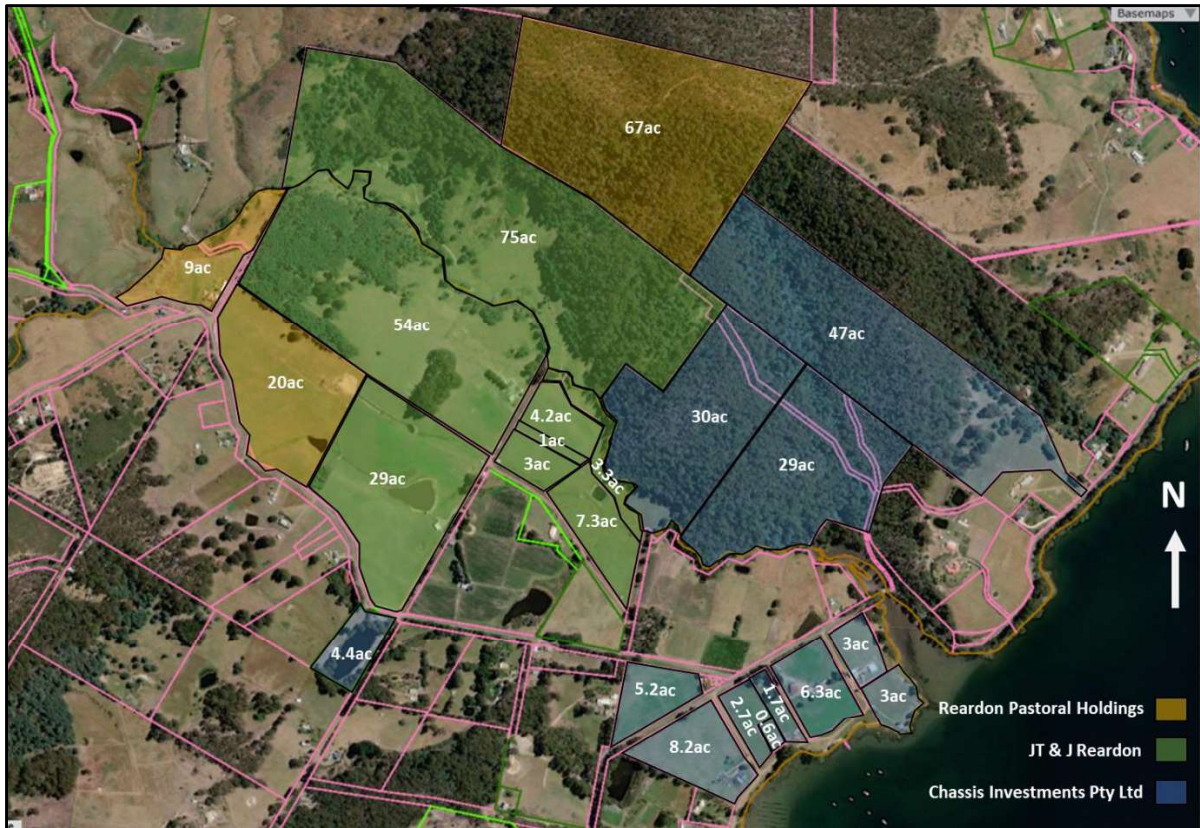


Figure 2 – Titles under management by Reardon Family farming business entities

The current landholdings for the 3 Reardon family farming business entities are tabled below in Figure 3

Reardon Consolidated Farms				
Business Entity	Company Director	PIC Number	Paddock / Block / Title Name	Acres of farm land under management
Reardon Pastoral Holdings	Damian Reardon	MDPC0918	Langdons cattle run	67
Reardon Pastoral Holdings	Damian Reardon	MDPC0918	Joses	9
Reardon Pastoral Holdings	Damian Reardon	MDPC0918	Gussys top paddock	20
JT & J Reardon	John Reardon	MIPC0183	Margrets	75
JT & J Reardon	John Reardon	MIPC0183	Coads	54
JT & J Reardon	John Reardon	MIPC0183	Gussys bottom paddock	29
JT & J Reardon	John Reardon	MIPC0183	Coulters #1	4.3
JT & J Reardon	John Reardon	MIPC0183	Coulters #2	1
JT & J Reardon	John Reardon	MIPC0183	Coulters #3	3
JT & J Reardon	John Reardon	MIPC0183	Hut Paddock	7.3
JT & J Reardon	John Reardon	MIPC0183	Forsters Rivulet Crown Lease	3.3
Chassis Investments	Brian Reardon	MHPC0181	Big Dam	4.4
Chassis Investments	Brian Reardon	MHPC0181	Shop Paddock	5.2
Chassis Investments	Brian Reardon	MHPC0181	Rattrays block lease	8.2
Chassis Investments	Brian Reardon	MHPC0181	Meat room paddock	1.7
Chassis Investments	Brian Reardon	MHPC0181	Church	0.6
Chassis Investments	Brian Reardon	MHPC0181	Under the pines	2.7
Chassis Investments	Brian Reardon	MHPC0181	front paddock	3
Chassis Investments	Brian Reardon	MHPC0181	house paddocks	6.3
Chassis Investments	Brian Reardon	MHPC0181	station paddock crown lease	3
Chassis Investments	Brian Reardon	MHPC0181	Top hill run	30
Chassis Investments	Brian Reardon	MHPC0181	lower hill run	29
Chassis Investments	Brian Reardon	MHPC0182	Prestnells block lease	47
<b>Subtotals</b>			<b>Family Total</b>	<b>414</b>
Business Entity	Acres under management	Current stock numbers		
Reardon Pastoral Holdings	96	14		
JT & J Reardon	176.9	68		
Chassis Investments	141.1	26		

Figure 3 – Land under management for Reardon farming activities in Lymington

Current aerial photos fail to show the value of the ongoing understory grazing practises across the titles considered in the Local Provisions Schedule (LPS), a review of historical aerial imagery from before the 1967 bushfires shows significant grazing areas across the titles in question, which remain in place today. These areas of ongoing understory grazing are considered to exceed 20% of each title for consideration under Rural zoning.

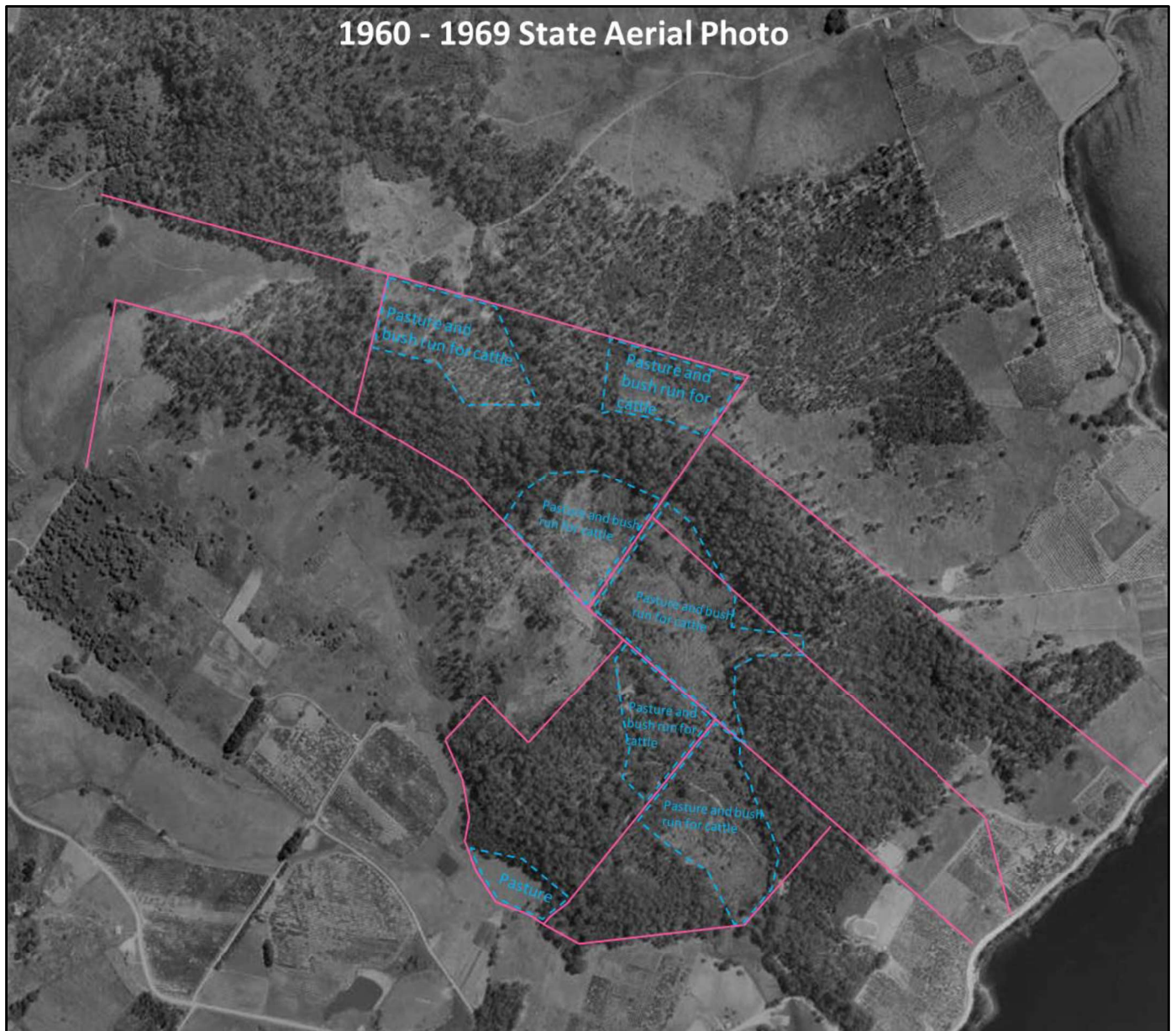


Figure 4 – Historical aerial imagery from before the 1967 bushfire showing areas of grazing and cropping across Langdon's hill.



#### 4 Reasons why the ongoing use of the Bush Runs across Langdon's Hill and understory grazing are considered important to the Reardon farming business entities

- Flood risk – large scale flooding has not been observed through the valley for the last 30 years. Historical flooding along Forsters Rivulet has posed a risk to cattle grazing along low lying areas. Recent examples of damaging floods across NSW and QLD has highlighted the importance of having higher ground for livestock to retreat into during heavy rain events.



Figure 5 - Forsters Rivulet in small flood after 60mls of rain in a 24hr period in 2019 (1.5mH of rise)

- Weed Management – Over the past 2 decades the introduction of noxious weeds such as Gorse have taken hold across much of the Huon valley. In order to eradicate patches of Gorse it is necessary to cut small access tracks into the affected regions using machinery, with targeted spraying completed using tractors owned by the family.



Figure 6 – Ongoing Gorse management in understory grazing areas.

- Bush fire management – ongoing cattle grazing of the understory continues to maintain lower undergrowth levels and reduce fuel loads. Observations from nearby properties in the cygnet area without understory grazing show concerning levels of fuel load, increasing the severity of bushfire impacts on the ecosystem.



Figure 7 – Access to bush run for understory grazing

- Cattle growth rates and pasture rotation over winter months – during winter months, paddocks through the Lymington valley often become water logged and boggy, particularly in low lying areas damaging the pasture and limiting spring growth. The use of understory grazing from (traditionally from May to September) to relieve stress on typical cattle grazing areas has shown a two fold improvement for each business entity.
  1. Cattle stay warmer in the bush and hold their condition much better. Previous trials on the farm have shown that a 15 to 20% drop in cattle weight can occur over the winter months when cattle are left exposed to the elements, reducing growth rates and profitability.
  2. Observations have consistently shown that pasture rotation over the winter months to understory grazing through sections of the existing bush run has shown considerable improvement in grass growth rates across low lying areas and hay paddocks that traditionally become water logged in the winter months. The resulting growth rates of the pasture through late winter and early spring are much improved in paddocks that have been allowed to rest. This has been observed to increase hay or silage yield by up to 30% between typical seasons.



Figure 8 – understory grazing by cattle across existing bush runs over Langdon's hill



Figure 9 – Understory grazing by cattle across existing bush runs over Langdon’s hill. Fallen debris from wind events is cut up and cleaned to prevent injury and maintain understory grasses on an ongoing basis.



Figure 10 – Cooperation between family farming entities (Angus bull over Hereford Cattle)



Figure 11 – Speckled park vealers grazing along boundary of black angus cattle



Figure 12 – Overview of Lymington valley and grazing areas

### Concluding remarks

We trust that this further information helps the Huon Valley planning department understand the farming practises undertaken by the Reardon family over the last 5 generations in Lymington and the importance of the ongoing understory grazing and farming practises to each business entity. In particular the existing uses of the bush runs for cattle across the 3 titles forms a key part of the business plan and pasture rotation plan for Reardon Pastural Holding and Chassis Investments Pty Ltd.

### Reardon Family Titles



Figure 13 – Reardon Family titles currently zoned and used as Rural Resource.

Furthermore all titles in question are currently recognised by the state Land Tax Office, as Primary Production. There is also current crop protection permits across these titles allocated by the Department of Primary Industries, Parks, Water and Environment.

Should the Huon Valley council planning team have any queries they are welcome to reach out to any of the landholders regarding the information presented within.



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