3. Proposed Development

3.1 Development Proposal

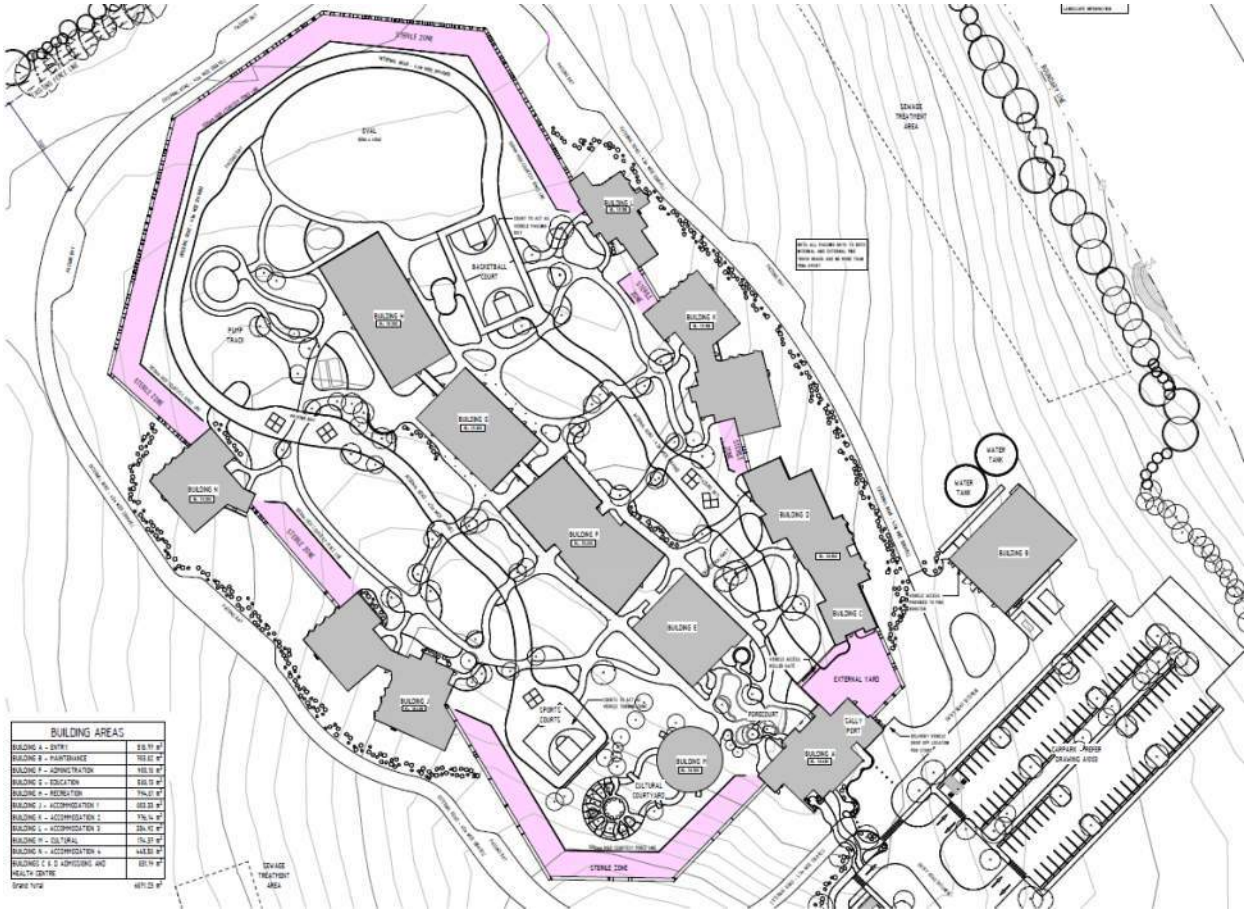
The proposed development involves the construction of a new Youth Justice Facility located at 466 Brighton Road and 36 Rifle Range Road, Pontville. The facility is designed to replace the existing Ashley Youth Detention Centre and will be developed in accordance with the State Government's Youth Justice Blueprint and Commission of Inquiry commitments.

The proposed facility will include:

- 20 residential beds, 2 health beds and 2 orientation beds with capacity for future expansion.
- Medical facilities.
- Support facilities for education and rehabilitation services.
- Administration and operational areas.
- Security infrastructure.
- On-site car parking for 111 spaces, comprising of 12 visitor parking spaces (including 1 disabled space) and 99 staff and government vehicles (including 2 disabled spaces). An additional overflow car park with capacity for approximately 10 spaces is also provided at the northeastern corner of the car park.

The proposed development plans are shown in Figure 6.

Figure 6 Proposed Development Plans



4. Traffic Impacts

4.1 Trip Generation

The traffic generation associated with the proposed development was determined from first principles.

4.1.1 Staff Movements

The facility will accommodate various staff roles across multiple departments including management, operations, security, administration, programs, health services, and education. There will be a total daily staff presence of a maximum of 107 staff members, with an additional 38 staff attending the site during shift changes.

Other vehicle movements include service vehicles (linen, food, etc).

4.1.2 Peak Hour Estimation

Based on the shift patterns, the following peak hour movements are anticipated:

Morning Peak (shift change/business hours commencement):

- Arrival of day shift staff (approximately 55-60 vehicles)
- Departure of night shift staff (approximately 20 vehicles)
- Total peak hour movements: 75-80 vehicles

Afternoon Peak (shift change/business hours conclusion):

- Arrival of evening shift staff (approximately 25-30 vehicles)
- Departure of day shift staff (approximately 55-60 vehicles)
- Total peak hour movements: 80-90 vehicles

4.1.3 Additional Traffic Considerations

Beyond regular staff movements, additional traffic will be generated by:

- Visitor Traffic: Family visits to detained youth
- Service Deliveries: Catering, supplies, and maintenance
- Professional Visits: Legal representatives, case workers, and other support services
- Emergency Services: Occasional access by emergency vehicles

It's estimated these additional movements would generate approximately 10-15 vehicle trips per day, primarily during business hours.

4.1.4 Summary of Daily Traffic Generation

The proposed youth detention facility in Brighton is expected to generate:

- Daily generation 350 vehicle movements per day
- Morning peak hour: ~80 vehicle movements
- Afternoon peak hour: ~85 vehicle movements

These estimates are based on the staffing information, assuming typical vehicle occupancy rates for staff of 1.1 persons per vehicle, acknowledging that some staff may carpool or use alternative transportation.

4.2 Trip Assignment

All traffic will access the site via Rifle Range Road. At the Rifle Range Road junction, all traffic will access the site via left-in/ right-out manoeuvres.

At the Brighton Road/ Rifle Range Road junction, the peak hour turning movements are summarised in Table 1.

Table 1 Brighton Road/ Rifle Range Road Turning Movements

Peak	Left In	Right In	Inward Total	Left Out	Right Out	Out Total
AM Peak	44 vph	21 vph	65 vph	7 vph	13 vph	20 vph
PM Peak	12 vph	5 vph	17 vph	21 vph	47 vph	68 vph

4.3 Traffic Capacity Analysis

The key intersection associated with the proposed development is the Brighton Road/ Rifle Range Road junction. Existing volumes of Rifle Range Road are in the order of 200 vehicles per day, with negligible background traffic growth due to the dead-end nature of the road and limited property access along its length. The existing peak flows of Rifle Range Road are in the order of 20 vehicles per hour.

The increased volume at the junction will be in the order of 350 vehicles per day. The peak increase will be up to 90 vehicles per hour (two-way flow). This peak flow will result in the intersection continuing to operate at a high level of efficiency following the completion of the proposed development.

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4.4 Access Impacts

The proposed development will remove the current access on Rifle Range Road, and reinstate a new driveway access connecting to Rifle Range Road.

The Acceptable Solution A1.2 of Clause C3.5.1 of the Planning Scheme states "*For a road, excluding a category 1 road or a limited access road, written consent for a new junction, vehicle crossing, or level crossing to serve the use and development has been issued by the road authority*".

A new access on Rifle Range Road will therefore require road authority approval from road authority (Council). No written approval has been provided and therefore the proposed access is assessed under the Performance Criteria P1 of Clause C3.5.1 of the Planning Scheme, which states:

> *"Vehicular traffic to and from the site must minimise any adverse effects on the safety of a junction, vehicle crossing or level crossing or safety or efficiency of the road or rail network, having regard to:*
>
> *(a) any increase in traffic caused by the use;*
>
> *(b) the nature of the traffic generated by the use;*
>
> *(c) the nature of the road;*
>
> *(d) the speed limit and traffic flow of the road;*
>
> *(e) any alternative access to a road;*
>
> *(f) the need for the use;*
>
> *(g) any traffic impact assessment; and*
>
> *(h) any advice received from the rail or road authority".*

The following is relevant with respect to the proposed access:

a. Increase in traffic. The facility is estimated to generate up to 280 vehicles per day, with a peak of up to 70 vehicles per hour. This level of traffic generation can be accommodated safely and efficiently with appropriate redesign.

b. Nature of traffic. The traffic will predominantly consist of light vehicle traffic (staff and visitors).

c. Nature of road. Rifle Range Road is a local access road. The function of the road is compatible with the access function.

d. Speed limit and traffic flow. Rifle Range Road has a speed limit of 50-km/h near the access and has an average daily traffic volume of approximately 200 vehicles per day. The traffic flow conditions of Rifle Range Road are compatible with the access that will service the facility.

e. Alternative access. Alternative access is available at the site's connection to Brighton Road. It was deemed more appropriate to utilise an existing road junction.

f. Need for use. The access is required to service the transport requirements associated with the proposed facility.

g. Traffic impact assessment. This report documents the findings of a traffic impact assessment.

h. Road authority advice. Council (as road authority) require a TIA to be prepared for the proposed development.

Based on the above assessment, the development meets the requirements of Performance Criteria P1 of Clause C3.5.1 of the Planning Scheme.

4.5 Number of Accesses

The Acceptable Solution A1 of Clause C2.6.3 of the Planning Scheme states "*the number of accesses provided for each frontage must: (a) be no more than 1; or (b) be no more than the existing number of accesses, whichever is greater*".

The proposed development will rely upon a single access on Rifle Range Road. The subject site will retain the existing access on Brighton Road, however this will be for rural use and not available for the facility.

The Acceptable Solution A1 of Clause C2.6.3 of the Planning Scheme is met.

4.6 Access Design

The proposed development will gain vehicular access via Rifle Range Road, which intersects Brighton Road at a simple T-junction. The intersection and adjoining road network have been assessed in accordance with *Austroads Guide to Road Design Part 4A – Unsignalised and Signalised Intersections (2021)* and *Guide to Traffic Management Part 6 – Intersections, Interchanges and Crossings (2020)* to determine whether any upgrades are warranted to accommodate the additional traffic generated by the Youth Justice Facility.

It is noted that the proposed development site straddles two municipal areas:

- The access road and internal site works are located within the Southern Midlands Council (SMC) municipality.
- The Rifle Range Road corridor and the Brighton Road / Rifle Range Road junction are located wholly within the Brighton Council municipality.

Accordingly, matters relating to the junction design and Rifle Range Road upgrades fall under Brighton Council's jurisdiction as the relevant road authority, while the internal access connection within the site lies within Southern Midlands Council area of responsibility.

4.6.1 Traffic Volumes and Turning Movements

Brighton Road currently carries approximately 2,000 vehicles per day with peak-hour volumes of around 200 vehicles per hour, while Rifle Range Road carries around 200 – 300 vehicles per day. The proposed Youth Justice Facility is expected to add up to 350 vehicle movements per day, including peak-hour two-way flows of approximately 80–90 vehicles per hour.

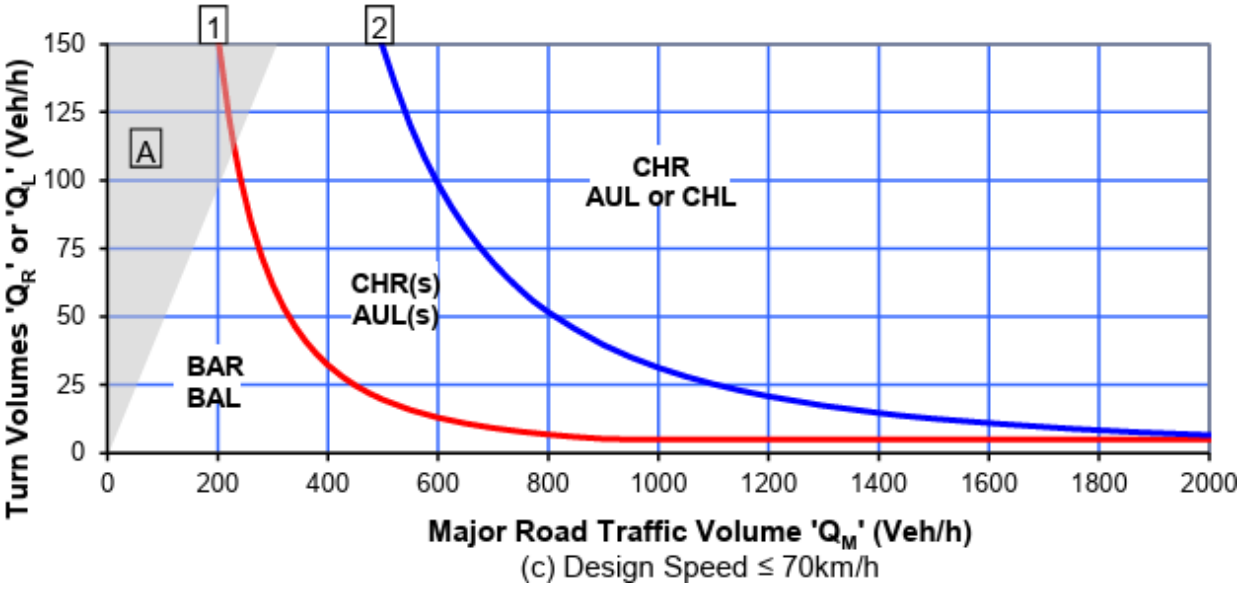
Of this total, right-turns from Brighton Road into Rifle Range Road are anticipated to be in the order of 20 – 25 vehicles per hour, inclusive of both existing and development-related traffic.

4.6.2 Austroads Assessment

According to Figure 5.5 of *Austroads Part 4A* (Warrants for Right-Turn Treatments on Major Roads, reproduced in Figure 7), the combination of a 60 km/h operating speed, 200 vph on the major road, and fewer than 25 vph right-turns lies within the Basic Auxiliary Right-turn (BAR) region, well below the threshold at which a Channelised Right-turn Lane (CHR) or more extensive treatment is required. This indicates that the existing simple-T layout is sufficient from a capacity and safety perspective.

The posted speed environment of 60 km/h and the semi-urban setting promote a high level of driver awareness approaching the junction, with low approach speeds and good sight distance. Observed 85th-percentile speeds confirm the design assumption of 60 km/h, giving a Safe Intersection Sight Distance (SISD) requirement of 114 metres. The available sight distance is approximately 120 metres to the south and more than 200 metres to the north, comfortably satisfying Austroads criteria.

Figure 7 Austroads Warrants for Turn Lanes



4.6.3 Implementation and Environmental Constraints

A detailed design review by Pitt & Sherry (October 2025) examined the feasibility of constructing a BAR treatment at this junction. The investigation identified several **significant constraints** that render such a treatment impractical

- Heritage impacts: The eastern side of Brighton Road adjoins St Mark's Anglican Church and Graveyard, while the western side adjoins the heritage-listed Brooksby property. Any widening to

provide a BAR would encroach into the Brooksby property, affecting its curtilage and screening vegetation.

- Topographic limitation: Brighton Road is in cut along its western side. Widening would require excavation of the existing cutting or construction of a retaining wall, both extending beyond the property boundary.
- Service relocation: A DN200 cast-iron water main runs parallel to the western verge and would require relocation into a widened verge to maintain connection to Rifle Range Road.
- Property acquisition and vegetation loss: Both a widened cut or retaining-wall option would extend into private land and require removal of mature trees providing landscape screening.
- Cost and benefit: The combination of heritage, geotechnical, and service-relocation constraints would lead to substantial construction costs that are disproportionate to the modest level of right-turn demand.

The junction currently operates safely and efficiently, with **no recorded crashes** in the most recent five-year dataset. Post-development volumes remain well within capacity, and the modest increase in right-turn demand can be accommodated under **gap-acceptance behaviour** without delay or queuing issues. The 60 km/h environment and urban-rural transition promote high driver awareness.

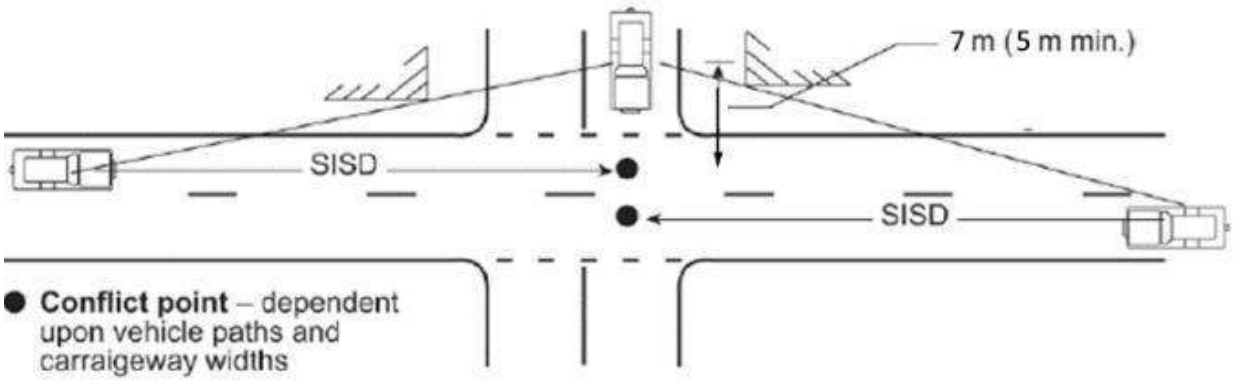
Taking into account the Austroads warrant assessment, traffic volumes, and Pitt & Sherry's engineering review of physical constraints, provision of a BAR treatment is not feasible nor warranted. The existing simple-T configuration provides safe and efficient operation for the projected development traffic.

4.7 Sight Distance

Austroads Part 4A provides the sight distance requirements for road junctions. The existing junction of Rifle Range Road with Brighton Road was assessed against Austroads sight distance requirements.

Safe Intersection Sight Distance (SISD) is the minimum sight distance which should be provided on the major road at any intersection. SISD is measured along the carriageway from the approaching vehicle to the conflict point; the line of sight having to be clear to a point 7.0 metres (5.0 metres minimum) back along the side road from the conflict point as shown in Figure 8.

Figure 8 Austroads SISD Requirements



A small sample of vehicle speeds were obtained for vehicles travelling along Brighton Road, confirming that the 85th percentile speed of vehicles is equal to the posted speed limit of 60-km/h. The required SISD is therefore 114 metres (with an alerted driver reaction time of 1.5 seconds). The available sight distance is approximately 120 metres to the south of the junction. Sight distance is unrestricted (more than 200 metres) to the north of the junction.

The Austroads SISD requirements are met at the existing junction.

4.8 Pedestrian Impacts

The Acceptable Solution A1 of Clause C2.6.5 of the Planning Scheme addresses pedestrian infrastructure requirements for developments requiring 10 or more car parking spaces. This clause contains two components: A1.1 relating to general pedestrian pathways, and A1.2 relating to accessible pathways for disabled parking spaces.

4.8.1 General Pedestrian Pathways (A1.1)

Acceptable Solution A1.1 of Clause C2.6.5 states:

> *"Uses that require 10 or more car parking spaces must:*
>
> *(a) have a 1m wide footpath that is separated from the access ways or parking aisles, excluding where crossing access ways or parking aisles, by:*
>
> *(i) a horizontal distance of 2.5m between the edge of the footpath and the access way or parking aisle; or*
>
> *(ii) protective devices such as bollards, guard rails or planters between the footpath and the access way or parking aisle; and*
>
> *(b) be signed and line marked at points where pedestrians cross access ways or parking aisles".*

Assessment of A1.1 Compliance:

(a) Footpath separation requirements:

The car park design incorporates pedestrian pathways with the following characteristics:

- Pedestrian paths are provided along the front of all parking spaces in both the visitor parking area and staff parking areas.
- The pedestrian paths have a minimum width exceeding 1 metre.
- The paths are located at the front edge of parking spaces, positioning them more than 2.5 metres from the parking aisles, thereby satisfying requirement (a)(i).
- This separation distance ensures pedestrian safety by providing adequate clearance from vehicular traffic in the aisles.

(b) Crossing points:

- A central marked pedestrian crossing is provided through the two aisles of the staff parking area.
- This crossing point will be appropriately signed and line marked in accordance with AS2890.1 and Australian Standards for pedestrian crossing treatments.
- The crossing provides safe pedestrian connectivity between different sections of the parking area.

4.8.2 Accessible Pedestrian Pathways (A1.2)

Acceptable Solution A1.2 of Clause C2.6.5 states:

> *"In parking areas containing accessible car parking spaces for use by persons with a disability, a footpath having a width not less than 1.5m and a gradient not steeper than 1 in 14 is required from those spaces to the main entry point to the building".*

Assessment of A1.2 Compliance:

The development provides 3 accessible parking spaces (2 staff disabled spaces and 1 visitor disabled space) and incorporates dedicated accessible pedestrian infrastructure as follows:

(a) Footpath width:

- The pedestrian footpath connecting the accessible parking spaces to the main building entry has a width of 1.5 metres, meeting the minimum requirement.
- This width provides adequate clearance for wheelchair users and mobility aids.

(b) Footpath gradient:

- The accessible pedestrian path has been designed with a gradient not exceeding 1 in 14 (7.1%), complying with the maximum gradient requirement.
- The relatively flat topography of the site facilitates compliance with gradient requirements.

(c) Connectivity:

- The accessible pathway provides direct connectivity from all accessible parking spaces to the main entry point of the facility.
- The pathway is separated from vehicular traffic areas by more than 2.5 metres, ensuring pedestrian safety.
- The path design incorporates appropriate tactile indicators and accessible design features in accordance with Australian Standards.

4.8.3 Pedestrians Conclusion

The pedestrian infrastructure within the car parking areas satisfies the requirements of both Acceptable Solution A1.1 and A1.2 of Clause C2.6.5 of the Planning Scheme. The design provides safe, accessible, and compliant pedestrian connectivity throughout the parking areas and ensures appropriate access for all users, including persons with disabilities.

4.9 Road Safety Impacts

No significant road safety impacts are foreseen for the proposed development. This is based on the following:

- The surrounding road transport network is capable of absorbing the estimated traffic generation of the developed development. The peak traffic generation of the development is estimated to be up to 60 vehicles per hour. The operational efficiency of the existing junction arrangement will continue to operate at a high level of efficiency as a result of the proposed development.
- The crash history of the surrounding road network near the subject site does not indicate that there are any specific road safety issues that are likely to be exacerbated by the proposed development.

4.10 Construction Impacts

The construction of the Tasmanian Youth Justice Facility is anticipated to take approximately 18 months to complete. During this period, the construction activities will generate moderate traffic generation, including heavy vehicle movements.

4.10.1 Construction Vehicle Access

Construction vehicles, including frequent heavy vehicle movements, will access the site via two primary routes:

- Rifle Range Road junction - Heavy vehicles will utilise the existing Brighton Road/ Rifle Range Road junction to access the construction site via Rifle Range Road.
- Brighton Road access - Construction vehicles may also utilise the existing site access point directly from Brighton Road, depending on the specific construction requirements and site layout.

The use of both access points will provide flexibility for construction operations while distributing construction traffic to minimise concentrated impacts on any single access route.

4.10.2 Construction Traffic Management

The specific nature and scale of construction activity, including detailed construction vehicle movements, delivery schedules, and construction methodology, are not yet determined as these will depend on the contractor engaged to undertake the construction works.

Given the scale of the development and the anticipated heavy vehicle movements during construction, a comprehensive Construction Traffic Management Plan (CTMP) will be required to be prepared by the contractor prior to commencement of construction activities.

The CTMP should address, but not be limited to, the following elements:

- Detailed construction vehicle routes and access arrangements
- Construction vehicle types, frequencies, and timing
- Traffic control measures during construction activities
- Coordination with road authorities regarding any temporary traffic management requirements
- Measures to minimise impacts on local traffic, residents, and businesses
- Procedures for oversized or overweight vehicle movements (if required)
- Site access protocols and on-site traffic management
- Communication strategies with affected stakeholders

4.10.3 Temporary Traffic Impacts

During the construction period, temporary increases in traffic volumes are anticipated on both Brighton Road and Rifle Range Road. These impacts will be managed through the implementation of the CTMP and will be temporary in nature.

The existing road network has adequate capacity to accommodate construction traffic movements, provided appropriate traffic management measures are implemented in accordance with the approved CTMP.

5. Parking Assessment

5.1 Parking Provision

The facility proposes a total of 111 on-site car parking spaces, comprising of 12 visitor parking spaces and 99 staff car parking spaces. Additional overflow parking is provided at the northeastern end of the car park, with capacity for approximately 10 cars.

The parking layout is shown in Figure 9.

5.2 Planning Scheme Requirements

The Acceptable Solution A1 of NOR-S1.6.6 of the Planning Scheme (Northern Midlands Local Provisions) states:

> *"The number of on-site car parking spaces must be*
>
> *no less than the number specified in Table C2.1, excluding if:*
>
> *(a) the site is subject to a parking plan for the area adopted by council, in which case parking provision (spaces or cash-in-lieu) must be in accordance with that plan;*
>
> *(b) the site is contained within a parking precinct plan and subject to Clause C2.7;*
>
> *(c) it relates to an intensification of an existing use or development or a change of use where:*
>
> > *(i) the number of on-site car parking spaces for the existing use or development specified in Table C2.1 is greater than the number of car parking spaces specified in Table C2.1 for the proposed use or development, in which case no additional on-site car parking is required; or*
> >
> > *(ii) the number of on-site car parking spaces for the existing use or development specified in Table C2.1 is less than the number of car parking spaces specified in Table C2.1 for the proposed use or development, in which case on-site car parking must be calculated as follows:*
> >
> > *(iii) N = A + (C- B) N = Number of on-site car parking spaces required*
> >
> > *(iv) A = Number of existing on site car parking spaces*
> >
> > *(v) B = Number of on-site car parking spaces required for the existing use or development specified in Table C2.1*
> >
> > *(vi) C = Number of on-site car parking spaces required for the proposed use or development specified in Table C2.1.".*

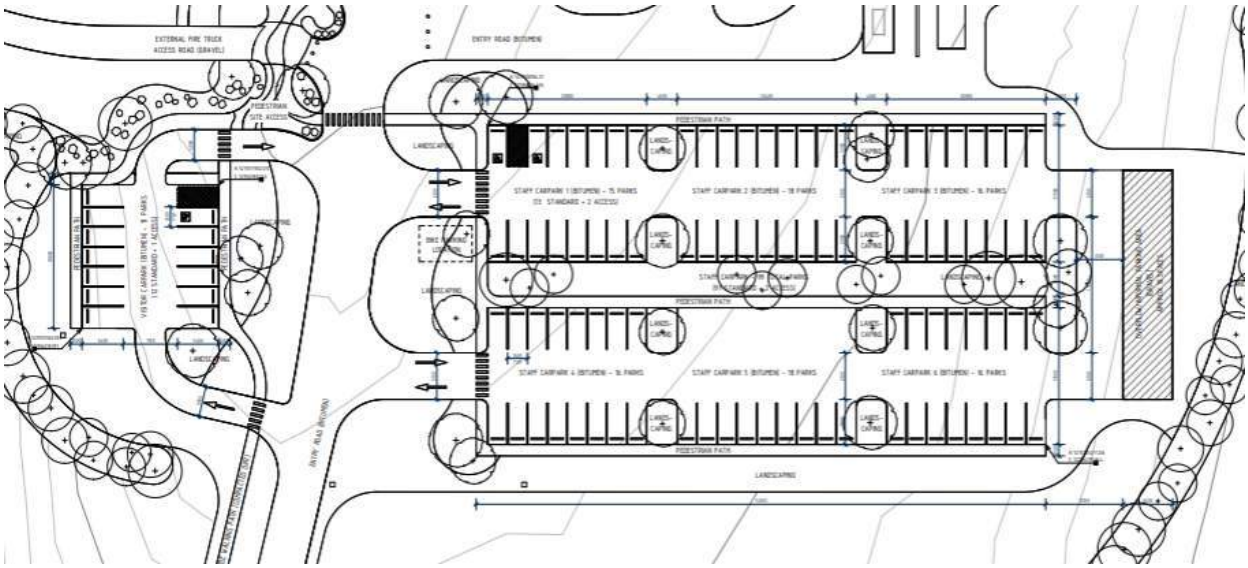
In this case, sub-points (a), (b), and (c) are not applicable.

Table C2.1 defines the facility as 'custodial facility', which requires 1 space per 2 employees plus 1 space per 5 inmates. This is a requirement for 58 spaces based on 107 staff and 24 youths. The provision of 111 spaces therefore satisfies the requirements of Acceptable Solution A1 of Clause C2.5.1 of the Planning Scheme.

5.3 Car Parking Layout

The car parking layout consists of 12 visitor parking spaces located on the western side of the access, and 99 staff and government parking spaces located in two interconnected parking aisles on the eastern side of the access. The parking layout is shown in Figure 9.

Figure 9 Car Parking Layout



The Acceptable Solution A1.1 of Clause C2.6.2 of the Planning Scheme states:

"Parking, access ways, manoeuvring and circulation spaces must either:

(a) comply with the following:

(i) have a gradient in accordance with Australian Standard AS 2890 - Parking facilities, Parts 1-6;

(ii) provide for vehicles to enter and exit the site in a forward direction where providing for more than 4 parking spaces;

(iii) have an access width not less than the requirements in Table C2.2;

(iv) have car parking space dimensions which satisfy the requirements in Table C2.3;

(v) have a combined access and manoeuvring width adjacent to parking spaces not less than the requirements in Table C2.3 where there are 3 or more car parking spaces;

(vi) have a vertical clearance of not less than 2.1m above the parking surface level; and

(vii) excluding a single dwelling, be delineated by line marking or other clear physical means; or

(b) comply with Australian Standard AS 2890- Parking facilities, Parts 1-6".

The car parking was assessed against the requirements of A1.1(b), using AS2890.1 as detailed in the following sections.

5.3.1 Driveway Grade

Section 2.5.3(b) of AS2890.1 states the following regarding the maximum grade of straight ramps:

i. Longer than 20 metres – 1 in 5 (20%) maximum.

ii. Up to 20 metres long – 1 in 4 (25%) maximum. The allowable 20 m maximum length shall include any parts of the grade change transitions at each end that exceed 1 in 5 (20%).

The maximum grade of the access is well below the maximum AS2890.1 requirements.

5.3.2 Parking Grade

Section 2.4.6 of AS2890.1 states that the maximum grades within a car park shall be:

- Measured parallel to the angle of parking 1 in 20 (5%)
- Measured in any other direction 1 in 16 (6.25%)

The grades of the parking spaces are effectively level, thus complying with the AS2890.1 grade requirements.

5.3.3 Parking Dimensions

AS2890.1 classifies the parking spaces as User Class 1A (staff) and User Class 2 (visitors). The dimensional requirements of User Class 2 (the largest sized spaces) is as follows:

- Space width 2.5 metres
- Space length 5.4 metres
- Aisle width 5.8 metres

All dimensions comply with or exceed AS2890.1 requirements.

5.3.4 AS2890.1 Summary

The parking space dimensions generally comply with the requirements of AS2890.1. The Acceptable Solution A1.1(b) of Clause C2.6.2 of the Planning Scheme is satisfied.

5.4 Disabled Parking

The Building Code of Australia (BCA) defines the commercial component of the development as a 'Class 9B' building.

As a Class 9b facility, the proposed Youth Justice Facility must provide accessible parking spaces in accordance with the requirements of the Tasmanian Planning Scheme and the Building Code of Australia (BCA).

The Acceptable Solution A1.1 of Clause C2.6.1 of the Planning Scheme requires that "*the number of accessible car parking spaces for people with disabilities must be not less than the number specified in Table C2.4*" For Class 9b buildings, Table C2.4 typically requires:

- 1 space for every 50 car parking spaces or part thereof for buildings requiring more than 50 parking spaces.

With a total provision of 111 parking spaces, the development is required to provide a minimum of 2 accessible parking spaces.

The provision of 3 disabled parking spaces satisfies the requirements of Acceptable Solution A1 of Clause C2.6.1 of the Planning Scheme.

5.5 Service Vehicle Access

The site will be accessed by various service vehicles, including emergency services (ambulance, fire, etc), and deliveries. A perimeter road is provided around the secured areas of the site for emergency vehicle access.

Swept paths of appropriate service vehicles were tested within the site. The swept paths confirm accessibility for each of the required design vehicles within each section of the site. The main service areas include:

- Delivery point and storage located at the Sallyport/ External Yard.
- Deliveries to Building B.
- Hardstands provided to Building B for fire truck access to booster pump, and to external transformer + generator plant.
- Secure ambulance access is required within the external yard. Access to the area is via the Sallyport. The swept path of this manoeuvre is shown in Figure 11.

5.6 Commercial Parking and Loading Areas

The Acceptable Solution A1 of Clause C2.5.4 of the Planning Scheme states "*a loading bay must be provided for uses with a floor area of more than 1,000m2 in a single occupancy*".

The development incorporates a designated loading area located adjacent to Building A. This area will accommodate delivery vehicles and enable the efficient receipt of various supplies including food provisions, linen services, equipment, and other materials essential to the facility's operations.

Deliveries will also be made to Building B, with vehicles able to enter the building, load/ unload, turn and exit in a forward direction.

This satisfies the requirements of Acceptable Solution A1 of Clause C2.5.4 of the Planning Scheme.

The Acceptable Solution A1 of Clause C2.6.6 of the Planning Scheme states: "*The area and dimensions of loading bays and access way areas must be designed in accordance with Australian Standard AS 2890.2–2002, Parking facilities, Part 2: Off-street commercial vehicle facilities, for the type of vehicles likely to use the site*".

AS2890.2 requires that the loading bay service area is dependent on a combination of:

(a) The maximum size of vehicle likely to use the facility.
(b) The frequency with which vehicles of different classification use the facility; and
(c) Whether the public road from which the facility is accessed is a major or minor road.

The following points are relevant for the site:

- Swept paths of an 8.8 metre truck (Medium Rigid Vehicle, MRV), the design vehicle) were tested through the site, to and from the site access. Swept paths of MRV vehicles within the site are detailed in Figure 10.
- The frequency of access to the site will be several times per day by vehicles of differing sizes.
- Access into the site is via a minor road. This access has been assessed to be appropriate in following sections of AS2890.2

AS2890.2 states that where providing regular service from a minor road, manoeuvring on-street, if permitted by the relevant authority, shall be strictly limited to one reverse movement either onto or off the street, and be subject to determination of both safety and obstruction to other on-street traffic. In this case, no manoeuvring is required in Rifle Range Road, all turning and manoeuvring is achieved within the site.

The loading area is also separated from the main car park and pedestrian accesses, with a dedicated manoeuvring area to facilitate forward entry and exit.

The loading area therefore complies with the requirements of AS2890.2 and thus satisfies the Acceptable Solution A1 of Clause C2.6.6 of the Planning Scheme.

Figure 10 MRV Swept Path Loading Area Access

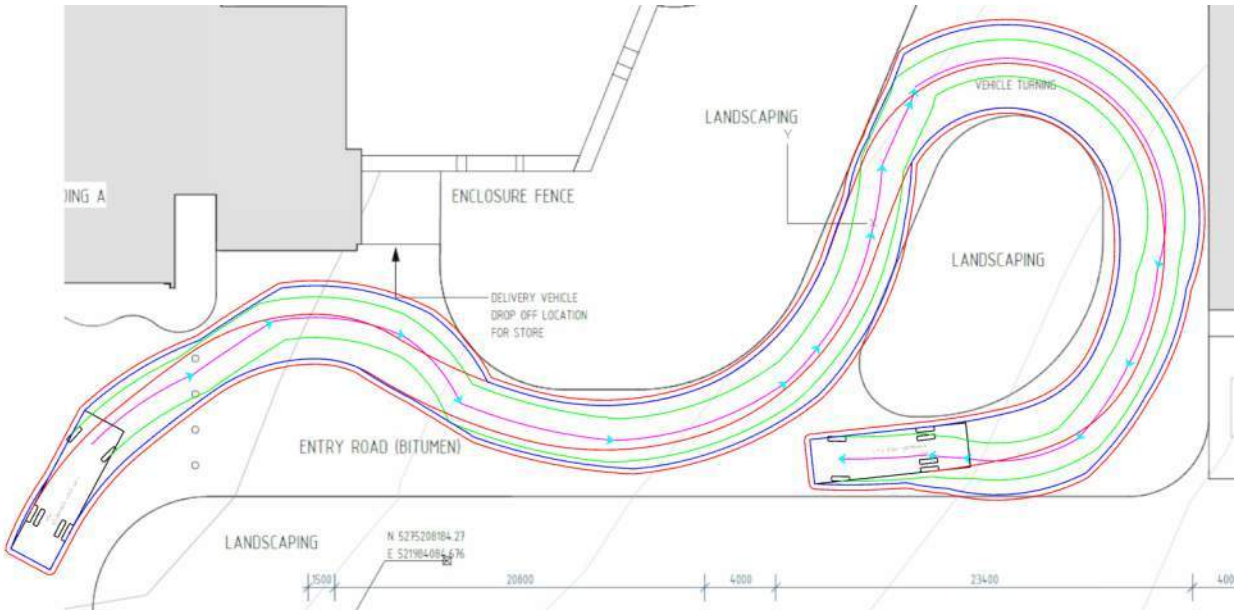
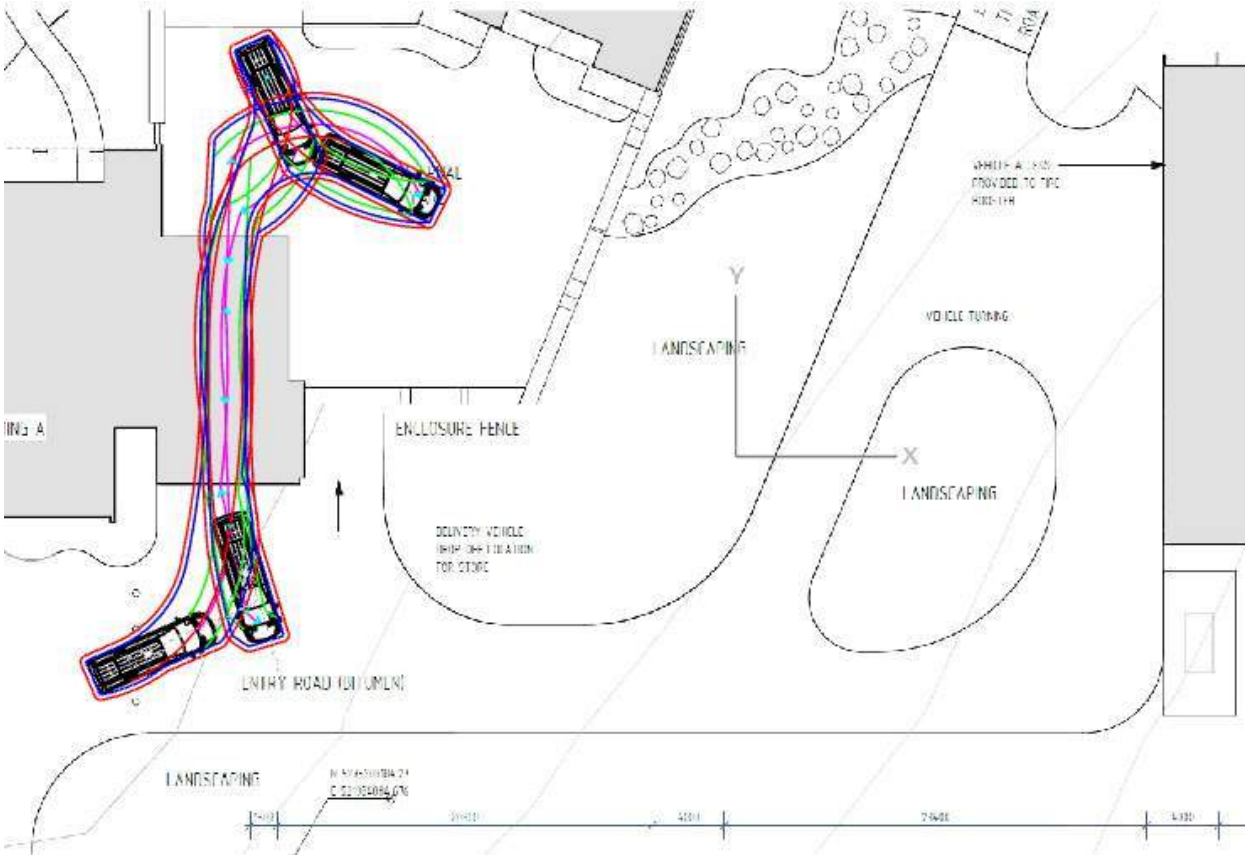


Figure 11 Ambulance Access

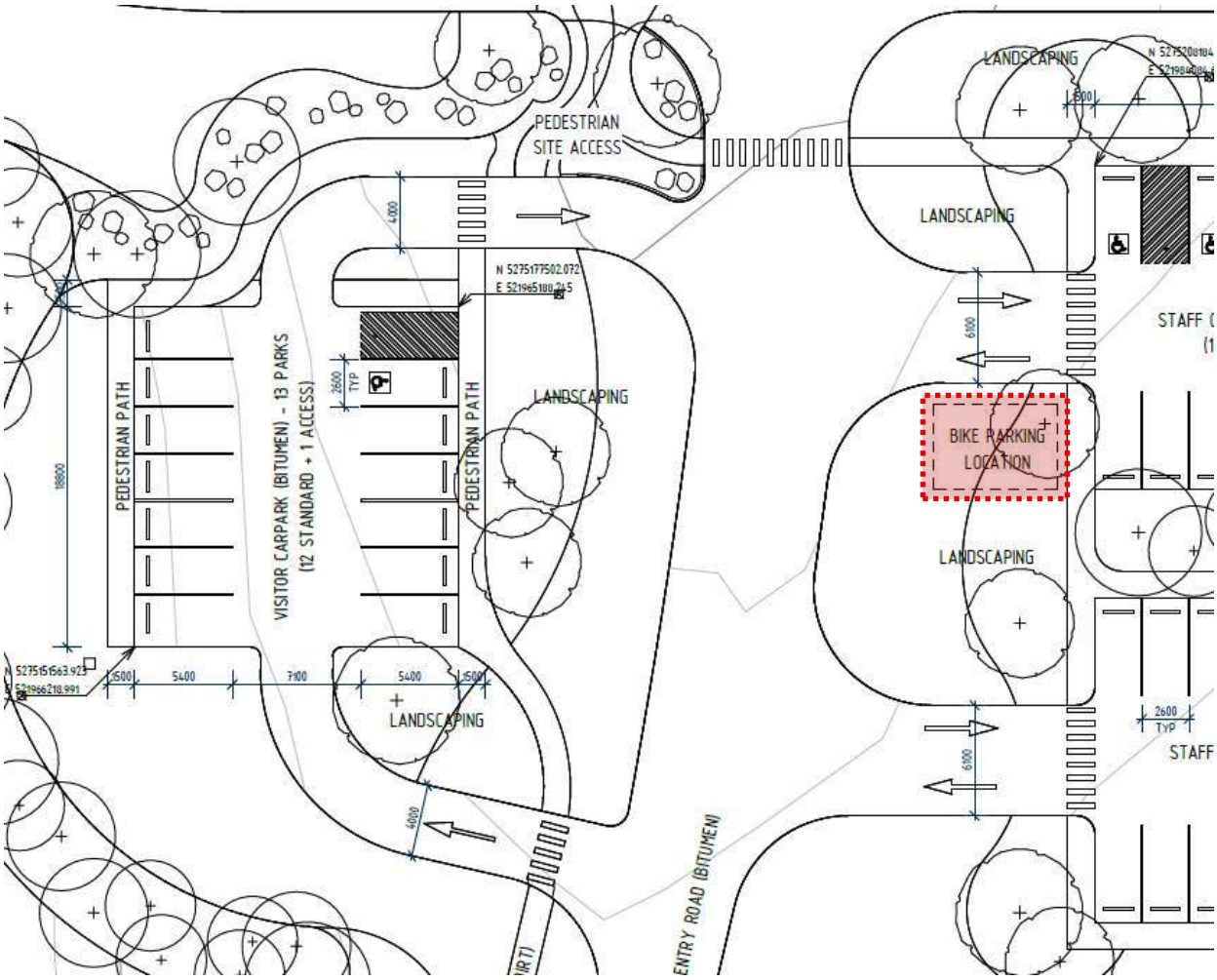


5.7 Bicycle Parking

The Acceptable Solution A1 of Clause C2.5.2 of the Planning Scheme states "*Bicycle parking must be provided on the site or within 50m of the site and be no less than the number specified in Table C2.1*".

Table C2.1 specifies '*no requirement*' for a custodial facility, therefore bicycle parking is not required. Bicycle parking is provided within the main car park however, as shown in Figure 12. Acceptable Solution A1 of Clause C2.5.2 of the Planning Scheme is satisfied.

Figure 12 Bicycle Parking



5.8 Motorcycle Parking

The Acceptable Solution A1 of Clause C2.5.3 of the Planning Scheme states "*the number of on-site motorcycle parking spaces for all users must: (a) be no less than the number specified in Table C2.4; and (b) if an existing use or development is extended or intensified, the number of on-site motorcycle parking spaces must be based on the proposed extension or intensification, provided the existing number of motorcycle parking spaces is maintained*".

Table C2.4 states a requirement for 1 space for every additional 20 spaces above 41 spaces. This is a requirement for 5 motorcycle parking spaces. The proposed development does not provide any motorcycle parking spaces and therefore does not satisfy the requirements of Acceptable Solution A1 of Clause C2.5.3 of the Planning Scheme.

The Performance Criteria P1 of Clause C2.5.3 of the Planning Scheme states:

> *"Motorcycle parking spaces for all uses must be provided to meet the reasonable needs of the use, having regard to:*
>
> *(a) the nature of the proposed use and development;*
>
> *(b) the topography of the site;*
>
> *(c) the location of existing buildings on the site;*
>
> *(d) any constraints imposed by existing development; and*
>
> *(e) the availability and accessibility of motorcycle parking spaces on the street or in the surrounding area".*

The following is relevant with respect to the development proposal:

(a) Nature of the proposed use and development

The proposed Youth Justice Facility is a specialised custodial facility with controlled access and high security requirements. The primary users are:

- Staff members (approximately 95 total across all shifts)
- Limited controlled visitor access for family visits and professional services
- Youths do not have vehicle access requirements

Given the security-sensitive nature of the facility and controlled access protocols, motorcycle usage by staff and visitors is anticipated to be minimal. The facility's operational requirements prioritise security and controlled movement, which may discourage motorcycle use by staff for safety and security reasons.

It is further noted that the development provides an excess of parking provision in accordance with Planning Scheme requirements. Motorcycles are permitted to park within car parking spaces.

(b) Topography of the site

The site topography is relatively flat and does not present any constraints that would necessitate motorcycle parking over standard car parking provision.

(c) Location of existing buildings on the site

The site is currently vacant with no existing buildings. The proposed development provides adequate space for car parking provision without spatial constraints that would require motorcycle parking as an alternative.

(d) Constraints imposed by existing development

As a greenfield site, there are no existing development constraints that would necessitate motorcycle parking provision.

(e) Availability and accessibility of motorcycle parking spaces in the surrounding area

The facility is located in a semi-rural area of Brighton/ Pontville with limited surrounding development. The nearest commercial or public facilities that might provide alternative motorcycle parking are located several kilometres away in Brighton township, making external motorcycle parking options impractical for facility users.

Conclusion

The reasonable needs of the use are adequately met without dedicated motorcycle parking provision. The specialized nature of the facility, security requirements, controlled access protocols, and semi-rural location result in minimal anticipated motorcycle usage. The substantial provision of car parking (111 spaces compared to the 52 spaces required) more than adequately accommodates the transportation needs of all facility users.

On this basis, the development meets the requirements of Performance Criteria P1 of Clause C2.5.3 of the Planning Scheme.

6. Conclusions

Based on the assessment of the proposed Tasmanian Youth Justice Facility, the following conclusions can be drawn regarding traffic impacts:

- Traffic Generation: The proposed facility will generate approximately 350 vehicle movements per day, with peak hour movements of 75-80 vehicles during the AM peak and 80-90 vehicles during the PM peak. This level of traffic generation is relatively modest and can be accommodated by the surrounding road network.
- Traffic Distribution: All traffic will access the site via Rifle Range Road, with 70% of traffic traveling to/ from the north (Midland Highway direction) and 30% to/ from the south. The turning movement analysis indicates that the Brighton Road/ Rifle Range Road junction can accommodate the anticipated traffic volumes with minimal impact on efficiency or safety.
- Junction Performance: The existing Brighton Road/ Rifle Range Road junction will continue to operate at a high level of efficiency following the completion of the facility. No changes are recommended to the junction layout.
- Sight Distance: The available sight distance at the Brighton Road/ Rifle Range Road junction exceeds the Austroads Safe Intersection Sight Distance (SISD) requirements for the posted speed limit, ensuring safe operation of the junction with the increased traffic movements resulting from the proposed development.
- Parking Provision & Layout: The facility provides 111 car parking spaces, which substantially exceeds the 58 spaces required under the Planning Scheme for a custodial facility. The parking layout complies with AS2890.1 requirements.

Based on the findings of this report the proposed development is supported on traffic and parking grounds.

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northbarker
ECOSYSTEM SERVICES

Proposed Youth Justice Facility

466 BRIGHTON RD PONTVILLE TAS 7030

Natural Values Assessment

22nd of October 2025

For Grieve Gillett Architects

(GGA001)

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ACKNOWLEDGEMENTS

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NBES Job Code	GGA001

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Version 0.1	10/4/2025	Drafted by Aleida Williams	Senior Ecologist
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Version 2.0	15/05/2025	Updated with access road area and delivered to client by Jared Parry	Lead Ecologist
Version 2.1	27/05/2025	Updated with project background and delivered to client by Jared Parry	Lead Ecologist
Version 2.2	26/06/2025	Addressed comments and delivered to client by Jared Parry	Lead Ecologist
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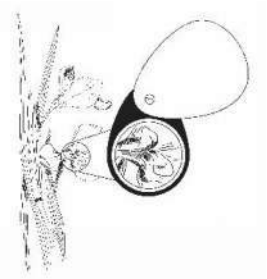

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1. PROJECT DETAILS

1.1. PROJECT BACKGROUND

The Tasmanian Government is reforming the youth justice system through a comprehensive, integrated and therapeutic approach that prioritises the rights of children, rehabilitation, and breaking the cycle of offending. This includes the delivery of a new youth justice facility to replace the Ashley Youth Detention Centre. The new facility will provide an environment where children and young people experience the highest standards of child centred, rights-based and therapeutic care, where they are provided with education, services and opportunities that support them to enhance connections and return successfully to community.

The new youth justice facility is designed to house up to 20 young people, comprising 20 residential beds, 2 treatment beds in the health centre, and 2 orientation beds in the admissions area. In addition, the facility will include a health centre providing health and mental support, education and recreational facilities, and a cultural centre and garden. Landscaping will also be provided across the site.

The new facility is proposed to be located at 466 Brighton Road, Pontville (PID: 3523093), with vehicular access across 36 Rifle Range Road, Pontville (PID: 3523106). The site is owned by the Crown, and is approximately 32 ha in size, situated between the Midland Highway and Brighton Road (Figure 1). The site is currently used to house ex-racehorses and contains a number of smaller paddocks divided by shelter belts of Eucalypts.

Since Version 2.4 of this document 36 Rifle Range Road has been purchased and the title has been combined with 466 Brighton Road. Both parcels are now contained within PID: 3523093 (Title 188959/1). The merging of parcels has no implications to the content of this report.

The proposed site is located entirely in the Southern Midlands Local Government Area (LGA). Under the relevant planning scheme, the *Tasmanian Planning Scheme – Southern Midlands*, the site is zoned Rural and is subject to the following overlays:

- Bushfire-prone areas– appliable to the entire site
- Scenic road corridor – small part of the eastern section of the site associated with buffer of the Midlands Highway
- Priority vegetation area –eastern / southern section of the site.

The youth justice facility falls under the Custodial Facility use class, which is a discretionary use in the Rural zone

Grieve Gillett Architects have engaged North Barker Ecosystem Services (NBES) on behalf of the proponent, the Tasmanian Government, to complete a Natural Values Assessment as required to support the submission of a planning permit application to the Southern Midlands Council. This, in conjunction with the supporting planning report and other accompanying specialist reports, provide a detailed assessment against the relevant planning scheme requirements.

1.2. PROJECT SPECIFICS

A high-level natural values determination (NVD) of the site was undertaken in 2023[1] for DECYP to identify the potential for significant natural values that could be incompatible with a development proposal, guide avoidance to natural values, determine needs for further assessment or field surveys, and consider potential implications under relevant environmental legislation.

- The proposed Youth Justice facility concept plan area (hereafter known as the **facility area**) incorporates ~ 5.8 ha (Figure 1).

[1] North Barker Ecosystem Services (2024)

- The facility area is within the property cadastral boundaries of 466 Brighton Road, Pontville, Tasmania, 7030; PID 3523093, title 188959/1, (Figure 1). The whole of this cadastral parcel makes up the **survey area**.
- The 466 Brighton Road survey area is 32.31 ha, but the development of the facility area and access is expected to only require around 6.21 ha of this.
- The survey area is within the Southern Midlands Council local government area and falls under the Southern Midlands Local Provisions Schedule of the *Tasmanian Planning Scheme*.
    - The survey area is zoned Rural (Zone 20).
    - The Natural Assets Code (7), specifically the Priority Vegetation Area provision, applies to the eastern and southern boundary of the site (Figure 2). In total, 2.17 ha of 14.53 ha of the priority vegetation within the project area is within the facility area footprint.
    - A small area of land in the southernmost corner of the project area is subject to the Waterway and Coastal Protection Area overlay (Natural Assets Code); however, the project will not encroach on this land and thus it is not addressed in this report.
    - The Bushfire-prone Areas Code (13) and Scenic Protection Code (8), also apply to the survey area but are addressed in a separate report as they do not pertain (directly) to natural values.
- TASVEG 4.0 vegetation mapping classifies the entire survey area as 'agricultural land' (TASVEG 4.0 unit: FAG).
- No threatened values have previously been reported from the survey area. Threatened flora and fauna have however previously been recorded within 500 m.

1.3. METHODS

Field surveys to inform the Natural Values Assessment were undertaken of the survey area in accordance with the *Guidelines for Natural Values Surveys*[2]. Field surveys were undertaken by NBES ecologists in December 2023, October 2023 (a high-level site reconnaissance and search of habitat for seasonal flora), and February 2025.

Grazing was excluded from most of the property/survey area (south of the shelter belt) and the facility area for one month prior to the December 2023 and February 2025 surveys respectively. This allowed plants to regrow, aiding detection and identification.

Native vegetation was surveyed/mapped in accordance with units defined in TASVEG 4.0[3]. The property was surveyed using a meandering area search technique[4]. Additional survey effort was applied to habitats suitable for threatened species and/or vegetation communities (under the Tasmanian *Threatened Species Protection Act 1995* [TSPA], the Tasmanian *Nature Conservation Act 2002* [NC Act], and/or the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* [EPBC Act]). The Natural Values Atlas database was consulted for records of threatened species within a 5 km radius.

Declared weeds listed under the Tasmanian *Biosecurity Act 2019* (and associated *Biosecurity Regulations 2022*) and/or Weeds of National Significance (WoNS) under the *Australian Weed Strategy 2017–2027* distributions were mapped, though it is likely that not all occurrences were recorded given the highly modified landscape.

Trees with potential to contain hollows for threatened fauna were recorded with a GPS, and the diameter at breast height (DBH) was recorded.

All location data were recorded with a handheld GPS and/or GPS mobile app.

[2] Department of Primary Industries, Parks, Water and Environment (2015)
[3] Kitchener and Harris (2013)
[4] Goff *et al.* (1982)

Botanical nomenclature follows the current census of Tasmanian plants[5].

1.3.1. Limitations

Field surveys were undertaken in summer (early and late), with the reconnaissance and seasonal flora habitat check in spring. No botanical survey can guarantee that all vascular flora will be due to the limitations of the sampling technique, seasonal and annual variation in abundance and the possible absence of fertile material for identification. However, all significant species known to occur in the vicinity of the survey area were considered and it is unlikely that any species of significance have been overlooked. Fauna habitat, including the presence of hollows and nests, was assessed from ground level only.

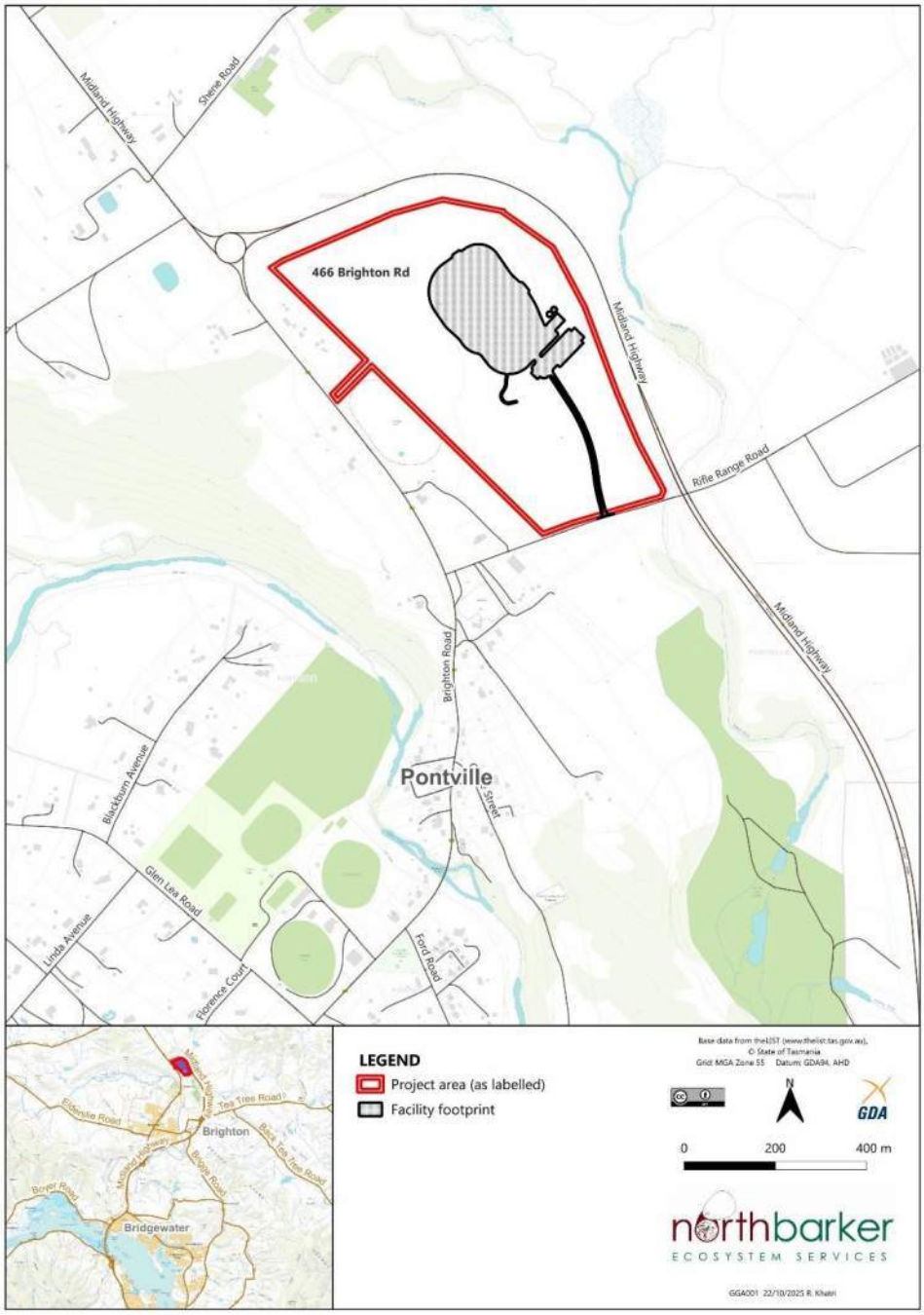

Figure 1: The location of the project area

[5] de Salas and Baker (2023)

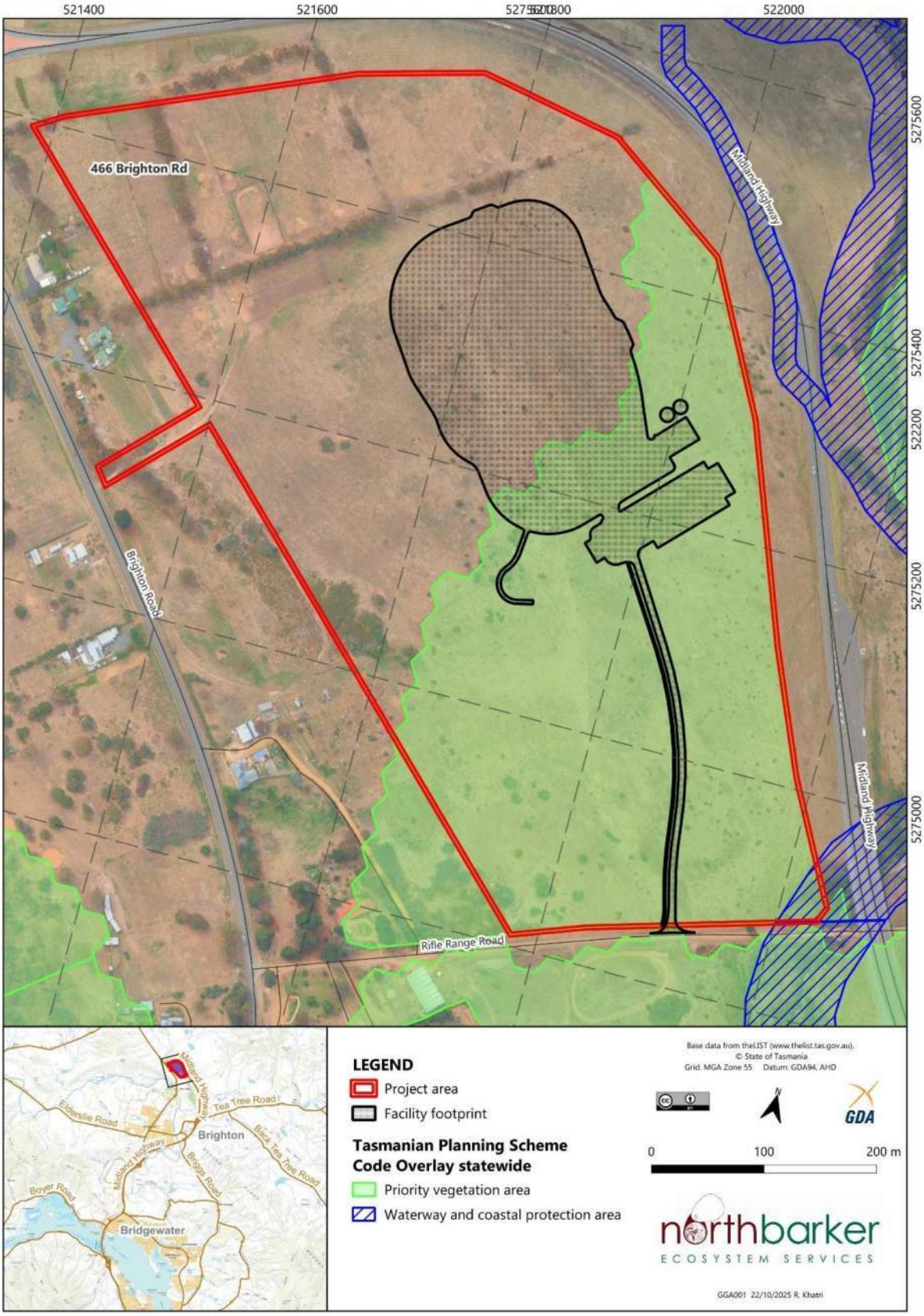

Figure 2: Priority vegetation overlay area in the survey area

2. BIOLOGICAL VALUES

2.1. VEGETATION

The survey area is highly modified and is comprised entirely of non-native vegetation (at the community level) consistent with agricultural land (TASVEG - FAG) (Plate 1). Most of the survey area consists of paddocks subjected to long-term intensive grazing of livestock (currently horses) (Plate 2).

The vegetation overall is predominantly made up of introduced species (herbaceous and woody) with occasional native species in areas protected from stock. The paddock vegetation is dominated by pasture grasses such as canary grass, Yorkshire fog, and cocksfoot (*Phalaris aquatica*, *Holcus lanatus* and *Dactylis glomeratus*), and ruderal herbs such as sheep sorrel, goosefoot, cape weed, hoary mustard, white weed, and horehound (*Acetosella vulgaris*, *Dysphania pumilio, Arctotheca calendula*, *Hirschfeldia incana, Lepidium draba,* and *Marrubium vulgare*) (Plate 1). Woody weeds, predominantly sweet briar hawthorn and African boxthorn (*Rosa rubiginosa, Crataegus monogyna*, and *Lycium ferocissimum*), are sparsely distributed across the paddocks, but concentrated in the southeast of the survey area (Plate 3).

Small areas within the FAG vegetation have a higher proportion of native species and are approaching the native floristic component cover percentage (25 %) required to be mapped as a weedy native grassland vegetation community. These patches are all on the southeastern side of the site (Figure 3) where the skeletal soil over basalt is the defining landscape feature (Plate 4). Here, patches of *Austrostipa* species and *Rytidosperma* species are present, though at the time of survey it was too dry to detect other native herb species. With reduced grazing pressure and favourable conditions, these areas may return to native grassland and/or rockplate communities. However, these patches are small and disjointed and as such no discrete patch can be mapped as native vegetation.

Despite the current state of the vegetation, it is recommended that the basalt rise area to the east of the site is avoided as a priority over the weedy western half of the site as the former area has potential to support native grassland and threatened flora if land use management changes.

A full species list can be found in Appendix A.

Plate 1: Typical composition of the existing cleared paddocks with a long history of grazing. Photo directed at the location of the proposed facility

Plate 2: Horses currently graze the site

Plate 3: Hawthorn and African boxthorn occur mainly as scattered plants across the site but also form dense patches in the southeast of the property, including the facility area. Horehound occurs scattered over the majority of the survey area at varying densities.

Plate 4: Speargrass species (left) and wallabygrass (right) occur in higher abundance in patcher of skeletal soil over basal in the eastern half of the survey area

In addition to paddock vegetation there is some semi-permanent infrastructure such as shipping containers, sheds, and horse yards present. Planted shelter belts of introduced gums, such as *Eucalyptus leucoxylon*, are present along fence lines in the north half of the property. Recently, an area near the southern access off Rifle Range Road has been used to dump soil, building rubble, and rubbish (Plate 5).

Plate 5: Soil and rubble dump

One native vegetation community was recorded on the southern extent of the property – *Bursaria-Acacia* woodland and scrub (TASVEG – NBA).

2.1.1. *Bursaria-Acacia* woodland and scrub

The survey area includes 0.13 ha of *Bursaria-Acacia* woodland and scrub (TASVEG – NBA) in the southwest corner of the site and extending outside the site (Figure 3). The NBA is dominated by a woodland of <10 m tall trees of *Acacia dealbata* and occasional *Bursaria spinosa* (Plate 5). A shrub layer is generally lacking here though occasional *Melicytus angustifolius* shrubs are present. The prevalent grass and graminoid layer is dominated by *Austrostipa* species and *Lomandra longifolia* with patches of *Juncus* species and *Ficinia nodosa*. The vegetation community is relatively weed free compared with the surrounding vegetation.

NBA is not listed as threatened under the NC Act. This community can qualify as the EPBC Act listed Lowland Native Grasslands of Tasmania (LNGT) which has been mapped in the broader area. However, due to the high cover of woody plants and the lack of *Poa* and *Themeda* tussocks, no parts of the community on site meet the criteria for the EPBC Act listed community.

Plate 6: NBA vegetation within the survey area

2.2. THREATENED FLORA

No flora species listed under either the TSP Act or EPBC Act were observed during the three surveys at 466 Brighton Road, nor have they been recorded in the survey area in the past[6]; however, one species, *Austrostipa bigeniculata* (listed as rare under the TSP Act), has been recorded outside of the property the road verge of Rifle Range Road. Six plants were recorded on the verge in a different location immediately adjacent to the site during 2025 field survey.

Plate 7: *Austrostipa bigeniculata* in the road reserve adjacent to the property boundary

[6] Department of Natural Resources and Environment (2025)

Due to the heavily grazed, modified condition of the survey area, it is extremely unlikely that any threatened flora species are present within the survey area, and none are considered likely to have been temporarily absent or overlooked.

Threatened flora recorded within 500 m and 5 km of the survey area can be found in Appendix B. A total of eight threatened flora species listed under the TSP Act (with one, *Dianella amoena*, also listed under the EPBC Act) have previously been recorded within 500 m of the survey area according to the Natural Values Atlas[6]. It is highly unlikely that these species occur in the survey area based on the extant habitat and the history of land management being incompatible with their presence.

The closest records of threatened flora to the survey area are *Dianella amoena* (r/EN), which has been recorded between 20 m and 40 m beyond the south-eastern property boundary in the road reserve next to the Midland Highway[6] (Figure 3). The closest area within the project boundary was searched extensively, and no signs of the species were observed. Given the history of grazing on site, there is no suitable habitat for the species within the survey area and it is unlikely to have been overlooked.

2.3. THREATENED FAUNA AND THREATENED FAUNA HABITAT

No targeted fauna surveys have been undertaken, however no signs characteristic of threatened fauna such as scats, prints, or diggings were observed on site, nor were any incidental observations made during site visits. No threatened fauna have previously been reported from the property, but there are records attributed to within 5 km (Appendix C).

Within the survey area, four potential habitat trees were recorded (Figure 3). These included three *Eucalyptus ovata* trees which provide foraging habitat for swift parrot (Plate 8). One *Eucalyptus ovata* and one *E. rubida* may provide nesting habitat for hollow nesting threatened fauna (Plates 9 -11). None of these trees are within the footprint of the facility.

2.3.1. Swift parrot

The swift parrot (*Lathamus discolor*), listed as endangered under the TPS Act and critically endangered under the EPBC Act, spends its winter in south-eastern mainland Australia before migrating to Tasmania in late winter to early spring to breed. During the breeding season, nectar from Tasmanian blue gum (*Eucalyptus globulus*) and black gum (*E. ovata*) flowers is the primary food source for the species. These eucalypts are patchily distributed, and their flowering patterns are erratic and unpredictable, often leading to only a small proportion of swift parrot habitat being available for breeding in any one year and conversely only a portion of habitat being utilised. Swift parrots breed in tree hollows in mature eucalypts within foraging range of a flower source[7].

According to the Natural Values Atlas[8], this species has been previously recorded six times within 5 km of the survey area (but not within 500 m), with the most recent record being from 2015.

Three *E. ovata* trees (potential foraging habitat) are present within the survey area (Plate 8, Figure 3). One of these *E. ovata* trees and an additional mature double-trunked *E. rubida* tree (Plates 5 and 6, Figure 3) have potential to support nesting habitat for swift parrots. These trees, however, are outside the facility area and there will be no impact to habitat for this species during development or use of the facility.

Bird strike (flying collision) with windows and fences is recognised as a source of mortality for the swift parrot[9]. Collision risk has particularly been linked to zones where swift parrot habitat or flyways occur in close proximity buildings (particularly with reflective or see-through surfaces) or high chain link

[7] Habitat descriptions for these species are informed by threatened species note sheets available for the species at the Threatened Species Link (https://www.threatenedspecieslink.tas.gov.au/Pages/default.aspx).
[8] Department of Natural Resources and Environment (2023)
[9] Swift parrot collision risk informed by: Pfennigwerth (2008); Threatened Species Scientific Committee (2016); Threatened Species Section (2023)

fences[10]. The facility in its own right does not pose a threat to swift parrots as there have been very few records of swift parrot in the area and the facility area is not between habitat resources or in close proximity to a known flyway. However, if foraging resources (ie *E. ovata* or *E. globulus* trees) were included in landscaping surrounding the facility, then the collision risk for incidental visiting swift parrots will increase as they fly from one foraging tree to another.

North Barker reviewed the planting palette for landscaping plans, and we are satisfied that with the removal of *E. ovata* and *E. globulus* from the planting list, swift parrots are not likely to be at risk of collision and further mitigation is not necessary.

2.3.2. Blue-winged parrot

This blue-winged parrot (*Neophema chrysostoma*) has not been recorded within 5 km of the survey area and was not recorded during the surveys. This species was listed as a vulnerable species under the EPBC Act in March 2023[11] and as such, available records (in databases such as the Natural Values Atlas) may not yet reflect the full extent of its occurrence. It is not listed under the TSP Act. Regardless, given the heavily cleared and disturbed nature of the Brighton and Pontville areas, including the survey area, the facility area is not expected to be important for the species in any way.

Blue-winged parrots have overlapping nesting habitat (hollow) requirements to swift parrot[12]. Thus, as for swift parrot, two potential nesting habitat trees for this species exist in the survey area but are outside the facility area and will not be impacted.

This species is known to forage in paddocks on seeds of native and introduced grasses, herbs and shrubs[11] and therefore suitable foraging habitat is present on site. However, the proposed development of ~6 ha of pasture grassland is negligible given the abundance of similar habitat in the surrounding landscape.

2.3.3. Tasmanian masked owl

The Tasmanian masked owl (*Tyto novaehollandiae castanops*), listed as endangered under the TSP Act and vulnerable under the EPBC Act, occurs in a range of habitats, with a reliance on mature hollow-bearing elements. Habitat includes native forests and woodlands as well as agricultural areas with a mosaic of native vegetation and pasture. Significant habitat is defined as large eucalypts within dry eucalypt forest in its known core range[7].

According to the Natural Values Atlas[8], this species has been previously recorded twice within 5 km of the survey area, with the most recent record being from 2019. This species has not previously been reported within 500 m.

Two potential habitat trees for this species are present within the survey area (Figure 3):

- A large (1.1.m DBH) *E. ovata* tree with a large hollow (~15–20 cm) 2 m from ground level (Figure 3, Plate 11). Although there is some potential for this to be used as a nesting tree, the hollow is relatively near ground level and inclined upward. The tree is marginal in terms of nesting potential and is unlikely to be utilised. Additionally, there is no evidence that the hollow has been used by this or any other species (no wear, whitewash, or pellets at the hollow entrance or around the base of the tree).
- The large *E. rubida* tree (Plate 10) contains hollows with sufficient entrance size for the masked owl, but stem size is marginal for roosting and not sufficient for nesting.

Neither of these trees are within the facility area and will not be directly impacted by the proposed development. For some development proposals the regulator has stipulated a 150 m buffer from

[10] Pfennigwerth (2008)
[11] Department of Climate Change, Energy, the Environment and Water (2023)
[12] Koch, Munks, & Woehler (2009)

development for masked owl nesting habitat trees. This is done to limit the potential to disturb a breeding pair. Given the sparsity of records in the area and the low likelihood of the tree being used as a nesting tree, the risk to masked owl as a result of the ~20 m overlap with the 150 m buffer is low and no further surveying or actions are warranted. Should the development impact the tree directly or shift within close proximity to the tree, additional assessment of impact to this species should be considered.

2.3.4. Eastern barred bandicoot

The EPBC Act vulnerable listed eastern barred bandicoot (*Perameles gunnii*) has been previously recorded 36 times within 5 km of the survey area and is known to occur in the broader Pontville and Brighton area[14]. No direct observations or signs of this species (such as characteristic conical diggings) were observed within the survey area. The species is likely present locally, if not on the site itself, but given the facility area and surrounding land has been heavily grazed (removing cover and nesting habitat), it constitutes marginal habitat only. The facility area and surrounds may be part of an individual bandicoot's range but unlikely to be a core or critical component[13]. More suitable habitat is abundant in the immediate surrounds.

The proposed development will impact a ~6 ha of pasture grassland, and as more suitable habitat is abundant in the surrounding landscape, the proposed loss of this marginal habitat is not expected to impact this species.

2.3.5. Additional fauna species

In addition to the species discussed above, two additional threatened fauna species, the Tasmanian wedge-tailed eagle (*Aquila audax fleayi,* TSP Act/EPBC Act endangered) and the Tasmanian devil (*Sarcophilus harrisii*, TSP Act/EPBC Act endangered) have been recorded within 500 m of the facility area[14]. There are no known eagle nests in the area and the nearest highly suitable nesting habitat patches are around 2 km away. The Tasmanian devil has only been recorded once in 2009, though it is likely to be present in the surrounding landscape but at relatively low density based on available habitat, expected prey resources, the level of development, and the presence of devil facial tumour disease.

Collectively, if present within the vicinity of the facility area, these species are likely to be transient and occasional visitors that may forage within or over the area, or pass through during dispersal, but not utilise the habitat in any way critical to maintaining their local presence. They are not considered at risk of being negatively impacted by the proposed development.

[13] Department of the Environment, Water, Heritage and the Arts (2008)
[14] Department of Natural Resources and Environment (2025)

Plate 8: *Eucalyptus ovata* tree; foraging habitat for swift parrot. Large broken trunk with main stem regrowth

Plate 9: *Eucalyptus ovata* tree; foraging habitat for swift parrot and potential nesting habitat for swift parrot, blue-winged parrot, and Tasmanian masked owl

Plate 10: The *Eucalyptus rubida* flutes that may support hollows and potential nesting habitat for swift parrot and blue-winged parrot

Plate 11: The large hollow that provides potential (marginal) nesting habitat for the Tasmanian masked owl (e/VU)

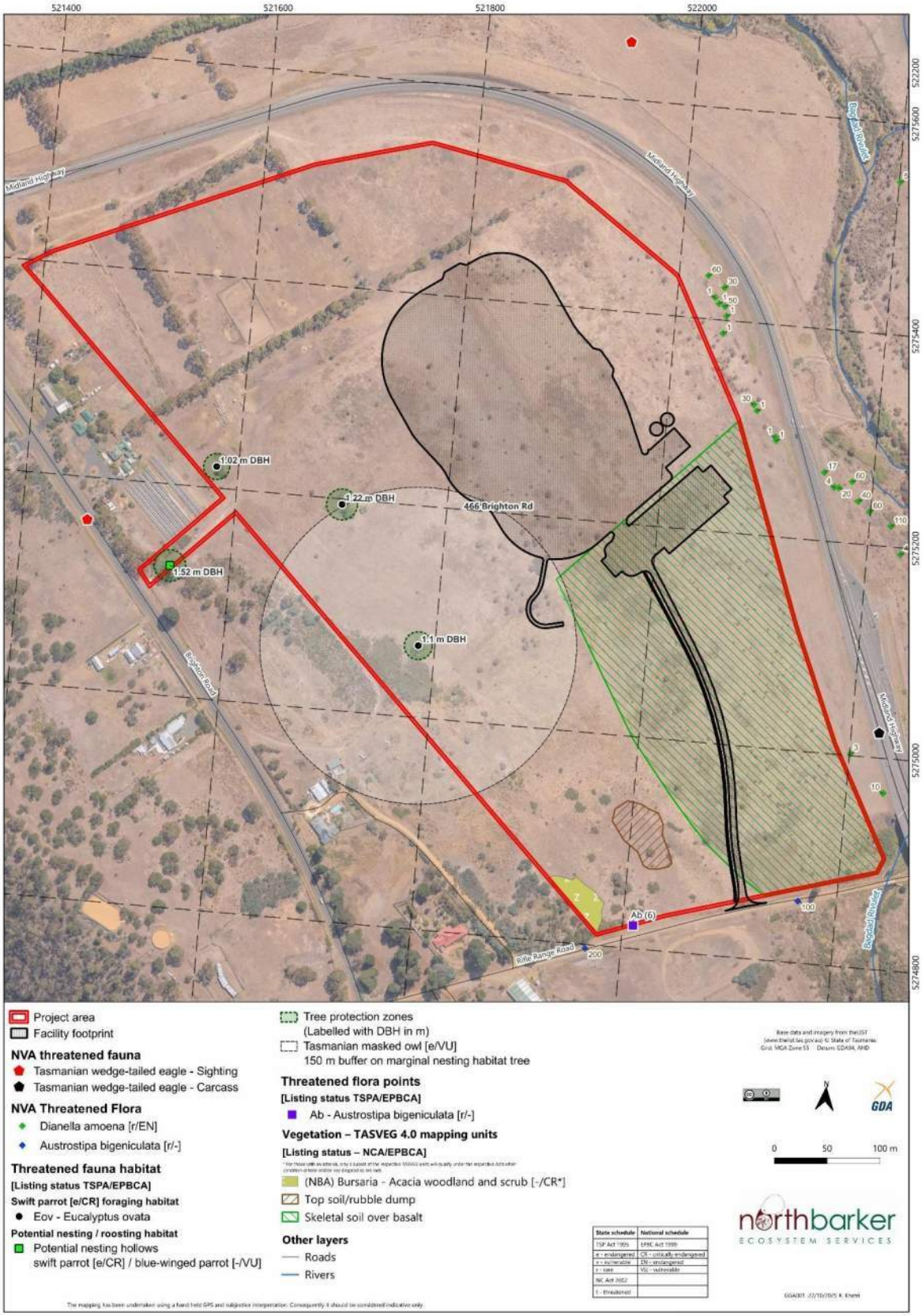

Figure 3: Native vegetation, vegetation features, threatened flora, and threatened fauna habitat within the project area

2.4. INTRODUCED FLORA

Weeds and their management are a significant consideration for the proposed development. Introduced flora species are ubiquitous across the survey area with declared, WoNS, and environmental weeds being widespread and abundant. Of the 66 recorded species, 41 species (or ~70%) are introduced (Appendix A).

The mapping of weeds in the survey area is indicative of the scale and extent of infestations (Figure 4).

2.4.1. Declared weeds

Eight species listed as 'declared' under the *Biosecurity Act 2019* are present in the survey area (Figure 4, Plate 12), with four of these species additionally listed as WoNS. Most of these declared species occur as large to moderate infestations (Figure 4). Declared weeds observed, and their general extent within the survey area, is described in Table 1.

The relevant statutory weed management plans for all the declared weeds recorded categorise them as Class B weeds in the Southern Midlands Council[15]. Class B municipalities are those which host moderate or large infestations of the declared weed that are not deemed eradicable because the feasibility of effective management is low at this time. Therefore, the objective is containment of infestations. This includes preventing spread of the declared weed from the municipality or into properties currently free of the weed or which have developed or are implementing a locally integrated weed management plan for that species. Further, there is a requirement to prevent spread of the weeds to properties containing sites for significant flora, fauna, and vegetation communities. Nevertheless, there is an opportunity to work towards eradication of declared weeds present within the entirety of the property, not just the facility area, particularly woody weeds.

Plate 12: Declared weeds, African boxthorn and horehound are abundant and widespread on site

African lovegrass (*Eragrostis curvula*) and Chilean needle grass (*Nassella neesiana*) (WoNS) are highly invasive grassy weeds that are also known to occur in the local area[16], with African lovegrass occurring in large numbers at the roundabout just beyond the northwestern corner of the property. Both weeds are Class A weeds in the Southern Midlands Council area[15]. These species (and any nearby occurrences)

[15] According to the provisions of the Tasmanian *Biosecurity Regulations 2022*, administered under the Tasmanian *Biosecurity Act 2019*, Further information about these weeds and their management recommendations is available at the NRE website: https://nre.tas.gov.au/invasive-species/weeds.
[16] Department of Natural Resources and Environment (2023)

will require consideration in project weed and hygiene management to ensure that works (and operations) associated with the development do not spread or worsen infestations locally or further.

Table 1. Extent of declared weed species found within the survey area and facility area

Species	WoNS Status	BA Class	Extent
African boxthorn *Lycium ferocissimum*	YES	**B**	At least ~70 (±10) plants are estimated within the Brighton Road survey area. The weed is abundant and forms thick clumps. It occurs in the understorey of other trees, such as *Eucalyptus ovata* and in the shelter belt, as well as growing through other trees, such as hawthorn. Approximately 20 plants are estimated as present in the south of the survey area, predominantly in the northwest corner of the site, with few scattered shrubs elsewhere. Mostly it occurs with hawthorn tall shrubs and or blackberry brambles. 7 plants estimated within the facility area.
blackberry *Rubus fruticosus* aggregate/ *R. anglocandicans*	YES	**B**	This weed occurs in patches throughout both survey areas. These patches are typically thick and have other weeds, such as African boxthorn as emerging through them in some cases. 2 patches within the facility area.
Californian thistle *Cirsium arvense var. arvense*	-	**B**	One patch of 9 m^2 was recorded near the property access off Rifle Range Road.
Fennel *Foeniculum vulgare*	-	**B**	2 plants on northern boundary of the survey area. Extends into the road reserve. No plants within the facility area.
gorse *Ulex europaeus*	YES	**B**	This weed occurs at two locations within the survey area. Approximately 13 plants are present, with the recorded location on the NE boundary fence holding most of the plants. Gorse was not recorded within the facility area.
horehound *Marrubium vulgare*	-	**B**	This weed is widespread and abundant in the survey area. It occurs in patches that cover 1 to 100s of square metres. It occurs throughout the facility area at varying density up to 50 % cover.
Montpellier broom *Genista monspessulana*	YES	**B**	20 plants recorded in 85 m^2 on the southeastern boundary of the survey area. Extends into the road reserve adjacent.
white weed *Lepidium draba*	-	**B**	This weed is widespread and abundant in the survey area. It occurs in patches that vary in size from a few square metres to 100s of square metres. Within the facility area it occurs in localised patches, though may be more abundant as it was difficult to detect in February 2025 after a Summer of grazing.

2.4.2. Non-declared weeds

Additionally, many species classified as environmental weeds[17] were observed across the survey area (Appendix A). These weeds are widespread and abundant. Woody environmental weeds, such as hawthorn (*Crataegus monogyna*) and sweet briar (*Rosa rubiginosa*), were indicatively mapped, with the species being most prevalent in the southeastern area of the survey area including within the facility area (Plate 13, Figure 4). There is no legislative requirement to manage environmental weeds, but it is typically done as a matter of good development practice and to protect other values.

Plate 13: Hawthorn and sweet briar, common environmental weeds observed with in the survey area. Photo looking at the facility area from the facility area

2.4.3. Weed and Hygiene Management Plan

The proposed development poses a high risk of spreading weeds locally (or further) and worsening infestations by creating new disturbance niches. Increased weed infestations will have the risk of compromising nearby native vegetation remnants, the occurrences of threatened flora in the local area, and the integrity of adjacent privately owned land.

To manage this risk, a project-specific Weed and Hygiene Management Plan (WHMP) must be developed to detail weed and hygiene prescriptions for contractors through construction and for land managers into operations. The plan must outline primary and secondary weed control and requirements, including wash-down stations and auditing procedures. The plan should take into account the following guidelines:

- *Weed and Disease Planning and Hygiene Guidelines – Preventing the spread of weeds and diseases in Tasmania* (DPIPWE, Stewart and Askey-Doran, 2015).

Having a WHMP will ensure legislative compliance and ensure that the proponent's responsibility regarding the containment of Class B weed species occurs. It is recommended that weed management is undertaken for the whole property, not just for (and during construction of) the facility. This would increase the natural value quality of the area and result in a net positive environmental outcome for the area. The degree of weed management that will be achievable property-wide will in some part be dictated by the land use of the land area surrounding the facility, but eradication of woody weeds (including blackberry) should be achievable.

[17] Department of Natural Resources and Environment (2023)

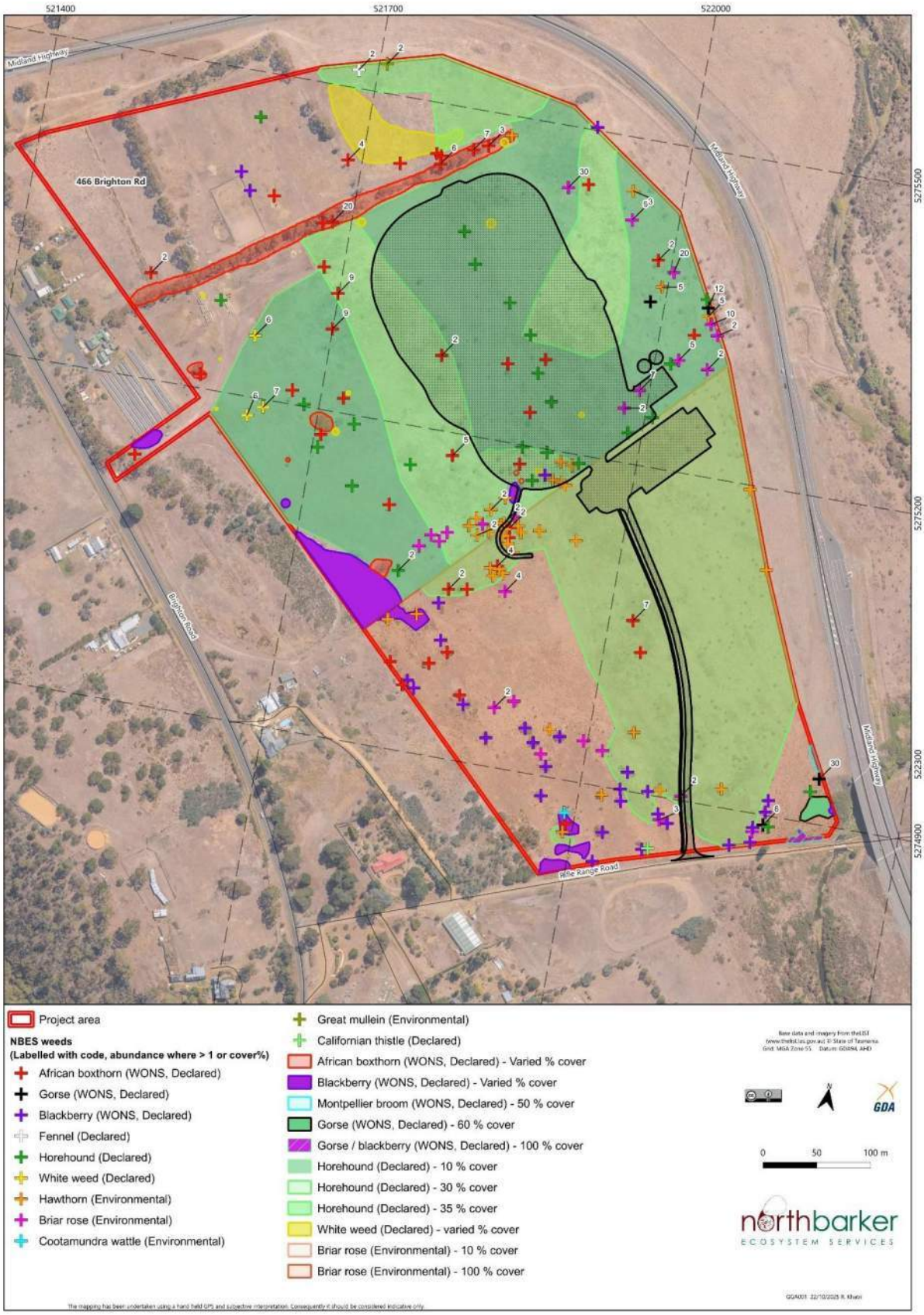

Figure 4: Extent and distribution of declared and environmental weeds

3. LEGISLATIVE REQUIREMENTS

3.1. TASMANIAN PLANNING SCHEME - SOUTHERN MIDLANDS LOCAL PROVISIONS SCHEDULE

In consideration of the requirements of Tasmanian *Land Use Planning and Approvals Act 1993* (LUPA Act), each municipal area incorporates development standards codes under the appropriate planning scheme. The facility area is located entirely within the Southern Midlands Council area, which is currently subject to the provisions of the *Tasmanian Planning Scheme*.

3.1.1. Zoning

The project area is zoned entirely as Rural (20). Custodial facilities, such as a youth justice facility, are listed as a discretionary use in this zone[18]. Planning approvals for any such development will require approval under LUPA Act.

3.1.2. Code Provisions

The project area is subject to the Natural Assets Code (Code 7) and Bushfire-prone Areas Code (Code 13). The Natural Assets Code is relevant for the current report.

The purpose of the Natural Assets Code is to:

(C7.1.1)	Minimise impacts on water quality, natural assets including native riparian vegetation, river condition and the natural ecological function of watercourses, wetlands, and lakes.
(C7.1.2)	To minimise impacts on coastal and foreshore assets, native littoral vegetation, natural coastal processes, and the natural ecological function of the coast.
(C7.1.3)	To protect vulnerable coastal areas to enable natural processes to continue to occur, including the landward transgression of sand dunes, wetlands, saltmarshes, and other sensitive coastal habitats due to sea-level rise.
(C7.1.4)	To minimise impacts on identified priority vegetation.
(C7.1.5)	To manage impacts on threatened fauna species by minimising clearance of significant habitat.

Under the code, 14.53 ha of the project area, of which 1.94 ha is within the facility area, is subject to the Priority Vegetation Area overlay provisions (Figure 2) A small area in the far southeast corner of the project area contains a Waterways and Coastal Protection Area overlay; however, this area will not be impacted, thus it is not addressed further in this report.

Priority Vegetation Area

The priority vegetation area refers to the 14.53 ha of land within the project area (Figure 2) that is subject to the priority vegetation overlay as specified in the Brighton Local Provisions Schedule of the Tasmanian Planning Scheme. Only 2.17 ha of the project footprint intersects with the priority vegetation area overlay.

Priority vegetation is defined as land that has native vegetation[19] where any of the following apply (Clause 7.3.1):

[18] Use table 20.2; Tasmanian Planning Scheme (2023)
[19] Meaning plants that are indigenous to Tasmania including trees, shrubs, herbs and grasses that have not been planted for domestic or commercial purposes.

(a) It forms an in integral part of a threatened native vegetation community as prescribed under Schedule 3A of the *Nature Conservation Act 2002*;
(b) is a threatened flora species;
(c) it forms a significant habitat for a threatened fauna species; or
(d) it has been identified as native vegetation of local importance.

Within the project area, the area that is subject to the priority vegetation area overlay is almost entirely modified agricultural land, with the exception of 0.13 ha of *Bursaria-Acacia* scrub (which is not within the impact footprint). This does not form an integral part of a threatened native vegetation community, is not a threatened flora species (nor does it contain threatened flora, or habitat for threatened flora), does not form significant habitat for a threatened fauna species, and has not been identified as native vegetation of local importance in the *Brighton Local Provisions Schedule*.

Under Clause 7.6.2 of the *Tasmanian Planning Scheme*, the acceptable solution A1 states that:

> "*Clearance of native vegetation within a priority vegetation area must be within a building area on a sealed plan approved under this planning scheme*."

The proposed facility cannot meet this acceptable solution, therefore the performance criteria P1.1 and P1.2 must be addressed.

Performance criteria P1.1 a)-c) are not relevant to this proposal and therefore cannot be met. It is understood that criterion P1.1 d) will be satisfied; however, as this pertains to socio-economic factors, this is beyond the remit of an ecologist to make an informed assessment on. Criterion P1.1 e) and f) are also not applicable as the vegetation to be cleared does not meet the definition of priority vegetation as specified in Clause 7.3.1.

Performance criteria P1.2 is also not applicable as there is no vegetation in the priority vegetation area that meets the definition of priority vegetation as specified in Clause 7.3.1; thus, there is no chance of adverse impacts to priority vegetation.

3.2. TASMANIAN *BIOSECURITY ACT 2019*

According to the provisions of the Tasmanian *Biosecurity Regulations 2022*, administered under the Tasmanian *Biosecurity Act 2019*, Class A localities are areas in which eradication is deemed feasible (generally due to the existence of a targeted management plan) and is the responsibility of the landowner or land manager, or in the case of disturbance the development proponent.

Class B municipalities are those which host moderate or large infestations of the declared weed that are not deemed eradicable because the feasibility of effective management is low at this time. Therefore, the objective is containment of infestations. This includes preventing spread of the declared weed from the municipality or into properties currently free of the weed or which have developed or are implementing a locally integrated weed management plan for that species. As well there is a requirement to prevent spread of the weeds to properties containing sites for significant flora, fauna, and vegetation communities.

The relevant statutory weed management plans for all the declared weeds recorded within the survey area, including the facility area, categorises them as Class B weeds in the Southern Midlands Council. The recommended WHMP will be sufficient to meet the requirements under this Act.

3.3. TASMANIAN *THREATENED SPECIES PROTECTION ACT 1995*

Under the TSP Act, a person cannot knowingly without a permit 'take' a listed species. The definition of 'take' encompassing actions that kill, injure, catch, damage, destroy and/or collect threatened species or vegetation elements that support threatened species, *e.g.,* nests and dens. Likewise, species listed under the *Nature Conservation (Wildlife) Regulations 2021* (essentially all native wildlife, with limited exceptions) are protected from direct impacts and impacts to their products (*e.g.* nests and dens).

Disturbance to either threatened flora or fauna species within the meaning of the word 'take' under this Act is not expected as a result of development on this site. In particular, with no threatened flora species present in the site, a permit to take flora is not expected. However, if the six plants of the threatened grass species *Austrostipa bigeniculata* recorded on the roadside adjacent to but outside the survey area cannot be avoided, then a permit will be required under the TSP Act.

3.4. COMMONWEALTH *ENVIRONMENT PROTECTION AND BIODIVERSITY CONSERVATION ACT 1999*

The EPBC Act is structured for self-assessment, with guidelines and criteria available to assist any person who proposes to take an action to decide whether they should submit a referral to the national Department of Climate Change, Energy, the Environment and Water for a decision by the Minister on whether assessment and approval is required under the Act.

Under the Act, an action will require approval from the minister if the action has, will have, or is likely to have, a significant impact on a matter of national environmental significance (MNES), which includes all species and communities listed as threatened and/or migratory under the Act, as well as world heritage values.

It is not considered likely that any MNES protected under this Act will be impacted by the proposed development to an extent that will trigger the Act and require referral of the project for consideration as a controlled action by the Minister.

4. CONCLUSION AND RECOMMENDATIONS/REQUIREMENTS

Overall, the potential impacts associated with construction of the proposed youth justice facility on the site are expected to be minimal with respect to conservation significant values, primarily on account of the general lack of habitat and the site being dominated by heavily modified agricultural land. The expected footprint size of an access road in relation to the available land is also beneficial in providing scope for avoidance.

Specific recommendations are summarised below for minimising potential impacts, aiding the selection of a development area within the property, and complying with relevant environmental legislation.

<u>Vegetation</u>

Only a small area of native vegetation (TASVEG – NBA) exists within the survey area and avoidance should be possible as regardless of the specific footprint area within the site, any development within the site will be within heavily modified agricultural land (TASVEG – FAG). This vegetation unit is not native, threatened or protected. The vegetation does not accord to the definition of priority vegetation under the *Tasmanian Planning Scheme*.

Nevertheless, it is recommended that the basalt rise area to the east of the site is avoided as a priority over the weedy western half of the site as the former area has potential to support native grassland and threatened flora if land use management changes.

<u>Threatened flora</u>

No threatened flora species listed under either the TSP Act or EPBC Act were observed within the survey area, nor are they likely to occur given the highly modified nature of the facility area; however, six plants of the threatened grass species *Austrostipa bigeniculata* recorded on the roadside adjacent to but outside the site.

Therefore, no specific mitigation or avoidance of threatened flora is required, and no permits are likely to be required for impacts to flora under the TSP Act unless the six plants of the *Austrostipa bigeniculata* cannot be avoided.

Threatened fauna

As swift parrot foraging resources have been omitted from landscaping plans, thus eliminating the potential risk of bird strike, no threatened fauna are likely to be impacted by the proposed development.

No specific mitigation or avoidance of threatened fauna is required, and no permits are likely to be required for impacts to fauna under the TSP Act or *Nature Conservation (Wildlife) Regulations 2021*.

Introduced flora

Declared weeds, including WoNS and environmental weeds, are abundant and widespread across the survey area. To manage this risk, a project-specific weed and hygiene management plan should be developed to detail weed and hygiene prescriptions for contractors through construction and for land managers into operations. The plan must outline primary and secondary weed control and requirements, including wash-down stations and auditing procedures. The plan should consider the following guideline:

- *Weed and Disease Planning and Hygiene Guidelines – Preventing the spread of weeds and diseases in Tasmania* (DPIPWE, Stewart and Askey-Doran, 2015).

Having a WHMP will ensure legislative compliance and ensure that the proponent's responsibility regarding the containment of Class B weed species occurs.

Legislative requirements

While the facility area intersects with mapped Priority Vegetation Area under the Natural Assets Code, it has been determined that that the vegetation in the overlay area does not accord to the definition of priority vegetation under Clause 7.3.1 of the *Tasmanian Planning Scheme*. Regardless, the project can meet the performance criteria P1.1 d) under Clause 7.6.2 of the *Tasmanian Planning Scheme*

A permit to take under the TSP Act may be required if the six plants of the *Austrostipa bigeniculata* cannot be avoided.

It is not considered likely that any MNES protected under the EPBC Act will be impacted by the proposed development to an extent that will trigger the Act and require referral of the project for consideration as a controlled action by the Minister.

REFERENCES

Commonwealth of Australia (1999). *Environment Protection and Biodiversity Conservation Act 1999*. No. 91 of 1999.

de Salas M.F. and Baker M.J. (2023). A Census of the Vascular Plants of Tasmania, including Macquarie Island. (Tasmanian Herbarium, Tasmanian Museum and Art Gallery, Hobart) https://flora.tmag.tas.gov.au/resources/census/

Department for Education, Children and Young People (2023). Proposed youth justice facilities. Department for Education, Children and Young People, Tasmanian Government, Tasmania. Available from https://www.decyp.tas.gov.au/safe-children/youth-justice-services/youth-justice-reform-in-tasmania/proposed-youth-justice-facilities/.

Department of Climate Change, Energy, the Environment and Water (2023). Conservation Advice for *Neophema chrysostoma* (blue-winged parrot). Canberra: Department of Climate Change, Energy, the Environment and Water. Available from: http://www.environment.gov.au/biodiversity/threatened/species/pubs/726-conservation-advice-31032023.pdf. In effect under the EPBC Act from 31-Mar-2023.

Department of Natural Resources and Environment (2025). Natural Values Report_4_14-May-2025, Natural Values Atlas, Threatened Species Section, Department of Natural Resources and Environment Tasmania, Hobart, Tasmania.

Department of Primary Industries, Parks, Water and Environment (2020). TASVEG 4.0, Released July 2020. Tasmanian Vegetation Monitoring and Mapping Program, Resource Management and Conservation Division.

Department of Primary Industries, Parks, Water and Environment (2015). *Guidelines for Natural Values Surveys - Terrestrial Development Proposals.* Department of Primary Industries, Parks, Water and Environment (Natural and Cultural Heritage Division), Hobart, Tasmania.

Department of the Environment, Water, Heritage and the Arts (2008). Approved Conservation Advice for Perameles gunnii gunnii (Eastern Barred Bandicoot (Tasmania)). Canberra: Department of the Environment, Water, Heritage and the Arts. Available from: http://www.environment.gov.au/biodiversity/threatened/species/pubs/66651-conservation-advice.pdf. In effect under the EPBC Act from 26-Mar-2008.

Goff, F.G, Dawson, G.A. and Rochow, J.J. (1982). Site examination for threatened and endangered plant species. *Environmental Management* 6(4) pp 307-316.

Kitchener, A. and Harris, S. (2013). *From Forest to Fjaeldmark: Descriptions of Tasmania's Vegetation*. Edition 2. Department of Primary Industries, Parks, Water and Environment, Tasmania.

Koch, A.J., Munks, S.A., Woehler, E.J. (2009). Hollow-using vertebrate fauna of Tasmania: distribution, hollow requirements, and conservation status. *Australian Journal of Zoology* 56, 323-349.

North Barker Ecosystem Services (2024). Youth Detention Centre, 466 Brighton Road Pontville: Natural values determination. Unpublished report for DECYP 12/01/2024 (DFE001).

Tasmanian State Government (1995). *Threatened Species Protection Act 1995*. No.83 of 1995. Government Printer, Hobart, Tasmania.

Tasmanian State Government (2002). *Nature Conservation Act 2002*. No. 63 of 2002. Government Printer, Hobart, Tasmania.

Tasmanian State Government (2019). *Biosecurity Act 2019.* No. 22 of 2019. Government Printer, Hobart, Tasmania.

Threatened Species Scientific Committee (2016). Conservation Advice *Lathamus discolor* swift parrot, Department of the Environment, Canberra: Available from: http://www.environment.gov.au/biodiversity/threatened/species/pubs/744-conservation-advice-05052016.pdf. In effect under the EPBC Act from 05-May-2016.

Threatened Species Section (2023). Swift Parrot (*Lathamus discolor*), Species Management Profile for Tasmania's Threatened Species Link. Department of Natural Resources and Environment Tasmania. Available from: https://www.threatenedspecieslink.tas.gov.au/Pages/Swift-Parrot.aspx.

APPENDIX A – VASCULAR FLORA SPECIES LIST – 466 BRIGHTON ROAD

Status codes:

ORIGIN	NATIONAL SCHEDULE	STATE SCHEDULE
	EPBC Act 1999	TSP Act 1995
i - introduced	CR - critically endangered	e - endangered
d - declared weed WM Act	EN - endangered	v - vulnerable
en - endemic to Tasmania	VU - vulnerable	r - rare
t - within Australia, occurs only in Tas.		

Sites:

1	FAG - Agricultural land	4/02/2025	Aleida Williams
2	FAG (native grass patches) -	4/02/2025	Aleida Williams
3	NBA – Bursaria-Acacia woodland and scrub	4/02/2025	Aleida Williams
4	FAG - E521761, N5275296	11/12/2023	Ian Jenkinson

Site	Name	Common name	Status
	DICOTYLEDONAE		
	APIACEAE		
1	*Foeniculum vulgare*	fennel	d
	ASTERACEAE		
4	*Arctotheca calendula*	capeweed	i
1	*Chondrilla juncea*	skeletonweed	i?
1	*Cirsium arvense var. arvense*	Californian thistle	d
1 4	*Cirsium vulgare*	spear thistle	i
4	*Hypochaeris radicata*	rough catsear	i
1 3	*Leontodon saxatilis*	hairy hawkbit	i
4	*Sonchus asper*	bluegreen prickly sowthistle	i
	BORAGINACEAE		
2 4	*Hackelia suaveolens*	sweet hounds-tongue	
	BRASSICACEAE		
1 4	*Hirschfeldia incana*	hoary mustard	i
1 4	*Lepidium africanum*	common peppercress	i
4	*Lepidium draba*	hoary cress, white weed	d
	CARYOPHYLLACEAE		
4	*Paronychia brasiliana*	nailwort	i
4	*Scleranthus annuus*	annual knawel	i
4	*Spergularia rubra*	greater sandspurrey	i
	CHENOPODIACEAE		
1 4	*Chenopodium album*	fat hen	i
1 4	*Dysphania pumilio*	clammy goosefoot	i
1 4	*Einadia nutans subsp. nutans*	climbing saltbush	
	CONVOLVULACEAE		
1 4	*Convolvulus angustissimus subsp. angustissimus*	blushing bindweed	
	FABACEAE		
3 4	*Acacia dealbata subsp. dealbata*	silver wattle	
4	*Acacia pravissima*	Oven's wattle	i
4	*Acacia sp.*	wattle	i (Planted)
4	*Daviesia ulicifolia*	spiky bitterpea	
1	*Genista monspessulana*	Canary broom	d
1	*Trifolium arvense*	haresfoot clover	i
1	*Trifolium dubium*	suckling clover	i
4	*Trifolium subterraneum*	subterranean clover	i

1 4	*Ulex europaeus*	gorse	d
	GERANIACEAE		
4	*Erodium moschatum*	musky heronsbill	i
	LAMIACEAE		
1 4	*Marrubium vulgare*	white horehound	d
	MYRTACEAE		
4	*Eucalyptus leucoxylon subsp. megalocarpa*	red flowering yellow gum	i
4	*Eucalyptus ovata var. ovata*	black gum	
4	*Eucalyptus rubida*	candlebark	
4	*Eucalyptus sp.*	gum	i (Planted)
	MALVACEAE		
4	*Malva sp.*	mallow	i
	OXALIDACEAE		
3 4	*Oxalis corniculata subsp. corniculata*	yellow woodsorrel	
4	*Oxalis perennans*	grassland woodsorrel	
	PITTOSPORACEAE		
3 4	*Bursaria spinosa subsp. spinosa*	prickly box	
	PLANTAGINACEAE		
1 4	*Plantago coronopus*	buckshorn plantain	i
4	*Plantago lanceolata*	ribwort plantain	i
	POLYGONACEAE		
1 3 4	*Acetosella vulgaris*	sheep sorrel	i
4	*Polygonum aviculare*	creeping wireweed	i
4	*Rumex brownii*	slender dock	
1 4	*Rumex crispus*	curled dock	i
	RESEDACEAE		
1 4	*Reseda luteola*	weld	i
	ROSACEAE		
1 4	*Crataegus monogyna*	hawthorn	i
1 4	*Rosa rubiginosa*	sweet briar	i
1 4	*Rubus fruticosus*	blackberry	d
1	*Sanguisorba minor*	salad burnet	i
	SAPINDACEAE		
1	*Dodonaea viscosa subsp. spatulata*	broadleaf hopbush	
	SCROPHULARIACEAE		
1 4	*Verbascum thapsus*	great mullein	i
	SOLANACEAE		
1 4	*Lycium ferocissimum*	African boxthorn	d
	THYMELAEACEAE		
2	*Pimelea humilis*	dwarf riceflower	
	URTICACEAE		
1	*Urtica urens*	stinging nettle	i
	VIOLACEAE		
2 3	*Melicytus angustifolius subsp. divaricatus*	divaricate tree violet	
	MONOCOTYLEDONAE		
	ASPARAGACEAE		
3 4	*Lomandra longifolia*	sagg	
	CYPERACEAE		
3	*Ficinia nodosa*	knobby clubsedge	

	HEMEROCALLIDACEAE		
1	*Dianella revoluta*	spreading flaxlily	
	JUNCACEAE		
1 3	*Juncus australis*	southern rush	
1 3 4	*Juncus pallidus*	pale rush	
1 3	*Juncus subsecundus*	finger rush	
	POACEAE		
1	*Agrostis stolonifera*	creeping bent	i
3	*Aira sp.*	hair grass	i
2	*Austrodanthonia carphoides var. angustior*	short wallabygrass	
2	*Austrostipa nodosa*	knotty speargrass	
2	*Austrostipa scabra*	rough spear grass	
2 3 4	*Austrostipa stipoides*	coast speargrass	
3	*Austrostipa stuposa*	corkscrew speargrass	
1 4	*Avena sp.*	oat	i
1	*Bromus catharticus*	prairie grass	i
1 4	*Bromus diandrus*	great brome	i
1 4	*Bromus hordeaceus*	soft brome	i
4	*Cynosurus cristatus*	crested dogstail	i
1	*Cynosurus echinatus*	rough dogstail	i
1 4	*Dactylis glomerata*	cocksfoot	i
1 3 4	*Holcus lanatus*	Yorkshire fog	i
1 4	*Hordeum sp.*	barley, barley grass	i
1 4	*Lolium perenne*	perennial ryegrass	i
1 4	*Phalaris aquatica*	Toowoomba canarygrass	i
4	*Poa annua*	winter grass	i
4	*Poa labillardierei*	silver tussockgrass	
2	*Rytidosperma caespitosum*	common wallabygrass	
4	*Rytidosperma carphoides*	short wallabygrass	
1 4	*Vulpia sp.*	fescue	i
	PTERIDOPHYTA		
	DENNSTAEDTIACEAE		
4	*Pteridium esculentum subsp. esculentum*	bracken	

APPENDIX B – THREATENED FLORA RECORDED WITHIN 500 M AND 5 KM OF THE SURVEY AREA

Table C1: Verified threatened flora records from within 500 m of the survey area. Sourced from the Natural Values Atlas (Department of Natural Resources and Environment, 2025)

Verified Records

Species	Common Name	SS	NS	Bio	Observation Count	Last Recorded
Austrostipa bigeniculata	doublejointed speargrass	r		n	4	18-Nov-2021
Brachyscome rigidula	cutleaf daisy	v		n	1	15-Nov-1998
Calocephalus citreus	lemon beautyheads	r		n	62	18-Jan-2022
Coronidium gunnianum	swamp everlasting	e		n	1	01-Jan-1900
Cryptandra amara	pretty pearlflower	e		n	8	09-Dec-2021
Dianella amoena	grassland flaxlily	r	EN	n	209	18-Jan-2022
Eryngium ovinum	blue devil	v		n	30	09-Dec-2021
Glycine latrobeana	clover glycine	v	VU	n	10	17-Dec-2008
Haloragis heterophylla	variable raspwort	r		n	1	25-Feb-2010
Isoetopsis graminifolia	grass cushion	v		n	2	01-Nov-1999
Lepidium hyssopifolium	soft peppercress	e	EN	n	1	31-Jan-1974
Pellaea calidirupium	hotrock fern	r		n	10	08-Dec-2021
Pterostylis ziegeleri	grassland greenhood	v	VU	e	3	01-Nov-1999
Pultenaea prostrata	silky bushpea	v		n	21	08-Dec-2021
Teucrium corymbosum	forest germander	r		n	2	18-Jan-1930
Triptilodiscus pygmaeus	dwarf sunray	v		n	2	01-Nov-1999
Vittadinia burbidgeae	smooth new-holland-daisy	r		e	1	08-Oct-2013
Vittadinia muelleri	narrowleaf new-holland-daisy	r		n	14	08-Dec-2021
Vittadinia muelleri (broad sense)	narrow leaf new holland daisy	p		n	2	01-Nov-1999
Xanthoparmelia amphixantha		e		n	18	01-Apr-2014
Xanthoparmelia molliuscula		e		n	9	01-Apr-2009
Xanthoparmelia vicariella		r		e	3	01-Apr-2009

Table C2: Verified threatened flora records from within 5 km of the survey area. Sourced from the Natural Values Atlas (Department of Natural Resources and Environment, 2025)

Verified Records

Species	Common Name	SS	NS	Bio	Observation Count	Last Recorded
Asperula scoparia subsp. scoparia	prickly woodruff	r		n	4	19-Sep-2016
Austrostipa bigeniculata	doublejointed speargrass	r		n	126	11-Feb-2022
Austrostipa blackii	crested speargrass	r		n	4	12-Jan-2022
Brachyscome rigidula	cutleaf daisy	v		n	1	15-Nov-1998
Calocephalus citreus	lemon beautyheads	r		n	169	10-Feb-2022
Calocephalus lacteus	milky beautyheads	r		n	7	01-Dec-1992
Carex gunniana	mountain sedge	r		n	1	01-Nov-1984
Coronidium gunnianum	swamp everlasting	e		n	2	01-Jan-1900
Cryptandra amara	pretty pearlflower	e		n	28	09-Dec-2021
Desmodium varians	slender ticktrefoil	e		n	4	09-Jan-2016
Dianella amoena	grassland flaxlily	r	EN	n	728	14-Nov-2023
Discaria pubescens	spiky anchorplant	e		n	1	01-Jan-1880
Eryngium ovinum	blue devil	v		n	44	09-Dec-2021
Eucalyptus risdonii	risdon peppermint	r		e	2	01-Jul-2002
Glycine latrobeana	clover glycine	v	VU	n	14	17-Dec-2008
Goodenia paradoxa	spur velleia	v		n	5	01-Jan-1999
Gratiola pubescens	hairy brooklime	r		n	1	01-Feb-1892
Haloragis heterophylla	variable raspwort	r		n	44	23-Nov-2021
Hibbertia basaltica	basalt guineaflower	e	EN	e	185	12-Jan-2022
Hyalosperma demissum	moss sunray	e		n	2	30-Sep-2009
Isoetopsis graminifolia	grass cushion	v		n	149	13-Jan-2022
Lepidium hyssopifolium	soft peppercress	e	EN	n	1	31-Jan-1974
Levenhookia dubia	hairy stylewort	x		n	2	01-Jan-1880
Pellaea calidirupium	hotrock fern	r		n	21	12-Jan-2022
Pterostylis wapstrarum	fleshy greenhood	e	CR	e	6	01-Nov-2009
Pterostylis ziegeleri	grassland greenhood	v	VU	e	38	04-Nov-2016
Pultenaea prostrata	silky bushpea	v		n	47	08-Dec-2021
Ranunculus pumilio var. pumilio	ferny buttercup	r		n	4	27-Oct-2009
Rumex bidens	mud dock	v		n	2	01-Jan-1875
Schoenoplectus tabernaemontani	river clubsedge	r		n	1	16-Jun-2019
Scleranthus diander	tufted knawel	v		n	2	09-Nov-2021
Scleranthus fasciculatus	spreading knawel	v		n	14	02-Jun-2012
Senecio squarrosus	leafy fireweed	r		n	16	02-Dec-2021
Siloxerus multiflorus	small wrinklewort	r		n	2	20-Oct-2015
Stackhousia subterranea	grassland candles	e		n	7	02-Nov-2021
Teucrium corymbosum	forest germander	r		n	3	18-Jan-1930
Triptilodiscus pygmaeus	dwarf sunray	v		n	55	09-Nov-2021
Vallisneria australis	river ribbons	r		n	22	16-Mar-2001
Vittadinia burbidgeae	smooth new-holland-daisy	r		e	5	04-Nov-2021
Vittadinia cuneata var. cuneata	fuzzy new-holland-daisy	r		n	20	02-Jun-2012
Vittadinia gracilis	woolly new-holland-daisy	r		n	45	19-Sep-2016
Vittadinia muelleri	narrowleaf new-holland-daisy	r		n	341	01-Feb-2022
Vittadinia muelleri (broad sense)	narrow leaf new holland daisy	p		n	41	28-Mar-2007
Xanthoparmelia amphixantha		e		n	59	01-Apr-2014
Xanthoparmelia mannumensis		v		n	3	01-Apr-2009
Xanthoparmelia molliuscula		e		n	15	01-Apr-2009
Xanthoparmelia vicariella		r		e	24	17-Mar-2023

APPENDIX C – THREATENED FAUNA RECORDED WITHIN 5 KM OF THE SURVEY AREA

Table D1: Verified threatened fauna records from within 5 km of the survey area. Sourced from the Natural Values Atlas (Department of Natural Resources and Environment, 2025)

Verified Records

Species	Common Name	SS	NS	Bio	Observation Count	Last Recorded
Aquila audax	wedge-tailed eagle	pe	PEN	n	23	12-Jun-2023
Aquila audax subsp. fleayi	tasmanian wedge-tailed eagle	e	EN	e	11	20-Jan-2025
Dasyurus maculatus	spotted-tailed quoll	r	VU	n	1	06-Dec-2022
Haliaeetus leucogaster	white-bellied sea-eagle	v		n	2	24-Jun-2023
Lathamus discolor	swift parrot	e	CR	mbe	6	04-Jan-2015
Perameles gunnii	eastern barred bandicoot		VU	n	43	17-Jun-2024
Pseudemoia pagenstecheri	tussock skink	v		n	5	01-Dec-2009
Sarcophilus harrisii	tasmanian devil	e	EN	e	17	07-Nov-2024
Tyto novaehollandiae	masked owl	pe	PVU	n	2	13-Feb-2019

northbarker
ECOSYSTEM SERVICES

Proposed New Tasmanian Youth Justice Facility

466 BRIGHTON RD PONTVILLE TAS 7030

Bushfire Report and Hazard Management Plan

4th November 2025

For Grieve Gillett Architects

(GGA001)

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Summary

Survey and report details	
Surveyed by	Cameron Geeves – 18th February 2025
Photos	Cameron Geeves
Report and Hazard Management Plan prepared by	Cameron Geeves (BSc Hons) (BFP – 178)
Emergency Management Strategy	Bryce Taplin (Taplin Consulting) and reviewed by Cameron Geeves
File control	v0.1 draft to Greive Gillet Architects 14/05/2025
	v0.2 draft addressing DPAC/DECYP comment to TFS for review 05/06/2025
	v0.3 address TFS comments and updated design 25/07/25
	v0.4 address TFS comments 04/08/2025
	v1.0 delivered to Greive Gillet Architects 07/08/2025
	v1.1 section 4 addendum to TFS 28/10/2025
	v2.0 minor amendments to TFS 04/11/2025
Mapping	Liam Andrews (BSc), Rabin Khatri (BSc, MEnvGeospatial), Eric Hong (BEng, MID, MAppSc) and Cameron Geeves
Site details	
Site name	Proposed New Tasmanian Youth Justice Facility
Address and PID	466 BRIGHTON RD PONTVILLE TAS 7030
Planning scheme - council	Tasmanian Planning Scheme – Southern Midlands (Youth Justice Facility) Tasmanian Planning Scheme – Brighton (Public access)
Planning scheme – zoning	Rural (Zone 20)
Planning scheme – code overlays	• Bushfire Prone Areas (entire cadastral parcel) • Scenic Protection (partial) • Natural Assets (partial)
BCA class of buildings	Class 3 / 5: Accommodation houses, admissions and health care Class 5: Entry building and administration,. Class 6: Café and visitors centre Class 9b: Education, recreation, cultural. Class 7b: Maintenance shed
Determined Bushfire Attack Level for the Facility	BAL 19: Education, Entry and Administration buildings BAL 12.5: All remaining habitable buildings

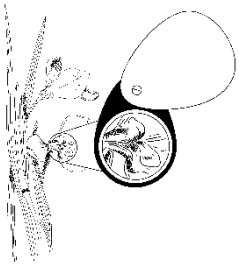


TABLE OF CONTENTS

1 INTRODUCTION

The Tasmanian Government is reforming the youth justice system through a comprehensive, integrated and therapeutic approach that prioritises the rights of children, rehabilitation and breaking the cycle of offending. This includes the delivery of a new Tasmanian Youth Justice Facility to replace Ashley Youth Detention Centre. The new facility will provide an environment where children and young people experience the highest standards of child-centred, rights-based and therapeutic care, where they are provided with education, services and opportunities that support them to enhance connections and return successfully to community.

The new Tasmanian youth justice facility is designed to house up to 24 young people, comprising 20 residential beds, 2 treatment beds in the health centre, and two orientation beds in the admissions area. In addition, the facility will include a health centre providing health and mental support, education and recreational facilities, and a cultural centre and garden. Landscaping will also be provided across the site. The facility will be staffed 24 hours a day.

The following proposal is for the development of a Proposed Tasmanian Youth Justice (custodial) Facility (hereafter known as the Facility) at 466 Brighton Road, Pontville (PID: 3523093) (hereafter known as the Site).

Under the *Tasmanian Planning Scheme – Southern Midlands* a custodial facility meets the definition as a vulnerable use and therefore must meet clause C13.5.1 (vulnerable uses) under the Bushfire-Prone Areas code.

The Facility will include buildings that will be used for educational purposes which meet the definition to be classified as certain class 9 buildings under the National Construction Code. Certain class 9 buildings within the facility must meet design requirements under Specification 43.

The site is within the municipality of Southern Midlands. The *Tasmanian Planning Scheme – Southern Midlands* (2020) identifies the land (466 Brighton Road, Pontville) as being within the Bushfire Prone Areas overlay. Grieve Gillett Architects have engaged North Barker Ecosystem Services on behalf of the proponent, the Tasmanian Government, to complete Bushfire Report and Hazard Management Plan as required to support the submission of a planning permit application to the Southern Midlands Council. This, in conjunction with the supporting planning report and other accompanying specialist reports, provide a detailed assessment against the relevant planning scheme requirements.

This report has been prepared by Cameron Geeves BFP – 178, Scope of accreditation – 1, 2 and 3B provisional scopes 3A and 3C, and demonstrates the proposal will likely comply with the following:

- C13.0 Bushfire-Prone Areas Code (the Code)
- Directors Determination – Bushfire Hazard Areas v1.2
- Certain Class 9 buildings must comply with additional requirements under Part G5 of the National Construction Code (NCC)

The proposal must comply with the required setbacks for the Bushfire Attack Level (BAL) and other mitigation in compliance with the AS3959:2018 Construction of Buildings in Bushfire Prone Areas as well as Specification 43 certain class 9 buildings. Given the proposal is classified as a vulnerable use – being for a correctional facility – it must meet the requirements of P1, A2 and A3 C13.5.1 of the Code.

2 SITE DESCRIPTION

The site is situated on c. 20 ha of crown owned land directly north of Pontville between the Midland Highway and Brighton Road (Figure 1). The land is degraded pasture and is currently rented to house ex racehorses and contains a number of smaller paddocks divided by shelter belts of Eucalypts (Figure 2). The lot as well as land from the southeast through to southwest, is zoned Rural. 466 Brighton Road, Pontville is bounded by land zoned utilities (Midlands Highway) to the north and east. The site and surrounds are essentially flat however there is a gentle slope to the north, east and south.

The site is subject to the following code overlays under the Tasmanian Planning Scheme – *Southern Midlands*.

- Bushfire-prone areas –applicable to the entire site
- Scenic road corridor – small part of the eastern section of the site associated with buffer of the Midlands Highway.
- Priority vegetation area – small part of the eastern / southern section of the site. This code is addressed in detail in a natural values report[1].

  Importantly, this report concludes that potential impacts associated with the proposed development are expected to be minimal with respect to potential conservation significant values, primarily on account of the general lack of habitat and the site being dominated by heavily modified agricultural land.

The predominant wind direction during summer in fire weather is from the northwest[2]. The site and surrounds were inspected on the 18th of February 2025. See Figures 1 - 2 for the context and locality of the proposal.

1 North Barker Ecosystem Services (2025)
2 Pers comm. Mark Chladil, Tasmania Fire Service (March 2025)

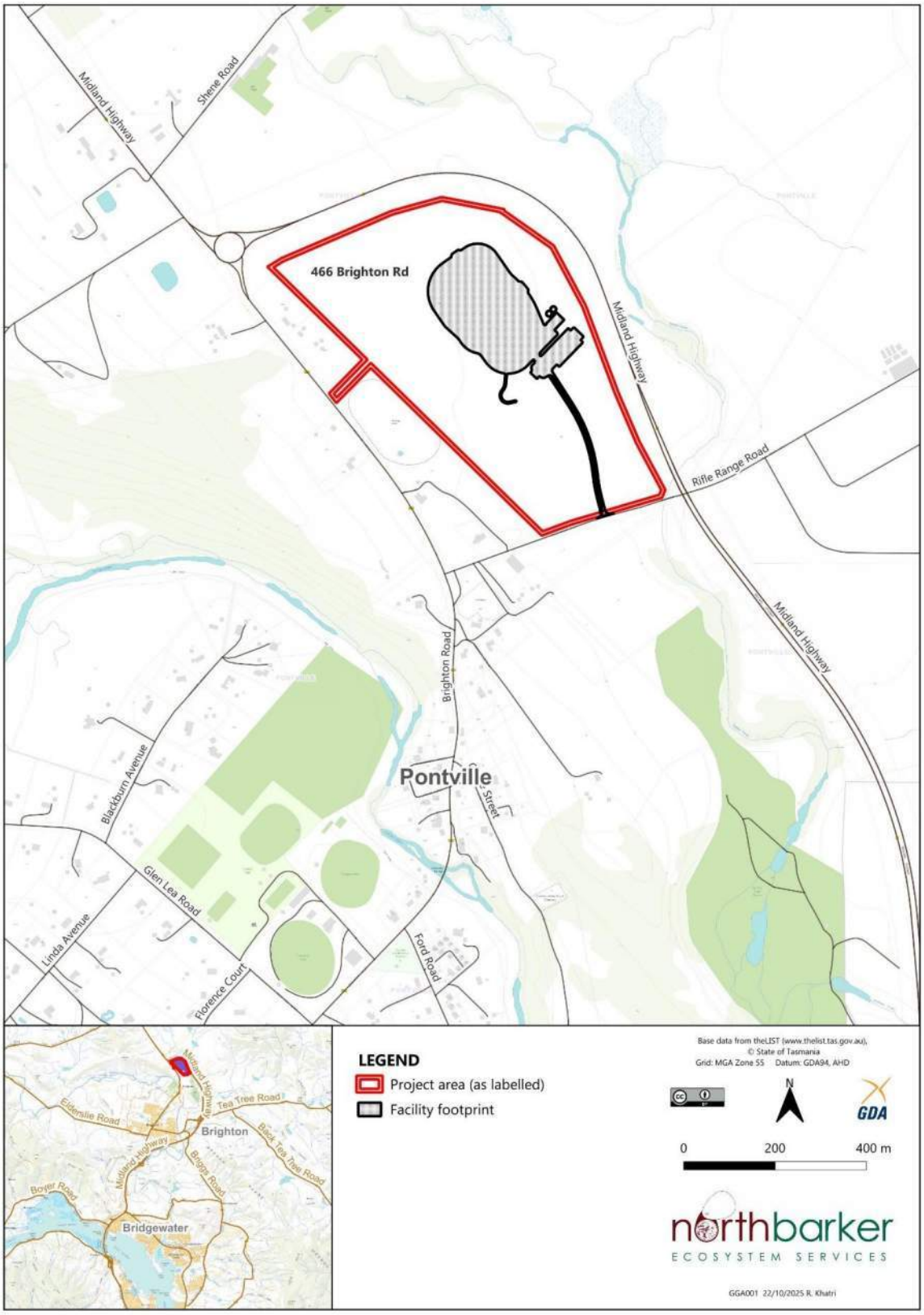


Figure 1: The location and context of 466 Brighton Road, Pontville.

Figure 2: State aerial imagery of the site (theLIST map, image date 24/02/2024 and 06/03/2024).

2.1 LIMITATIONS

This report is based on site measurements at the time of inspection and from information provided by the proponent. The report is limited in scope to bushfire hazard assessment only. The assessment is based on this proposal and its findings are for this site only. Future changes to the building proposal or changes in the vegetation that affect bushfire hazard have not been considered.

The report has been created primarily to assess the development layout and/or the applicable building construction standards, where relevant. The measures outlined are the minimum standards based on the requirements set by the relevant authorities. The effectiveness of bushfire risk mitigation will depend on the actions of the landowner and is not the responsibility of the author. For guidance on preparing for and responding to a bushfire, the local government and fire authority (e.g., Tasmania Fire Service or the local bushfire brigade) should be consulted.

Due to the unpredictable nature of bushfire behaviour and the impacts of extreme weather no structure built in a bushfire-prone area can be guaranteed to survive a bushfire. If possible, the safest option in the event of a bushfire is to leave the area early and seek shelter in a safe location.

3 PROPOSED DEVELOPMENT

The Proposed Tasmanian Youth Justice Facility Masterplan was released on the 5th of May 2025. This masterplan outlines the design rationale for the facility and gives a description of each building as well as access, landscaping and site infrastructure relevant to this report.

3.1 BUILDING

Figure 3 depicts the master plan for the facility and figure 4 depicts a preliminary detailed design of the facility. The facility will accommodate occupants who require support/supervision for daily living. The facility will be secure and includes perimeter fencing which will inhibit residents ability to independently take appropriate action in an emergency and therefore residents are wholly reliant on staff in the case of an emergency. Support staff, including an Emergency Control Organisation (ECO) and fire wardens will be present onsite at all times.

Table 1 below illustrates the NCC building classification for each building within the facility:

Table 1: NCC building classification for each building within the facility with reference to the preliminary detailed design (depicted in Figure 4 below).

NCC building class	Building within facility
Class 3 / 5	Buildings J, K, L and N - Accommodation / Houses Building C – Admissions Building D – Health care
Class 5	Building A - Entry building Building F - Administration
Class 6	Building E – Café Building E - Visitor centre
Class 9b	Building G - Education Building H - Recreation Building M - Cultural
Class 7b	Building B - Maintenance building

3.1.1 Certain class 9 buildings

Within the Facility, the education building – Building G - meets the definition of a certain class 9 building under the National Construction Code (2022) Part G5P1 as it is proposed to deliver either primary or secondary education (or both) depending on the needs of the residents.

3.2 ACCESS AND WATER SUPPLY

3.2.1 Public access

Public access to the Facility is proposed from Rifle Range Road which is proposed to be upgraded as a part of the development.

3.2.2 Private access

Access to the Facility is proposed to be from Rifle Range Road via a two way road and is c. 400 m in length.

Perimeter (exterior) access

Given the nature of the Facility, perimeter fencing will be incorporated around the extent of the buildings. A 4.5 m wide all weather (gravel) perimeter access road beyond this fencing will provide access for emergency vehicles to the exterior of the site. Although the perimeter access has been designed to enable travel in a forward direction from the public road around the entire Facility, seven passing bays have been included.

Internal access

A 4.5 m wide internal access road suitable for fire appliances will provide access to the extent of the internal portion of the Facility.

Access to the internal part of the Facility is through the sally port and secure service yard. This access will effectively encircle the central spine buildings and terminates with a turning area on a basketball court. The internal access also provides two passing bays, one on each side of the central spine of buildings. The design of the sally port will consider the access requirements for fire appliance as directed by the Tasmania Fire Service.

Parking

Staff and visitor parking lots will be situated next to the Facility entrance which is on the southeastern side of the Facility.

3.2.3 Supply of water for firefighting

Reticulated water

The site is located within a water serviced area. Consultation is required with TasWater, and a fire hydrant system must be installed that meets the requirements of AS2419.1.

Static water supply

A secondary water supply for fire fighting purposes is proposed to be installed for the Facility. Two c. 250,000 L tanks are proposed to be installed on the northern side of building B, which can supplement water supply to the external portion of the Facility.

3.3 LANDSCAPING

A landscaping plan has been developed which primarily serves to screen the Facility from the Midlands Highway and neighbouring residences. The plan consists of a 9 – 10 m wide screen that extends around

the property boundary and proposed car parking. The screening will consist of local provenance Eucalypt species such as *Eucalyptus ovata* and *E. rubida* with a subcanopy of *Acacia* and *Allocasuarina* species. The screening is considered as low threat vegetation under AS3959: 2018 clause 2.2.3.2 (f). Figure 5 depicts the current landscaping plan for the Facility.

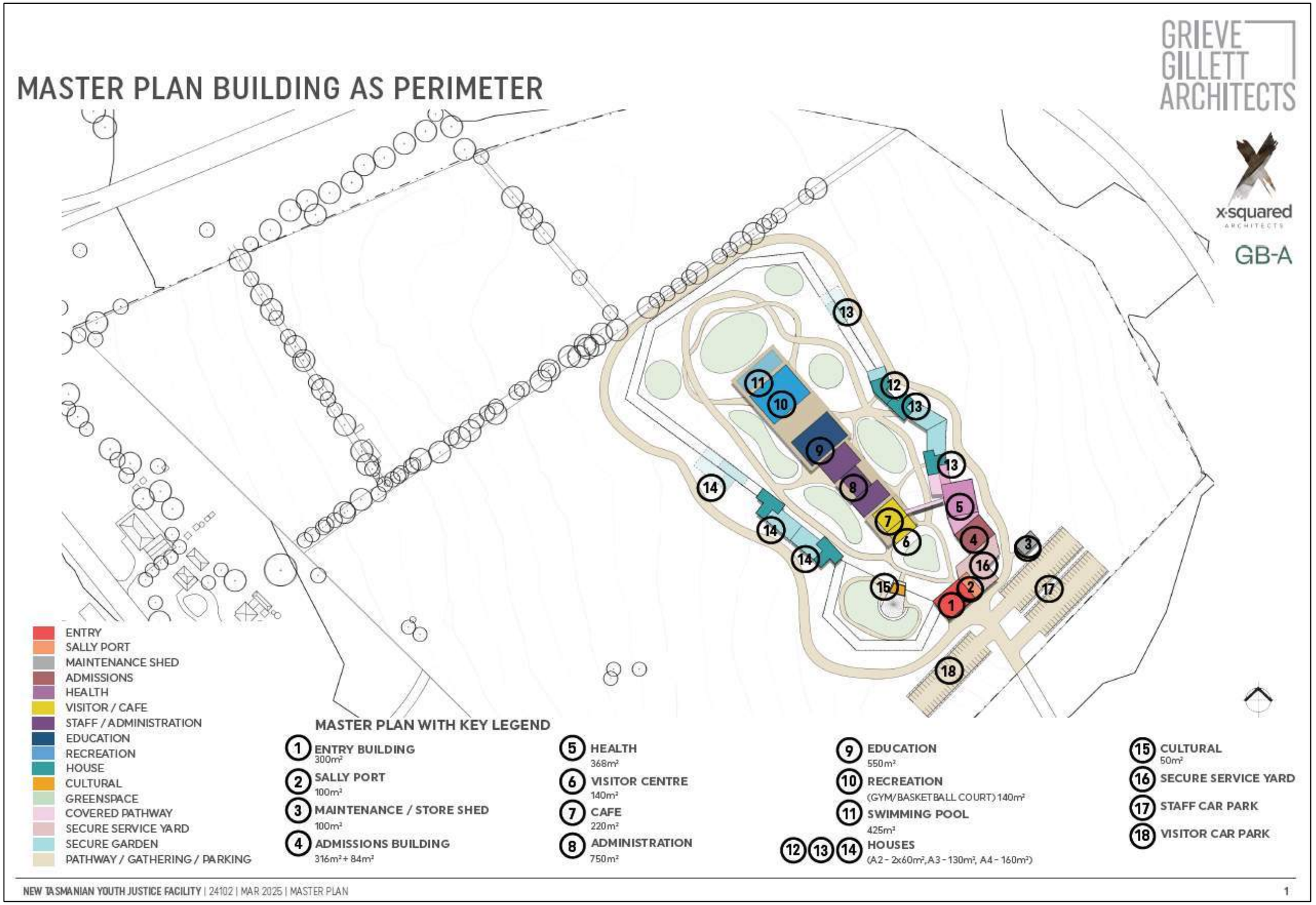


Figure 3: Master plan for the Proposed Tasmanian Youth Justice Facility at 466 Brighton Road, Pontville.

Figure 4. Detailed design for the Proposed Tasmanian Youth Justice Facility at 466 Brighton Road, Pontville.

Figure 5: Screening / landscaping plan for the Proposed Tasmanian Youth Justice Facility at 466 Brighton Road, Pontville.

4 ADDENDUM – DESIGN CHANGES OCTOBER 2025

4.1 PURPOSE

This addendum has been prepared to describe changes to the New Tasmanian Youth Justice Facility site plan.

4.2 DESCRIPTION OF CHANGES

This addendum report is based on the following documents:

- Overall site plan (17/10/25) – Grieve Gilett Architects, and
- Enclosure site plan (17/10/25) – Grieve Gilett Architects.

The revised overall site plan includes one change. The adjoining land (36 Rifle Range Road, Pontville) has now been purchased – and appended to 466 Brighton Road, Pontville. Figures 6 and 7 illustrate this change.

The enclosure site plan has been modified so that:

- the boundary fencing, perimeter access road and passing bays of the facility have been altered (reduced in size on the north-western side of the facility),
- the internal access road of the facility has in turn been altered to accommodate the changes to the perimeter fencing, and
- very minor alterations to the shapes of building within the Facility – noting that the locations of each building are essentially the same.

The client has also identified that a portion of the entry building (BUILDING A) which is planned to be used as the Facilities main control room be built as a fire refuge. The purpose for this is so the Facility can remain under control / surveillance in the event of an emergency (including in the event of a bushfire).

Figures 8 and 9 below illustrate the enclosure site plan originally used for assessment and the updated plan respectively.

Figure 6: State aerial imagery of the site (theLIST map, image date 24/02/2024 and 06/03/2024). 466 Brighton Road, Pontville and 36 Rifle Range Road, Pontville.

Figure 7. 466 Brighton Road, Pontville.

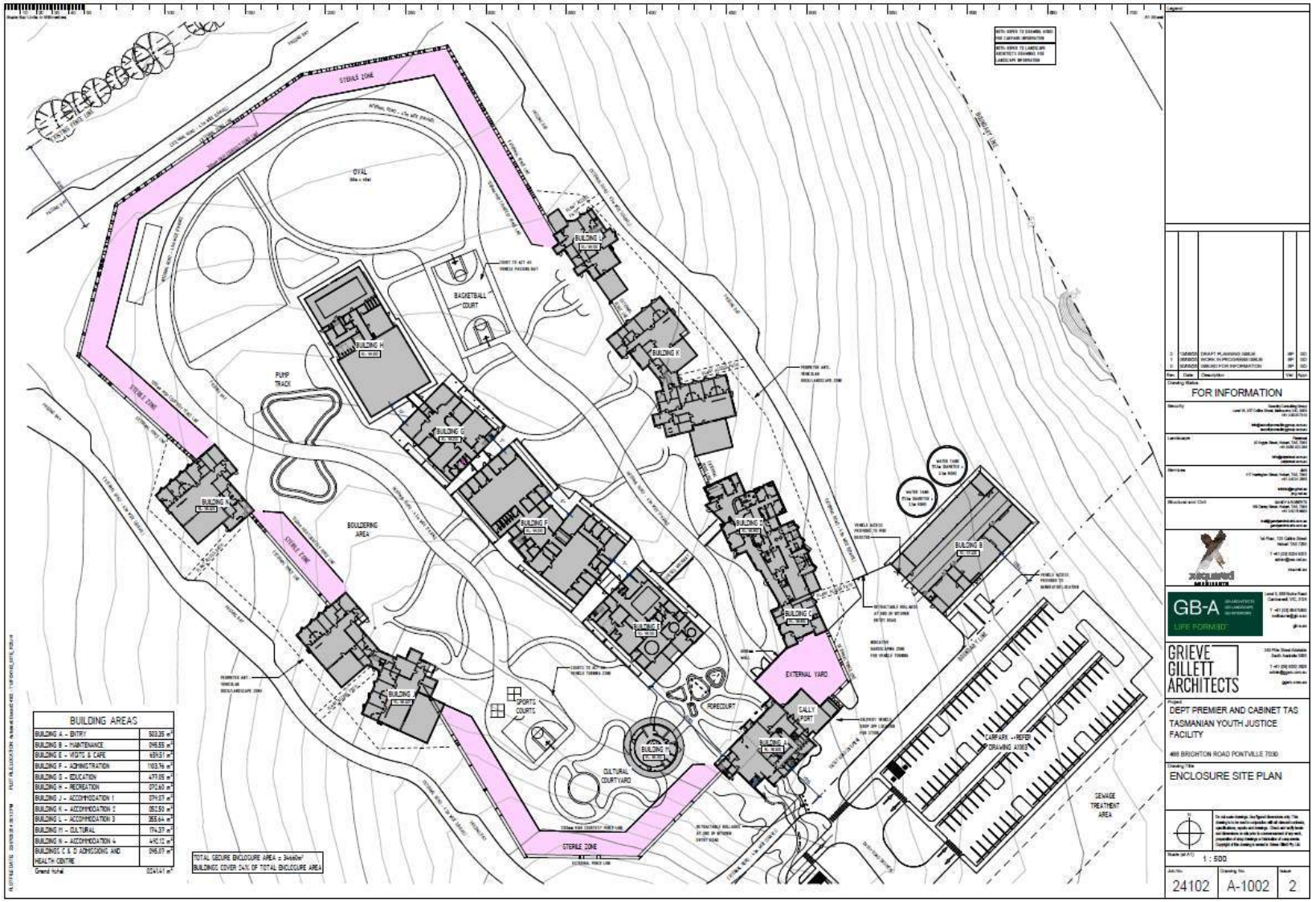


Figure 8. Original design used for the BHMP assessment for the Proposed Tasmanian Youth Justice Facility at 466 Brighton Road, Pontville.

Figure 9. Updated design for the New Tasmanian Youth Justice Facility.

4.3 ASSESSMENT OF IMPLICATIONS

Overall, the changes to the facility design do not result in any meaningful change to the bushfire exposure or required Bushfire Attack Level (BAL) setbacks previously assessed for the site. The footprint of habitable buildings remains essentially unchanged, and the bushfire hazard management area identified in the original Bushfire Hazard Management Plan (BHMP) provide the necessary protection to achieve compliance with the requirements of AS 3959: 2018 and C13.5.1 of the Bushfire-Prone Areas Code.

The reduction in the extent of the perimeter fencing and associated external access road on the north-western side of the Facility does not increase bushfire risk. The remaining perimeter road and associated passing bays have not changed.

The adjustment to the internal access road layout maintains continuous all-weather access around the secure portions of the facility. Minor changes to individual buildings do not affect building separation distances.

The designation of the control room within Building A (Entry Building) as a fire refuge is a necessary measure to ensure the facility can maintain control and coordination during an emergency. When constructed to an appropriate BAL 19 and fire-resistance standard, the refuge will provide a shelter-in-place option for staff, ensuring continuity of communication and oversight should external evacuation be temporarily unsafe. Final detailed design should ensure that the refuge space is developed as a performance solution, incorporating advice from the project's fire engineer to achieve compliance with AS 3959:2018 and NCC Part G5 performance requirements.

In summary, the revised design is consistent with the mitigation measures established in the original BHMP and does not trigger any change to the applicable BAL ratings, access or water-supply requirements, or compliance outcomes under the Bushfire-Prone Areas Code or the Director's Determination – Bushfire Hazard Areas v1.2, with the exception of Building A, which must now be constructed to BAL 19 (increased from BAL 12.5) to reflect its designation as a staff fire refuge.

The subsequent sections and remainder of this report incorporate these design changes and updated requirements accordingly.

5 BUSHFIRE HAZARD ASSESSMENT

5.1 VEGETATION AND EFFECTIVE SLOPE

5.1.1 Bushfire-prone vegetation

The lot and surrounds consist of grassy paddocks and pasture with occasional small woody weeds (Figure 8). The northern portion of the lot has been divided into smaller paddocks by shelter belts of Eucalypts that contain an understory of woody weeds. A reasonably large (0.3 ha) infestation of blackberry has colonised the southern portion of the lot, which is part of a larger patch on neighbouring land at 440 Brighton Road, Pontville. Under Table 2.3 of AS3959: 2018 vegetation on the lot has been classified as follows:

- pasture / paddock areas: grassland
- shelter belts: low threat vegetation.
- infestation of blackberry: scrub.

Under Table 2.3 of AS3959: 2018 vegetation beyond the lot boundaries (within 140 m) has been assessed as predominantly grassland with small areas of forest to the northwest and southwest. Plates 1 - 4 depict vegetation in proximity of the facility. No vegetation mapped on the site is listed as threatened under either Tasmanian *Nature Conservation Act 2002* or Federal *Environment Protection and Biodiversity Conservation Act 1999.* Classification of vegetation within 140 m of the site is in accordance with Table 2.3 of AS3959: 2018.

5.1.2 Topography and slope

Within 140 m of the proposal the land slopes very gently to the north, east and south. More locally, slope on the lot is influenced by a small drainage line which runs south towards Rifle Range Road. Figure 10 depicts slope in degrees that has been modelled within c. 140 m of the site. The site is situated ~ 20 m above sea level.

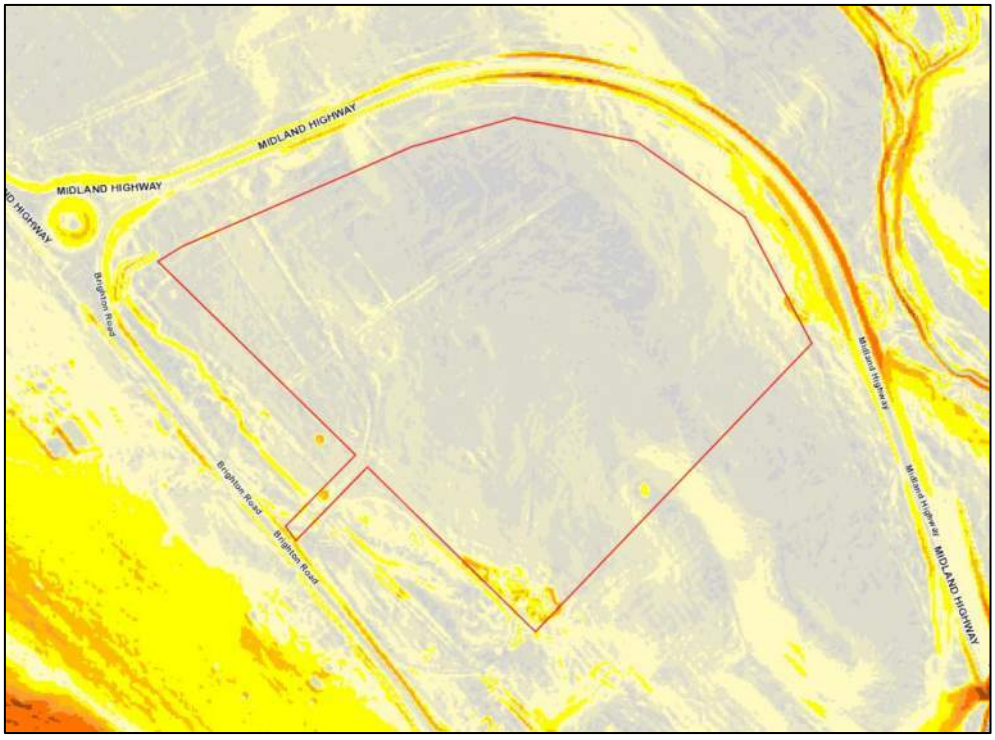


Figure 10: Slope in degrees digital elevation model in proximity of 466 Brighton Road, Pontville. The site is essentially flat with a gentle slope to the southeast. Accessed from theLIST map 27/03/2025.

5.2 Fire History

The fire history layer from the LIST shows two bushfires have occurred in proximity of the site (the 1967 Black Tuesday fire and the Midlands Highway fire).

The Midlands Highway grassfire occurred in the 2018/19 fire season (25th February) and quickly burned an extensive area of land southeast of the site (LIST accessed 27/03/2025[3]) (Figure 11). This fire started from roadside slashing work[4].

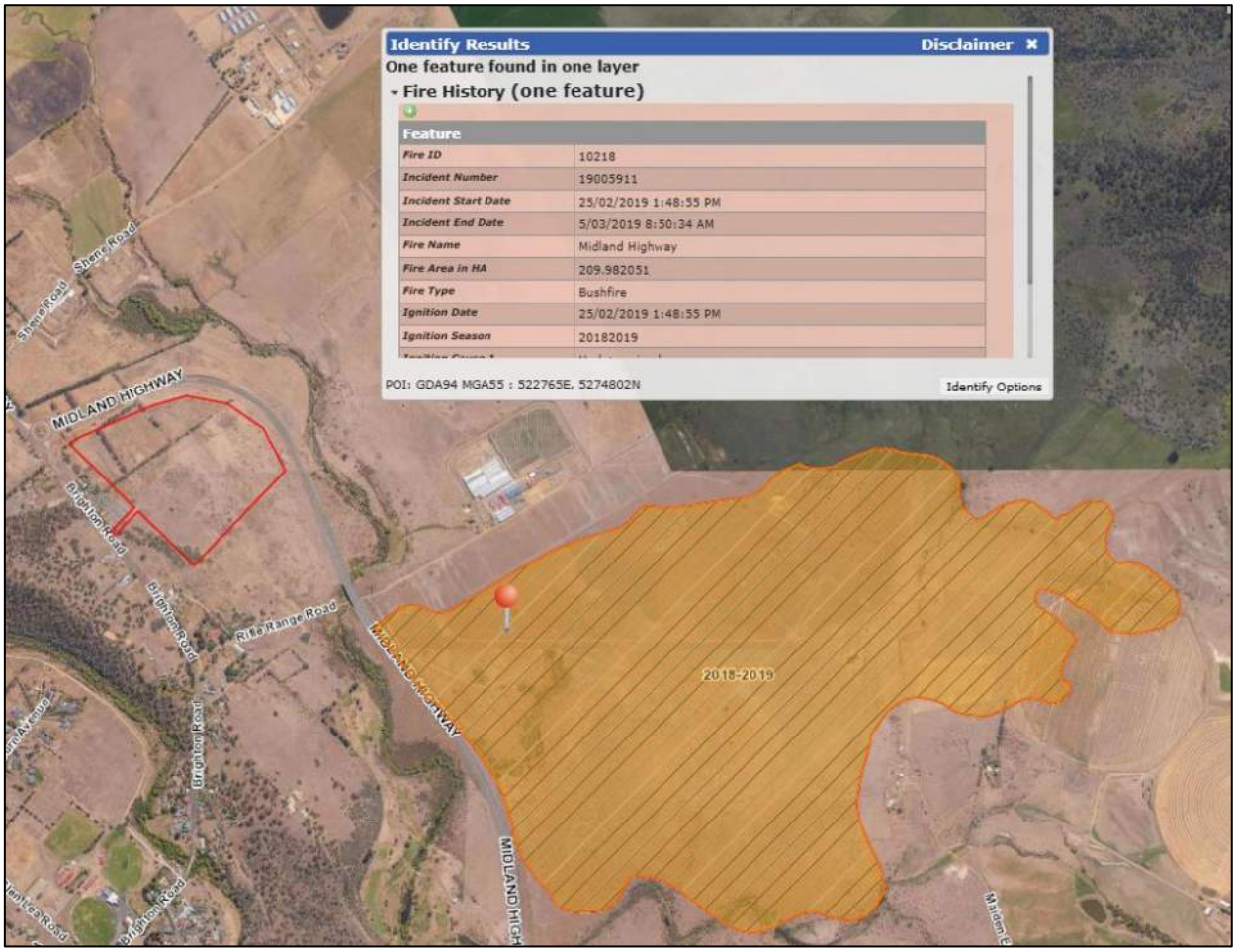


Figure 11. Extent of the Midlands Highway fire in proximity of the site.

[3] Note: Data accessed from the LIST is not a complete record of all fire incidents.
[4] Pers comm. Mark Chladil - Tasmania Fire Service (24/03/2025)

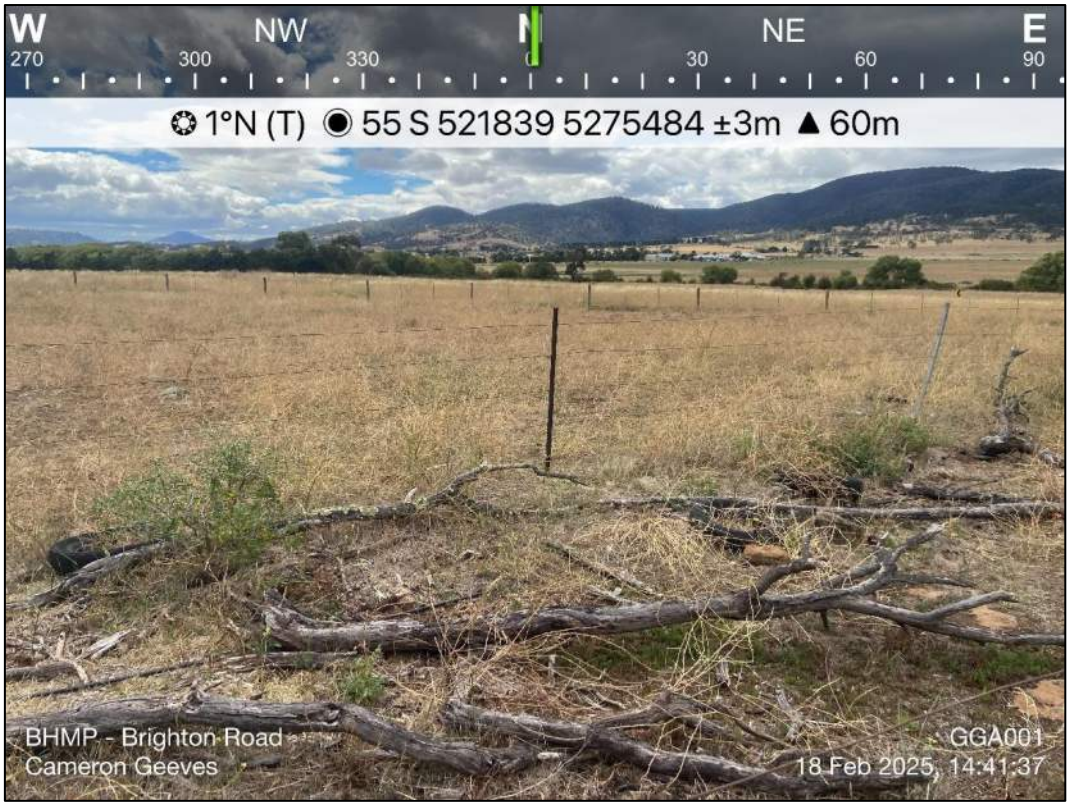


Plate 1. Looking north from the northern most edge of the proposed facility.

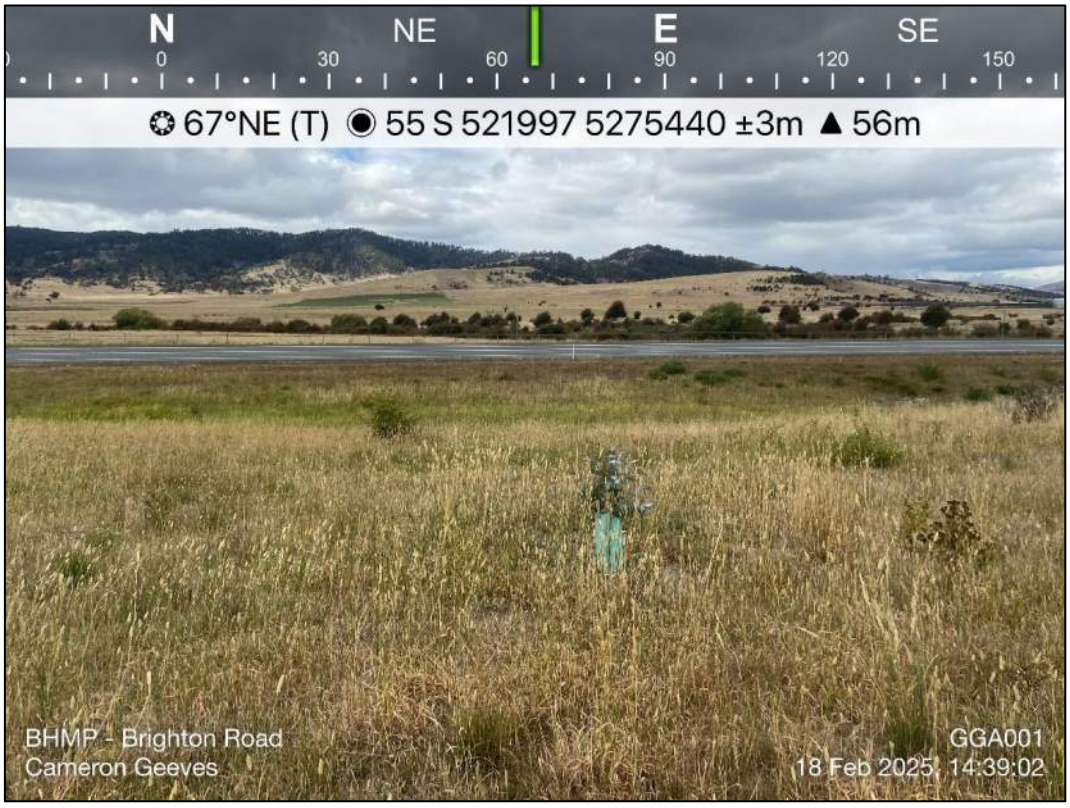


Plate 2. Looking east from the site boundary across the Midlands Highway.

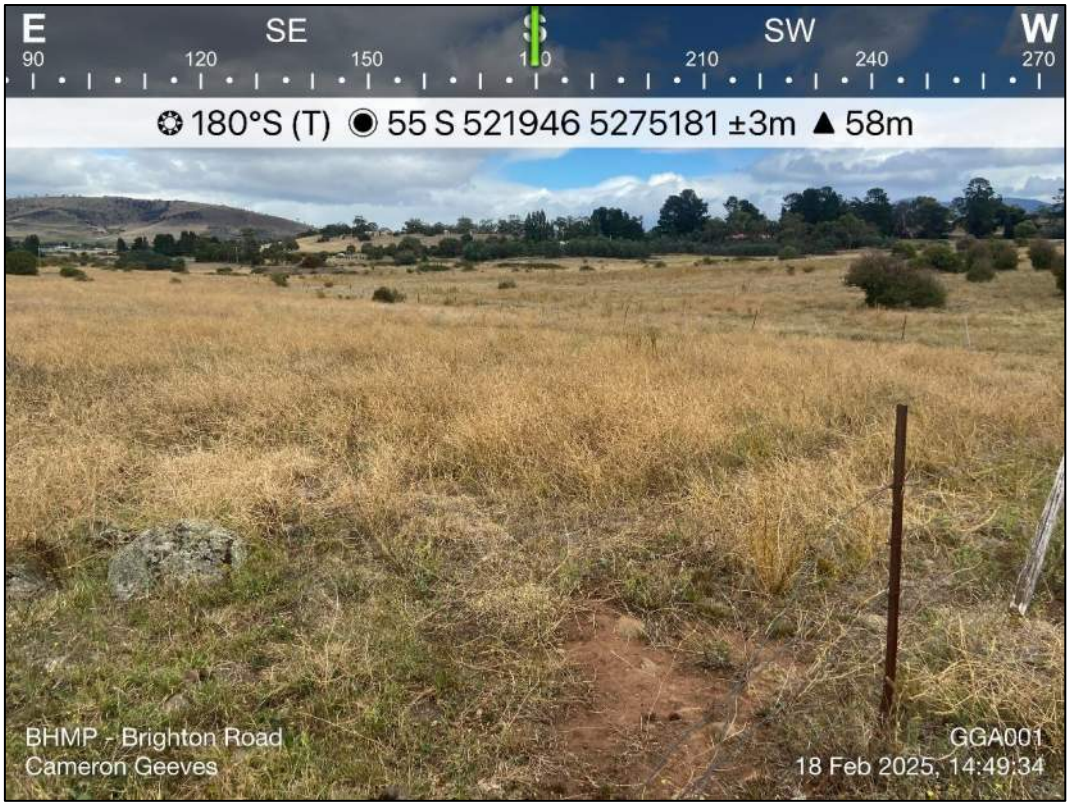


Plate 3. Looking south from the site boundary towards Rifle Range Road.

Plate 4. Looking west from the sites southern boundary. Occasional woody shrubs in grassland.

6 BUSHFIRE ATTACK LEVEL ASSESSMENT

This Bushfire Attack Level (BAL) assessment relates to all habitable buildings (Class 3, 5 and 9b) proposed within the preliminary detailed design from hereafter 'Facility area' and has been conducted in accordance with Clause 2.2 Simplified Procedure (Method 1) of AS3959: 2018.

The BAL assessment for all buildings has been conducted in accordance with Clause 2.2 Simplified Procedure (Method 1) of AS3959: 2018.

Tables 2 - 16 and Figure 12 indicate the site characteristics within a 140 m buffer of the lot boundary that have been assessed to determine the BAL of the proposal and provide the dimensions for the hazard management area for a BAL 12.5 solution as per Table 2.6 of AS 3959:2018.

The BHMP makes provision for separation from bushfire-prone vegetation that complies (or exceeds) the minimum distances for BAL-12.5 as determined in Table 2.6 of AS 3959:2018.

NOTE: All distances are based on information provided by the client.

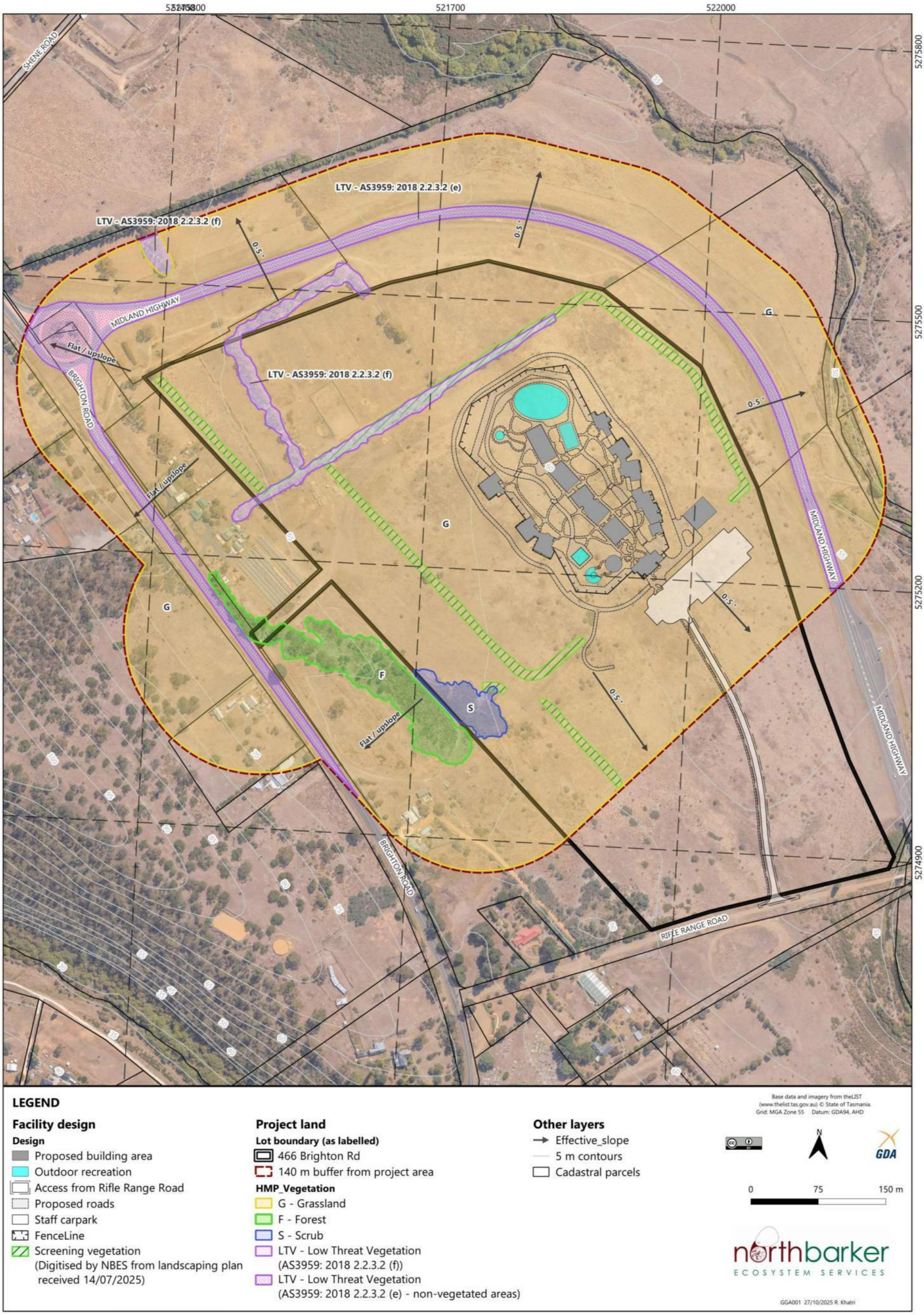


Figure 12. Site analysis plan. The red polygon surrounding the site delineates a 140 m buffer of the proposed Facility building footprint in which all vegetation has been assessed as per Table 2.3 of AS3959: 2018

6.1 BUILDING A: ENTRY BUILDING AND SALLY PORT

Table 2. Vegetation in each cardinal direction with relation to building A. Vegetation has been classified as per Table 2.3 of AS3959: 2018[5].

Vegetation Classification	North	Northeast	East	Southeast	South	Southwest	West	Northwest
Group A – Forest								
Group B – Woodland								
Group C – Shrubland								
Group D – Scrub								
Group E – Mallee/Mulga								
Group F – Rainforest								
Group G – Grassland	✓	✓	✓	✓	✓	✓	✓	✓
Low threat (cl. 2.2.3.2)								

[5] AS3959: 2018

Table 3. Effective slope under classified vegetation within 140 m of building A as per AS3959: 2018.

Vegetation Classification	North	Northeast	East	Southeast	South	Southwest	West	Northwest
Group G – Grassland	Flat/upslope	Flat/upslope	Flat/upslope	0 - 5°	0 - 5°	0 - 5°	Flat/upslope	Flat/upslope

Table 4. Existing separation between building A and dimension for a proposed BAL 12.5 or BAL LOW hazard management area (HMA) as per Table 2.6 of AS3959: 2018.

	North	Northeast	East	Southeast	South	Southwest	West	Northwest
Existing separation (m)	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland
Minimum hazard management area dimension (m)	14 m	14 m	14 m	16 m	16 m	16 m	14 m	14 m
BAL value for each quadrant	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**

6.2 BUILDINGS C AND D: HEALTH BUILDING AND ADMISSION BUILDING

Table 5. Vegetation in each cardinal direction with relation buildings C and D. Vegetation has been classified as per Table 2.3 of AS3959: 2018[6].

Vegetation Classification	North	Northeast	East	Southeast	South	Southwest	West	Northwest
Group A – Forest								
Group B – Woodland								
Group C – Shrubland								
Group D – Scrub								
Group E – Mallee/Mulga								
Group F – Rainforest								
Group G – Grassland	✓	✓	✓	✓	✓	✓	✓	✓
Low threat (cl. 2.2.3.2)								

[6] AS3959: 2018

Table 6. Effective slope under classified vegetation within 140 m of buildings C and D as per AS3959: 2018.

Vegetation Classification	North	Northeast	East	Southeast	South	Southwest	West	Northwest
Group G – Grassland	Flat/upslope	Flat/upslope	Flat/upslope	0 - 5°	0 - 5°	0 - 5°	Flat/upslope	Flat/upslope

Table 7. Existing separation between buildings C and D and dimension for a proposed BAL 12.5 or BAL LOW hazard management area (HMA) as per Table 2.6 of AS3959: 2018.

	North	Northeast	East	Southeast	South	Southwest	West	Northwest
Existing separation (m)	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland
Minimum hazard management area dimension (m)	14 m	14 m	14 m	16 m	16 m	16 m	14 m	14 m
BAL value for each quadrant	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**

6.3 BUILDINGS J, K, L AND N: ACCOMMODATION BUILDINGS

Table 8. Vegetation in each cardinal direction with relation to buildings J, K, L, and N. Vegetation has been classified as per Table 2.3 of AS3959: 2018[7].

Vegetation Classification	North	Northeast	East	Southeast	South	Southwest	West	Northwest
Group A – Forest								
Group B – Woodland								
Group C – Shrubland								
Group D – Scrub								
Group E – Mallee/Mulga								
Group F – Rainforest								
Group G – Grassland	✓	✓	✓	✓	✓	✓	✓	✓
Low threat (cl. 2.2.3.2)								

[7] AS3959: 2018

Table 9. Effective slope under classified vegetation within 140 m of buildings J, K, L, and N as per AS3959: 2018.

Vegetation Classification	North	Northeast	East	Southeast	South	Southwest	West	Northwest
Group G – Grassland	Flat/upslope	Flat/upslope	Flat/upslope	0 - 5°	0 - 5°	0 - 5°	Flat/upslope	Flat/upslope

Table 10. Existing separation between buildings J, K, L, and N and dimension for a proposed BAL 12.5 or BAL LOW hazard management area (HMA) as per Table 2.6 of AS3959: 2018.

	North	Northeast	East	Southeast	South	Southwest	West	Northwest
Existing separation (m)	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland
Minimum hazard management area dimension (m)	14 m	14 m	14 m	16 m	16 m	16 m	14 m	14 m
BAL value for each quadrant	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**

6.4 BUILDINGS E, F, G AND H: CAFÉ AND VISITOR CENTRE, ADMINISTRATION, EDUCATION AND RECREATION

Table 11. Vegetation in each cardinal direction with relation to buildings E, F, G and H. Vegetation has been classified as per Table 2.3 of AS3959: 2018[8]

Vegetation Classification	North	Northeast	East	Southeast	South	Southwest	West	Northwest
Group A – Forest								
Group B – Woodland								
Group C – Shrubland								
Group D – Scrub								
Group E – Mallee/Mulga								
Group F – Rainforest								
Group G – Grassland	✓	✓	✓	✓	✓	✓	✓	✓
Low threat (cl. 2.2.3.2)								

[8] AS3959: 2018

Table 12. Effective slope under classified vegetation within 140 m of buildings E, F, G and H as per AS3959: 2018.

Vegetation Classification	North	Northeast	East	Southeast	South	Southwest	West	Northwest
Group G – Grassland	Flat/upslope	Flat/upslope	Flat/upslope	0 - 5°	0 - 5°	0 - 5°	Flat/upslope	Flat/upslope

Table 13. Existing separation between buildings E, F, G and H and dimension for a proposed BAL 12.5 or BAL LOW hazard management area (HMA) as per Table 2.6 of AS3959: 2018.

	North	Northeast	East	Southeast	South	Southwest	West	Northwest
Existing separation (m)	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland	0 – 123 m Grassland
Minimum hazard management area dimension (m)	14 m	14 m	14 m	16 m	16 m	16 m	14 m	14 m
BAL value for each quadrant	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**

6.5 BUILDING M: CULTURAL BUILDING

Table 14. Vegetation in each cardinal direction with relation to building M. Vegetation has been classified as per Table 2.3 of AS3959: 2018[9].

Vegetation Classification	North	Northeast	East	Southeast	South	Southwest	West	Northwest
Group A – Forest								
Group B – Woodland								
Group C – Shrubland								
Group D – Scrub								
Group E – Mallee/Mulga								
Group F – Rainforest								
Group G – Grassland	✓	✓	✓	✓	✓	✓	✓	✓
Low threat (cl. 2.2.3.2)								

[9] AS3959: 2018

Table 15. Effective slope under classified vegetation within 140 m of building M as per AS3959: 2018.

Vegetation Classification	North	Northeast	East	Southeast	South	Southwest	West	Northwest
Group G – Grassland	Flat/upslope	Flat/upslope	Flat/upslope	0 - 5°	0 - 5°	0 - 5°	Flat/upslope	Flat/upslope

Table 16. Existing separation between building M and dimension for a proposed BAL 12.5 or BAL LOW hazard management area (HMA) as per Table 2.6 of AS3959: 2018.

	North	Northeast	East	Southeast	South	Southwest	West	Northwest
Existing separation (m)	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland	0 – 140 m Grassland
Minimum hazard management area dimension (m)	14 m	14 m	14 m	16 m	16 m	16 m	14 m	14 m
BAL value for each quadrant	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**	**BAL 12.5**

7 REQUIRED BUSHFIRE PROTECTION MEASURES

The proposal is required to comply with:

- C13.0 Bushfire-Prone Areas Code (the Code)
- Directors Determination – Bushfire Hazard Areas v1.2
- National Construction Code (NCC) Volume 1 Part G5 including additional requirements for certain Class 9 buildings.

These documents have been developed to ensure that development is planned, designed, located, serviced and constructed to reduce the risk to human life and property, and the cost to the community, caused by bushfires.

Each required element of protection is discussed in sections 7 and 8 of the report. The required protective features have been consolidated in the bushfire hazard management plan enclosed as Appendix 1.

8 PLANNING COMPLIANCE

8.1 TASMANIAN PLANNING SCHEME – BUSHFIRE-PRONE AREAS CODE (C13.0)

The proposal must meet requirements of the Under the Tasmanian Planning Scheme – C13.0 Bushfire-Prone Areas Code. Under C13.3.1 a vulnerable use means a use that is within one or more of the following classes:

(a) Custodial Facility;
(b) Education and Occasional Care;
(c) Hospital Services;
(d) Residential if the use is for assisted housing, residential care facility, respite centre or retirement village

Given the proposal is for a custodial facility and includes education and health services it meets the definition as a vulnerable use and therefore must meet the use standards set out in clause C13.5.1 Use Standards for Vulnerable Use (Table 17).

Table 17: Use standards C13.5.1 Vulnerable Use.

Objective:	That vulnerable uses can only be located on land within a bushfire-prone area where tolerable risks are achieved through mitigation measures that take into account the specific characteristics of both the vulnerable use and the bushfire hazard. A vulnerable use must only be located in a bushfire-prone area if a tolerable risk from bushfire can be achieved and maintained, having regard to:	
Acceptable solution	**Performance criteria**	**Response to criteria**
A1 No Acceptable solution	(a) the location, characteristics, nature and scale of the use;	The site at 466 Brighton Road is located in an area that is dominated by agricultural use. Vegetation surrounding the site reflects the nature of the agricultural use, being degraded pasture (grassland). Grassland vegetation within the proposed HMA can be managed to reduce risk to the site from bushfire attack. Given the application of specification 43, the HMA will be significantly larger than

		what is normally required under AS3959: 2018. Furthermore, a suite of other protective measures, will be implemented together which will achieve a high level of protection. These include both internal and external road ways for fire fighting access, a fire hydrant system, portable fire extinguishers, and detailed emergency management procedures. These features complimented by the ultimate adaption of a site-specific bushfire emergency plan (which will be informed by the attached bushfire emergency management strategy) will ensure the facility can be planned and built to achieve a tolerable risk.
	(b) whether there is an overriding benefit to the community;	The Tasmanian Government is reforming the youth justice system through a comprehensive, integrated and therapeutic approach that prioritises the rights of children, rehabilitation and breaking the cycle of offending. The development of the new facility will allow for the closure of the Ashley Youth Detention Centre in the north of the state. Based on feedback received through the public consultation and the final report from the Commission of Inquiry into the Tasmanian Government's Responses to Child Sexual Abuse in Institutional Settings, the preferred site for the new facility was chosen to be 466 Brighton Road, Pontville.
	(c) whether there is no suitable alternative lower-risk site;	The site was selected following a site selection process, this included a public consultation process (2023) and feasibility studies (2024) by the Department for Education, Children and Young People. Site assessment criteria included the following: • Planning analysis • Aboriginal heritage assessment and sub-surface investigations • Natural values assessment • Infrastructure feasibility study • Geotechnical assessment Given the siting requirements for this facility, it would be impractical to locate the facility outside of a bushfire-prone area. Some level of bushfire risk is unavoidable but can be effectively mitigated on this site. The site is large and situated on grassland it is considered to be a low-risk site.
	d) the emergency management strategy (vulnerable use) and bushfire hazard management plan; and	An emergency management strategy for the proposal has been prepared and is enclosed as Attachment A.
	(e) other advice, if any, from the TFS.	TFS advice has been sought in the early stages of planning and incorporated into design.

A2 An emergency management strategy (vulnerable use) is endorsed by the TFS or accredited person.	The proposed development is a vulnerable use and requires the preparation of a site-specific emergency management strategy. An emergency management strategy which provides relevant details of the site, risk analysis to occupants of the site and demonstrates how risk to occupants will be managed is attached as Attachment A. This strategy can be used to inform the more detailed Emergency Management Plan that will be required at the building permit stage of the development. Subject to adoption of the bushfire emergency management strategy, the project will comply with the requirements for emergency planning. The enclosed version has been endorsed by the Tasmania Fire Service.
A3 A bushfire hazard management plan that contains appropriate bushfire protection measures that is certified by the TFS or an accredited person	A certified bushfire hazard management plan containing the appropriate protection measures is enclosed as Appendix 1. Appropriate protection measures are detailed in sections 8.1 – 8.5 of this report.

9 BUILDING COMPLIANCE

9.1 DIRECTORS DETERMINATION – BUSHFIRE HAZARD AREAS V1.2 (2024)

The *Director's Determination – Bushfire Hazard Areas* (Director's Determination) applies to building work in bushfire-prone areas for Class 1, 2, 3, 8, 9, and 10a buildings. The deemed-to-satisfy solutions (DtS) relevant to the proposed development are addressed below and summarised in Table 19.

9.1.1 Requirements for Hazard Management Area

A hazard management area (HMA) is a fuel-reduced area surrounding a building which separates the building from the bushfire hazard. This area provides a buffer zone that allows emergency services access and provides a relatively safe area for firefighters and homeowners to defend their property.

Bushfire fuels should be minimised within the HMA. This is so that the vegetation within the area does not provide a path for the spread of fire to the building, either from the ground level or through the tree canopy. If maintained regularly a HMA will reduce the risk of:

- Direct flame contact on the building;
- Damage to the building from intense radiant heat; and
- Ember attack.

Under clause 2.3.4 of the Directors Determination – Bushfire Hazard Areas v1.2 a new habitable building that is classified as a vulnerable use must be located on the lot so as to be provided with a HMA no smaller than the separation distances required for BAL-12.5. Clause 2.3.4 (5) calls up additional requirements for Certain Class 9 buildings, which will apply to Building G. This is addressed in Section 8.2 of this report.

The bushfire hazard management plan (Appendix 1) has resolved all aspects to BAL 12.5 as per Tables 4, 7, 10, 13 and 16.

The following recommendations are made:

- *The HMA is to be implemented prior to occupancy and is to be verified by a building surveyor.*
- *Subject to implementation of the BHMP, the proposal will comply with the requirements for the HMA under the Directors Determination – Bushfire Hazard Areas v1.2.*
- *Landscape design must be consistent with the bushfire hazard management plan hazard management area.*
- *The implementation and maintenance of the HMA is the responsibility of the owner of the lot – 466 Brighton Road, Pontville. This can be achieved by following the prescriptions in Table 18 below. The HMA must then be maintained by the owner of the lot in perpetuity as a low fuel environment.*

Table 18. Hazard management area establishment and maintenance schedule.

Bushfire hazard management area establishment and maintenance schedule		**Timing**
Trees within the HMA	Locate any new tree plantings 1.5 x their mature height from buildings	As a part of any landscaping plan
Understory vegetation within HMA	Maintain ground cover vegetation (mow, slash, rake) including grasses to within 100 mm.	As a part of establishment of the HMA, and then as often as necessary.
	Provide heat shields and ember traps on the bushfire prone side of buildings such as non-flammable fencing or low flammability shrubs and small trees.	As a part of any landscaping plan and as a part of establishment of the HMA.
	Remove fallen limbs, sticks, leaf litter and bark.	As a part of establishment of the HMA, and then as necessary.
	Maintain vegetation clearances around access and water supply points.	As a part of establishment of the HMA, and then as necessary.
Within 10 m of buildings	Minimize the storage of flammable materials such as gas bottles.	As a part of establishment of the HMA, and then as necessary.
	Clear out any accumulated leaf and other debris from roof gutters and other debris accumulation points.	Annually in spring
	Non-flammable features such as driveways, paths and paving are encouraged as part of design and landscaping.	As a part of establishment of the HMA
	Avoid the use of organic mulches on garden beds. A suitable alternative may be to utilise living mulches such as low growing ground covers.	As a part of any landscaping plan

9.1.2 Construction Standard

The design and construction of Class 3, 5, 6 and 9b buildings in a bushfire-prone area must be in accordance with the relevant deemed-to-satisfy provisions of the National Construction Code Volume 1, Part G5 with the objective being to:

a) safeguard occupants from injury from the effects of a bushfire; and

b) protect buildings from the effects of a bushfire; and

c) facilitate temporary shelter for building occupants who may be unable to readily evacuate the building prior to a bushfire.

Building G must be designed and constructed to a minimum BAL 19 standard. All remaining habitable buildings within the facility must be designed and constructed to a minimum BAL 12.5 standard.

Regarding timing – the design plans must be verified as compliant by the building surveyor prior to the issue of a certificate of likely compliance. The completed work must be verified by the building surveyor prior to occupancy.

- *Subject to implementation of the BHMP the proposal will comply with clause 2.3.1 under the Directors Determination – Bushfire Hazard Areas v1.2.*

9.1.3 Property Access

Public access to the site is via Rifle Range Road, which is proposed to be upgraded as a part of the development. Property access into the facility is via a c.380 m long two-way road.

External (perimeter) access to the facility from a public road has been designed to provide continuous access around the perimeter of the facility for a fire appliance. The external access provides a minimum unobstructed width of 4.5 m.

Internal access to the facility is provided which encircles the central spine buildings which includes the certain class 9 buildings. Access to the internal part of the facility is through the sally port and secure service yard. The design of the sally port will consider the access requirements for an Aerial Appliance (Rosenbauer B32) to access the internal portion of the facility.

To meet the deemed-to-satisfy provisions the proposal must comply with Table 2 Elements (b) and (c) in the *Directors Determination – Bushfire Hazard Areas* v1.2 and must also comply with additional requirements for certain class 9 buildings under the NCC Part G5. Part G5 is addressed in Section 8.2 below.

Given access to the facility will be two-way, the provision of passing bays Table 2 Element (c) can be satisfied.

- *Subject to implementation of the BHMP, the proposal will comply with clause 2.3.2 under the Directors Determination – Bushfire Hazard Areas v1.2.*
- *Civil design must be prepared by a civil designer.*
- *Regarding timing – the design plans must be verified as compliant by the building surveyor prior to the issue of a certificate of likely compliance. The completed work must be verified by the building surveyor prior to occupancy.*

9.1.4 Water supply for firefighting

The site is within serviced land for water. Thus, the water supply for firefighting purposes can be provided from reticulated water supply. Provision of two c. 250,000 L water tanks and fire booster for firefighting purposes is also proposed.

To meet the deemed to satisfy requirements for firefighting water supply, firefighting water supplies must be designed and constructed to comply with the Table 3A of the Directors Determination – Bushfire Hazard Areas and the National Construction Code Part E1D2 which includes that all buildings to be protected must be within 120 m of the nearest TasWater Hydrant.

Consultation with TasWater is required and a fire hydrant system must be installed to meet this requirement. Notional hydrant locations have been included in the BHMP in Appendix 1 that can meet this requirement. The fire hydrant system must be installed in accordance with AS 2419.1.

- *Following installation, all parts of the existing buildings will be within 120 m of a firefighting water point as measured by hose lay, thereby achieving compliance.*
- *Subject to implementation of the BHMP, the proposal will comply with the requirements of clause 2.3.3 under the Directors Determination – Bushfire Hazard Areas v1.2.*
- *Civil design plans must be prepared by a civil designer and verified by a licensed building surveyor.*

9.1.5 Emergency Planning

Building application stage

Under clause 2.3.5 of the Directors Determination – Bushfire Hazard Areas v1.2 (1) and (2) a bushfire emergency plan that is consistent with the TFS Bushfire Emergency Planning Guideline and approved by the TFS must be prepared for the facility. The bushfire emergency plan will be informed by the bushfire emergency management strategy which is included as Attachment A.

The bushfire emergency plan should be reviewed annually for currency and updated as required.

Table 19. Assessment against the Deemed-to-Satisfy solutions of the Directors Determination.

Direction	Deemed to satisfy requirements (Elements)	Requirement	Compliance
2.3.1	Construction requirements	Table 1 AS 3959 – 2018 – BAL 19 or *NASH Standard – Steel Framed Construction in Bushfire Areas*	TBD by building surveyor. The BAL for each proposed building within the Facility has been determined using the minimum separation distances detailed in Table 2.6 of AS3959: 2018. All habitable building proposed within the Facility must be designed and constructed to meet a minimum BAL 12.5 standard. The requirements of Table 1 Element (c) are addressed in section 8.2.2 below.
2.3.2	Private access	Table 2 (B, C and E)	Public access to the site is via Rifle Range Road, which is proposed to be upgraded as a part of the development. Property access into the facility is via a c.380 m long two-way road. External (perimeter) access to the facility from a public road has been designed to provide continuous access around the perimeter of the facility for a fire appliance. The external access provides a minimum unobstructed width of 4.5 m. Internal access to the facility is provided which effectively encircles the central spine buildings which includes the certain class 9 buildings, this access terminates with a turning area the size of a basketball court. Access to the internal part of the facility is through the sally port and secure service yard. The design of the sally port will consider the access requirements for an Aerial Appliance (Rosenbauer B32) to access the internal portion of the facility. To meet the deemed-to-satisfy provisions the proposal must comply with Table 2 Elements (B), (C) and (E). The requirements for Element (E) are addressed in section 8.2.2 below.

2.3.3	Reticulated supply for fire fighting	Table 3A – (A-D)	The site is within serviced land for water. Thus, the water supply for firefighting purposes can be provided from reticulated water supply. Additionally, provision of two c. 250,000 L water tanks and fire booster for firefighting purposes is also proposed. To meet the deemed to satisfy requirements for firefighting water supply, firefighting water supplies must be designed and constructed to comply with the Table 3A of the Directors Determination – Bushfire Hazard Areas and the National Construction Code Part E1D2 which includes that all buildings to be protected must be within 120 m of the nearest TasWater Hydrant. Consultation with TasWater is required and a fire hydrant system must be installed to meet this requirement. Notional hydrant locations have been included in the BHMP in Appendix 1. The fire hydrant system must be installed in accordance with AS 2419.1. The requirements for Element (E) are addressed in section 8.2.2 below.
2.3.4	Hazard management area	Table 4 (E and G)	Under clause 2.3.4 of the Directors Determination – Bushfire Hazard Areas v1.2 a new habitable building that is classified as a vulnerable use must be located on the lot so as to be provided with a HMA no smaller than the separation distances required for BAL-12.5. The bushfire hazard management plan (Appendix 1) has resolved all aspects to BAL 12.5 as per Tables 4, 7, 10, 13 and 16. Compliance is subject to the hazard management area being established and maintained in accordance with the certified bushfire hazard management plan. The hazard management area is to be implemented prior to occupancy and is to be verified by a building surveyor. The hazard management area must be maintained in perpetuity by the owner of the lot. The requirements for Element (E) are addressed in section 7.2.2 below.

9.2 National Construction Code (2022)

9.2.1 Objective (G5O1), function (G5F1) and application

Part G5 of the NCC pertains to construction of buildings located in designated bushfire prone areas, to address the additional risks posed by bushfire attack. The objective of Part G5 is to:

(a) safeguard occupants from injury from the effects of a bushfire; and

(b) protect buildings from the effects of a bushfire; and

(c) facilitate temporary shelter for building occupants who may be unable to readily evacuate the building prior to a bushfire.

Under the NCC part G5D3 the deemed-to-satisfy requirement for Class 3 buildings is construction of the building to AS 3959: 2018.

Under the NCC part G5D4 the deemed-to-satisfy requirement for Class 9b buildings are satisfied by meeting the requirements set out in Specification 43 of the NCC (Table 20).

A separate assessment was made by DDEG fire engineers for buildings A, G and F. Building G has been assessed by the projects building surveyor as a certain class 9 building under the NCC. Buildings A, F and G have been nominated as the locations for shelter in place in the case where evacuation of the Facility is not possible.

The projects fire engineer will provide input to the designer so that appropriate design that will meet the requirements of Specification 43 are applied through the course of the detailed design phase of the project.

Compliance with Specification 43 is required for the education building (Building G: Figure 4, Appendix 1).

- *Subject to implementation of the BHMP, the proposal will comply with the requirements for the HMA under the National Construction Code (NCC) Volume 1 Part G5 including Specification 43 Bushfire protection for certain Class 9 buildings.*

All remaining buildings must meet the requirements AS3959 construction standards as specified in the BHMP.

9.2.2 Specification 43 Bushfire protection for certain Class 9 buildings

Table 20. Specification 43 Bushfire protection for certain Class 9 buildings

Direction	Deemed to satisfy requirements (Elements)	Requirement	Compliance
S43C2	Separation for classified vegetation	(1) The building must be separated from classified vegetation— (a) by not less than the minimum distances specified in Table S43C2; or (b) such that radiant heat flux on exposed building elements will not exceed 10kW/m^2. (2) For the purposes of (1), the term 'classified vegetation' has the meaning that it has in AS 3959.	Classified vegetation within 140 m of the facility is predominantly Grassland. Under Table S43C2 grassland is attributed as LOW RISK vegetation. The BHMP enclosed as Appendix 1 has resolved all aspects from building G to greater than the minimum distances set out in Table S43C2. The minimum separation from classified vegetation to building G must be 130 m. This will ensure the radiant heat flux on the building will not exceed 1 kW/m^2. This exceeds the minimum distances set out in S43C2. The hazard management area is to be implemented prior to occupancy and is to be verified by a licensed building surveyor.
S43C3	Separation between buildings	(1) The building must be located not less than 12 m from any other building. (2) The separation distance required by (1) need not be complied with if the building is constructed— (a) with external walls that have an FRL of not less than 60/60/60 when tested from the outside, including any openings protected in accordance with AS 3959 for BAL—19 or greater; or (b) for external walls and roof, using a material or system that satisfies the test criteria of AS 1530.8.1 for a radiant heat flux of 10 kW/m^2 or greater.	The BHMP enclosed as Appendix 1 shows separation distances for building G and identifies which facades must be designed with fire separation as follows: • Fire wall separating building G and building F. • Fire wall separating building G and building H. Building design must be verified by a licensed building surveyor.

S43C4	Separation from allotment boundaries and carparking areas	(1) The building must be located not less than 10 m from any allotment boundary or open carparking area/spots (2) The separation distance required by (1) need not be complied with if the building is constructed— (a) with external walls that have an FRL of not less than 60/60/60 when tested from the outside, including any openings protected in accordance with AS 3959 for BAL—19 or greater; or (b) for external walls and roof, using a material or system that satisfies the test criteria of AS 1530.8.1 for a radiant heat flux of 10 kW/m^2 or greater.	The BHMP enclosed as Appendix 1 shows that all buildings within the facility are set back greater than the required minimum distance from the lot boundary. The distance to the nearest lot boundary from building G is 177 m. The distance to the nearest carparking area from building G is 160 m.
S43C5	Separation from hazards	The external walls and roof of the building must be protected from potential hazards on the site such as liquefied petroleum gas bottles, fuel storage, storage of combustible materials, waste bins, vehicles, machinery, and the like, by— (a) a separation distance of not less than 10 m; or (b) where within the 10 m separation distance described in (a), constructed with external walls that have an FRL of not less than 60/60/60 when tested from the outside, including any openings protected in accordance with AS 3959 for BAL—19 or greater; or (c) for external walls and roof, using a material or system that satisfies the test criteria of AS 1530.8.1 for a radiant heat flux of 10 kW/m^2 or greater.	At the planning stage of the proposal the location of potential hazards such as LPG, fuel or other combustible storage is unknown. These hazards and their locations will be considered as a part of the detailed design. Separation from hazards and/or building design incorporating protection from hazards within 10 m of a building must be verified by a licensed building surveyor.
S43C6	Non-combustible path around building	A non-combustible pathway directly adjacent to the building and not less than 1.5 m wide must be provided around the perimeter of the building.	The BHMP enclosed as Appendix 1 depicts the alignment of a 1.5 m pathway around the perimeter of each class 9b building.

S43C7	Access pathways	(1) Access pathways that lead to a road or open space must— (a) be readily identifiable; and (b) have an even surface; and (c) have a minimum clear width of not less than 1 m. (2) If the access pathway is an accessway that is required to comply with Part D4, the requirements of Part D4 override (1) to the extent of any inconsistency.	The BHMP enclosed as Appendix 1 depicts access pathways that are linked with both open space within the Facility and the Facilities internal road. The minimum width of the pathways throughout the internal areas of the facility are depicted in the BHMP as 1.5 m.
S43C8	Exposed external areas	An external area designed to hold people unable to be safely accommodated within the building, that may be exposed to radiant heat flux from a fire front during a bushfire event, must not be exposed to an incident radiant heat flux from the fire front exceeding 1 kW/m^2 above background solar radiant heat flux	The proposed fire refuge(s) – buildings (buildings A, G and F) will be designed to accommodate all residents and staff on site. Thus, S43C8 is not applicable.
S43C9	Internal tenability	To maintain internal tenability throughout the duration of occupancy during a bushfire event, the building must comply with the following: (a) An air handling system must be provided that is capable of— i. being adjusted for full recycling of internal air for a period of not less than 4 hours to avoid the introduction of smoke into the building; and ii. maintaining an internal air temperature of not more than 25°C. (b) The building envelope must be designed such that if an air handling system required by (a) fails, then—	The BHMP enclosed as Appendix 1 identifies the education building as the building within the facility that will be designed in order to provide an on-site refuge in case of a bushfire impacting the site. This building will be designed to a BAL 19 standard. A bushfire hazard management setback of 130 m will be applied to this building. A performance solution addressing internal tenability will be resolved by the projects fire engineer during the detailed design phase. Building design plans must be verified by a licensed building surveyor.

		i. internal air temperatures can be maintained below 39°C; and ii. internal surface temperatures can be maintained below 60°C. (c) If the building is divided into separate compartments then, for the purposes of (a), each compartment must have a separate air handling system. (d) Each air handling system required by (a) must be designed to account for the activation of smoke detectors from low concentrations of smoke from external sources, so as to ensure that air-conditioning and other essential systems remain operational.	
S43C10	Building envelope	The building envelope must be constructed in accordance with AS 3959 – BAL 19 or greater, except that where the use of combustible materials is permitted by AS 3959, they are not to be used unless permitted by C2D10(4), (5) or (6).	Building design for the certain class 9 buildings will be resolved during the detailed design. Building design plans for the education and recreation buildings must demonstrate compliance with AS 3959 – BAL 19 building standards as specified in the BHMP enclosed as Appendix 1. Building design must be verified by a licensed building surveyor.
S43C11	Supply of water for fire-fighting purposes	Water for fire-fighting purposes must be available and consist of— (a) a fire hydrant system complying with E1D2, or (b) a static water supply consisting of tanks, swimming pools, dams or the like, or a combination of these, together with suitable pumps, hoses and fittings, capable of providing the required flow rate for a period of not less than 4 hours, determined in consultation with the relevant fire brigade.	The facility is located on water serviced land. Consultation with TasWater is required and a fire hydrant system must be installed to meet this requirement. The fire hydrant system must be installed in accordance with AS 2419.1: 2021. Notional hydrant locations have been included in the BHMP in Appendix 1. Civil design will be prepared by a civil designer and verified by a licensed building surveyor.

S43C12	Emergency power supply	(1) Emergency power must be provided to support, for not less than 4 hours before and 2 hours after the passing of the fire front during a bushfire event, the ongoing operation of— (a) air handling systems to maintain internal tenability; and (b) any pumps for fire-fighting; and (c) any emergency lighting and exit signs; and (d) any other emergency equipment listed in C3D14(6) and required to be provided. (2) Manual control for emergency back-up power supply must be provided to facilitate manual intervention where the power supply fails or runs out.	Siting of an emergency power supply should be determined by the designer through consultation with an electrical engineer. This is to be resolved during the detailed design stage along and must include fire engineering input.
S43C13	Signage	Signage must be provided to warn building occupants against storing combustible materials under or adjacent to the building.	Siting of signage should be determined by the designer through consultation with a fire engineer. This is to be resolved during the detailed design stage.
S43C14	Vehicular access	Vehicular access to the building must be provided in accordance C3D5(2), as if the building were a large isolated building for the purposes of C3D4.	The proposed vehicular access does not meet the requirement of C3D5 (2). The BHMP enclosed as Appendix 1 identifies the following: Public access via Rifle Range Road and private access from Rifle Range Road to the following: External (perimeter) access to the facility from a public road which provides continuous access around the perimeter of the facility. The external access provides a minimum unobstructed width of 4.5 m and includes passing bays every 100 m. Under C3D5 (2) the minimum width required in 6 m. Internal access to the facility is provided with a road which covers the northern, eastern and western aspects of the central spine buildings

			which includes building H. The internal access road is 4.5 m in width and includes two passing bays, one on either side of the central spine buildings and a turning area (basketball court) sufficient for turning of a fire appliance. A performance solution addressing the vehicular access requirements will be resolved by the projects fire engineer during the detailed design phase. Civil design will be prepared by a civil designer and verified by a licensed building surveyor.

10 CONCLUSION

A site for the Proposed Tasmanian Youth Justice Facility has been selected at 466 Brighton Road, Pontville (PID: 3523093). The facility will accommodate up to 24 occupants from an age range of 10 to 18 who require support and supervision for daily living.

Following the preparation of an addendum (October 2025) to reflect design changes, a Bushfire Attack Level (BAL) Assessment has been conducted for the Facility. The determined BAL for the EDUCATION building is BAL 19; this building is subject to Specification 43 as part of the detailed design phase and is specifically designated as a fire refuge for residents. The ADMINISTRATION and ENTRY buildings are also determined to be BAL 19 and are specifically designated as staff fire refuges. These buildings will be designed and constructed as a performance solution, incorporating advice from the project's fire engineer. All remaining buildings within the Facility are determined to be BAL 12.5 and must be designed and constructed to a minimum BAL 12.5 standard.

This report, including the addendum, demonstrates that the Facility can meet the requirements for planning under the Tasmanian Planning Scheme – Southern Midlands Bushfire-Prone Areas Code C13.5.1 (vulnerable uses).

The detailed design of the EDUCATION building will incorporate advice from the project's fire engineer to ensure compliance with Specification 43 performance requirements. The ADMINISTRATION and ENTRY buildings will similarly be developed as performance solutions to ensure staff safety and operational control during an emergency.

REFERENCES

Australian Standard AS 3959 (2018) Construction of Buildings in Bushfire Prone Areas.

Bureau of Meteorology, climate data, viewed 27/03/2025 (http://www.bom.gov.au/climate/data/index.shtml?bookmark=200&view=map)

DDEG Fire Engineering Preliminary Report. New Tasmanian Youth Justice Facility, 466 Brighton Road, Pontville. Rev. 0. 28/05/2025.

Department of Primary Industries and Water, The LIST, viewed 28/10/2025 (www.thelist.tas.gov.au)

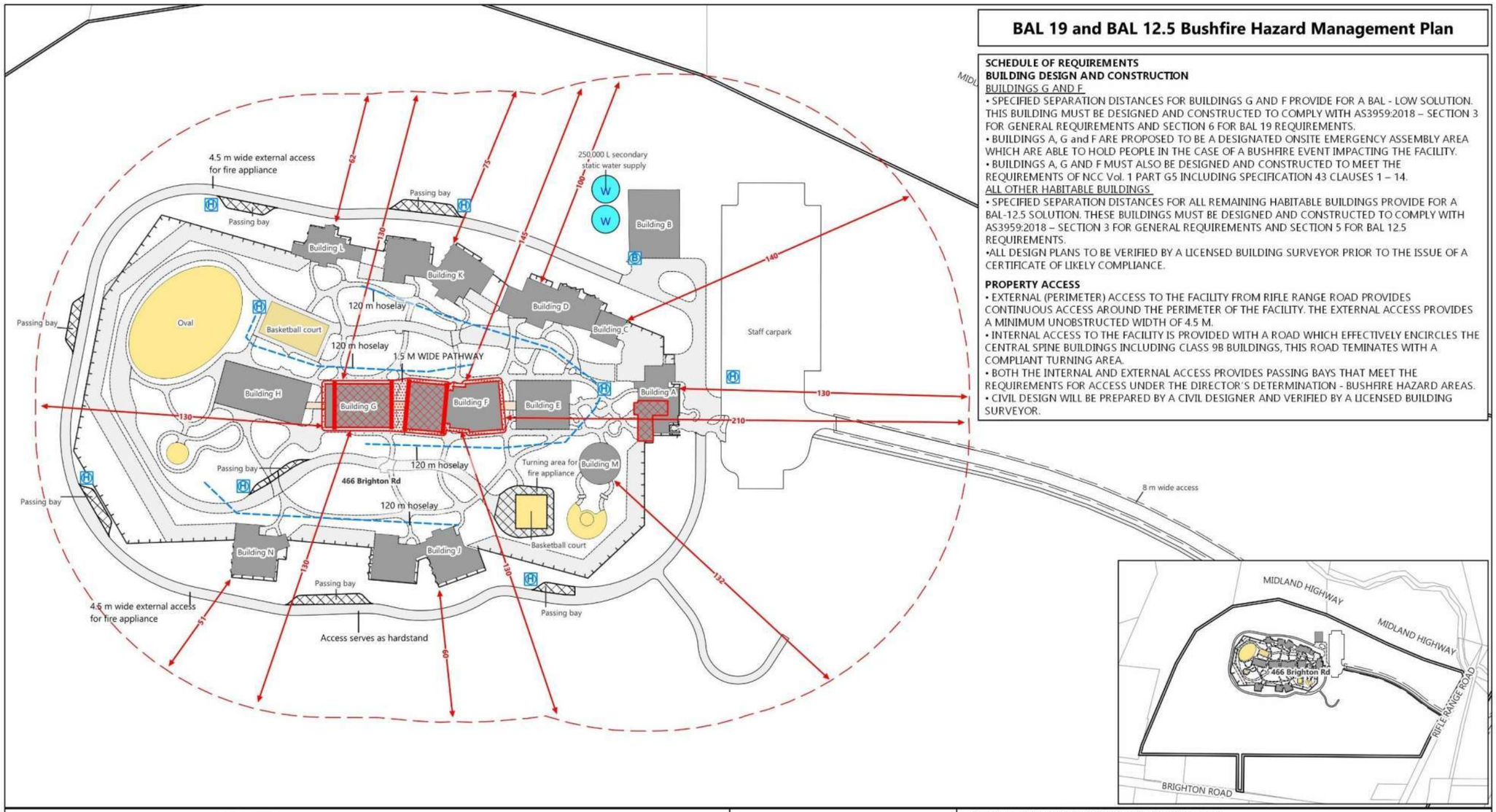
Directors Determination – Bushfire Hazard Areas v1.2 (2024).

Tasmania Fire Service (2017). Bushfire Emergency Planning Guideline. A guide to planning for bushfire emergency Version 2.0. Bushfire Planning and Policy.

National Construction Code (2022). Volume 1 – Building Code of Australia Class 2- 9 buildings, Part G5, Specification 43.

North Barker Ecosystem Services (2025). Proposed Youth Justice Facility, 466 Brighton Rd Pontville. Natural Values Assessment. Unpublished report for DECYP (GGA001)

APPENDIX 1. BAL 19 AND BAL 12.5 BUSHFIRE HAZARD MANAGEMENT PLAN



BAL 19 and BAL 12.5 Bushfire Hazard Management Plan

SCHEDULE OF REQUIREMENTS
BUILDING DESIGN AND CONSTRUCTION

BUILDINGS G AND F

- SPECIFIED SEPARATION DISTANCES FOR BUILDINGS G AND F PROVIDE FOR A BAL - LOW SOLUTION. THIS BUILDING MUST BE DESIGNED AND CONSTRUCTED TO COMPLY WITH AS3959:2018 – SECTION 3 FOR GENERAL REQUIREMENTS AND SECTION 6 FOR BAL 19 REQUIREMENTS.
- BUILDINGS A, G and F ARE PROPOSED TO BE A DESIGNATED ONSITE EMERGENCY ASSEMBLY AREA WHICH ARE ABLE TO HOLD PEOPLE IN THE CASE OF A BUSHFIRE EVENT IMPACTING THE FACILITY.
- BUILDINGS A, G AND F MUST ALSO BE DESIGNED AND CONSTRUCTED TO MEET THE REQUIREMENTS OF NCC Vol. 1 PART G5 INCLUDING SPECIFICATION 43 CLAUSES 1 – 14.

ALL OTHER HABITABLE BUILDINGS

- SPECIFIED SEPARATION DISTANCES FOR ALL REMAINING HABITABLE BUILDINGS PROVIDE FOR A BAL-12.5 SOLUTION. THESE BUILDINGS MUST BE DESIGNED AND CONSTRUCTED TO COMPLY WITH AS3959:2018 – SECTION 3 FOR GENERAL REQUIREMENTS AND SECTION 5 FOR BAL 12.5 REQUIREMENTS.
- ALL DESIGN PLANS TO BE VERIFIED BY A LICENSED BUILDING SURVEYOR PRIOR TO THE ISSUE OF A CERTIFICATE OF LIKELY COMPLIANCE.

PROPERTY ACCESS

- EXTERNAL (PERIMETER) ACCESS TO THE FACILITY FROM RIFLE RANGE ROAD PROVIDES CONTINUOUS ACCESS AROUND THE PERIMETER OF THE FACILITY. THE EXTERNAL ACCESS PROVIDES A MINIMUM UNOBSTRUCTED WIDTH OF 4.5 M.
- INTERNAL ACCESS TO THE FACILITY IS PROVIDED WITH A ROAD WHICH EFFECTIVELY ENCIRCLES THE CENTRAL SPINE BUILDINGS INCLUDING CLASS 9B BUILDINGS, THIS ROAD TEMINATES WITH A COMPLIANT TURNING AREA.
- BOTH THE INTERNAL AND EXTERNAL ACCESS PROVIDES PASSING BAYS THAT MEET THE REQUIREMENTS FOR ACCESS UNDER THE DIRECTOR'S DETERMINATION - BUSHFIRE HAZARD AREAS.
- CIVIL DESIGN WILL BE PREPARED BY A CIVIL DESIGNER AND VERIFIED BY A LICENSED BUILDING SURVEYOR.

Base data and imagery from theLIST (www.thelist.tas.gov.au) © State of Tasmania. Grid: MGA Zone 55 Datum: GDA94, AHD

GDA

0 25 50 m

northbarker ECOSYSTEM SERVICES

GGA001 28/10/2025 R. Khatri

LEGEND

Lot boundary (466 BRIGHTON RD PONTVILLE TAS 7030)

FACILITY DESIGN (Received 22/07/25)

- Proposed building area
- Outdoor recreation
- Passway
- Passing bay or turning area for fire appliance
- Access from Rifle Range Road
- External access
- Internal access
- Staff carpark
- FenceLine

HAZARD MANAGEMENT AREA

- Hazard management area
- Fire refuge
- 1.5 m pathway
- Fire Wall
- Hose lay
- Distance to hazard management area (m)

WATER SUPPLY FOR FIRE FIGHTING

- 250,000 L secondary static water supply
- Fire booster
- Notional location of TasWater Hydrant

OTHER LAYERS

- Cadastral parcels

Applicants name: Greive Gillett Architects
Municipality: Southern Midlands
Address: 466 BRIGHTON RD & 36 RIFLE RANGE RD PONTVILLE TAS 7030
PID: 3523093 & 3523106
Proposal: New Tasmanian Youth Justice Facility

To be read in conjunction with Proposed New Tasmanian Youth Justice Facility, 466 Brighton Road, Pontville, Bushfire Report and Hazard Management Plan, North Barker Ecosystem Services, October 2025.

Assessor: Cameron Geeves BFP-178 Scope of accreditation 1, 2, 3B. Provisional scopes 3A and 3C
Assessment date: 27/10/2025

RETICULATED WATER SUPPLY FOR FIREFIGHTING

- CONSULTATION WITH TASWATER IS REQUIRED AND A FIRE HYDRANT SYSTEM MUST BE INSTALLED. THE FIRE HYDRANT SYSTEM MUST BE INSTALLED IN ACCORDANCE WITH AS 2419.1: 2021.
- A FIREFIGHTING WATER SUPPLY MUST BE LOCATED WITHIN 120 M (MEASURED AS HOSELAY) OF ALL HABITABLE BUILDINGS WITHIN THE FACILITY.
- CIVIL DESIGN WILL BE PREPARED BY A CIVIL DESIGNER AND VERIFIED BY A LICENSED BUILDING SURVEYOR.

HAZARD MANAGEMENT AREA

- ALL AREA WITHIN FENCED PORTION OF THE FACILITY MUST BE ESTABLISHED AND MANAGED AS HAZARD MANAGEMENT AREA. AREAS BEYOND FENCING AS DIMENSIONED ON THIS PLAN MUST ALSO BE MANAGED AS HMA.
- THE HMA MUST BE MAINTAINED IN A LOW FUEL CONDITION IN PERPETUITY, ENSURING FUELS ARE REDUCED SUFFICIENTLY AND OTHER HAZARDS ARE REMOVED SUCH THAT THE FUELS AND OTHER HAZARDS DO NOT SIGNIFICANTLY CONTRIBUTE TO THE BUSHFIRE ATTACK.
- LIMITED AMOUNTS OF LOW FLAMMABILITY PLANTS ARE ACCEPTABLE WITHIN THE HMA INCLUDING MAINTAINED LAWNS (KEPT TO A NOMINAL HEIGHT OF 100 MM), PATHS, PAVING, LOW FLAMMABILITY ORNAMENTAL GARDENS AND VEGETABLE GARDENS.
- HAZARD MANAGEMENT AREA SHOULD BE IMPLEMENTED PRIOR TO OCCPANCY AND VERIFIED BY A LICENSED BUILDING SURVEYOR.

Mark Chladil, On behalf of the Chief Officer Tasmania Fire Service 5/11/2025

APPENDIX 2. DIRECTORS DETERMINATION – BUSHFIRE HAZARD AREAS: SPECIFICATIONS FOR ACCESS, WATER SUPPLY AND HAZARD MANAGEMENT AREAS.

Table 1: Construction Requirements

Element		Requirement
A	Straw Bale Construction	May be used in exposures up to and including BAL-19.
B	Shielding provisions under Section 3.5 of AS 3959	To reduce construction requirements due to shielding, building plans or supporting documentation must include suitable detailed elevations or plans that demonstrate that the requirements of Section 3.5 of the Standard can be met. Comment: Application of Section 3.5 of the Standard cannot result in an assessment of BAL – LOW.
C	Additional requirements for Certain Class 9 Buildings	Refer to NCC Vol. 1 – Part G5 (incorporating TAS G5P1 and TAS G5P2) and Specification 43.

Table 2: Requirements for Property Access

Element		Requirement
A	Property access length is less than 30 m; or access is not required for a fire appliance to access a fire fighting water point.	There are no specified design and construction requirements.
B	Property access length is 30m or greater; or access is required for a fire appliance to a fire fighting water point.	The following design and construction requirements apply to property access: (a) all-weather construction; (b) load capacity of at least 20t, including for bridges and culverts; (c) minimum carriageway width of 4m; (d) minimum vertical clearance of 4m; (e) minimum horizontal clearance of 0.5m from the edge of the carriageway; (f) cross falls of less than 3 degrees (1:20 or 5%); (g) dips less than 7 degrees (1:8 or 12.5%) entry and exit angle; (h) curves with a minimum inner radius of 10m; (i) maximum gradient of 15 degrees (1:3.5 or 28%) for sealed roads, and 10 degrees (1:5.5 or 18%) for unsealed roads; and (j) terminate with a turning area for fire appliances provided by one of the following: (i) a turning circle with a minimum outer radius of 10m; or (ii) a property access encircling the building; or

Element		Requirement
		(iii) a hammerhead "T" or "Y" turning head 4m wide and 8m long.
C	Property access length is 200 m or greater.	The following design and construction requirements apply to property access: (a) the requirements for B above; and (b) passing bays of 2m additional carriageway width and 20m length provided every 200m.
D	Property access length is greater than 30 m, and access is provided to 3 or more properties.	The following design and construction requirements apply to property access: (a) complies with requirements for B above; and (b) passing bays of 2m additional carriageway width and 20m length must be provided every 100m.

Table 3A: Requirements for Reticulated Water Supply for Firefighting

Element		Requirement
A.	Distance between building to be protected and water supply	The following requirements apply: (a) the building to be protected must be located within 120 metres of a fire hydrant; and (b) the distance must be measured as a hose lay between the firefighting water point and the furthest part of the building.
B.	Design criteria for proposed fire hydrants	The following requirements apply: (a) fire hydrant system must be designed and constructed in accordance with TasWater Supplement to Water Supply Code of Australia WSA 03 – 2011-3.1 MRWA Edition V2.0 as amended from time to time; and (b) fire hydrants are not installed in parking areas.
C.	Hardstand associated with proposed fire hydrants	A hardstand area for fire appliances must be provided: (a) no more than thirty metres from the hydrant measured as a hose lay; (b) no closer than six metres from the building to be protected; (c) with a minimum width of three metres and a minimum length of six metres constructed to the same standard as the carriageway; and (d) connected to the property access by a carriageway equivalent to the standard of the property access.
D.	Additional requirements for Certain Class 9 Buildings	Refer to NCC Vol. 1 – Part G5 (incorporating TAS G5P1 and TAS G5P2) and Specification 43.

Table 4: Requirements for Hazard Management Area

Element		Requirement
A.	New buildings on lots provided with a BAL at the time of subdivision.	A new building must: (a) be provided with a HMA no smaller than the required separation distances required for BAL-19, except where a higher BAL was approved as part of the subdivision bushfire hazard management plan; and (b) have a HMA established in accordance with a certified bushfire hazard management plan.
B.	New buildings on lots not provided with a BAL at the time of subdivision.	A new building must: (a) be located on the lot so as to be provided with a HMA no smaller than the separation distances required for BAL 29; and (b) have a HMA established in accordance with a certified bushfire hazard management plan.
C.	Alterations or additions to buildings.	An alteration or addition to a building must: (a) be located on the lot so as to be provided with a HMA which:

Element		Requirement
		(i) has the separation distances required for the BAL assessed for the construction of the existing building; or (ii) in the case of a building without an existing BAL assessment, is no smaller than the separation distances required for BAL-29; and (b) have a HMA established in accordance with a certified bushfire hazard management plan.
D.	Hazard management areas for new buildings and additions and alterations to buildings classified as an accommodation building Class 1b, Class 2, or Class 3, other than communal residence for persons with a disability, a respite centre or a residential aged care facility of similar	A new building or an alteration or addition must: (a) be located on the lot so as to be provided with HMAs no smaller than the separation distances required for BAL 12.5; and (b) have a HMA established in accordance with a certified bushfire hazard management plan.
E.	Hazard management areas for new buildings and additions and alterations to existing buildings classified as vulnerable use as defined in the relevant planning scheme.	A new building or an addition or alteration including change of use must: (a) be located on the lot so as to be provided with HMAs no smaller than the separation distances required for BAL 12.5; and (b) have a HMA established in accordance with a certified bushfire hazard management plan.
F.	Hazard management areas for new buildings or additions and alterations to buildings associated with the use, handling, generation or storage of a hazardous chemical or explosive.	A new building or an alteration or addition, including change of use, for a building associated with the use, handling, generation or storage of a hazardous chemical must: (a) be located on the lot so as to be provided with a HMA no smaller than the required separation distances for the BAL determined in the certified bushfire hazard management plan; and (b) have a HMA established in accordance with a certified bushfire hazard management plan.
G.	Additional requirements for Certain Class 9 Buildings and associated Class 10a Buildings and decks.	Refer to NCC Vol. 1 – Part G5 (incorporating TAS G5P1 and TAS G5P2) and Specification 43.

APPENDIX 3. PLANNING CERTIFICATE

BUSHFIRE-PRONE AREAS CODE

CERTIFICATE[10] UNDER S51(2)(d) *LAND USE PLANNING AND APPROVALS ACT 1993*

1. and to which certificate applies

The subject site includes property that is proposed for use and development and includes all properties upon which works are proposed for bushfire protection purposes.

Street address:	466 Brighton Road, Pontville
Certificate of Title / PID:	Title Reference: 172508/2 Property ID: 3523093

2. Proposed Use or Development

Description of proposed Use and Development:	Proposed New Tasmanian Youth Justice Facility
Applicable Planning Scheme:	Tasmanian Planning Scheme

3. Documents relied upon

This certificate relates to the following documents:

Title	Author	Date	Version
Proposed New Tasmanian Youth Justice Facility, 466 Brighton Road, Pontville. Bushfire Report and Hazard Management Plan. October 2025.	Cameron Geeves, North Barker Ecosystem Services	~~28/10/2025~~ 4/11/2025	~~v1.1~~ v.2.0

[10] This document is the approved form of certification for this purpose and must not be altered from its original form.

Tasmanian Youth Justice Facility, Enclosure Site Plan. Draft Planning Issue	Grieve Gillet Architects	Received 22/07/2025	Rev 2
Tasmanian Youth Justice Facility, Overall Site Plan. Draft Planning Issue	Grieve Gillet Architects	Received 22/07/2025	Rev 2
Tasmanian Youth Justice Facility, Enclosure Site Plan. Draft Planning Issue	Grieve Gillet Architects	Received 16/10/2025	Issue D
Tasmanian Youth Justice Facility, Overall Site Plan. Draft Planning Issue	Grieve Gillet Architects	Received 16/10/2025	Issue D
Tasmanian Youth Justice Facility, Surfaces Plan	Inspiring Place	Date printed 09/07/2025	Rev 0
Tasmanian Youth Justice Facility, 466 Brighton Road, Pontville. Emergency Management Strategy. July 2025	Department for Education and Young People	Received 24/07/2025	v0.3

4. Nature of Certificate

The following requirements are applicable to the proposed use and development:

☐	**E1.4 / C13.4 – Use or development exempt from this Code**	
	Compliance test	**Compliance Requirement**
☐	E1.4(a) / C13.4.1(a)	Insufficient increase in risk

☒	**E1.5.1 / C13.5.1 – Vulnerable Uses**	
	Acceptable Solution	**Compliance Requirement**
☒	E1.5.1 P1 / C13.5.1 P1	***Planning authority discretion required. A proposal cannot be certified as compliant with P1.***
☒	E1.5.1 A2 / C13.5.1 A2	Emergency management strategy
☒	E1.5.1 A3 / C13.5.1 A2	Bushfire hazard management plan

☐	**E1.5.2 / C13.5.2 – Hazardous Uses**	
	Acceptable Solution	**Compliance Requirement**

☐	E1.5.2 P1 / C13.5.2 P1	***Planning authority discretion required. A proposal cannot be certified as compliant with P1.***
☐	E1.5.2 A2 / C13.5.2 A2	Emergency management strategy
☐	E1.5.2 A3 / C13.5.2 A3	Bushfire hazard management plan

☐	**E1.6.1 / C13.6.1 Subdivision: Provision of hazard management areas**	
	Acceptable Solution	**Compliance Requirement**
☐	E1.6.1 P1 / C13.6.1 P1	***Planning authority discretion required. A proposal cannot be certified as compliant with P1.***
☐	E1.6.1 A1 (a) / C13.6.1 A1(a)	Insufficient increase in risk
☐	E1.6.1 A1 (b) / C13.6.1 A1(b)	Provides BAL-19 for all lots (including any lot designated as 'balance')
☐	E1.6.1 A1(c) / C13.6.1 A1(c)	Consent for Part 5 Agreement

☐	**E1.6.2 / C13.6.2 Subdivision: Public and fire fighting access**	
	Acceptable Solution	**Compliance Requirement**
☐	E1.6.2 P1 / C13.6.2 P1	***Planning authority discretion required. A proposal cannot be certified as compliant with P1.***
☐	E1.6.2 A1 (a) / C13.6.2 A1 (a)	Insufficient increase in risk
☐	E1.6.2 A1 (b) / C13.6.2 A1 (b)	Access complies with relevant Tables

☐	**E1.6.3 / C13.1.6.3 Subdivision: Provision of water supply for fire fighting purposes**	
	Acceptable Solution	**Compliance Requirement**
☐	E1.6.3 A1 (a) / C13.6.3 A1 (a)	Insufficient increase in risk
☐	E1.6.3 A1 (b) / C13.6.3 A1 (b)	Reticulated water supply complies with relevant Table

☐	E1.6.3 A1 (c) / C13.6.3 A1 (c)	Water supply consistent with the objective
☐	E1.6.3 A2 (a) / C13.6.3 A2 (a)	Insufficient increase in risk
☐	E1.6.3 A2 (b) / C13.6.3 A2 (b)	Static water supply complies with relevant Table
☐	E1.6.3 A2 (c) / C13.6.3 A2 (c)	Static water supply consistent with the objective

5. Bushfire Hazard Practitioner

Name:	Cameron Geeves	**Phone No:**	0424 232 983
Postal Address:	313 Macquarie Street, Hobart, TAS	**Email Address:**	cgeeves@northbarker.com.au
Accreditation No:	BFP – 178	**Scope:**	1, 2, 3B Provisional scopes 3A and 3C.

6. Certification

I certify that in accordance with the authority given under Part 4A of the *Fire Service Act 1979* that the proposed use and development:

☐ Is exempt from the requirement Bushfire-Prone Areas Code because, having regard to the objective of all applicable standards in the Code, there is considered to be an insufficient increase in risk to the use or development from bushfire to warrant any specific bushfire protection measures, or

☐ The Bushfire Hazard Management Plan/s identified in Section 3 of this certificate is/are in accordance with the Chief Officer's requirements and compliant with the relevant **Acceptable Solutions** identified in Section 4 of this Certificate.

Signed:

certifier

Name: Mark Chladil
On behalf of the Chief Officer
Tasmania Fire Service
5/11/2025

Date: 04/11/2025

Certificate Number:	GGA001

(for Practitioner Use only)

AGRICULTURAL ASSESSMENT REPORT

Grieve Gillet Architects

Tasmanian Youth Justice Facility

February 2025 – Revised October 2025

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Document status

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Executive Summary

The Tasmanian Government is reforming the youth justice system through a comprehensive, integrated and therapeutic approach that prioritises the rights of children, rehabilitation, and breaking the cycle of offending. This includes the delivery of a new youth justice facility to replace the Ashley Youth Detention Centre. The new facility will provide an environment where children and young people experience the highest standards of child centred, rights-based and therapeutic care, where they are provided with education, services and opportunities that support them to enhance connections and return successfully to community.

The new youth justice facility is designed to house up to 20 young people, comprising 20 residential beds, two treatment beds in the health centre, and two orientation beds in the admissions area. In addition, the facility will include a health centre providing health and mental support, education and recreational facilities, and a cultural centre and garden. Landscaping will also be provided across the site.

The new facility is proposed to be located at 466 Brighton Road, Pontville (PID: 3523093). The site is owned by the Crown, and is approximately 32.4 hectares in size, and situated between the Midland Highway and Brighton Road. The northern area of the property is currently used to house ex-racehorses and contains a number of smaller paddocks divided by shelter belts of Eucalypts with the balance covered by open very heavily degraded pastureland.

The proposed site is located entirely in the Southern Midlands Local Government Area (LGA). Under the relevant planning scheme, the *Tasmanian Planning Scheme – Southern Midlands*, the site is zoned Rural and is subject to the following overlays:

- Bushfire-prone areas– appliable to the entire site
- Scenic road corridor – small part of the eastern section of the site associated with buffer of the Midlands Highway
- Priority vegetation area – small part of the eastern / southern section of the site.

The youth justice facility falls under the Custodial Facility use class, which is a discretionary use in the Rural zone.

Grieve Gillett Architects have engaged Jason Lynch (Pinion Advisory senior consultant) on behalf of the proponent, the Tasmanian Government, to complete an Agricultural Assessment Report, as required to support the submission of a planning permit application to the Southern Midlands Council. This, in conjunction with the supporting planning report and other accompanying specialist reports, provide a detailed assessment against the relevant planning scheme requirements.

The proposed Tasmanian Youth Justice Facility (TYJF) study area covers approximately 32.4 hectares and is located on the northern outskirts of Pontville in the Southern Midlands Municipality of Southern Tasmania.

The land associated with the TYJF study area is severely constrained for agricultural land use activity due to the predominantly low land capability of the ground, complete absence of irrigation water which limits any potential scale and level of intensification.

Agricultural land use activity does occur on the subject property as per a small horse agistment enterprise which occurs on a small portion of land on northern area of the block and is very heavily reliant upon bought in feed to ensure the nutritional requirements of the horses are able to be met. The opportunity to intensify and future scale of agricultural land use activity on this adjacent land is severely constrained by the low land capability of the land present, prevailing low rainfall climate and complete absence of access to irrigation water.

Agricultural land use activity on adjacent properties is severely constrained, and limited to a small (0.24 hectare) vineyard is located on property title CT 136556/3 adjacent to the northern end of the western boundary of the subject property title and a small degraded non-operational horse training track located on the central western boundary of the subject property. Agricultural land use activity is undertaken on the properties further to the north east and east, however a combination of the significant setback distances present, and presence of the Midlands Highway Brighton bypass as a buffer would ensure no negative impacts on this agricultural land.

A number of existing features associated with the subject property including setback distances and relative separation from nearby agricultural land, in conjunction with measures taken by the proponent such as layout of the facility, landscaping around the facility, secure fencing, and active land management (e.g. weed control) would mitigate the impact of the development on adjacent and nearby land.

The proposed TYJF development is consistent with the PAL policy and clause 20.3.1 of the Tasmanian Planning Scheme and could be undertaken without undue and unnecessary loss and negative impacts to agricultural land.

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Purpose

Thie agricultural assessment report has been undertaken on behalf of Grieve Gillett Architects in order to provide an assessment of the agricultural qualities and use of the land covered by the proposed new Tasmanian Youth Justice Facility (TYJF) located on the northern outskirts of Pontville.

1 General overview

1.1 LAND CAPABILITY

The currently recognised reference for identifying land capability is based on the class definitions and methodology described in the Land Classification Handbook, Second Edition, C.J Grose, 1999, Department of Primary Industries, Water and Environment, Tasmania.

Most agricultural land in Tasmania has been classified by the Department of Primary Industries and Water at a scale of 1:100,000, according to its ability to withstand degradation. A scale of 1 to 7 has been developed with class 1 being the most productive for agriculture and resilient to degradation and class 7 the least suitable to agriculture. Class 1, 2 and 3 are collectively termed "prime agricultural land". For planning purposes, a scale of 1:100,000 is often unsuitable and a re-assessment is required at a scale of 1:25,000 or 1:10,000. Factors influencing capability include elevation, slope, climate, soil type, rooting depth, salinity, rockiness and susceptibility to wind, water erosion and flooding.

1.2 REPORT AUTHOR

Jason Lynch possesses a Bachelor of Applied Science (horticulture) and is a certified practising agriculturalist (CPAg) with over 25 years' experience in the agricultural industry in Tasmania. He has previously been engaged by property owners, independent planners, and surveyors to undertake evaluations and studies across various council based interim planning schemes. This work involves the assessment of land for development purposes and potential conflict.

2 Property details

2.1 LOCATION

The subject property which is associated with the new Tasmanian Youth Justice Facility (TYJF) is located on the northern outskirts of Pontville and consists of single property title which covers a total area of approximately 32.4 hectares. Table 1 and Image 1.

Table 1 Study area location identification details

Owners	Property ID	Title reference	Address	Hectares (approx.)
Department for Education, Children and Young People	3523093	CT 172508/2	466 Brighton Road, Pontville TAS 7030	32.4

The subject property is held as Authority Crown, and adjacent properties are held as Public Reserve located to the north and east, and Private Freehold to the south and west.[1] Image 2.

The subject property is Rural zoned land, whilst land zoning on adjacent and nearby properties includes:

- North: Utilities, Rural, Agriculture, Rural and Utilities.
- East: Utilities, Agriculture, Rural and Particular Purpose.
- South: Rural, Landscape Conservation and Village, Open Space and Recreation.
- West: Agriculture, Rural, Rural Living, Open Space and Recreation. [2]

Image 3.

The topography of the subject property is characterised by flat to very gently sloping and undulating ground, with the highest elevation at 65m ASL on the far north western area of the block. Image 4.

The vegetation present on the subject property is dominated by open pastureland and a number of shelter belts which consist of various native trees and shrubs.

It should be noted that the open pastureland present on the subject property is in a very heavily degraded condition with very limited improved species present (e.g. ryegrass, cocksfoot, Phalaris), various broadleaf (e.g. hoary cress, capeweed, wild mignonette and various flat weeds) and woody weeds as per Hawthorn- *Crataegus monogyna* and Briar- *Rosa rubiginosa*).

Infrastructure present on the subject property includes boundary and limited internal paddock (in very poor condition), although the current lessor of the property title CT 172508/2 has installed various sections of temporary fencing, horse yards, 3 shipping containers used for storage and a chicken run.

Appendix 2 has a series of images which documents the subject property.

[1] The LISTmap dataset
[2] The LISTmap dataset

Image 1 Location map of the subject property. (source the LISTmap)

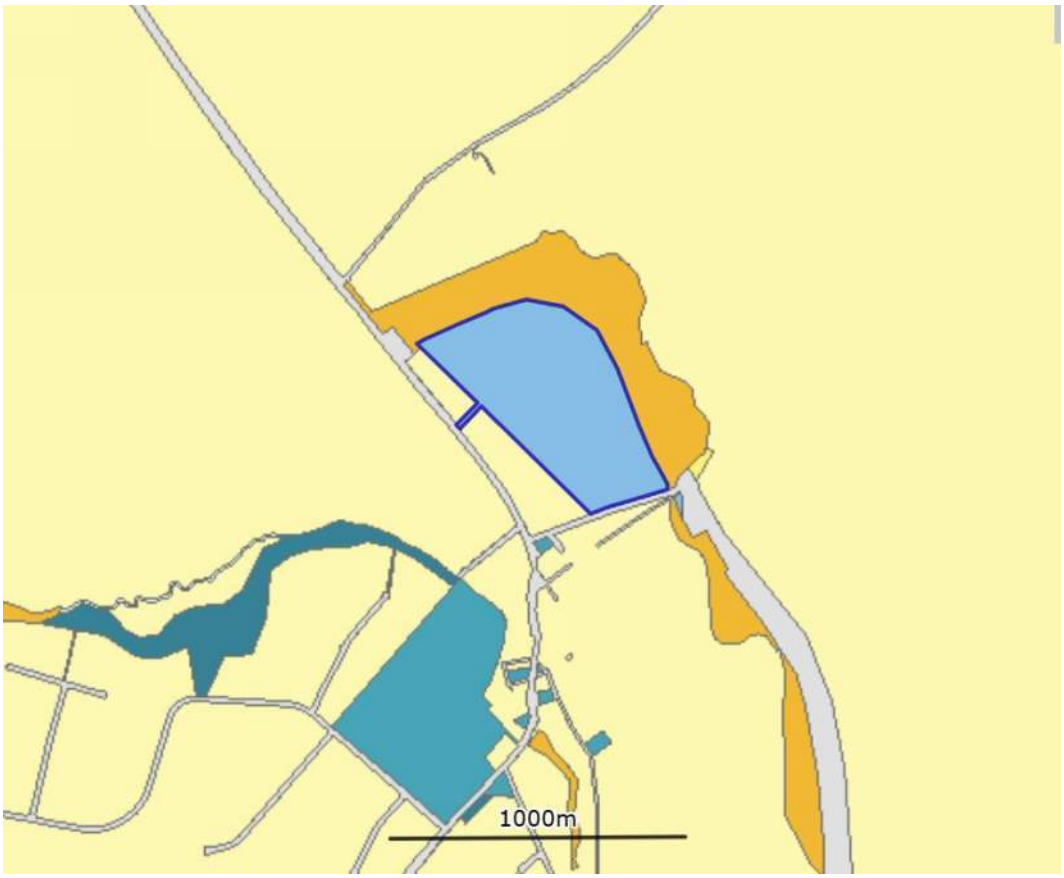

Image 2 The subject property is held as Authority Crown (light blue shaded), with private freehold land (yellow shaded) property adjacent to the west, south and further nearby on all directions, adjacent to the north and east is land covered by Public Reserve (orange shaded), Local Government Act Reserve land (magenta shaded) is located nearby to the west and further to the south, and nearby to the south is Local Government (light blue shaded). (source the LISTmap)

Image 3 The subject property is Rural zoned (light brown shaded) as well as adjacent land to the west and south as well nearby to the north, Utilities zoned land (yellow shaded) zoned land is adjacent to the north and east, Particular Purpose (pink shaded) zoned land is nearby to the east, with Agricultural zoned land further to the north, west and east, whilst to the south is Open Space (dark green shaded), Landscape conservation (olive shaded), Village (orange shaded), Recreation (light green shaded), General Residential (red shaded) and Rural Living (light pink shaded) zoned land. (source the LISTmap)

Image 4 Topography of the subject property. (source the LISTmap)

3 Land capability

Land capability of the study area was assessed according to the Tasmanian land capability classification system (Grose, 1999). Land is graded according to its ability to sustain a range of agricultural activities considering the chances of degradation of the land resource. Class 1 land is prime agricultural and class 7 land is unsuitable for agriculture due to severe limitations. A wide range of limitations are considered, and the most significant limitation determines the final classification. For example, limitations can be in relation to soils and could include stoniness, topsoil depth, drainage, and erosion hazard. Limitations to topography could include slope angle and associated erosion hazard.

3.1 SITE VISIT

Desktop research was conducted to review available data associated with geology, topography, presence of threatened native vegetation, land capability, soil information and climatic data of the study area and surrounding area. Pinion Advisory consultant Jason Lynch conducted a site visit on the 19th of February 2025 to ground-truth the available dataset information. The site assessment included inspection of the soil profile (to spade depth), an evaluation of the topography and vegetation as well as examination of land use on the study area and neighbouring properties.

3.1.1 Land capability assessment

The original land capability assessment of the area was modelled undertaken by DPIWE at a scale of 1:100,000 and reported in their Derwent Report[3] [4] in 2000. The property involved with the TYJF was classified as class 4 and 5 land to be present.

A more detailed recent assessment in February 2025 by the report author identified class 4 and 5 land to be present. Image 5

The soils present on the subject property were identified and compared to the available datasets included a light textured sandy soil on the western area and clay loam to be present on the eastern area. [5] [6]

[3] Musk R. A. and DeRose R. C. (2000) Land Capability Survey of Tasmania. Derwent Report. Department of Primary Industries, Water and Environment, Tasmania
[4] Musk R. A. and DeRose R. C. (2000) Land Capability Survey of Tasmania, Derwent, 1:100 000 map. Department of Primary Industries, Water and Environment, Tasmania.
[5] Spanswick S. & D. Kidd, (2000) Revised Brighton Reconnaissance Soil Map of Tasmania. Brighton Report. Department of Primary Industry Water & Environment.
[6] Spanswick S. & D. Kidd, (2000) Revised Brighton Reconnaissance Soil Map of Tasmania. 1:100,000 Brighton Soil Reconnaissance Map. Department of Primary Industry Water & Environment.

Table 2 Land capability class definitions.[7]

Class	Definition
4	Land well suited to grazing but which is limited to occasional cropping or to a very restricted range of crops. The length of cropping phase and/or range of crops are constrained by severe limitations of erosion, wetness, soils, or climate. Major conservation treatments and/or careful management is required to minimise degradation. Cropping rotations should be restricted to one to two years out of ten in a rotation with pasture or equivalent to avoid damage to the soil resource. In some areas longer cropping phases may be possible but the versatility of the land is very limited.
5	Land with slight to moderate limitations to pastoral use. This land is unsuitable for cropping, although some areas on easier slopes may be cultivated for pasture establishment or renewal. The effects of limitations on the grazing potential may be reduced by applying appropriate soil conservation measures and land management practices.

The key land capability limitations associated with the subject property are:

- Erosion (e) associated with the risk rill and sheet erosion caused by surface water movement and wind scouring on bare and exposed soil and potential for degraded soil structural due to pugging from livestock movement on waterlogged soils and/or inappropriate and excessive ground cultivation activities.
- Rockiness (r) due to the presence of rock and stone present in the soil profiles which negatively impacts land cultivation activities and vehicle access.
- Soils (s) associated with challenging growing conditions for pasture and/or crops due to limitations such as soil depth, texture contrast, shallower depth and the presence of rock and stone.

[7] Grose C.J. (1999) Land Capability Handbook: Guidelines for the Classification of Agricultural Land in Tasmania. 2nd Edition, DPIWE, Tasmania.

Image 5 Land capability of the subject property.

Table 3 The subject property land capability characteristics

Land capability class	Land characteristics							
	Geology and soils	**Slope %**	**Topography and elevation**	**Erosion type and severity**	**Soil qualities**	**Agricultural versatility**	**Main land management requirements**	**Climatic limitations**
4sr (approx. 8.2 ha)	Dermosol soil type, as per the Sorell soil profile class, formed from Tertiary basalt. Red brown clay loam soils (dermosol soil type).	0-5%	Flat to very gently sloping ground. 50-60m ASL	Low risk. Rill and sheet erosion due to surface water on bare and exposed soils and structure decline due to excessive and inappropriate soil cultivation.	Moderate to well drained. Variable top soil depth (20-30+cm). Moderate soil moisture and nutrient holding capacity. Surface rock and stone present in the soil profile.	This is technically suitable for cropping, however in practice due to the complete lack of irrigation water and small area of land it would not be cropped. This land is suitable for grazing with moderate limitations associated with the low rainfall environment, and any scale of grazing enterprise is severely limited.	Moderate/high. Avoid situations that lead to the exposure of bare soil, therefore maintain sufficient ground cover. The risk of soil compaction in winter from soil cultivation, machinery and stock movement increases significantly during periods of soil water logging albeit infrequently as this occurs.	Moderate to high. This land experiences cool winters and warm summer conditions. Receives on average approximately 484mm annual rainfall, has up to 25 annual frost events, has 1,060 GDD (Oct to April) and 1,020 chill hours (May to August).

Land capability class	Land characteristics							
	Geology and soils	**Slope %**	**Topography and elevation**	**Erosion type and severity**	**Soil qualities**	**Agricultural versatility**	**Main land management requirements**	**Climatic limitations**
5rs (approx. 8.6)	Dermosol soil type, as per the Sorell soil profile class, formed from Tertiary basalt. Red brown clay loam soils (dermosol soil type).	0-3%	Flat to very gently sloping ground. 60-65m ASL	Moderate/high risk. Rill and sheet erosion due to surface water and wind scouring on bare and exposed soils and structure decline due to excessive and inappropriate soil cultivation.	Moderate to well drained. Variable top soil depth (20-30+cm). Moderate soil moisture and nutrient holding capacity. Surface rock and stone frequently present in the soil profile and occasional rocky outcrops present	This is technically suitable for cropping, however in practice due to the complete lack of irrigation water and small area of land it would not be cropped. This land is suitable for grazing with moderate limitations associated with the low rainfall environment, and any scale of grazing enterprise is severely limited.	Moderate/high. Avoid situations that lead to the exposure of bare soil, therefore maintain sufficient ground cover. The risk of soil compaction in winter from soil cultivation, machinery and stock movement increases significantly during periods of soil water logging albeit infrequently as this occurs.	Moderate to high. This land experiences cool winters and warm summer conditions. Receives on average approximately 484mm annual rainfall, has up to 25 annual frost events, has 1,060 GDD (Oct to April) and 1,020 chill hours (May to August).

Land capability class	Land characteristics							
	Geology and soils	**Slope %**	**Topography and elevation**	**Erosion type and severity**	**Soil qualities**	**Agricultural versatility**	**Main land management requirements**	**Climatic limitations**
5se (approx. 15.6 ha)	Dominated by a podzolic soil, present as a light texture sandy soil derived from sandstone geology, with smaller patches of a dermosol soil type, as per the Sorell soil profile class, formed from Tertiary basalt. Predominantly grey sandy soils, and some red brown clay loam soils (dermosol soil type).	0-3	Flat to very gently sloping ground. 55-60m ASL	Moderate/high risk. Rill and sheet erosion due to surface water and wind scouring on bare and exposed soils and structure decline due to excessive and inappropriate soil cultivation.	Rapidly drained. Top soil depth of 30-40cm. Low soil moisture and nutrient holding capacity. Occasional stone and rock fragments present on the soil surface and in the soil profile.	Unsuitable for cropping. This land is suitable for grazing with moderate/severe limitations associated with the low rainfall environment, and any scale of grazing enterprise is severely limited.	Moderate to high. Avoid situations that lead to the exposure of bare soil, therefore maintain sufficient ground cover. Maintain the current native vegetation cover on this land and do not clear this land. Fence off and control access to livestock.	Moderate to high. This land experiences cool winters and warm summer conditions. Receives on average approximately 484mm annual rainfall, has up to 25 annual frost events, has 1,060 GDD (Oct to April) and 1,020 chill hours (May to August).

4 Water resources

4.1 CURRENT WATER RESOURSES

The subject property title CT 172508/2 is serviced by TasWater for the supply of drinking water.[8]

The subject property is not located within a declared irrigation district and not serviced by an irrigation scheme.

No irrigation dams are present on the subject property.

No waterways are present on the subject property.

Two groundwater bores are present on the property with details provided in Table 4.

Table 4 Groundwater bore information[9].

Bore ID	3569	3570
Date installed	9/3/1992	9/3/1992
Depth (m)	6	11
Initial yield (L/s)	Not provided	0
Initial quality (TDS mg/L)	Not provided	Not provided
Last operating status date	1/12/1996	1/12/1996
Last operating status	unknown	unknown

It is reasonable to consider all agricultural land use activity currently conducted on the subject property regardless of intensity and scale is severely limited due to a combination of the low rainfall climate in conjunction with the complete lack of access to irrigation water.

4.2 FUTURE WATER RESOURCES

No waterways are present on and/or adjacent to the subject property, and therefore there are no opportunities to obtain a water licence to extract any irrigation water and/or riparian right.

Based on available datasets[10] [11] this area of south east Tasmania is not recognised as having a significant groundwater resource. The geology underlying the subject property consists of:

- Fractured Tertiary basalt which typically has a successful bore yield (>0.03 L/s) of 81.8% and average yield 3.25 L/s.
- Porous Triassic sandstone which typically has a successful bore yield (>0.03 L/s) of 78% and average yield 1.23 L/s.

[9] Department of Natural Resources and Environment, Groundwater Information Access Portal.
[10] Matthews W, Latinovic M. (2006) South East Tasmanian Groundwater Map. Department of Infrastructure and Energy.
[11] Department of Natural Resources and Environment, Groundwater Information Access Portal.

Four groundwater bores are located within a 1 km radius of the subject property, all of which have no initial yield data and an unknown operation status. Realistically even if a successful groundwater bore was installed in all probability, it would only have a low yield and would be only suitable for use to support small scale livestock and domestic use (e.g. garden).

The Greater South East Irrigation Scheme (GSEIS) is planned to cover land within in the Jordan River Valley, and this does include the locale which the subject property is located within. GSEIS has the potential to irrigation water at a cost of $2,500/ML and would be supplied at a minimum quantum of 10ML. The cost a minimum water purchase would largely dictate that this irrigation water would need to be used for high value agriculture, such as perennial horticulture in order to justify the required level of economic investment. Currently at this time the nearest irrigation scheme is 5 km to the east, as per the South East Irrigation Stage 3 (SEIS3) and this services the middle and lower Coal Valley and Sorell.

Theoretically potable water, supplied by TasWater, could be used a source of irrigation water, however it does come with significant management constraints including:

- Cost[12]:
    - Current (2024/25) TasWater fixed annual connection charge varies with the diameter of the inlet pipe, such as a 50mm connection costs $2,459 whilst a 100mm connection costs $9,838.
    - TasWater delivery costs would be anticipated to cost approximately $1,200/ML which is over four times greater than the most expensive irrigation water delivery charges charged TasWater in the SEIS.
- Surety:
    - TasWater is not obliged to give priority access to an irrigation water users. An example would be during periods when water restrictions apply (e.g. summer) and the supply of water to irrigation users could be restricted.
- Flow rate and delivery[13]:
    - The minimum water delivery pressure is 220 kPa and the flow rate is determined by the size of the outlet.
    - If a smaller outlet is available, then it may be necessary to require a buffer dam to ensure sufficient irrigation water delivery. The exact size of any buffer dam would be calculated based on the required irrigation schedule flow rate, irrigation season length and size of the TasWater outlet.

The opportunity to develop new irrigation water resources on the subject property and on adjacent and nearby properties is severely limited and, in most cases, realistically not possible due to a combination of economic, lack of scale and operational factors.

It would be reasonable to consider that the majority of agricultural land use activity will be dominated by dryland production systems.

[12] TasWater Price and Service Plan 4. 1 July 2022-30 June 2026. CM record number 22/40133.
[13] TasWater Price and Service Plan 4. 1 July 2022-30 June 2026. CM record number 22/40133

5 Land use

5.1 AGRICULTURAL AND PRIMARY INDUSTRIES CONDUCTED

The northern area of the subject property is used for grazing purposes for a horse agistment enterprise and running 3 beef cattle. This enterprise involves agisting appropriately 14 horses and is heavily reliant upon the importation of supplementary feed to ensure the horses have a sufficient level of nutrition.

5.1.1 Potential pastoral use

The land associated with the subject property has the potential to be used for pastoral use, albeit highly restricted due to a combination of the prevailing land capability of the ground and low rainfall environment (annual rainfall of 484mm[14]). In total the subject property covers approximately 32.4 hectares, of which approximately 31 hectares are covered by open pastureland, and this would support a modelled potential sustainable total carrying capacity of approximately 270 DSE/ha[15].

270 DSE would equate to equate to a sheep enterprise consisting of 115 mature breeding and 15 replacement ewes and producing 140 store lambs, and this would generate a possible annual gross margin return of approximately $11,000.

The Australian Bureau of Statistics (ABS) has identified a minimum value of Estimated Value of Agricultural Output (EVAO) for an agricultural enterprise to be included in the ABS agricultural enterprise survey data to be $40,000[16].

A 270 DSE sheep based grazing enterprise undertaken on the subject property would not constitute and/or be recognised as a commercial scale grazing operation.

At an operational level the exact numbers of sheep run on the property will vary, such as the number of replacement ewes required, sucker lambs sold directly at weaning and the associated number of prime lambs finished.

It would be reasonable to consider that supplementary feeding of livestock run on the property would be required when pasture growth is limiting (noting this can be extended periods), such as during winter and to a lesser extent during summer and when there is insufficient rainfall and associated limited available soil moisture levels.

Based on the current condition of the pastures present on the subject the carrying capacity would be closer to approximately 50 DSE and would be sufficient to sustainably support running approximately 20 mature breeding ewes. Supplementary feeding would be required during periods when pasture growth is limited, such as during summer or winter and when there is insufficient rainfall and associated limited available soil moisture levels.

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[14] Bureau of Meteorology, Brighton BoM station# 94233.
[15] A dry sheep equivalent (DSE) is a standard unit used to compare the feed requirements of different classes of livestock to assess the carrying capacity of a farm or paddock. One DSE is defined as the amount of feed required by a two-year-old 50 kg 'dry' Merino sheep (wether or non-lactating, non-pregnant ewe) to maintain its weight.
[16] https://www.agriculture.gov.au/abares/research-topics/agricultural-outlook/definitions

5.1.2 Potential cropping use

The class 4 land present on the subject property covers a total of approximately 8 hectares (as per the class 4 land) has the theoretical potential to be cropped.

Due to the complete current and future lack of access to irrigation water the range of crops which could be grown is severely restricted and effectively limited to low rainfall dryland cereal production such as wheat or barley.

It should be noted that class 4 land would only be suitable for cropping potentially on an average cropping rotation of 2 times in 10 years, and this equates to a sustainable annual cropping area of less than 2.5 ha/yr.

Realistically due to the small amount of available cropping land in conjunction with the prevailing low rainfall dryland climate and very small sustainable cropping rotation it would not be reasonable to undertake cropping on the subject property.

5.1.3 Potential perennial horticultural use

Due to a combination of the prevailing low rainfall dryland environment and complete current and future lack of access to irrigation water the potential to grow perennial horticultural crops, such as wine grapes, olives or cherries is severely diminished and in reality, would not be possible.

5.1.4 Intensive livestock use

Intensive livestock uses includes a piggery, dairy, or feedlot, however due to a combination of the restrictions associated with access to water and the compliance requirements for appropriate setbacks to sensitive uses it would not be possible undertake these types of developments on the subject property.

6 Adjacent and nearby land use activity

Land use on the properties adjacent to the subject property includes residential use of lifestyle blocks, vacant land, and utilities (road).

South

- Title CT 101124/1 at 4 Rifle Range Road, covering approximately 1.9 hectares, Rural zoned, has a large shed and two short horse training trotting tracks. This property is separated from the southern subject property title (as per title CT 172508/1) by the 22m wide Rifle Range Road.

East and north

- Titles CT 172514/2, CT 172514/1, CT 136556/1, and CT 172515/1 (as acquired road), covering a combined total of approximately 25.3 hectares, Utilities zoned, used for the Midlands Highway Brighton bypass.

West

- Title CT 103746/4 at 440 Brighton Road, covering approximately 6.9 ha, Rural zoned, with a residential dwelling present, agricultural land use activity is limited to dryland grazing on rough pasture and has a horse training track present.
- Title CT 136556/3 at 484 Brighton Road, covering approximately 1.4 ha, Rural zoned, with a residential dwelling present as per the heritage listed building Old Station Masters Residence and has a 0.24 ha vineyard.
- Title CT 136556/2 at 484 Brighton Road, covering approximately 0.9 ha, Rural zoned, with a residential dwelling present and no agricultural usage.

Properties nearby to the subject property uses include:

- North, west and south
  - Residential use to the north, west and south on small lifestyle and residential blocks.
- South and north
  - Recreation uses as per three sports oval to the south and shooting range to the north. The sports ovals are located approximately 840m at the nearest point from the subject property, whilst the shooting range is separated by the property titles associated with the Midlands Highway Brighton bypass, with approximately a 300m setback.
- West
  - Property title CT 16022/2, covering approximately 32.5 hectares, Rural zoned, has no residential dwelling on, is undeveloped for agricultural use and is predominantly covered by native vegetation.
- North east and east
  - Agriculture uses as per grazing livestock on dryland and irrigated pasture and broadacre cropping to the north east and a greenhouse based medicinal cannabis production enterprise to the east. The land where these agricultural use is separated by the property titles associated with the Midlands Highway Brighton bypass, with approximately a 110m setback to the property used for grazing/cropping purposes and approximately 510m at the nearest to the high security cannabis production facility from the subject properties. It should be noted that this Agriculture zoned land is also buffered by the presence of property titles CT 18559/2 and CT 103746/5 which are located following along the Jordan River and form the

eastern boundary of the titles CT 172514/1 and CT 172514/2 (as per acquired land associated with the Brighton Bypass).

7 Local and regional importance

The subject property is located on the northern outskirts on Pontville, and it is reasonable to consider that it holds a negligible level of local and regional prominence.

Table 5 provides details on the prominence of the subject property in terms of the area and quality of the land within the Derwent land capability mapping area.

The subject property accounts for less than 0.05% of the Derwent land capability mapping area.

Table 5 Local and regional importance of the subject property.

Land capability	Derwent mapping area		Subject property	
	Area (ha)	Mapping area (%)	Area (ha)	Derwent mapping area (%)
Prime	144	0.007	0	0
Non-prime	173,451	82.14	32.4	0.018
Exempt	37,726	17.85	0	0
Total	211,321	100.00	32.4	0.015

The subject property clearly holds a negligible level of agricultural prominence and it should be noted that any current and future potential agricultural land use activity is severely constrained by a number of factors:

- Low land capability of the ground:
  - Limited area of class 4 present (approximately 8 hectares) which theoretically could be used for low frequency cropping (2-3 times in 10 years) with a severely restricted range of crops and can be used for grazing minimal limitations (albeit having a low carrying capacity). In reality the complete absence of irrigation water and small area of land realistically means it would not be cropped.
  - Class 5 is unsuitable for cropping and is suitable for grazing with moderate/severe restrictions and has a low carrying capacity.
  - No prime agricultural land is located on and/or in the vicinity of the subject property.
- Lack of access to irrigation both currently and in the future:
  - No waterways are located on and/or adjacent to the subject property.
  - Not located within an irrigation district and not serviced by an irrigation scheme.
  - The future GSEIS could theoretically service the subject property, however due to a combination of economics, lack of scale and operational issues it is unlikely to consider this is a realistic option.
  - No operational bores are located on the subject property, and groundwater yields in this locale are typically low.
  - Sourcing irrigation water from TasWater comes at a particularly high cost and limited surety, with both of these factors making this irrigation water option unrealistic.
  - In reality agricultural land use activity is restricted to dryland activity only.

- Is physically isolated from larger contiguous parcels of agricultural land, as per which exists further to the east:
    - Adjacent land holdings are a combination of property titles principally used for residential purposes with no commercial agricultural land use activity conducted therewith.

8 Protection of Agricultural Land policy compliance

8.1 PRINCIPLE 1

Principle 1 states;

"Agricultural land is a valuable resource and its use for the sustainable development of agriculture should not be unreasonably confined or restrained by non-agricultural use or development."

Response: The land associated with the subject property is severely constrained for any and all agricultural land use activities due to a combination of the predominately low land capability present, lack of current and/or future access to irrigation water and the overall small amount of available land present. The current horse agistment enterprise would continue to be operated on the northern subject title (as per title CT 172508/2) , and this would not be recognised as a commercial scale agricultural activity. It should be noted this current horse agistment enterprise is heavily reliant upon bought in supplementary feed due to the lack of pasture production on the subject property.

The agricultural land further to the east and north east is setback by significant separation distances from the subject properties.

No agricultural resources, such as water resources, irrigation infrastructure (e.g. dams or pipelines) are present on the subject property and therefore not integral and/or required to support agricultural land use activity on nearby properties.

8.2 PRINCIPLE 2

Principle 2 states;

"Use and development of prime agricultural land should not result in unnecessary conversion to non-agricultural use or agricultural use not dependent on the soil as the growth medium."

Response: This is not applicable as no prime agricultural land is present on the subject property.

8.3 PRINCIPLE 3

Principle 3 states;

"Use and development, other than residential, of prime agricultural land that is directly associated with, and a subservient part of, an agricultural use of that land is consistent with this Policy."

Response: This is not applicable as no prime agricultural land is present on the subject property.

8.4 PRINCIPLE 4

Principle 4 states;

"The development of utilities, extractive industries and controlled environment agriculture on prime agricultural land may be allowed, having regard to criteria, including the following:

(a) minimising the amount of land alienated;

(b) minimising negative impacts on the surrounding environment; and

(c) ensuring the particular location is reasonably required for operational efficiency."

Response: This is not applicable as no prime agricultural land is present on the subject property.

8.5 PRINCIPLE 5

Principle 5 states;

"Residential use of agricultural land is consistent with the Policy where it is required as part of an agricultural use or where it does not unreasonably convert agricultural land and does not confine or restrain agricultural use on or in the vicinity of that land."

Response: This is not applicable as no residential use is associated with the proposed development on the subject property.

8.6 PRINCIPLE 6

Principle 6 states;

"Proposals of significant benefit to a region that may cause prime agricultural land to be converted to non-agricultural use or agricultural use not dependent on the soil as a growth medium, and which are not covered by Principles 3, 4 or 5, will need to demonstrate significant benefits to the region based on an assessment of the social, environmental and economic costs and benefits".

Response: This is not applicable as no prime agricultural land is present on the subject property.

8.7 PRINCIPLE 7

Principle 7 states;

"The protection of non-prime agricultural land from conversion to non-agricultural use will be determined through consideration of the local and regional significance of that land for agricultural use."

Response: It is reasonable to consider that the subject property holds a negligible level of local and regional prominence.

The basis for the subject property holding a negligible level of local and regional prominence includes:

- Small area of land involved and accounts for a very small area of the relevant land capability mapping area, as per the Derwent mapping area.
- Predominantly covered by land with a low land capability, as per class 5 land.
- No prime agricultural is present.
- Not included within a declared irrigation district.
- No current and/or realistic access to irrigation water.
- The future GSEIS could theoretically service the subject property, however due to a combination of economics, lack of scale and operational issues it is unlikely to consider this is a realistic option.
- No agricultural resources, such as water resources, irrigation infrastructure (e.g. dams or pipelines) are present on the subject property and therefore not integral and/or required to support agricultural land use activity on nearby properties.
- Physically isolated from larger parcels of agricultural land nearby to the north east and east and cannot be adhered to this agricultural land due to being physically separated by the Midlands Highway Brighton bypass.

8.8 PRINCIPLE 8

Principle 8 states;

"Provision must be made for the appropriate protection of agricultural land within irrigation districts proclaimed under Part 9 of the Water Management Act 1999 and may be made for the protection of other areas that may benefit from broad-scale irrigation development".

Response: The subject property is not included within a proclaimed irrigation district. The subject property's access to irrigation water is severely limited, and effectively the only option would be to use TasWater supplied irrigation water which is encumbered by cost, surety, and flow rate, and in reality, this option would not be viable.

Even if irrigation water was theoretically made available it would not benefit nor be applicable to broad scale irrigation development due to the limited amount of available land, low land capability of the ground present, operational restrictions and negative economics associated with this type of development/investment.

8.9 PRINCIPLE 9-11

The remaining principles are not relevant to the development on the subject property.

These principles relate to the following:

- Planning schemes facilitating agricultural use on land zoned for rural purposes (Principle 9); and
- Plantation forestry (Principles 10 and 11).

9 Compliance with the Tasmanian Planning Scheme clause 20.3.1

Objective
That the location, scale, and intensity of a use listed as Discretionary: (a) is required for operational reasons; (b) does not unreasonably confine or restrain the operation of uses on adjoining properties; (c) is compatible with agricultural use and sited to minimise conversion of agricultural land; and (d) is appropriate for a rural location and does not compromise the function of surrounding settlements.
Response A response to A1 is not applicable to the proposed development and therefore direct responses to performance criteria P1, P2, P3 and P4 are required.

Performance Criteria	Response
P1 A use listed as Discretionary, excluding Residential, must require a rural location for operational reasons, having regard to: (a) the nature, scale, and intensity of the use; (b) the importance or significance of the proposed use for the local community; (c) whether the use supports an existing agricultural use; (d) whether the use requires close proximity to infrastructure or natural resources; and (e) whether the use requires separation from other uses to minimise impacts.	**P1** (a) A full master plan of the layout and proposed operation of the TYJF is available. In summary the TYJF facility is a safe, secure, and rehabilitative facility that provides a high standard of care for children and young people. The employment numbers at the facility have not been finalised but likely to have a potential estimated maximum staff numbers per shift of 95 employees. At this stage, the facility will provide accommodation for 20 residential beds, with four additional beds off count (treatment and orientation/short stay). (b) This is beyond the scope of the authors expertise and a response to this has been prepared by the planning consultants. (c) The existing horse agistment enterprise will continue on the northern area of the subject property. It is intended that other land on the balance of the subject property would be integrated into the operation and management TYJF and be used to support the health and