

**From:**  
**Sent:** Monday, 30 October 2017 7:33 PM  
**To:** Michael Stretton; Contact Us  
**Subject:** DA 0497/2017 representation - attention General Manager

I am submitting a representation regarding DA 0497/2017 advertised in The Examiner on Wednesday 25 October 2017.

Could you please clarify the situation with regard to the inclusion of land titles in a development application. I note on page 3 that for 8 - 14 Oxford there is "no title" and for 18 Mary (the existing school site) it states there is "no title" but it appears that one has been included? I should note that the title that is included 'appears' to be 18 Mary but it is difficult to confirm this as the text is largely illegible.

I have been informed by former P and F members who did a lot of work on the East Launceston Recreation Ground and its facilities over the years that the issue of titles came up a number of times in regard to confirming ownership of the land (given the 'division' between Crown Land and private ownership to make up the whole) and titles were apparently viewed. Given questions have been asked about these ownership arrangements more recently by both P and F and community members with no consistent response, it would be helpful if not prudent I would have thought to make available all relevant land documentation.

Look forward to your earliest response.

**From:**  
**Sent:** Tuesday, 31 October 2017 8:02 PM  
**To:** Michael Stretton; Contact Us  
**Subject:** DA 0497/2017 Attention: General Manager

I am submitting a representation regarding DA 0497/2017 advertised in The Examiner on Wednesday 25 October 2017.

- Can you please advise if it is usual for an applicant who intends to build on a piece of land to unilaterally detail how parking and traffic will be managed around their development and beyond particularly when:
  - the proposals will significantly impact on the amenity of the area (no parking areas, limited parking areas and traffic to flow in one direction only at designated times)
  - the proposals are likely to impact on property values (is Council prepared to address this issue with local residents and guarantee this will not happen?)
  - do not include how they will be policed (I believe the word "encouraged" was used for one proposal and 10 minute restrictions requires someone to be keeping time)
  - do not state what will happen if the proposals do not work (which would be disastrous if the development is predicated on them being successful)
  - do not address how the proposals will be resourced (should we expect a rate hike?)
  - do not take into account the 'peculiarities' of local street usage ( the Tasma/Oxford intersection is frequently used as a turning circle by parents; the corner of Tasma and Oxford is narrow, dangerous and almost to a car is 'cut' by drivers coming from Tasma into Oxford - many 'near misses' for both drivers and pedestrians have been seen here over the years)
- Does this proposal to change existing parking/traffic conditions to make this development 'work' suggest to Council that the development is not well suited to the location?

I look forward to your advice.

Representation

DA 0497/2017

As advertised in The Examiner Wednesday 25 October 2017

Context

- East Launceston Recreation Ground ('the Rec') has been an open public green space since the 1920's. It represents the efforts of parents and community members alike to purchase and maintain "a playground for the children of Launceston" (Trove article) in acknowledgement that East Launceston had and still has today, few open spaces for its children and other community members to use.
- In 2005, before a Parliamentary Standing Committee, the Department of Education (DoE) stated it preferred the school population to stay at no more than 500 pupils in "...an established residential area of historic significance". The school numbers now stand around 600+.
- Has East Launceston grown? DoE staff have stated in public forums there is an influx of young families into East Launceston. ABS census data (2011 and 2016 comparisons) does not support this contention and in fact shows a declining trend (see table below for 'Family' numbers). Realestate.com.au - using different sources - calculates 'young families' as only 2.2 % of the East Launceston population.  
<https://www.realestate.com.au/neighbourhoods/east%20launceston-7250-tas>
- ABS census data also shows an overall decline in the eligible school population in East Launceston. Given the evident decrease in the 0-4 years group (see table below), it would be expected that numbers for kindergarten will decrease with a domino effect for primary school admissions.

Age group	2011	2016
0-4 years	<b>141</b>	<b>103</b>
5-9 years	<b>175</b>	<b>161</b>
10-14 years	<b>148</b>	<b>156</b>
'Family' numbers	<b>568</b>	<b>529</b>

- East Launceston also has 6 private schools within a 1 km radius which presumably reduces the pool of eligible students for East Launceston Public School (ELPS).
- The Tasmanian Education Act 2016 advises that schools must not operate beyond capacity and that government has a responsibility to oversight this. This does not appear to be the case for ELPS and as a consequence, the East Launceston community is being adversely impacted.
- An RTI was requested in July 2016 to show out of area enrolments for the ELPS catchment area:  
**2015** – 160 children out of area; **2016** – 156 children out of area.

Since that time, there have been suggestions this figure has been as high as 170.

The following tables show a breakdown of these out of area enrolments by suburb of origin for enrolled child.

East Launceston Primary School Out of Area Enrolments by Suburb

Suburb	2015	2016
Blackstone Heights	5	2
Cressy	2	
Dilston	2	3
Evandale	2	2
Hillwood	1	1
Invermay	4	3
Karoola	1	1
Kings Meadows	9	14
Lalla		2
Launceston	6	8
Legana		2
Lilydale	2	2
Longford	2	2
Mount Direction	2	1
Mowbray	2	2
Newnham	4	5
Newstead	30	23
Norwood	9	12
Perth	5	4
Prospect	6	3
Prospect Vale	7	3

Suburb	2015	2016
Punchbowl		1
Ravenswood	6	3
Relbia		1
Ringarooma	2	2
Riverside	4	7
Smithton	1	
South Launceston	13	13
St Leonards	9	9
Summerhill	3	2
Targa	2	2
Trevallyn	1	5
Waverley	6	5
West Launceston	3	4
White Hills	2	1
Whitemore	1	
Windermere	2	2
York Plains		1
Youngtown	4	3
<b>Total</b>	<b>160</b>	<b>156</b>

- The number of out of area enrolments at ELPS is impacting not only the school but, by default, the amenity of local residents who face a potential reduction in public open space and increased traffic flows and parking restrictions as the school expands its structural footprint. East Launceston cannot accommodate a major school hub. The infrastructure simply isn't there.
- A concentration of pupils in East Launceston has a negative impact on other public schools within Greater Launceston. This in turn has an impact on the vibrancy of individual communities and where school closure occurs, it may even mean the long-term sustainability of that community is in question. This inequity must be of concern to LCC who clearly are committed to Launceston being a regional area of renown.
- The DA states: "The assessment looked at long term expectations in terms of student and staff numbers and associated parking requirements....an additional seven staff vehicles will be associated with the proposed kindergarten". 7 additional staff parking spaces for the proposed kindergarten signals to me that the school intends to grow the kindergarten cohort exponentially. Yet the rationale for this growth is not supported by Census data. Does this mean that the DoE intends to grow the school through more out of area enrolments?
- The DA also states there will be no net increase in numbers merely a shift of existing numbers across the campus. Is this for 2018, till 2020? The lack of explicit timeframes, the oblique reference to "long term", the omission of student numbers now and projected, lack of accurate data about car/bus/walking modality usage prevents rigorous analysis of the proposals. At the very least the number of student places in the proposed kindergarten building should be provided to extrapolate facts about pedestrian and traffic movement. As it stands, it is virtually impossible for the reader to calculate if the traffic projections are accurate and the traffic and parking recommendations feasible, realistic and future proofing.
- In my opinion, a DA must include sufficient detailed information, including valid and complete data, to inform an open, transparent and balanced analysis.

### *The Land Swap*

- In the background of this DA is another very concerning proposal. It appears likely that the ELPS P and F will 'swap' land with the DoE. This will give the DoE (government) the pavilion,

all the land frontage along Oxford St and the land situated behind Tasma Street properties and just beyond the current Tasma St entrance to the Rec.

- If this swap goes ahead, the DoE and government more broadly will have the means to do any number of things. Hypothetically they could: build more classrooms taking up the Oxford St frontage; demolish the pavilion and replace it with the original proposal for a hall to accommodate up to 700 people; build ‘other’ infrastructure for the DoE (e.g. administration offices for displaced DoE staff); sell it off to a developer (precedents have been set); appropriate the land for other government use. These hypothetical ‘future scenarios’ for a small suburb of historic significance with narrow roads and limited infrastructure are very disturbing and sadly not beyond the realms of possibility. Will East Launceston become a campus of the DoE and/or a government precinct?

#### *What has the community done?*

- Community members have requested (on numerous occasions and long before the DA) the DoE conduct broad formal community consultation/s to open up dialogue. The DoE did not respond to these suggestions.
- A few community members met with the Secretary DoE to discuss the issues and to recommend other options for development including i) development on the existing school site which was one of three options originally presented and ii) purchase of the property on Oxford St next to the walkway to keep classrooms on one campus (it is my understanding the owners of this property also approached the Minister directly with regards to a sale and were declined). None were found to be appropriate. Community members have been led to believe there have been previous attempts to acquire the Rec by the DoE.
- It beggars belief that the DoE is prepared to spend money on “levelling and re-sealing of existing (basketball) courts off Abbott St...” part of which will “...be converted to artificial turf” (??!!) when i) there are excellent basketball courts on the Oxford St site surrounded by expansive ‘real’ grass areas for play and rest and ii) when this area could have been used for new classrooms keeping the school to one (safer) campus.

#### *The Development Application*

This DA signals loss of amenity for local residents current and future; loss of historical open space that has been of inestimable value since 1920; a complete disregard for a local community that is already under significant pressure from burgeoning commercial and other interests in neighbouring streets.

##### *i) Setback*

- The building does not comply with the required setback and if the visual representations provided are to be believed, it will not be “lower than the road”. In fact, it looks very much like it will be virtually sitting on the footpath changing irrevocably the residential appearance of Oxford Street.

##### *ii) Traffic and Parking*

- The traffic assessment provided as part of the DA is confusing, incomplete and does not demonstrate an understanding of local usage i.e. the way people drive on the local streets that aren’t reflected in statistics and which residents have understood for many years.
- It uses language such as “estimated and indicative”, does not provide the time periods when measurements were taken and doesn’t provide the data that underpins certain

assumptions. This goes to the rigour of the assessment and the confidence that both residents and LCC can have that the evidence validly informs the argument.

- The proposed carpark is for “seven staff vehicles” but is suggested as a means by which traffic flow can be alleviated. How is this possible?
- There is inconsistency in the figures related to traffic increases. On page 9 - 42 cars extra and on page 10 - 28 cars extra.
- A number of assumptions are made e.g. percentage of children coming by car. Why wasn't a survey conducted to establish the facts? This is an easily accessed cohort for the purposes of collecting data.
- The assessment recognises that Oxford St has heavy traffic periods and states it will see an increase of 42 cars (p.9). It also states the DA recommendations will alleviate the problems that will arise from this. In my opinion, the assessment fails to address many issues with regard to traffic and parking including:
  - An increase in children crossing and moving around Oxford St has safety implications for the children, staff and residents. At the very least, it would be expected that a crossing guard would be recommended for drop off and pick up times.
  - Kinder children are rarely just dropped off or picked up as if they are old enough to make their own way along the street. Parking restrictions do not factor parents walking children in and possibly spending time to settle them.
  - How realistic is it to say that “parents should be encouraged to use Oxford St in the northbound direction rather than southbound” and to park on one side of the road and not the other? Is this rigorous traffic management? Council should be aware that complaints about drivers parking across driveways and abusing residents who ask them to move, butting up against corners, doing three point turns on Oxford St as children cross, parking on yellow lines especially near crossings and generally refusing to comply with the rules and etiquette of parking have been made to the school, Learning North's head office and Tasmania Police on a number of occasions. Confidence in “encouragement” compliance as a traffic management strategy is nil.
  - Encouraging a northbound approach means that traffic will enter Tasma Street from Mary and thence into Oxford. For some years residents have been concerned that the Tasma/Oxford intersection is cut by virtually every car using it. It is a tight corner entered from a relatively steep gradient that is not constructed to ensure people stay on the correct side of the road. To encourage increased use of this corner rather than less is an incident waiting to happen.
  - The Tasma/Oxford St area is used as a turning circle by some drivers. A potential scenario could include: some cars trying to go northbound, some turning to stay on Tasma to face up to Mary and those, for whom “encouragement” failed, going southbound. How is this a traffic management ‘plan’?
  - While parents may be “encouraged” to go north, residents will continue to go about their daily business. Is there an expectation that Oxford St residents who want to go to High Street do a blockie to get there? Or Ann Street residents who want to go right will have to go left and ...so on. These are traffic proposals that favour parents and school staff to the detriment of local residents.
  - There is no mention of cars parking right on the corner which can be an issue at the Tasma/Oxford and Tasma/Mary intersections. The Tasmanian Road Rules (p. 30) state you must be 10 metres from the corner where there is no traffic light. Tasmania Police have indicated that they will book motorists if they park on the corner in contravention of the rules.

- The imposition of traffic and parking restrictions is likely to force cars into surrounding streets. It should be noted that for Tasma St at least, the issue of increased traffic flow for the addition of a Bed and Breakfast (not a school!) was seen by the Resource Management and Planning Tribunal as unreasonable on 2 occasions (LCC versus M and M White, 2005). It was noted by the tribunal: *This zone is the principal residential living area of the City, characterised by single dwellings interspersed with unit development (Multiple dwellings), where residential amenity is of primary concern*. Nothing about this area has changed since this time.
- “The proposed redevelopment is unlikely to result in significant adverse impacts to traffic efficiency or road safety in the road network.” (p. 10) This part of East Launceston is increasingly impacted by traffic and parking issues. Consider the addition of a number of commercial, health and social service ventures which when considered individually are admirable but collectively compound traffic and parking issues. Add to this, cars which are encouraged to go in one direction, an increase in blockies to comply/deal with time limited parking and it is difficult to see how there couldn't be an adverse impact!!
- The assessment does not address emergency management. An increase in traffic in narrow streets (and one a dead end street) could impact on the access and exit of emergency vehicles. In the event of a serious event that impacts a broad area, the ‘good luck’ approach to traffic management could result in seriously poor outcomes.
- Importantly, the assessment does not address the following questions:
  - Who will police the parking restrictions?
  - If there is no policing and traffic and parking policy is one of good luck rather than good management, what outcomes can we expect?
  - If traffic and parking proposals go completely pear shaped, what legacy will the community and local residents be left to live with?

### Open spaces

- The Oxford St streetscape will be impacted by the removal of well-developed trees that create shaded areas. When the oval was being resurfaced, LCC cautioned that these trees were not to be removed. The silver birch has been classified in the past, I believe, as a historic tree. Landscaping of an institutional building cannot sufficiently recompense for the destruction of these trees. The application states that landscaping will minimise visual impacts. The visual representations show a few shrubs and grasses that cannot possibly minimise what is being proposed. I can still see the building perfectly well!!
- The proposal to build a carpark on an open green space in the inner city in the 21<sup>st</sup> century is astonishing. LCC produced a report in 2007 that noted East Launceston has the least open space of ALL Launceston suburbs and if the East Launceston Recreation Ground was to be put up for sale, then it should be purchased to prevent development. LCC should be congratulated for this position and it applies as much today as it did then.
- If there is no increase in staffing or absolute pupil numbers then why is there a need for another carpark? What of the amenity of the neighbours who currently do not look out on a hot sealed area with cars crammed into it? Further the carpark at the school is rarely full.
- The current playground on the East Launceston Recreation Ground is well used by the community. The proposal is to raze this and re-invent it behind a fence. Is there an assumption, given that the DoE have said many times their facilities are open for community

access, that local children can climb the fence to use the equipment (and they will just as they did with the basketball courts during the period the DoE locked the gates)?

- The DA says the development “will not encroach on to the oval.” What it fails to mention is that the building, given the dimensions, will be right on the edge. The DA does not address the implications this has for ball sports played on the oval including organised independent school cricket games on weekends. Will there be a high screen in front of the development to prevent windows being smashed and balls going behind fences? It is clear that the development, for all that it is ‘not on the oval’, will change the character and use of this space forever.
- The ELPS P and F developed a Master Plan in 2012 that proposed some wonderful uses of this beautiful open space that included a community garden and nature trails. The potential this had to serve both the school and the community was exciting. This has now been withdrawn to accommodate the land swap. Very disappointing and yet another loss linked to these proposals.

### *Conclusion*

It is my belief that the DA as it stands is not of a standard to even consider the immensity of what is being proposed. Any decisions made will be done so in the absence of critical information and rigorous analysis.



**From:**  
**Sent:** Monday, 30 October 2017 3:37 PM  
**To:** Contact Us  
**Subject:** FW: re the DA 0497/2017

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**Subject:** re the DA 0497/2017

The General Manager  
Launceston City Council  
Launceston

I have recently looked over the Development Application/Plan for East Launceston Primary School/Oxford Street new building to house Early Childhood and Kindergarten children in the near future.

I have many concerns one of which is the current and I believe continuing situation with a non-manned crossing in Oxford Street, the traffic will increase significantly given priority is Northbound drop offs and pickups for children and the inference is that parents will **be encouraged** to drive through the area, it is in my mind an accident waiting to happen.

Can you explain to me as Oxford St is a residential area and if an official observer of the situation at drop off and pick up times were to do more than just observe for a minimal amount of time in order to do a traffic summary, they would surely see that the area is narrow and lends to situations whereby children are at risk of accident as I am sure that parents would have older children as well coming down from the main part of the school to go to parents already parked to gain the best parking spot and how can the time for parking be managed as well, under that circumstance? 10 minute drop off/pick up is unrealistic with small children.

I would appreciate knowing the reason why teachers have to have parking on a green space when there is a parking availability in a car park opposite the proposed new building close to the current new Library. Is it a Policy for teaching staff to have car spaces within 10 metres of their working area?

Please advise at your earliest

Our driveway is accessible from Oxford Street

**From:****Sent:**

Tuesday, 31 October 2017 11:06 PM

**To:**

Council

**Subject:**

Comment on application DA0497/2017

## **For the attention of the General Manager / Planning Manager / Planning Department**

Application DA0497/2017

Address 8-14 Oxford Street East Launceston TAS 7250

Description Educational and Occasional Care - primary school; construction of a new kindergarten building, car park including upgrade of crossover, construction of alterations and additions to existing buildings, and retaining wall and reseal ball courts

Name of  
commenterAddress of  
commenterEmail of  
commenter

### **Comment**

As a resident of Tasma Street I find that the proposed development on Oxford Street would be detrimental to local residents due to the substantial increase in traffic this development would bring. Oxford Street is already heavily burdened with traffic during school drop-off and pick-up times. Any extra traffic would make Oxford Street virtually impassable at this time, preventing access by emergency vehicles and other traffic. Additionally the area would lose a significant proportion of green space and greatly diminish the character of the area. The oval becomes waterlogged at times during periods of heavy rain, and extra building on the oval would create more run-off and exacerbate this.

# Development Application Representation Letter

Development Application Number

DA0497/2017

## Address of Development

8-14 Oxford Street

East Launceston

## Details of Represantor

Title

Given Name/s

Surname

Date of Birth

/ /

Suburb

State

Postcode

Phone

H

B

M

Email

## Reason for Representing

I have serious reservations about the proposed development for 8-14 Oxford St.

Not only is it proposed building on one of the few remaining green spaces in the inner city suburbs, it includes increasing traffic flow with the addition of a car park in a street barely able to cope with current usage.

Green space, in my opinion, has an irreplaceable premium. To propose building on this valuable commodity when several properties immediately adjacent to school buildings have been available for sale, suggests a more insidious agenda to ultimately 'build out' the recreation ground altogether, once precedence is attained.

Surely additions to existing buildings within current campus boundaries is preferable and more cost effective. Perhaps limiting enrolments to the capacity of the existing campus is more logical and sustainable.

The proposed traffic management scheme will definitely increase parking in front of my property, which already suffers over-use, resulting, often, in my being unable to easily park and access my home.

It will negatively impact on the value of residential property within the area, with reduced real estate value near schools already well documented.

I strenuously urge the council to reject this development application in the interests of local residents.

Represantor's Signature

Date 27 / 10 / 2017

PLEASE NOTE: If a report on a Planning Application matter goes to Council, the full content of the submission will be included in the report and will be available for public access. It is therefore the responsibility of the author of the submission to make sure that what is written is factual, is fair and reasonable, and is not defamatory against any person.

**Personal Information Protection Statement**

As required under the *Personal Information Protection Act 2004*

1.	Personal information is managed in accordance with the <i>Personal Information Protection Act 2004</i> and may be accessed by the individual to whom it relates, on request to the City of Launceston.
2.	Information can be used for other purposes permitted by the Local Government Act 1993 and regulations made by or under that Act, and, if necessary, may be disclosed to other public sector bodies, agents or contractors of City of Launceston, in accordance with Council's Personal Information Protection Policy (17-Plx-005).
3.	Failure to provide this information may result in your application not being able to be accepted or processed.

File No. DA0497/2017					
EO		OD	✓	Box	✓
Doc. No.					
Action Officer			Date Received		
C.WRANKMORE			02/11/2017		

E-COPY I. MORE

**From:**  
**Sent:** Saturday, 4 November 2017 3:54 PM  
**To:** Michael Stretton; Contact Us  
**Subject:** Att: General Manager - DA 0497/2017

**Importance:** High

I am making representation regarding DA 0497/2017.

I am concerned that:

- The proposed building does not comply with the building regulations in terms of setback and it will be too close to a narrow street. This is particularly of concern given that the building will house kindergarten children who will need close supervision as they walk to and from the building.
- The trees on the proposed development site have stood for many years and Council advised they were not to be damaged or removed when the pavilion was being built and the oval was re-surfaced. They will now be removed completely to be replaced by 'landscaping' which will not afford shade and will affect the streetscape.
- In the 21st Century it defies thinking that a carpark is being proposed on a recreational area. To add insult to injury, this is in a suburb that has the least open green space in Launceston according to a 2007 LCC report.
- The changes to parking in Oxford Street favour staff and parents over residents.

**From:**  
**Sent:** Tuesday, 7 November 2017 9:17 PM  
**To:** Mayor; Alderman Hugh McKenzie; Alderman Danny Gibson; Alderman Simon Wood  
**Cc:** Contact Us  
**Subject:** ELPS Development on Oxford Street

Thank you so much for meeting with us this evening. We fully understand that the role of Council is to ensure that Development Applications comply with the Planning Scheme, and that many of the matters mentioned earlier were pertinent to the DoE and/or ELPS P &F.

As you've seen, our bluestone-lined sloping 7.5m wide road is incapable of being widened or altered. The plans state that there will be 4 new learning areas (and associated infrastructure) on the Oxford St site to re-site the existing kindergarten from Mary Street. With a current enrolment of approx. 620 students currently, this assumes a kindergarten of approximately 60-80 pupils.

The September 2017 Report to support the Development Application suggests a net increase of 42 cars in Oxford St at pick-up and drop-off time (or 28 in the Appendix). There is no explanation as to how these figures have been calculated, and there appears to have been little consideration given to the fact that (as we discussed tonight), kindergarten-aged children need to be walked to and from a locked gate. Given that I know a lot of the regular ELPS parents who park along our street, I know they're not picking up children from kindergarten. As such I'm certain that whatever the projected increase in traffic in our street has been grossly underestimated with no reference given to the age of the children.

Having been a resident of Oxford Street for over 11 years, we witness the chaotic scenes along the street on a daily basis (as we leave to pick up our kids from another school). We've witnessed (and taken photos of) parents parked over double lines, driveways, on the footpath, and on the opposite side of the road (i.e. in the wrong direction). Adding 42 cars (or whatever the real number is) to this is extremely difficult to imagine, and is certainly adding further risk to an already unsafe situation.

We really appreciate you meeting with us to hear our concerns this evening.

**From:**

**Sent:** Wednesday, 8 November 2017 9:56 AM  
**To:** Council  
**Subject:** Comment on application DA0497/2017

## **For the attention of the General Manager / Planning Manager / Planning Department**

Application DA0497/2017  
Address 8-14 Oxford Street East Launceston TAS 7250  
Description Educational and Occasional Care - primary school; construction of a new kindergarten building, car park including upgrade of crossover, construction of alterations and additions to existing buildings, and retaining wall and reseal ball courts  
Name of commenter  
Address of commenter  
Email of commenter

### **Comment**

This is a great recreational community asset that is well used by the children of ELPS and the broader community. Any further construction on the site of additional buildings and car parks in a suburb that already has very limited green space is contrary to contemporary community and environmental planning which is focused on creating and maintaining these types of green areas in inner urban cities.

**From:**

**Sent:** Wednesday, 8 November 2017 10:02 AM  
**To:** Council  
**Subject:** Comment on application DA0497/2017

## **For the attention of the General Manager / Planning Manager / Planning Department**

Application DA0497/2017  
Address 8-14 Oxford Street East Launceston TAS 7250  
Description Educational and Occasional Care - primary school; construction of a new kindergarten building, car park including upgrade of crossover, construction of alterations and additions to existing buildings, and retaining wall and reseal ball courts  
Name of commenter  
Address of commenter  
Email of commenter

### **Comment**

More tarmac and concrete! Just what the school kids need to play on. The traffic flow is a nightmare and a carpark is not going to fix this.



**From:****Sent:**

Wednesday, 8 November 2017 4:04 PM

**To:**

Council

**Subject:**

Comment on application DA0497/2017

## **For the attention of the General Manager / Planning Manager / Planning Department**

Application DA0497/2017

Address 8-14 Oxford Street East Launceston TAS 7250

Description Educational and Occasional Care - primary school; construction of a new kindergarten building, car park including upgrade of crossover, construction of alterations and additions to existing buildings, and retaining wall and reseal ball courts

Name of  
commenterAddress of  
commenterEmail of  
commenter

### **Comment**

As I live in Tasma Street, opposite Oxford Street, I witness every day the traffic chaos caused by numerous vehicles jockeying for position in both streets, as well as through traffic coming down Tasma Street and cutting the corner as it proceeds at breakneck speed into Oxford Street. This proposed development is only going to markedly increase the danger to everyone as more vehicles are added to this mix. The amenity of the area is also going to be dramatically reduced by building on the current green space, as well as reducing the area available for the actual children of ELPS to use.

**From:**  
**Sent:** Wednesday, 8 November 2017 8:13 PM  
**To:** Contact Us  
**Subject:** Development Application DA0497/2017

Dear Sir/Madam,

I am writing to express my opposition to Development Application No.: DA0497/2017 - New Kindergarten at 8-14 Oxford Street. Whilst not opposed to a Kindergarten being built on the site, I believe that it should be built on the site of the current basketball courts (which are incorrectly labelled as Tennis Courts on the architectural plans), and not between the courts and the hall as shown on the plans. The reason for this is that I currently suffer much disturbance from use of the basketball courts by members of the public, outside of school hours.

On a daily basis (outside of school hours), I am disturbed by noise from the basketball courts, which back on to my property. As well as the constant ball-bounce noise (annoying in its own right), people yell and scream (and swear), bring along stereos and play music loudly, bang balls hard against the backboard so that it rattles loudly, and swing on the hoops so that they rotate and make a loud squealing noise. The hoop closest to my property is lower than normal, which seems to further encourage annoying behaviour, as it is easier for children and teenagers to swing on. This is disturbing in the middle of winter, and unbearable during summer daylight saving time, when the noise can last from early morning until 10pm or later, every day. I have also been woken after midnight on occasions, the most recently being less than a month ago. There are also no toilets provided on the site, and I have frequently witnessed people urinating in the grass/shrub area between the courts and my property.

Despite repeated contact, both the school and the education department are rarely responsive, and have done nothing to reduce or prevent this constant disturbance. Building the Kindergarten on the basketball courts would provide my neighbours and myself with the peace and security of a secure building on our boundary, and act as a noise and visual barrier to the rest of the playground site. I call on the council to make this happen.

**From:**  
**Sent:** Thursday, 2 November 2017 8:13 AM  
**To:** Michael Stretton  
**Cc:** Contact Us  
**Subject:** Planning Permit no. DA0497/2017

Dear Michael

It is my intention to write a representation with respect to DA0497/2017 8-14 Oxford St East Launceston.

Before I do I request clarification and comment from Council on the following points.

The points for which additional information is requested are:

1. Page 3 – Report to support a development application – Site Context

It is stated that the trees on the site of the proposed building will be removed. Can you confirm this as being fact in view of previous Council directives that those trees, and all other trees in the area of the oval, were not to be in any way damaged or removed. This directive was issued at the time that the pavilion was built in the 1980's and again in the 1990's when the oval surface was re-constructed. It was considered that they were an important part of the tree scape and had to be preserved.

2. Page 9 – Traffic and parking study. It is noted that there will likely be an additional 42 vehicle movements each morning and each afternoon. This figure is also quoted on page13 of Appendix 3 whereas on page 10 and in Appendix 3 it is stated that there would be 28 additional vehicle movements each morning and afternoon. Can you clarify this situation as there is a substantial difference between 28 and 42 vehicle movements in terms of potential congestion in Oxford Street.

3. Page 9 – it is noted that associated with the proposed development seven new off street car park spaces for staff would be provided and it is suggested on page 10 that this would alleviate congestion. The question is "How?" when there will be a considerable number of vehicle movements.

4. Page 7 – Building setback – figure 17.4.1 is totally confusing to myself and I ask the question: How is it that a setback of 3.082m is deemed to be compliant when it is also noted that setback from a primary frontage must be no less than 6.0m. Is Oxford Street not a primary frontage?; or is there some other form of explanation.

I request that you provide me with any additional information that will clarify the above points.

## Reference DA0497/2017

The following representation is being written to you without the benefit of having answers to the questions that were asked in a communication to you last week on 2 November 2017. As no response has been received as at Tuesday 7 November 2017, preparation of this document will be done without the benefit of answers to the questions that were asked.

I have a number of concerns about the proposed project to build a kindergarten complex on the East Launceston Primary School oval area even though the site chosen is owned by the Department of Education.

Firstly, there are important historical considerations, in that the area was purchased shortly past World War I for the use of the citizens and children of the East Launceston area. Even though part of the whole area was bought by the Government (now owned by the Department of Education) the **whole** area has been available for community use ever since. Will this still be the case or will the area of the proposed kindergarten and the existing pavilion and land fronting Oxford Street and behind the homes on the northern side of Tasma Street be excluded from use by the community? The existing pavilion, the land along Oxford Street and behind the Tasma Street homes is to be given to the Department of Education under an arrangement between that Department and the school Parents and Friends Association. As most of the main Primary School area is fenced off to prevent after school hours access, will this area of the oval also be fenced off to exclude public access?

In the 1980's when the Parents and Friends Association built the pavilion and again in the 1990's when the surface of the oval and surrounds were redeveloped a component of the plans approved by Launceston City Council in each case was that the Parents and Friends Association was to continue to allow public access at all times. This was achieved by the pavilion being available for hire, as it was on many dozens of occasions. It was also, on occasion, provided free of charge for some organisations for special occasions. The oval and surrounds have always been available for general use by the community as well as by sporting bodies, both under hire arrangements and in many cases at no charge for use.

It should be highlighted that following redevelopment of the oval surface the Council did not install a water meter for many years and allowed the Parents and Friends Association to water the oval at no cost because it was an area for community use as well as for use by the school.

Secondly, the submission concerning the proposed new development states that 'there are a number of trees on the site which will be removed to accommodate the development'. In the 1980's when the pavilion was built and in the 1990's during the oval redevelopment the Parents and Friends Association was not allowed to touch or damage these trees because the Council considered them to be important elements of the streetscape. Accordingly the activities undertaken did not interfere with the trees in any way. Have the Council's rules and guidelines now changed such that items that were in the past of high importance are now no longer important with respect to proposed development applications?

It would be a tragedy to have the Oak tree removed as it has been present for a very long time and is a near perfect example of an Oak tree. Not to mention the shade it provides.

Thirdly, the matter of traffic issues is of major concern to local residents. The application document on page 9 notes that there will be an expected additional 42 vehicle movements for child drop off and also for pick ups. However, on page 10, the figure of an extra 28 cars for drop offs and pick ups respectively, is noted. In Appendix 3 the number of additional vehicle movements is again quoted as being 28 at drop off and pick up times and again on page 13 the number of 42 vehicle movements is quoted. What is the actual number of estimated vehicle movements each drop off and pick up time: 42 or 28.

The streets around East Launceston Primary School are very crowded each morning and afternoon and extra vehicles are going to contribute to even greater congestion. The extra seven parking spaces that will be provided will make no substantial difference to parking and overall traffic problems.

Oxford Street is a narrow street, as is recognised in the project application, but the suggested solutions only appear to be superficial at best and will cause considerable disruption to all users of Oxford Street and to the homeowners in that street in particular. The proposed traffic management measures will not only be a significant imposition to the local residents but it is also unlikely that they will work in terms of successfully managing and streamlining the movement of the additional vehicles that will need to move through and park in Oxford Street. As one example it is not realistic to believe that the proposed 10 minute parking limit will be a reality especially in the area furthest away from the proposed kindergarten. Also who is going to enforce compliance with a 10 minute parking limit? Will Council station a parking compliance officer in Oxford Street?

To say the least, the developer's presentation regarding traffic is confusing, incomplete and the whole issue of traffic and safety with respect to traffic requires further investigation and explanation.

Fourthly, the development application notes that the building setback is to be 3.082m while at the same time stating that the setback from a primary frontage must be no less than 6m. Oxford Street would have to be considered to be a primary frontage. The development application also notes that for infill lots the setback can be in the range of setbacks of adjacent buildings. In this case there only appears to be one adjacent, that being the existing pavilion which is more than 6m setback. The figure 17.4.1 appears to be misleading and confusing and requires further explanation. Why should the proposed development be exempt from the normal setback requirements?

Fifthly, in section 4.1.6 it is stated that the building bulk and form should be compatible with the streetscape and surrounding area and that it should protect the amenity of adjoining lots and surrounding uses. In this case the pictures presented do not indicate that the building will be markedly built into the bank thereby making it less obtrusive and less visible. The building would also result in the loss, forever, of the children's play area which is used every day of the week. There is no provision whatsoever for the replacement of the play area. The impact of the proposed building

will affect the amenity of the adjacent areas permanently and forever in a negative sense.

Sixth, and lastly for this representation, the case for real need for this development has to be raised. In a purely planning sense there does not appear to be a real need for the development because

- the available statistics indicate that in East Launceston the child population is declining and the development submission indicates no projected increase in school pupil numbers in the foreseeable future. This, of course, includes the out of area enrolments which contributes significantly to the school population
- if the school really does need extra area for teaching purposes there are alternative building options in the main school area
- there still is the option of purchasing an adjacent property right on the school boundary and
- in terms of planning for the future of this part of Launceston there is incalculable value in retaining the whole area of the oval and surrounds as it is for continued community access and use.

Thank you for accepting this representation

November 8, 2017

Michael Stretton  
General Manager  
Launceston City Council

By email to: [michael.stretton@launceston.tas.gov.au](mailto:michael.stretton@launceston.tas.gov.au)

Dear Mr Stretton,

Re: DA0497/2017 8-14 Oxford Street

The application is not supported, it constitutes an over development of the site that has traditionally been an open recreation area. The discretion to allow a reduced setback for the buildings should not be exercised.

It is hard to see how the new carpark area in any way 'improves the offering' to students by its mean-spirited design that will set the courts cheek by jowl with cars. In the case of the carpark the discretion being sought is not a reduction of the setback but its extinction. This discretion should not be exercised.

It is unclear how the oval can retain disability access given the current access appears to be demolished and the area fenced off.

The development results in a net loss of open recreation area and largely leaves the obligation to supply such area to the East Launceston Parents and Friends Association that owns the bulk of the remaining recreation ground area.

The development results in the loss of several mature trees that provide dense shade to students and other recreation ground users. The loss of shaded area is significant and cannot be mitigated with artificial shade structures.

The development further splits the school across two sides of Oxford Street. This is pedagogically undesirable and was noted as such in evidence to the Parliamentary Standing Committee on Public Works.

While the building may avoid the footprint of the existing oval, it comes so close to it as to effectively encroach upon it. The oval is used for cricket and the building so close to the oval boundary will result in broken windows or the abandonment of the oval by cricket and other ball sports.

The Traffic Impact Assessment repeatedly stresses that the redevelopment is to 'improve current offering' rather than to facilitate expansion of the school. It tries too hard, the claim is not credible and the report offers no evidence to support it. The history at the school has been of constant expansion beyond the capacity of the school. Given this is the central assumption of the report; the report is meaningless.

It is made more meaningless by its manifold disclaimers and limitations. The Traffic Impact Assessment authors disclaim any responsibility to any person other than Artas Architects arising from the report, yet it is the community and local residents that are to bear the loss of amenity and other costs that will arise from the proposal if approved based as it is, on doubtful 'evidence'.

The school has been managed such as to create a crisis of accommodation, largely by neglecting to manage the school area boundaries and accepting out of area enrolments, allowing its total numbers to go well above its design capacity. Given the reputation of the school, it is the school of choice for parents seeking to place their children outside their home area.

No other Launceston primary school has as many out of area enrolments as ELPS. This trend will continue and if this proposal is accepted, there will be further proposals for additional works on Oxford Street with attending further loss of amenity.

Approval should be denied and the Department of Education encouraged to enforce its school areas policy and invest in the future of the school by purchasing land contiguous to the existing buildings and redeveloping aged buildings to enable its expansion plans leaving the recreation ground area for its intended use.



**RITCHIE & PARKER ALFRED GREEN & CO**  
**BARRISTERS & SOLICITORS**  
LAUNCESTON

**PARTNERS**

TIMOTHY JOHN WHYTE  
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TELEPHONE 03 6331 5233  
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E-mail: rpag@vision.net.au

9 November, 2017

Our ref: JMG/km

The General Manager  
Launceston City Council  
Town Hall  
LAUNCESTON TAS 7250

Dear Sir

**Re: 8-14 Oxford Street East Launceston**  
DA 0497/2017

We act for:

- 1)
- 2)

Both properties are in the closed residential Zone.

Our clients have instructed us to make the following representation.

In general the proposed development does not satisfy the objectives or performance criteria detailed within the Community Purpose Zone.

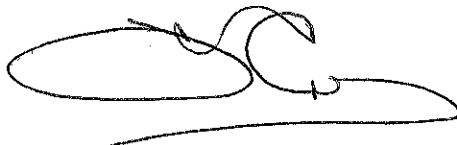
Further that the proposed use and development will have a detrimental impact on the amenity of our clients residential properties.

Tasma Street is classified as a local road and the substantial increase in traffic usage on Oxford Street will have a negative impact on the in and out traffic using Tasma Street be it limited to weekdays and school start/finish times.

As a consequence the value of our client's properties will be reduced.

*Yours faithfully*  
**RITCHIE & PARKER ALFRED GREEN & CO**

**John Green**



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**LEGAL SERVICES** - BUYING & SELLING PROPERTY -- COMPANY & BUSINESS LAW -- FAMILY LAW  
WORKERS COMPENSATION - PERSONAL INJURY - WILLS & ESTATES -- GENERAL & ACCIDENT LITIGATION

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# Development Application Representation Letter

Development Application Number

DA 0497/2017

## Address of Development

8 - 14 Oxford St

East Launceston 7250

## Details of Representer

Title  Given Name/s

Surname  Date of Birth

Suburb  State  Postcode

Phone H  B  M

Email

## Reason for Representing

The proposed development should be built within the existing School precinct. **NOT ON VALUABLE GREEN SPACE**

The overpopulation, of the school by DOE & its representative, from the 450 pupils set down as the limit in 2005 to current 650 pupils & still growing is being used to justify this build.

Upon reading the proposal I am amazed at:

1. How the required set back of 6m can be ignored
2. If the Teaching staff is not going to be increased, why do they need an extra 7 car parks?
3. The proposed traffic alterations of 10min parking on the western side of Oxford St will not work as the age of the children being delivered will require personal delivery into the school precinct by parents, does not allow for any discussion time with teachers or staff and as most parents have more than one child attending so will require parents supervising the older children up the walkway to the main school ... it can't be done! Who will police it?
4. The proposed traffic alterations of 10min parking on the western side of Oxford St will not work as the age of the children being delivered will require personal delivery into the school precinct by parents, does not allow for any discussion time with teachers or staff and as most parents have more than one child attending so will require parents supervising the older children up the walkway to the main school ... it can't be done! Who will police it?

This green space was purchased by the Parents & Friends of East Launceston "For the Children of Launceston"

Once building is allowed it will only increase, as the DOE intend to build all along Oxford St.

I don't believe enough planning has gone into the proposal and object strenuously to it going ahead.

Representer's Signature

Date

## Reference DA0497/2017

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- in terms of planning for the future of this part of Launceston there is incalculable value in retaining the whole area of the oval and surrounds as it is for continued community access and use.

Thank you for accepting this representation

8 November 2017

Mr. Michael Stretton  
General Manager  
Launceston City Council  
Town Hall  
St John Street  
LAUNCESTON TAS 7250

By email to [Michael.Stretton@launceston.tas.gov.au](mailto:Michael.Stretton@launceston.tas.gov.au)

Dear Sir,

**Re: DA0497/2017. 8-14 Oxford Street EAST LAUNCESTON  
Educational and Occasional Care - primary school; construction of a new  
kindergarten building, car park including upgrade of crossover,  
construction of alterations and additions to existing buildings; and  
retaining wall and reseal ball courts.**

In the preparation of this representation, our Association's Executive have consulted broadly with the East Launceston community, including school parents. A special sub-committee of our Association, named the *Friends of East Launceston Oval* group have actively been involved in the assessment of this Application, and in monitoring the course of how the project has been unveiled during the past couple of years.

We refer to the advertised application, which we note has been described in part, to construct school buildings across the street from the present campus on land to the west side of Oxford Street.

**IS THIS LAND AVAILABLE AND CAPABLE OF BEING BUILT UPON FOR  
SCHOOL CLASSROOM BUILDINGS?**

It is noted from the applicant's supporting documents, that no Title to the land has been presented, and in fact, furthermore, no Title or any other form of proof of ownership exists.

We submit that this valuable recreational land is not for building school buildings, and is held as an *implied trust*.

[A **trust** that is imposed by law onto certain subjects either by presuming an intention of the participants to create a **trust** or simply because of the facts at hand].

The land was acquired during the period c1920 - c1930's to *provide a playground for the children of Launceston*, on favorable financial terms from the previous owner, Mr. W. Sidebottom, and in collaboration with what became the East Launceston Parents and Friends Association who acquired the Title to the major portion of this recreation ground, using public fundraising subscriptions raised with a public appeal organized by the Mrs. M. G. Cleaver, (later LCC Mayoress). Via a public subscription

process, people were invited to contribute to the acquisition fund, a donation of 1 guinea per square foot. At the conclusion of the 10 year+ campaign, the land was transferred from Mr. Sidebottom, following which P&F working bees first cleared and levelled the main playing field, and managed the Oval they viewed as a single entity regardless of boundaries. The recreation ground integrates both flat playing space and shaded elevated areas that provide an ideal space for formal school and community sporting activities and informal community recreation.

The subject portion of this recreational land has a prominent signboard erected on the Oxford Street Frontage that reads :

**This is the private property of  
East Launceston Parents  
and Friends Association (not crown land).  
Community use is permitted, however entry is subject to  
a reasonable standard of conduct. Permission may be  
withheld at any time at the discretion of the  
East Launceston P&F**

The East Launceston Parents and Friends Association believe they are owners of the subject land. Members of the public who may have read the Notice, read the application documents and visited the site to view the proposed location of the proposed development and read the signboard erected there, may quite understandably concluded that this development site has either been mis-identified, and is not where the it appears to be located on the application documents. In any event, the terms of the *implied trust* only allow the area to be used as a playground for the children of Launceston.



View of the site, the sign and existing mature trees.

Accordingly, we submit that this land may not be capable of being developed as proposed.

**THE PROPOSED DEVELOPMENT SITE IS VALUABLE RECREATIONAL LAND AND COMMUNITY GREENSPACE.**

Known colloquially as East Launceston Oval (the Oval) is the heart of the inner city suburb of East Launceston and it continues to be the only primary green space in a suburb that surprisingly has the least council-owned open space in all of Launceston.

In 2007, Launceston City Council published an Open Space Strategy for the city, concluding in relation to East Launceston Oval ***"If this became available in the future it should be acquired [by LCC] as public open space rather than being lost to development."***

Perhaps that day has now arrived, and Council should deliver on its undertaking, and purchase at least the subject portion of the land that is under imminent threat by this development proposal.

Open space recreational land is fundamentally central to the physical and mental well being of East Launceston residents and to students at the school.

- "The *Friends of East Launceston Oval* group care greatly for the welfare of the school and its students and it is because of this that the provision of open green space, which is more important today than it was in 1920 when purchased, is of such concern. In a state where obesity, low physical activity and poor mental health outcomes are endemic, retention of green space especially in the inner city must be a local government priority".

Please be aware that two petitions have been tabled in the Tasmanian Parliament (one to the Legislative Council and a separate one to the House of Assembly), earlier this year, opposing the development of school buildings on the East Launceston Recreation Ground, and instead to consider alternative sites for the School expansion.

#### PRESENT USES AND FUTURE DEVELOPMENT PLANS BY THE P&F

Some of our members are also members of the ELP&F Assoc. Inc, and advise that the P&F is debt free and presently holds cash reserves sufficient to proceed with development of the Master Plan recreational works.



Oval-Masterplan-2012 (2).pdf

This Master Plan focuses on the area of land along the Oxford Street frontage where we direct your attention to the scheduled works on the Legend Nos. 23-31, which are located in the same area as the presently proposed construction works.

Should this present Development Application proceed, the following works and future opportunities will be forgone:-

- new shaded deck area for outdoor learning and a sitting area
- new pathways and paving to allow for access to all levels of the Pavilion, and the oval from Oxford Street (the main access from the school)
- replacement of the present playground with compliant playground equipment, including spinners, lookout/climbing structure, balance beams, basket swing, and a platform and obstacle course
- upgrade of the cricket nets, surfacing/linework to tennis and netball courts.
- emergency vehicle access restricted and potentially congested.

Accordingly, our submission is that this proposed development will seriously limit the future and present uses of the land for recreation purposes for which it was acquitted and progressively developed and used for the past 97 years. Accordingly the proposal should not be supported.



THIS PROPOSED EXPANSION OF THE SCHOOL IS BECAUSE OF UNRESTRAINED ENROLMENTS AT THE SCHOOL AND DISREGARD FOR OUT-OF-AREA ENROLMENTS.

Parliament records that East Launceston Primary School was established in 1908 with 88 students ranging from Prep to Grade 6 and located in eight classrooms. Due to growth of the school, by 2005 the school population had increased significantly, but by then, evidence documented by the Parliamentary Standing Committee on Public Works in 2005, stated the population had stabilized at 515 students. Accordingly, the school facilities were redesigned to satisfy this stabilized population.

Over the past 7 or so years, there appears to have been no regard given by the School Administration, School Association or the ELPS Building Reference Group to manage the student intake, and now the population of the school is well in excess of the agreed size limit of 450-500, now more than 630 enrolments, (about 180 students over the limit, 40% over capacity), and apparently with virtually all of this excess attributable to out-of-area enrolments. This overcrowding has produced what is said by the school's staff and parents to be a mounting crisis threatening educational outcomes and that reportedly causes some classes to be accommodated in non-classroom areas displacing functions such as the library and music facilities, and even utilising the staff room. They also cite higher than expected injury level occurs in the playground areas, apparently due to negligent overcrowding of these play areas.

We believe that irresponsible administration has placed the student enclave at East Launceston at risk.

Enrolments at the East Launceston School have skyrocketed with a significant number from out of area (as confirmed by the Department of Education through an RTI application). The enrolments at May 2016 were 634 against a formal student design limit at 450, and with around 120 out of area enrolments. The Principal has openly stated at a public forum, that she "can't bring herself to turn away" anyone making application to attend the school.

Given the overcrowding and pressure on existing school infrastructure, the P&F was asked by the School Association and School administrators in early 2016, to gift Oval land for DoE to build additional classrooms. The State Budget in May 2016 allocated \$4.5M to fund a project at East Launceston Primary School. Others may have written to you or explained at meetings with you, what has occurred concerning Constitutional changes to the P&F Association, and then a massive school-managed and intensively-promoted membership drive. Regretfully, this process has divided the school community and in our opinion gerrymandered the orderly decision-making and authorisation process within the P&F Association.

You will find that the situation with the neighbouring Punchbowl Primary School that their enrolments are apparently down by a similar number to the over-enrolments experienced at East Launceston. We have been advised that when Punchbowl School sought to change the area boundary with East Launceston, this was not supported, and now certain subjects and activities at Punchbowl cannot be offered due the non-viability of class numbers.

We refer you to <https://www.change.org/p/education-department-tasmania-stop-the-proposed-changes-to-the-punchbowl-primary-school-catchment-zone> and a petition forwarded to the then Minister Education, Nick McKim MP.

***Our current student population is 305 within a current capacity of 350. This is an 87% utilisation rate indicating a strong, healthy, viable school with capacity to grow. Our neighbouring schools are at or over capacity.***

***The new catchment boundaries effect the formula used to determine the number of students 'in area'. The school population would drop from over 300 to under 200.***

***We agree to the changes at the southern fringe of the zone with the removal of Carr Villa and the Launceston Golf course from the Punchbowl zone. The adjacent homes should logically be zoned to Norwood Primary School. We disagree in the strongest of terms with the change to the Northern boundary from Wentworth Street to Waldren Street. In fact we believe that the boundary should be extended further north to David Street. This would be an equitable boundary between Punchbowl and East Launceston Primary Schools. Punchbowl has current capacity (currently at 87%) and has infrastructure capacity for additional buildings/classrooms. East Launceston Primary School is at full student capacity and has no room for additional infrastructure. We do not want to see a reduction in student numbers, staff numbers, specialist programs offered or the outstanding academic, sporting and community achievements of this school due to this inequitable proposal.***

We attach a newspaper article published in The Sunday Tasmanian, that specifically refers to the political issue that apparently allows East Launceston Primary School to remain over-crowded. This press DISCUSSION about out-of-area school enrolment is a perfect example of how good public policy and good political policy can sometimes be so at odds with each other.

Opinion column by Matt Smith: Sound policy politically unpopular MATT SMITH, State Political Editor, Sunday Tasmanian November 27, 2016

A state with a population of 500,000 people maintains four public hospitals, is represented by 29 councils, has two seriously good sporting complexes that can cater for both AFL and world class cricket, 15 senators, 25 House of Assembly representatives, 15 Legislative Councillors and eight government departments.

Local representation and access to high-quality services within driving distances is something that as residents we not only appreciate but expect.

It is a quirk of our identity that is both envied and ridiculed by outsiders.

And it is a reason why issues like schools closures, council amalgamations and asset sales are so difficult for politicians to implement.

The Tasmanian Principals Association president Malcolm Elliott should be commended for expressing his view today that parents should send their kids to their local school and incentives to do otherwise should be reduced or scrapped.

A Sunday Tasmanian analysis of school numbers and capacity, earlier this year, showed there was huge disparity between schools.

Schools with great reputations, like Albuera Street Primary School in Battery Point and **East Launceston Primary School, are bursting at the seams.**

At the other end of the scale Cosgrove High School in Glenorchy has about 200 students for a capacity of more than 900.

But the subject was met with deathly silence from Tasmania's major political parties, who are more concerned with "winning the day"

over their political opponents than seriously addressing the inequity.

Aspirational parents that want the best for their kids are going to do what is best for their children.

And who can blame them.

If a phone call, to the right person on the right day, secures a spot for their child in a school with a great reputation — outside of their home zone — they can hardly be criticised for it.

But politicians need to acknowledge that the current system is creating further inequity in Tasmanian schools.

When the former Labor-Green government flirted with the idea of school closures they struck a tsunami of criticism from local communities.

The importance of the local school was integral to the fabric of the community, they argued.

But the fact that many residents — in the areas where school closures were foreshadowed — were not sending their children to the local school and contributing to why the school was so inefficient, was glossed over. Some of Hobart's most popular primary schools are rumoured to have students from multiple postcodes, with parents, who are often professionals or public servants, dropping them off on the way to their CBD jobs. Some have quite legitimate reasons, including the need to have their children at schools with well-known attributes such as disability access.

But the current system needs to be more seriously addressed.

Labor have announced a transport policy that could have a positive impact on reversing this very Tasmanian trait. Children will ride school buses for free, but only if they get off at the first stop and not go past multiple schools to get to their preferred destination.

But the Liberals are not having any of it, tapping straight in to the desire for Tasmanians to have freedom of choice.

The Liberals' policy is the best politics.

But that does not mean it is the best thing to do.

It is of note that the planning submission again promises that once this development has been completed, the population at East Launceston School will be stabilized, however, our experience is that this is most certainly unlikely to be the case and point to the promises and statements made when the last major redevelopment and expansion of East Launceston School was debated before the Parliamentary Select Committee

Our submission is that the applicant's submission on expansion control cannot be believed and accordingly this present expansion proposal will not be the last.

#### INNAPPROPRIATE SETBACK REDUCTION

There is no justification for this discretion to reduce the setback to Oxford Street to be approved. Clearly there is insufficient land for this development on this part of the land as evidenced by the buildings being excavated so deeply into the ground and extend so close to the sports oval that it cannot be itself improved and expanded in the future or be capable of hosting sports to present Australian Rules football, soccer, or cricket standards, which includes the recommended safety over-runs and without space for spectators.

With school buildings and their surrounding spaces built below ground level, there is the serious safety aspect of motor vehicles crashing into the place, whether accidentally or even intentionally. The juxtaposition of the sloping, elevated school car park opposite the Oxford Street site, is also potentially a safety risk of cars being able to cross Oxford Street at some speed, and crash into the new facilities. With a car park bounding the tennis courts there will only be a sheet of wire fencing as a barrier there, further exposing students and others to a serious potential safety risk.

The loss of a mature Blackwood tree and mature Birch tree on the development site has not been addressed in the submission. These are valuable shade trees and environmentally help maintain a healthier environment, quite apart from their contribution to the aesthetics of the area and their cultural heritage attributes.

Our submission is that this is an over-intensification of development of an inadequately sized piece of land which is clearly too small for the purpose, hence the reduced setback and encroachment onto the surrounds of the sports field, notwithstanding the loss of the trees, amenity shade and useful grassed activity area. This non-residential use will clearly cause an unreasonable loss of amenity to nearby residential and other sensitive uses and general safety considerations.

THE T.I.S. IS MISLEADING AND INADEQUATE

From our assessment of this report, we note that is so subject to qualification, estimates and unjustified opinion, that it does not provide any useful contribution to the assessment or adjudication of this proposed development and its unacceptable impacts on the area.

It appears that traffic in Oxford Street will DOUBLE, and that is significant and unacceptable.

Tasma Street has no special speed limit.

Parents/carers dropping off very young students to a Kindergarten must have off-street parking made available where they can leave their vehicle, take younger children/babies out of car seats, take prams/pushers out of the vehicle, and together take their Kindergarten-aged children inside the building. Is it seriously suggested that otherwise these parents/carers will momentarily pause at the kerb, even double park, let their child slip out of the car door un-aided and find their way along the street to the Kindergarten door? This is a preposterous situation, but given the complete absence of parking, a very likely situation that will arise.

For Council to consider the suggestions on restrictions to on-street parking, traffic management and possible changes to traffic direction, it will need to act as the Roads and Traffic Authority, compromising itself in the independent role and duty as the Planning Authority. This is an unacceptable impost on Councillors in considering this application.

In summary, it is our submission that this proposal should be refused.

Dear Mayor and Aldermen

Would you kindly answer some of the many questions that I would like to have addressed for the Development Application for the proposed destroying of valuable green space for a new kindergarten building for East Launceston Primary School.

- What guarantee can the council give me if this proposal is approved the value of the homes in surrounding streets will not decrease?
- Why should the residents of Oxford Street be prevented from parking on the street outside their homes during school time?
- How would the 10 minute parking in Oxford Street be policed?
- The Development Application is incomplete and needs a lot work how will this be dealt with?
- East Launceston's population is not increasing, if the school was properly managed there would not be a need for such a development, why should the community lose this valuable green space and amenities because of someone's mismanagement?