



NORTHERN TASMANIAN NETWORK PARTNERS & ASSOCIATES

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28 September 2020

Michael Stretton
General Manager
City of Launceston Council
P.O. Box 396
LAUNCESTON TAS 7250

By email to: contactus@Launceston.tas.gov.au

Dear Sir, Re: DA0320/2020 7 Willis Street Launceston; Educational and Occasional Care – Construction of educational building (Science, Health and Research) incorporating clinical rooms, exercise physiology facilities, consultation rooms, research and teaching laboratories, simulation labs, teaching and shared work spaces, staff facilities and amenities, café, end of trip facilities and associated landscaping. Development of car parking to service the Willis Street building and general university population together with passive recreation areas and access pathways through campus. Demolition works as follows : 80 Cimitiere Street – the previous National Automobile Museum of Tasmania including associated infrastructure including garden beds, appendices, portal roof and walkway; 78 Cimitiere Street – Demolition of three existing buildings and associated infrastructure formerly occupied by Crystal Cleaning; Removal existing parking infrastructure including lighting, fences and shipping container; and the removal of eight trees on site from the Boland

We refer to the public notice dated 12 September 2020.

Our Group is determined to keep the City of Launceston Councillors reminded of the folly of its support of the Utas campus relocation.

Winston Churchill had a great saying *“When you are walking through hell it is best that you keep walking”*, and so we will continue, with the recollection of that great statesman resounding in our ears, our Group is making this representation consistent with our earlier representations and submissions that have strenuously opposed the development of a relocated campus of the University of Tasmania to the Inveresk and Willis Street flood plains, which will be subjected to increasing threat from climate change affecting sea level rises in the Tamar/Esk estuary, and further threatened by predicted seismic activity that would cause collapse of/ damage to the flood levee system.

We again dispute whether this application has been advertised clearly to the public in that it has been advertised as an address at 7 Willis Street Launceston, without any reference to 78 or 80 Cimitiere Street or that the land also fronts Boland Street including vehicular access thereto. There is no specific reference to the foot bridge construction over Boland Street, which was not included in that earlier Development Approval.

There is no reference in the application to the demolition of the platform structure of the former and historic Tasmanian Main Line Railway Company. This structure is an important historic artefact and should be recognised and considered in context of the responsibility to protect and enhance the historic cultural heritage significance of the local heritage place and more broadly the heritage precinct.

The largest portion of the land upon which this application is proposed, (the former Goods Railyard) is land transferred to the Ratepayers of the City of Launceston by the Commonwealth Government for the specific purpose of constructing community affordable housing, and not for the development of a university campus. This reason for the land being owned by the City of Launceston Council imposes certain responsibilities on City of Launceston Council (CoL) and its ratepayers.

Nothing written has, nor can it, extinguish the principle of *implied trust*.

The land is on a tidal flood plain and is subject to certain seismic activity risks. Not only does the seismic risk endanger the safety of any infrastructure that may exist or is proposed to be constructed there, but it also endangers the stability and durability of the City Flood Levee system which allegedly is intended to make-safe the land area in question. This application continues to promote the fast-changing flood risk modelling stating. This is not low risk and only likely to occur at a time beyond the life cycle of the proposed University building structures, to the contrary the expression 1:100 years DOES NOT mean that such a flood will only occur once in one hundred years, as has been publicly stated by several Councillors.

Former State Treasury official, (Mr. Don Challen), was a strident opponent of any further building intensification within the Flood Inundation Zone. This was in part due to his concerns of an increase in government compensation liability, should the area be flooded. This significant financial liability will likely extend to City of Launceston Council acting as the Planning Authority, and to the Councillors who made the determination.

A **one-hundred-year flood** is a flood event that has a 1 in 100 chance (1% probability) of being equalled or exceeded in any given year.

The 100-year flood has also been referred to as the 1% flood, since its annual exceedence probability is 1%. For coastal or lake flooding, the 100-year flood is generally expressed as a flood elevation or depth, and may include wave effects. For river systems, the 100-year flood is generally expressed as a flow rate. Based on the expected 100-year flood flow rate, the flood water level can be mapped as an area of inundation. The resulting floodplain map is referred to as the 100-year floodplain. The common misunderstanding is that a 100-year flood is likely to occur only once in a 100-year period is incorrect. In fact, there is approximately a 63.4% chance of one or more 100-year floods occurring in a 100-year period.

The objectives of the LUPA Act includes for sustainable development whereby in Part 1 *sustainable development* is defined as managing the use, development and protection of natural and physical resources in a way, or at a rate , which enables

people and communities to provide for their social, economic and cultural well-being and for their health and safety while-

2(c) avoiding, remedying or mitigating any adverse effects of activities on the environment.

And in Part 2

(f) to promote the health and wellbeing of all Tasmanians and visitors to Tasmania by ensuring a pleasant, efficient and safe environment for working, living and recreation, and

(i) to provide a planning framework which fully considers land capability.

It is our general submission that CoL fails its ratepayers, citizens and visitors to Tasmania should it allow this unstable, flood prone and undesirable land to be further developed as a University Campus, when prudent and feasible alternatives are available, if not elsewhere within the Central Launceston area, then on the site that has already been established and contains substantial infrastructure and is surrounded by significant community resources, and does not suffer from an inability to be evacuated in the event of flooding, inundation by sea level rises or climate change or such dangers and risks being compounded by seismic activity.

Details of subsequent changes are described in the widely circulated and peer-reviewed *EVALUATIVE REVIEW of the University of Tasmania Inveresk Precinct Redevelopment Project*, commissioned by Northern Tasmanian Network Partners and Associates, and authored by eminent researcher Chris Penna.

Precipitated by behind-the-scenes political activists and opportunists, with electoral cycles and pork barrelling, the ridiculous relocation of the Newnham campus to the flood plains of Inveresk and Willis Street sites has been imposed on our Launceston Community. Suggestions of a central Launceston university population of 10,000 students and supported by a staff numbering 500 people is a ludicrous dream. Covid 19 issues that have already devastated university populations worldwide, and in particular the overseas Chinese student market, will prevent any expansion of the small campus in Launceston from occurring, and at the very least for quite a number of years, if not decades. Already, UTas has pushed out their student population forecasts until 2032.

Substantive community support has never existed for this relocation project, and the ludicrous traffic congestion and lack of adequate parking for a relocated university campus continues to be the basis of a raging public discourse. The UTas Newnham campus has generous parking and land for expansion of the university precinct. It already sits in a residential area that has re-accommodated the student population, and the Mowbray Shopping district caters for a broad variety of cultural cuisines. That student population will not simply vacate Mowbray and move to the yet-to-be constructed accommodation facilities in central Launceston. The transport system pressures that will inevitably occur to connect from Newnham/Mowbray to an Inveresk/Willis St campus will place an unaffordable impost on our ratepayers.

There are references to a CMP prepared by Paul Davies & Associates. This CMP was undertaken without public input, scrutiny or public acceptance. It has no authority in adjudication about what should or how what is of cultural heritage significance or

what be retained or managed into the future. The CMP appears to be a self-serving document produced only in 2019.

We are confident that this present Development Application is not supported by Launceston ratepayers, and it is interesting that the even more dramatic campus relocation in Hobart from Sandy Bay to Hobart central city, has been abandoned by UTas, due to the unaffordable costs and realities of the situation, now revealed.

The banner of RETREAT from building and retaining developments on flood plains that will be further impacted by climate change and rising sea levels and furthermore with seismic risks, could not be more solemn. The spectre of liability for allowing this development to occur will be forever a dark cloud over the heads of the present Councillors who are being lead along to sanction and approve it.

Seemingly oblivious to publicity and public opinion (see The Examiner Tuesday September 15, 2020) the Pitt and Sherry report is quoted ***“Based on these changes for the 1 per cent event the Launceston Levee and Inveresk Levee are expected to top”***. And ***“Any structure at either the Willis St or the Inveresk site is likely to have a life above 30 years. Therefore it would be prudent to consider flood scenarios at periods within that life. As no defined criteria are in place for development in flood-prone areas, developers should consider the risk associated with their development and plan appropriately”***.

The journalist goes on to report that at a 2 per cent increase, bothe the Willis Street and Inveresk sites would be severely impacted by floodwater for an extended period following the flood levee failure. The report said if a levee failure occurred the onset of the water would be rapid, and the flood behaviour would be unsafe for everyone. Not reported from the application, is the admission that in addition to the flooded situation would it be unsafe for people, but that there would be structural damage and the campus would be inoperable for multiple weeks....

Accordingly, we implore that this Development Application be refused, and political influence be instead engaged to redirect the allocated funding to either the present site at Newnham or another central site that is not flood prone or at risk of collapsing flood levees.

Yours faithfully,

Lionel J. Morrell

Architect

For Northern Tasmanian Network Partners and Associates



Enc. ATTACHMENT Summation of Workshop June 2019
THE STANDING OF ETHICS IN RELATION TO
Utas INVERESK PRECINCT REDEVELOPMENT PROJECT

APPENDIX 1
TRUST, TRANSPARENCY AND SOCIAL LICENCE: PUBLIC INTEREST
AND COMMUNITY CONSULTATION FAILURE (EXTRACT).

ATTACHMENT

**SUMMATION OF RESEARCH WORKSHOP attended by members of Northern
Tasmanian Network Partners & Associates :**

THE STANDING OF ETHICS IN RELATION TO UTas INVERESK PRECINCT REDEVELOPMENT PROJECT June 2019

Two articles by John Hewson published in the *Launceston Examiner*, (28 December 2018 and 25 January 2019) raised issues of considerable concern for many Australians. In his articles, one of which was head-lined "Australia's in the midst of moral, ethical decline" Dr Hewson talked about "trust deficit" and "a longer term erosion of the moral and ethical standards across society, as well as their application and enforcement".

He pointed out that the loss of public confidence is not only with our politicians, political processes but also with a broad range of institutions – "churches, banks (and more broadly in business) various sports, the RSL, and numerous authorities ranging from the police, judicial processes through to a host of regulatory authorities...ASIC/APRA and even the Reserve Bank)". Geoffrey Watson QC expressed similar concerns and a "falling trust in politicians" in a local ABC radio interview in November 2018 and in subsequent interviews. He described Tasmania's Integrity Commission as a toothless tiger. He talked about transparency, hidden agendas, secrecy and the influence of lobbyists on politicians in Tasmania.¹

Dr Hewson and Geoffrey Watson didn't include universities in the list of institutions, but in a recent ABC radio interview (5 July 2019) well-known journalist, Ray Martin did mention universities. He talked about the cult of secrecy with governments and public servants disliking "light being shone in dark corners". He had addressed university students earlier in the day and explained how he had told them that "we can't have the sort of open, free democracy that we have don't have watch dogs, if people aren't watching, not just governments, but public servants and parliament and universities etc...big organisations, all the institutions...all need to be scrutinised."

In an ABC radio interview in Tasmania in 2018 about the Tamar Valley Peace Festival, VC Prof. Rufus Black also talked about integrity and "breach of trust" and "a kind of stain that's been spreading across Australian society, in politics, then went into churches, businesses, as we've been seeing recently with the royal commission." The Ethics Centre has written about social licence and how "big companies with controversial practice often give out community grants and investments" in an effort to buy "social licence" and "community acceptance", in an approach that the Ethics Centre refers to as "a calculated and cynical payoff".²

In Tasmania, there are serious public concerns about the actions and culture around the University of Tasmania (UTas). UTas is a cossetted monopoly in Tasmania. Under the management of the past 6-7 years, a culture of misrepresentation, deception, real estate matters and staff intimidation has evolved. In Launceston, this has occurred as the result of combined Launceston City Council (LCC)-UTas' management ambition and lobbying to secure millions of dollars in public funding, including \$300 million to relocate the Launceston and Burnie main campuses (consisting of \$150 m from the Federal government, \$150 m from the Tasmanian government, plus gifts of several parcels of public land from the Launceston and Burnie City Councils).

From the start, the plan for the relocation of the entire Launceston campus (concomitant with and mirroring the Burnie and Hobart plans) away from a safe, secure fully-operating campus to a site only 3-4 kilometres away - on an estuarine flood inundation zone that sits below high tide level, and with severe traffic and parking issues - has lacked any significant supporting evidence or academic rigour. The plan is full of obvious inherent

¹ See also ABC radio news transcript, 7 March 2019, comments by Geoffrey Watson.

² The Ethics Centre, "Ethics Explainer: Social license to operate", ethics.org.au, 23 January 2018.

flaws, ongoing inconsistencies and planning 'on the run'. In other words, it is/has been a shambles. These matters were recently the subject of a highly critical article by Richard Flanagan in the Hobart Mercury.³

Since 2012, the process has involved a lengthy, convoluted series of machinations and ad hoc reactionary actions and responses. Furthermore, it has involved a complete rejection of community opinion as well as serious **intimidation** of UTas staff who objected or criticised the plans. In the push to obtain funding promises in the lead up to the 2016 federal election, UTas, LCC and lobbyists operated, and continue to do so, outside ethical, integrity and academic standards. The lobbying and propaganda were thorough and highly successful. Outlandish claims used to support the Launceston campus move to Inveresk, such as the projected enrolment of an additional 12,500 students, (10,000 of whom would, they claimed, be from Tasmania – a statistical impossibility) combined with threats that the northern section of the university would close if it didn't move to Inveresk, not only went unchallenged, but they were accepted by all levels of government, the major parties and most politicians.

After much assistance and 'coaching', UTas eventually submitted a 'final' business case to Infrastructure Australia (IA). This was right on the final deadline it had been given, 31 January 2019, potentially it seems, for routine and expedient approval post 2019 election. It appears that this UTas proposal by-passed Stages 1 and 2 of the IA assessment process, to go straight to Stage 3 where it was evaluated by IA.

The trust deficit, and the erosion of moral and ethical standards discussed by Dr Hewson, Geoffrey Watson QC and others are applicable to this situation in Tasmania. It might also be noteworthy that the three main instigators behind the Tasmanian plans, and the associated degeneration of ethics, integrity and honesty, and the sheer success of Illusory Truth Effect, - LCC GM Dobrzynski, VC Rathjen and Provost Calford - have all since left Tasmania for greener pastures. (Sep '17, Oct '17, Jan-Feb '18 respectively)

Trying to condense the issue into as few pages as possible but it is not an easy task, given the nature and volume of material involved. The following four examples might be the easiest way to sum up the misrepresentation, deception and due diligence failure within UTas and LCC and the cosy relationship between them, that have been features of this matter. Sections marked in bold in are direct quotes.

Example 1. The plan was initiated around mid-2012 by the then LCC General Manager (GM), Robert Dobrzynski, when he started working behind the scenes to achieve his aim and to encourage UTas, to change the original intended location – the UTas Newnham campus – of its planned NRAS funded student accommodation. The GM's enticement involved 'giving' a parcel of public land at Inveresk to UTas for the accommodation building. He ignored the existing high-level Master Plans for both Inveresk Precinct, the Mowbray Precinct sections of the Greater Launceston Plan and the major plans for the Mowbray-Newnham campus. He also ignored the legally constituted York Park Inveresk Precinct Authority, (YPIPA) its 4 community members and senior state public servant member (head of Events Tasmania) as well as several genuine full public consultations and community input into all those existing Master Plans.

Even before this accommodation relocation was formalised, it soon emerged that the GM's ill-thought out plan, which he simplistically insisted was 'good town-planning', involved more than just student accommodation relocation. Behind the scenes he moved quickly to invite and encourage UTas to provide information to support his plans for a full campus move to Inveresk, a distance of 3-4 kilometres from the existing fully operating campus site of 180 acres and associated infrastructure. His intentions are revealed in items listed in an email from him to UTas in December 2012. An example of such items on the list is, "**LCC would wish to gain an indication of the future**

³ Richard Flanagan, *The Mercury*, 20 April 2019, pp. 7,

development proposed by UTAS at the Inveresk site, and to gain the collaboration of UTAS in developing the Inveresk precinct Plan which will guide development at Inveresk”.

UTas management was quick to take advantage of this encouragement and start its own push. In its December 2012 response to GM Dobrzynski's email, UTas referred to previous discussions adding that, **“the University needs to finalise the matter.”** It referred to **“tight deadlines”** and warned that **“If in-principle agreement on Inveresk cannot be reached before Christmas the University will have to look at alternate sites to meet these deadlines.”** It must be pointed out here that until July that year the intention had been to build the accommodation at Newnham campus where UTas already ‘owned’/occupied the land, and for which the NRAS funding had been obtained. Thus, the opportunity was seized by UTas, particularly by VC Peter Rathjen (now at Adelaide) and Provost, Mike Calford (now at ANU), with the latter doing much of the lobbying of politicians and candidates of all parties well in advance of the 2016 federal election. Meanwhile, in order to silence vocal opposition, the GM was able to sideline YPIPA community members by working directly and secretly with the LCC Mayor and the two aldermanic representatives on the Authority. In 2016, he succeeded in getting UTas to sponsor the York Park stadium for an undisclosed amount understood to be lower than the previous 5 year sponsorship by Aurora.

Example 2. i) In early 2016, a senior Commonwealth public servant (who shall be referred to as PB), but acting independently, approached northern UTas management to query the document that they had put forward as their ‘business plan’. This document was/is nothing more than a glossy marketing brochure. Initially the northern UTas representative argued that it was indeed the business case, but PB insisted it was not. After some discussion, and as PB was not to be fobbed off, it was suggested (or he may have requested to speak to someone, it is uncertain at this stage) that he speak with the University's Hobart-based business manager. It is perhaps noteworthy that the business manager travelled from Hobart to Launceston to talk with PB. Again, when PB insisted that the glossy brochure was not a business plan he received the same response from the business manager that it was. However, as PB persisted on the existence or otherwise of a business plan, the business manager finally admitted, **“We don't have one”**.

ii) Similarly, PB also sought the student statistics that UTas would have presumably used to support/underpin their arguments for public funding and land acquisitions. After much running around, PB was eventually told that **“there aren't any”**. This accords the experience of another researcher. Not from want of trying, including a trip to Hobart, they were unable to find or obtain current or earlier statistics of student numbers, not even basic Full Time Equivalents (FTE), across the campuses.

Example 3. On Monday 2 October 2017, less than three weeks before VC Rathjen was due to finish up as VC and leave Tasmania, an ordinary meeting of Launceston City Council was attended by some members of the public and twelve well-prepared UTas representatives intending to address the meeting on the controversial Agenda item relating to a LCC-UTas campus relocation land deals. During the morning before the meeting, the aldermen received an email from the LCC Acting General Manager. The email read: **“A robust debate in council that does not result in the required absolute majority will significantly damage relations and our reputation, especially when the university has been organising speakers to attend the meeting supporting the proposal,”**

Apart from one alderman, Danny Gibson, the other aldermen and the Mayor were very keen to give more parcels of land to UTas, still without having carried out any due diligence (in breach of their code of conduct) on behalf of ratepayers. Alderman Gibson was incensed at such an instruction from a council official and asked what was the intent of the email. He also asked about the nature – a convoluted series of “exchanges” - of

what the Aldermen were being “asked” to approve. He stated that it “was ludicrous to have not questioned” the land deals further and “appalling that the council had not finished its parking study before the land decision was made.” He pointed to the haste, with which the deal was being voted on that day simply as a farewell favour for VC Rathjen. Referring to the land deals and an upcoming LCC send-off for the VC, Ald Gibson argued, “I believe if there wasn't a function to celebrate the achievements of the Vice Chancellor this Thursday in Launceston that we would have negotiated a better outcome”.

The Mayor tried several times to silence Ald Gibson on this, saying it was a confidential email. However, Alderman Gibson held his ground, until he finally got an answer regarding to the nature of what the aldermen were being asked to approve. The eventual answer from the Acting GM was, **“It has been a long process of working to address the issue of trying to achieve the outcome of the relocation of the university to the inner city site. I think that through that process, as aldermen have been advised, there was a point now of an expectation that we had reached an agreement. For us not to proceed would be something that is regrettable, given the effort that had gone into it.”**

That answer from the Acting GM was a clear indication of the failure by all levels of government to carry out any due diligence or requirement for UTas to produce modelling, demonstrated need or a full evidence-based business case. By late 2017-early 2018 it had become the fall-back position of many politicians and proponents to suggest that the ‘plan’ is/was either too far advanced to halt, or that “it’s a done deal” or similar.

Example 4. On 28 May 2018 four members of a series of community networks that include businesses, academics, students, tradespeople, retailers, ratepayers, residents and others, requested a meeting with the new VC, Rufus Black. Black invited two UTas representatives/lobbyists, Professor David Adams and James McKee, to the meeting. During the very polite discussions, Professor Adams had as much to say as the VC, Mr McKee said nothing. Well into the discussions and on the topic of the complete lack of any evidence, reason or need for the Launceston campus move, Adams, as he spoke, volunteered this shocking and revealing top level admission of six years of misrepresentation, academic disregard, negligence and ad hoc actions with the statement (information that the public was already well aware of) **“We are retrospectively trying to create the logic of this.”**

This, in 2018 - after 6 years of machinations and disbursement on associated resources (personnel, equipment, marketing, travel, office space, real estate etc) after millions of dollars of public funds had been promised, with some funds already handed over, land parcels gifted and some land titles granted, and planning scheme flood inundation codes altered - was the best they could come up with! Adams’ words were a full admission that they, UTas and proponents, still had not established justification for relocation, that all their previous claims and actions have indeed been a scam. Furthermore, on 1 March 2019, a full month after their submission to IA, Adams was quoted in the local newspaper, *The Examiner*: ‘Pro-vice chancellor David Adams said the university had been **“working hard to get the evidence”** for its transformation project, but **“unforeseen challenges had meant a delay to the existing timelines.”**

The level of misrepresentation, deception, manipulation, demise of ethical standards, lack of accountability and transparency by UTas and/or those in government responsible for organising and signing MOUs and granting funding has been mind-boggling and continues unabated. Not even the serious damage to the Sandy Bay campus caused by the

flood in June 2018, nor the public response to an Open Letter⁴ to VC Black was enough to bring about a rethink of the folly of relocating the whole Launceston campus to a flood prone tidal flat – an area that sits below high tide levels, albeit behind levees, but which has to be evacuated, at great expense and effort, every time there's a flood evacuation warning as there was in June 2016 at a cost to UTas of over \$40,000 to evacuate the small campus there.

Moreover, the cost of Launceston relocation is now rumoured to have blown out to well over \$400 million, (presumably in part due to the nature of the intended location), while the posited randomly selected number of 'additional' students has been reduced from the original figure of 12,500 quoted in 2015-6, to 7,000 in mid-2018 to 1,200 in late 2018. **This combination and size of altered projections alone should be enough to negate all MOUs and to force serious, open examination of LCC-UTas methods, funding and efficacy of the all campus relocation plans.** However, it has made no difference to the funding promise by politicians and proponents.

No single politician, candidate or party carried out any due diligence or fact checking before supporting the funding promises. Because of the obvious flaws and absence of any need to relocate (quite the contrary, **the evidence for remaining at the current campus is overwhelming and fully understood by the public**), ad hoc decisions, policy and planning on the run, and absence of any coherent proposal have been ongoing characteristics of the process from the start, a feature also recognised by the public. In this absence of any due diligence or fact checking by the political class or of any requirement for UTas to produce actual evidence or modelling or full business case, Launceston-based community networks assigned a full academic-level report.

Researchers have spoken to many people, politicians of all persuasions, business owners, professionals, tradespeople, academics, students, current and former UTas employees, UTas lobbyists, University Vice Chancellor, administration staff, media/radio hosts, and had numerous discussions and casual conversations with members of the public. The high level of opposition within the general public (80-85% opposed) and within UTas staff (75% opposed in Hobart, approx. 90% opposed in Launceston) and students, has remained high from the start, It has not diminished.

One of the difficulties for any member of the public in trying to deal with this issue, or to expose the misrepresentation and deception (in the legal sense, say as per Aust Consumer Law, or under 'wilful blindness' or 'public interest') is the constant stream of ad hoc responses, inconsistencies and the almost weekly contradictions that emerge from the UTas Northern Transformation (NTP) office. In addition to that is the secrecy and collusion by the Launceston City Council on matters such as Development Applications and discretionary Planning Scheme Amendments in assisting UTas actions.⁵ People who

⁴ See the published Open Letter including all the community social media comments.

⁵ The clearest example of this was the successful passing of Amendment 43 to the L'ton Planning Scheme to alter part of the Invermay Flood Inundation Code to allow a previously 'prohibited category' development on the tidal zone that sits below high tide level. When the Code was originally put in place, then State Treasury Secretary, Don Challen, was adamant that no further intensification of the area was to occur. In the past 3-4 years the City Council has succeed in weakening the Code to allow full-scale development there (with the associated growth in daily traffic movements, the highest in Tasmania, outside Hobart). The City Council failed to mention to the Planning Commission or to anyone else, that a Flood Modelling Report by BMT, that it, the Council, had commissioned and had already seen several interim versions, was close to final publication at the time of the Amendment 43 Planning Commission hearings. The BMT report is a serious document based on the latest climate change data and flood data, with serious projections (2050, 2090) for flooding in/around Launceston. *North and South Esk Rivers Flood Modelling and Mapping Update Vol 1: Technical Report, and Vol 2 Flood mapping*, published in Nov 2018, but not released by LCC until 22 January 2019. Several Launceston experts (flooding, estuarine scientist, engineer, emergency personnel) expressed surprise

should be checking this issue, are not. Those who should be taking action or are in a position to bring about action are ignoring or dismissing the issue in a wilful abrogation of their responsibility. By not carrying out their own due diligence and/or fact checking, these “self-absorbed” politicians and councillors have rejected accountability and transparency, and most likely breached their Codes of Conduct. Meanwhile UTas misrepresentation, under the guise of ‘transformation’, continues unchecked and undeterred. Indeed, they have created several new positions over the time and appointed a new pro-vice chancellor to oversee the ‘northern transformation’.

Given this situation and the failure by anyone involved to apply and enforce standards, (as per your articles and Geoffrey Watson’s comments about the Tasmanian Integrity Commission being a paper tiger), how does the community go about using the research and the reports to bring honesty and common sense to the issue?⁶ A return to the earlier published common-sense UTas plans of refurbishing the current main Launceston campus in conjunction with the Mowbray Precinct Study, at a cost of between \$59m to \$72m, would release public funds for several important alternative projects needed in Launceston and fully supported by the public.

It is not possible in this letter to cover all the matters of public concern associated with the UTas relocation projects. A full academic-level, peer-reviewed evaluation of the planned campus relocation and UTas’ claims, *Evaluative Review of the University of Tasmania Inveresk Precinct Redevelopment Project*, by Chris Penna, has been published and sent to relevant people in the hope that they might read it and perhaps take notice of the content and of the misrepresentation and deception perpetuated by UTas and its lobbyists. A further independent academic-level report is in progress.

FURTHER REFERENCES –

1. SECTION ON TRUST, TRANSPARENCY AND SOCIAL LICENCE - EXTRACT FROM AN UPCOMING INDEPENDENT REPORT ON THE UTAS RELOCATION (The Report includes aspects from an ETHICS CENTRE publication)
2. OPEN LETTER TO THE VICE CHANCELLOR, AND SOCIAL MEDIA COMMENTS, JUNE 2018.
3. ARTICLE BY DR M POWELL ON THE NEED FOR “AN INDEPENDENT INQUIRY INTO UTAS?” 8 JUNE 2018

that the Council even released it publicly it at all, due to the seriousness of the report and the projections. In all its actions the City Council - and the State Government - has given preference to the UTas proposal over everything else.

⁶ A rethink and a possible reversal on the Hobart STEM centre relocation, which has been with Infrastructure Australia for some time and had reached the final stages, was announced in mid-January 2019.

APPENDIX 1.

TRUST, TRANSPARENCY AND SOCIAL LICENCE: PUBLIC INTEREST AND COMMUNITY CONSULTATION FAILURE (EXTRACT)

The UTas relocation proposal has almost no public support. Surveys consistently show that it is opposed by the overwhelming majority of the public and UTas staff and students across Tasmania.⁷

Neither the University of Tasmania nor the Launceston City Council (LCC/CoL) have social licence for the campus relocation plan. LCC/CoL seems to believe that while it gifts millions of dollars' worth of land or interest-free loans on the one hand, social licence for the campus relocation can be gained, on the other, by carrying out small, disjointed projects in the Mowbray-Newnham area, under the now severely truncated and weakened Northern Suburbs Strategy, misleadingly renamed "Northern Suburbs Revitalisation Plan". As the Ethics Centre notes, *"Too often, social licence is thought to be something that can be purchased, like an offset. Big companies with controversial practices often give out community grants and investments...a social licence...might be seen as a kind of transaction where community acceptance can be bought. Of course, such an approach will often fail precisely because it is conceived as a calculated and cynical pay-off."*⁸

Social licence has never been earned or 'granted' for by UTas for its campus relocations. UTas has never required to provide an impact study or any modelling for the effects of its plans on either the intended location or on the current campuses and the local areas. Although originally intended for resource development projects, the Queensland Govt produced guidelines for preparing a local impact management plan (SIMP).⁹ A similar plan should have been a requirement for the UTas relocation plans in Hobart, Launceston and Burnie, where water-front public (local/state gov't-owned) land has been given to UTas without any examination of local activities severely impacted/affected or at risk of serious negative impact, and an increase in infrastructure to cater for UTas desires.

The survey-report by the Australian Institute of Company Directors and KPMG on social licence, could well have been written specifically about aspects of the university sector in Australia, and could be seen as pointing the finger directly at the failures of UTas management *"Vulnerable stake holders are the ones we have difficulty hearing because their voices are filtered out by layers of management that are using a business-only lens to prioritise their biggest risks...A Social licence must be earned every day."* KPMG p.7

"Social licence is an important and powerful lens to frame trust. It acknowledges the active role that people and communities play in granting ongoing acceptance and approval of how companies – or entire industries – conduct their business.(p11)"¹⁰ Aggrieved and cynical communities can

⁷ Surveys and petitions of the general public, UTas staff and students conducted since 2016, and assessment of social media show up to 85% opposition. Staff at the Launceston campus believe the rate among all staff there is 90%. According to a recent NTEU survey, the rate among Hobart staff to relocations there is 75%.

⁸ The Ethics Centre, "Ethics Explainer: Social license to operate", ethics.org.au, 23 January 2018.

⁹ Lacey, Justine, "Can you legislate a social licence to operate?" *The Conversation*, 27 February 2013.

¹⁰ Australian Institute of Company Directors & KPMG, *Maintaining the social licence to operate. 2018 KPMG – AICD Trust Survey*, 2018, pp. 11, 12.

withdraw the social licence of organisations that lose or exploit their trust – with potentially devastating financial, legal and regulatory impacts. Organisations can no longer view trust as an asset that they can buy or rebuild after a crisis, but one that must be earned and maintained on an ongoing basis. Boards of all sectors are increasingly aware that fundamentally, trust is about relationships, not solely reputation... (p.11) " We no longer place unquestioning trust in systems and institutions. Instead, trust is more likely to flow between local networks, individuals and peers..." (p. 12)

UTas has nothing concrete to offer or give the local Northern Suburbs community in the way of 'bribes' or 'sweeteners' to win community support, but it has a great deal – in the form of a fully functioning campus and all that it entails - to take away, so gaining social licence is difficult, if not impossible. UTas management has made, and continues to make, endless wild promises to its staff and the public of a rosy transformed future. While limited sections of the public (strikingly and unashamedly closely associated with each other) have accepted the UTas spin and propaganda, the wider community recognises the absence of any modelling or supporting evidence, and it recognises that the main part of the UTas 'spin' or 'case' is framed in verbose general education/pedagogy unrelated to location. That is, UTas's case is largely location-neutral, a fact well-understood by the public.

The proponents of the relocation plan have given no consideration to the destruction of local amenity and/or liveability. They have ignored all previous extensive community consultations around Inveresk Precinct land use.

Museum Search Conference, genuine community input and listening by YPIPA, to community and tenants.....Folder with letters and submissions, From the time UTas management arrived on the scene, the community (as represented by YPIPA community members, Inveresk precinct tenants) began to lose any say, and worse, were push aside. UTas and other proponents of the relocation plan continue to ignore/disregard the intent of the GHD 2006 Flood Study, the Deed and the Flood Inundation Code, and even the latest BMT Flood study, 2018. Regrettably, on all aspects of the relocation issue, the public is justified in its suspicions and mistrust of UTas and CoL, The wider community is fully aware of the deficiencies and problems associated with Inveresk. The community also recognises the quality and value of the current Mowbray-Newnham campus/location combined with the long-term sustainability and cost effectiveness of remaining there. The vast majority of the population has not been seduced by the endless stream of media releases, media photo opportunities, marketing presentations and false gestures posturing as 'consultation' by UTas in its effort to gain or claim social licence. In this UTas has failed spectacularly.

Moreover, in their wilful determination and enthusiasm for their relocation project, UTas and CoL have also failed to abide by good governance principles. Governance is "the process and culture that guide the activities of an organisation beyond its basic legal obligations". Good governance includes, but is not limited to, "acting with the highest ethical standards...fostering trusting and respectful relationships, showing a commitment to risk management...following a transparent and accountable decision-making process..."¹¹ In their ongoing planning chaos, their failure to

¹¹ Tasmanian DPAC, Good Governance Guide

abide by the highest standards of risk management, and the absence of transparency and accountability, both UTAs management and CoL have sacrificed the principles of good governance.

FILE No.	DA 0320/2020				
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Doc ID.					
	Action Officer	Noted	Replied		

E-COPY: I. MORE

To: Launceston City Councillors and Council Officers, 28 September 2020.

Re Traffic Impact Assessments (TIA) for Development Applications 0320/2020 and 0321/2020.

The TIAs for DAs 0320/2020 (Willis Street) and 0321/2020 (Inveresk River Edge - estuarine silt bank) are similar in many aspects.

According to the Midson Traffic Impact Statements, August 2020, for the two DAs, “Land use developments generate traffic movements as people move to, from and within a development. Without a clear understanding of the type of traffic movements, (including cars, pedestrians, trucks, etc), the scale of their movements, timing, duration and location, there is a risk that this traffic movement may contribute to safety issues, unforeseen congestion or other problems where the development connects to the road system or elsewhere on the road network. A TIA attempts to forecast these movements and their impact on the surrounding transport network.

A TIA is not a promotional exercise undertaken on behalf of a developer; a TIA must provide an impartial and objective description of the impacts and traffic effects of a proposed development. A full and detailed assessment of how vehicle and person movements to and from a development site might affect existing road and pedestrian networks is required. An objective consideration of the traffic impact of a proposal is vital to enable planning decisions to be based upon the principles of sustainable development.”

Midson TIA reckons that for the Inveresk development, “No significant adverse road safety impacts are foreseen for the proposed development. Based on the following: That there is sufficient spare capacity in the surrounding road network to absorb the relatively low peak hour traffic generated from the development...”

- That is a misleading statement, and one that is rejected by local residents and businesses as well as commuters who travel along that section of Invermay road on a daily basis. What will it take for Council to listen to and take notice of the local residents and businesses?

According to the Midson TIA for the Inveresk development, “The existing road safety performance of Invermay Road near the subject site does not indicate that there are any specific road safety deficiencies that might be exacerbated by traffic generated...”

- That is a misleading statement, and one that is rejected by local residents and businesses as well as commuters who travel along that section of Invermay road on a daily basis.
- How many times do local residents and businesses have to tell Councillors and Council officers and the authors of their reports and so-called 'community consultation' sessions, that traffic and parking across Inveresk and parts of Invermay have long since reached saturation levels and are getting steadily worse?

PARKING: Actual parking provision for a tertiary institution as per the Launceston Planning Scheme is one car space for every six students and one space for every one staff member. The Midson TIA introduced its own new provision level using 'FTE':

- Instead of sticking to the Planning Scheme requirements for tertiary parking, the Midson report uses the FTE thing for a bit of creative accounting: "The report identified a total of 1 space per 9 FTE students and 1 space per 2 FTE staff across the campus as a whole."
This does not meet the planning Scheme requirements. FTE does not measure the actual number of people, so therefore it does not, and cannot, measure the required number of car spaces to meet the Planning Scheme.

The TIA states on page 4 that "A TIA attempts to forecast these (traffic) movements and their impact on the surrounding transport network."

It also states, "A TIA is not a promotional exercise undertaken on behalf of a developer; a TIA must provide an impartial and objective description of the impacts and traffic effects of a proposed development. A full and detailed assessment of how vehicle and person movements to and from a development site might affect existing road and pedestrian networks is required. An objective consideration of the traffic impact of a proposal is vital to enable planning decisions to be based upon the principles of sustainable development."

- If this is true, and this TIA was written completely objectively, then Midson Traffic Pty Ltd, in good faith, was relying on yet another set of rubbery figures provided by UTas. No one in Tasmania has any idea of what the actual UTas student numbers are or will be –
 - a) because UTas never provides its existing numbers on a per campus basis, and

b) because at this stage, the Covid-19 pandemic is making the prediction of future growth difficult.

- UTas is again trying to pull the wool over the eyes of the Planning Authority, ie the Launceston City Council. Seeing that the Midson TIA under '4. Traffic Impacts 4.1 Traffic Generation', Table 1 lists student population growth from 3,000 to 5,400 FTE, presumably the author of the TIA was given these growth forecasts by UTas.
- The TIA author points out, "Note that this traffic generation will be experienced across the Inveresk campus as a whole."
- The Council should postpone any consideration of this ridiculous relocation. The student numbers in the table are fewer than the numbers given elsewhere for the current Newnham campus.

The Council should not even be considering these DAs. Rather, it should be asking UTas what is going on.

"FTE" (Full Time Equivalent – or to put it another way - the adding up of fractions of students and whole numbers of students to get an FTE number of students)

The original (public) funding for this UTas relocation was based on various random UTas claims of over 16,500 people (existing student numbers, 10,000-12,500 additional students, existing staff and additional staff) coming to the Inveresk campus and thereby invigorating poor ol' Launceston. (to make Launceston great again). UTas never clearly stated whether these were full-time, part-time or whether it was 10,000 FTE. Then at some stage the current VC, revised those numbers down.

- How can a Planning Authority know what it is actually planning for, if it hasn't been provided with the latest verifiable statistics? It can't. So therefore, Councillors, you must consider the ratepayers and residents for a change, do your ratepayers and residents a favour. Throw this DA out and return the public funds to **genuine** areas of **need** - projects such as public housing, hospital upgrade and aged care.

‘FTE’ – again, for anyone not familiar with the term, Full Time Equivalent - is a bogus term to use in a development application.

- For example, if the student population is simply stated to be 3,000 FTE, there is **NO** way of knowing what the actual number of students is, so therefore no way of calculating traffic or pedestrian numbers. And what is the difference between 3,000 FTE and 5,400 FTE in the actual number of students, ie in the actual number of people? That is a question for the UTas statistician, if he/she still has a job.
- And while the student FTE population is listed, what about the staff population? How many full-time and part-time staff are there? Is the number of staff also reduced to an FTE?
- **A traffic impact study requires actual numbers of people in order to calculate traffic generation, not FTE numbers.**

For those on the Planning Authority, that is, the Council, who are not familiar with FTE and university units, course and degrees, courses vary in the number of units to be completed in order to obtain a degree. Degrees are generally three year bachelor degrees, some are four; associate degrees/diplomas are generally 18 months to two years, and then there is a range of post-graduate courses, either by course work or research or a combination. So what’s that all go to do with FTE? A first year fulltime load is usually around four units per semester, a part-time load between one and three units. So, if four students were all enrolled part time for a single unit each, that would be one (1) full-time equivalent student. To take the example to full scale, a 3,000 FTE student population all enrolled part-time could actually be up to as many as 12,000 people.

- Before any further UTas relocation developments are considered by the Council, UTas should be made to
 - a) provide actual breakdown of actual current students at Newnham and at Inveresk and to
 - b) carry out a full academic-standard, verifiable re-assessment and modelling (with proven methodology) of what its student numbers – the actual number of people, not the loose fraction term ‘FTE’ - are projected to be.

As with the Flood Assessments, the Traffic Impact Assessments for DAs 0320/2020 and 0321/2020 have identical sections. They are both based on the same FTE student population Table 1.

Yet, at 4.2 the TIA for DA 0321/2020 for Inveresk states that “The proposed development has no parking provision and therefore does not generate significant traffic at the primary access to the site from Invermay Road. As such, the traffic generation of the site’s access will be limited to service vehicles only.”

- Isn’t that just too cute by half. That sounds like a crafty way of avoiding stating the traffic impact of that part of the UTas Inveresk plan because vehicles won’t actually be going up the stairs via the main doors. Moreover, it conflicts with the TIA statement on page 4 that “A TIA attempts to forecast these (traffic) movements and their impact on the surrounding transport network.

Because it is impossible to assess precinct use and traffic impacts on the local amenity and liveability of Inveresk-Invermay and the Boland-Willis St areas using FTEs and rubbery figures provided by UTas - an organisation known for maladministration, poor governance and misrepresentation – the Council should reject both DA 0320/2020 and DA 0321/2020.

Instead of blindly accepting the faulty UTas proposals and grovelling to UTas’ every whim, Launceston Council should **act in the public interest** and require UTas to go back to the drawing board at Newnham, to return to their earlier well researched, high-level master plans for Newnham and press the ‘Refresh’ button on those plans.

Dr Jillian Koshin.

Iain More

From: [REDACTED]
Sent: Monday, 28 September 2020 5:03 PM
To: Contact Us
Subject: Submission to DA 0320/2020

Dear Council,

1.Re DA 0320/2020

I wish to object to this DA on the basis that

- a) UTas has never provided verifiable evidence to support relocating from the Newnham Campus.
- b) the intended Willis St site is subject to flood inundation, levees or not.
- c) the site is already surrounded by busy traffic thoroughfares and it is madness to add still more traffic to the current situation.
- d) Adding to the current traffic saturation levels further impacts on the local amenity and on current users of Boland Street, the Esplanade, Tamar St Bridge with the ever-increasing domino effects on north-south traffic flow as well as east-west traffic flow.
- e) Reomval of the current car parking and the loss of the convenience of that parking is not in the public interest and detracts from the local amenity in that it will push those users further afield thereby affecting propoerties further afield.

If the Council really held genuine concern for the interests of residents and ratepayers, and if Councillors placed honesty, integrity, genuine transparency and such like attributes at the top of their personal lists, the Councillors would and should vote to reject this and all other, future UTas relocation development applications.

Dr Jillian Koshin, Launceston

TO: The Mayor Albert van Zetten, Mr Stretton, Councillors

Launceston City Council

RE: Development Application 0320/2020 UTas at Willis St.

Application ID	DA0320/2020
Application Description	Educational and Occasional Care - Construction of educational building (Science, Health and Research) incorporating clinical rooms, exercise physiology facilities, consultation rooms, research and teaching laboratories, simulation labs, teaching and shared work spaces, staff facilities and amenities, café, end of trip facilities and associated landscaping. Development of car parking to service the new Willis Street building and general university population together with passive recreation areas and access pathways through campus. Demolition works as follows: 80 Cimitiere Street - the previous National Automobile Museum of Tasmania including associated infrastructure including garden beds, appendices, portal roof and walkway; 78 Cimitiere Street - Demolition of three existing buildings and associated infrastructure formerly occupied by Crystal Cleaning; Removal existing parking infrastructure including lighting, fences and shipping container; and the removal of eight trees on site from the Boland
Property Address	7 Willis Street LAUNCESTON TAS 7250
Closing Date	28/09/2020

As this DA forms part of the University of Tasmania's iniquitous proposal to relocate its full campus to part of Launceston's sub-tidal flood inundation zones, it is also subject to the same points of opposition as the UTas DAs for the Inveresk precinct.

The Flood assessment reports for both Inveresk and Willis Street are identical in all but names. They are almost word for word from the BMT Flood Report. The Traffic Impact Assessments for both Inveresk and Willis Street are identical in many aspects. Therefore, I have included extracts from the Contextual Review and Analysis of UTas-LCC Northern Suburbs Campus Relocation project, because these extracts

are relevant to all UTas relocation project and the associated Development Applications.

This DA mentions the Pedestrian Bridge as being a part of the UTas project. If that is the case, is the City Council and its ratepayers still paying for that piece of overkill infrastructure. How will that bridge connect to the Willis St site without further disruption to the local area, and without compromising the flood levees?

Extracts from

CONTEXTUAL REVIEW & ANALYSIS OF UTAS-CITY OF LAUNCESTON NORTHERN SUBURBS CAMPUS RELOCATION PROJECT.

This study is an evidence-based review, assessment and analysis of aspects associated with, but not properly considered by, campus relocation proponents or political representatives and funding bodies in all levels of government, of the relocation of the UTas Mowbray-Newnham Campus from its current site to the Inveresk Precinct, a distance of 3.5 kilometres. Mowbray, Newnham and Inveresk all form part of the 'Northern' suburbs of Launceston.

As part of our brief, we have examined copious relevant documents, studies, maintenance-management plans and master plans from 2007-2019/20 associated with the University of Tasmania Mowbray-Newnham campus's current location, the Mowbray Precinct and the Inveresk areas of the Northern suburbs.

Detailed examination of the UTas relocation proposal from 2016 to 2019 and associated serious issues are covered by Chris Penna's in his major review, *Evaluative Review of the University of Tasmania Inveresk Precinct Redevelopment Project* (March 2019). This *Review & Analysis* considers the wider context of the relocation in conjunction with Penna's *Evaluative Review*. Having examined and collated the evidence, we have reached the conclusion that the relocation to Inveresk is seriously flawed and risky. As Penna states, "the complete campus move to Inveresk is a significant long-term public issue, is fraught with potential problems, and that the process, in conjunction with the City of Launceston, has been inadequate, lacking transparency and perhaps with insider involvement

THE FALLOUT OF THE 2006 MOVE TO INVERESK

The move by the Schools of Architecture and Performing Arts & Contemporary Art not only reduced student numbers at the main Mowbray-Newnham campus, it left space and resources under-utilised there. The removal of four schools from the main campus brought no nett gain to the university itself. At the same time, it also resulted in doubling up on services for the small Inveresk campus. It brought risks and

monetary costs associated with flooding and with evacuations as in 2011 and 2016. By 2012 the Inveresk Schools were showing signs of failure with falling student numbers brought on by the retirement of the energetic Head of Art, Vincent McGrath and the beginning of 'rationalisation' by UTas management and hastening corporatisation under Vice Chancellor Peter Rathjen, 2012-2017. Gradual reduction of subjects and course offering and removal of certain services, such as an important printing service serving visual art, design and architecture, until 2018, reached the point of no more music, a course as basic as music degree - a course integral to a performing arts school - by 2018 was/is no longer available in the north, a serious loss to Northern Tasmania. The removal of subjects and courses from the north to Hobart has been occurring for some time. As a result, considerable numbers of students have chosen, or been forced by circumstances, to either drop out, change course/subject or to enrol in universities outside Tasmania.¹ This is a trend that was set in motion and perpetuated by UTas itself, **not**, as UTas likes to claim, the result of the location or condition of any of its campuses. It is a major complaint by Northern students, who are happy with the Northern campuses, but who have been forced to reconsider their study plans/futures.

The same types of claims and secrecy as mentioned above for the 2006-07 relocations of Architecture, Art and Performing Arts and School of Fine Furniture, have been constant features of the current UTas relocation proposal. UTas and CoL continue to perpetuate the misrepresentation despite clear evidence to the contrary. Any success or 'vibrancy' resulting from these schools, (combined with the co-location with TAFE²) at Inveresk was short-lived, reaching its peak in around 2011-2012, decreasing annually since then to the point that by 2017 the School of Fine Furniture closed and no longer exists. By 2019 architecture is no longer available as a degree course and other course options within the school have been greatly reduced to a Bachelor of Design, also available in Hobart, with an ATAR entry score of 65.³ Similarly, the Academy of the Arts has been reduced to a handful of courses and subjects, as many have been closed down and/or removed to Hobart. Music, a staple component of a performing arts course and important for any Education student who wishes to teach music, early childhood or primary school children, is no longer available in Launceston/Inveresk as a degree course. There are a number of additional non-location factors - university-driven factors that are completely independent of campus location - that contribute to, and exacerbate, student dropout rates. These factors include: lower ATAR entry scores; lower course entry criteria, reduced student-lecturer face-to-face contact time, the greater chance of student dropout. Reduced requirement to attend lectures combined with more on-line content, the greater the chance of drop-out. In pursuing the corporate model of

¹ Numerous examples of this are easily available and can be provided if needed. One example of the loss of a full degree course is music. Any student who wants to study in Tasmania with the intention of teaching music has to study music in Hobart before being able to study education in Launceston. Hobart's well-documented serious accommodation shortages and prohibitive rental costs add to the dilemma for northern students. Examples of subject/course removals and the consequences are easily available, and can be provided if needed.

² TAFE Art, Craft & Design diploma courses co-located with UTas to form the Art Academy. TAFE has also since down-graded and/or removed many of its courses.

³ BD pamphlet: utas.edu.au/design.

numbers-driven enrolments, UTas has driven its own student attrition rate, NOT the location of campuses as alleged by UTas management. To claim that the Mowbray-Newnham campus is “bleeding students” as stated by VC Rufus Black, is misleading and disingenuous.⁴

During the past three years (2016-2018/19) there has been general down-grading of the small campus at Inveresk. UTas has been closing facilities and reducing courses and student numbers have fallen dramatically there. A café, originally intended as a student café, but operated as a more expensive, ‘up-market’ style café, closed during 2018. This was in large part due to the uncertainty for the café owners trying to operate the business with UTas as their land-lord, with very short term (monthly) leases by UTas - an impossible situation for a small locally owned business. The premises remain unoccupied and unused as they have done for the past year, 2018-2019.

From approximately 2008-09 to 2011-12, a period of 4-5 years, the designated student and staff car parking spaces immediately adjacent to the UTas buildings at Inveresk, were usually fully occupied, Monday to Thursday. However, from approximately 2013, with the reduction in student numbers, use declined steadily until 2018-19 so that they are now more than half empty on any given semester day.

While the nearby local takeaway shop, newsagent and art supplies shop on Invermay Road and the on-site coffee stand, together with the former café, benefitted from the student presence, that presence was not reflected by any increased activity in the city centre.⁵ To describe Inveresk as being on the edge of CBD is misleading. The ‘CBD’ is neither conveniently located nor particularly inviting for students. The central mall is approximately 1.9 km away from Inveresk, a full 25 minutes at a very fast walking pace to the main entrance of the School of Architecture, or 30 minutes’ walk to the free car park near the Round House.⁶ The CBD offers few services, attractions or retailers to meet the needs or interests of tertiary students and is therefore unlikely to become a centre for them.

...

Anecdotally, the NRAS-funded student accommodation, which opened at Inveresk in c.2016, is noisy, (especially during windy periods), window leaks during periods of rain, and puddles of water forming in some hallways, has cracks in the walls (from ground movement/subsidence), ground movement can be felt within the building (a well-known and documented characteristic of streets and buildings around Inveresk). It has been described by student residents as expensive and unpleasant to live in. During 2016-17, while there was a waiting list for student accommodation at Newnham, the Inveresk building was only half occupied.

...

⁴ Statement by Rufus Black, 3 March 2019.

⁵ Refer also to the section on housing, shopping centres, K-Mart centre

⁶ Test walk conducted by author July 2017, fast walking, Brisbane, George, Cameron, Tamar Sts, Inveresk pedestrian route along the ‘Spine’, stopping only for lights at Brisbane George Sts, Tamar St opposite City Park, Cimitiere-Tamar Sts (x2 crossings); Victoria Bridge.

DISTRICT & NEIGHBOURHOOD ACTIVITY CENTRES ANALYSIS

MOWBRAY DISTRICT PRECINCT

Mowbray is one of only two District Centres in greater Launceston. A full retail audit was commissioned by Launceston City Council (CoL) in 2011 **“to provide an evidence based strategy to guide retail-commercial policy over the next 25 years and beyond.”** The authors point out in their summary of the resulting study that it *“provides an overview of the greater urban area for the first time”*. Three of the seven stated “key elements” are: - *“recommended consolidation of the district centres of Kings Meadows and Mowbray”*; *“recommended consolidation of the neighbourhood centres of Launceston and the greater urban area”* and *“recommended long term development of a high access corridor extending from Kings Meadows to the CBD and north to Mowbray and the University of Tasmania campus”*.⁷

The Retail Audit was/is the basis for the subsequent full Greater Launceston Plan and the Individual Precinct Plans (by different consultants)

District Centres represent the highest rank of urban centres. *“District Centres are...comprehensive higher order activity centre complementing the CBD. Comprehensive food and grocery shopping role with a wider range of discretionary stores and services. Intended to serve district and regional catchments.”*

The Mowbray District Centre is approximately 3-4 kilometres north of the Launceston CBD and runs along Invermay Road north from Vermont Road to Haig and Beatty Streets. The area includes Coles and Woolworths supermarkets, a Target department store and a range of street-based activities including dining and retail. Around 50% of the activity centre area is devoted to parking. A bus route runs through the activity centre along Invermay Rd. It currently attracts the highest patronage of any route in Launceston.⁸

The Mowbray District Centre is considered to have a reasonably high level of pedestrian access, the highest in Launceston. The area has high-density residential development and is conducive to pedestrian access. Therefore, when compared to

⁷ Renaissance Planning, “Launceston Retail Audit and Activities Centres Strategy, Information Booklet. 2011. The other relevant key elements are: *“detailed understanding of Launceston’s contribution to the regional economy and the significance of tourism for retailing and employment; policies to maintain and consolidate the leading regional role of the Launceston CBD for retailing and employment; policies to maintain and consolidate the leading regional role of the Launceston CBD and the Launceston Central Area.*

⁸ The bus service to Northern Launceston area— incorporating Inveresk, Invermay, Mowbray, Mayfield, Alanvale and Rocherlea – is the highest level of the 5 main Launceston metropolitan bus services areas. It is “a high frequency corridor service operates Monday to Fridays from Launceston CBD to Mowbray Shopping Area, operating on average every 10 minutes during weekdays until 6pm. At other times services operate at least on an hourly basis. (p.50, GLMPTP, DEIR) , DOES THIS LEVEL OF PUBLIC TRANSPORT FOR MOWBRAY-NEUNHAM POSSIBLY WEAKEN THE UTAS ARGUMENT THAT THERE WILL BE 8.5% LESS TRAFFIC AT INVERESK – cf UTas claim, Information session, 6 June 2019, Traffic Impact Assessment 2019)

the one other District Centre, Kings Meadows (KM) and the Neighbourhood Activity Centres (NACs), Mowbray District Centre is the highest level centre in Launceston for access. As such, it is the most suitable centre/location in Launceston for tertiary students (Kings Meadows by comparison has a range of retail and commercial frontages although the Retail Audit found less than 25% of the street frontage was active. The immediate area lacks high-density residential development. Access would generally be by private vehicle. Beyond the individual shopping complexes, the area of Kings Meadows is not conducive to pedestrian access.)⁹

Mowbray is the most accessible and convenient District Centre in Launceston. It has a high level of services, is within walking distance (pedestrian access) of the Mowbray-Newnham campus and much of the student accommodation, making it the ideal location for both the AMC **and** the main university campus (as is currently the situation).

Among the recommendations of the Retail Audit Study it is noted that both "KM and Mowbray have significant opportunities for higher order expansion and consolidation" It is important to note also that recommendations are not in isolation, they are linked, spatially, structurally and strategically, ie they form integral parts, to the overall success of Greater Launceston. The Study recommends a "higher order role for KM and Mowbray as the supporting higher order centres of the CBD" (pp. 23, 24, Considering all the recommendation, removing main campus from the mix is against all the recommendations (pp 23-25). Indeed, from the start, and as can be seen from all the evidence, the very suggestion and proposal to relocate the campus has been seriously flawed and remains without foundation.

NEIGHBOURHOOD ACTIVITY CENTRES

As discussed above, Mowbray is a District Centre, the highest level in the retail audit, and one of only two in this category in Greater Launceston. The next level centre is the Neighbourhood Activity Centre (NAC).

Neighbourhood Activity Centres are defined as "*Neighbourhood activity centres provide for daily and most weekly purchases. [They] are also intended to provide supporting medical and community services*"¹⁰ In stark contrast to Mowbray District Centre and NACs in other parts of Greater Launceston there are no NACs in the Northern Suburbs.

INVERESK OR INVERMAY – UNCLASSIFIED LOCATIONS

Neither Inveresk nor Invermay are classified under the Retail Audit. Neither area meets the criteria for Neighbourhood Activity Centre (NAC) classification. Invermay has lost most of any resemblance to, and features of, the NAC category, with only one independent supermarket-newsagency, no post office, no chemist and no medical service available. Previous residential blocks were systematically overtaken

⁹ Retail Audit CHECK FOR REF

¹⁰ Greater Launceston Metropolitan Passenger Transport Plan Background, Dept Infrastructure, Energy and Resources, Tasmania, YEAR???? p. 30

by commercial premises from the 1950s to 1960s and residents encouraged to move to new housing estates.

Historically, the severe limitations of the nature of the low-lying land, (below high tide level, bounded along 80% of its perimeter by tidal estuary, high water table, stormwater runoff and drainage problems, areas of toxin-contaminated soils), the flood risk, and the single main through street, have determined the relatively consistent character and lack of major change to Inveresk over 150 years. With reduced residential scope and no capacity for expansion, it was, and remains a small, limited shopping area in a now largely commercial-business zone relying on flood levees to protect property. These issues and limitations are recognised in, and were the rationale behind, the 2006 GHD Report, the 2007 Flood Deed and the Flood Inundation Code land use prohibition of uses such as Education, Medical etc etc (((ADD FN HERE!!!)) Author's emphasis.

Although there was some housing department unit developments particularly for local aged and disabled residents during 1980s,¹¹ planning decisions/permits over time to the present (2018-19) have reinforced that situation to favour small businesses rather than residential activity.

As a result of its physical location, Inveresk's trading strip is confined to the western side of the through road, (Invermay Rd), and is made up of a mixture of traders (with little change in number and type since the early twentieth century) - traders such as vehicle and battery service centre, an automobile accessories business, a bathroom/plumbing retailer, real estate agent, a restaurant, a 'pub', a car dealer, an art supplies shop, a newsagency with a small post office counter located within, a mixed takeaway-milkbar, an upholstery business, a betting establishment, a solar panel and battery retailer and a hunting gear/camping retailer, a delicatessen, two-three other takeaway establishments and a restaurant, a single outdoor automatic teller, (the only one between the nearest city teller and the Mowbray Precinct, a distance of 4?? km). Unlike the well-serviced Mowbray Precinct, neither Inveresk nor Invermay have any personal services such as doctors' surgery, dental or medical centre, chemist or bank.

INVERESK-INVERMAY DISTRICTS - BACKGROUND

While it might be the case that inner city areas elsewhere are undergoing a residential revival, the evolution of Invermay and Inveresk as 19 and early 20th century suburbs has been governed by the nature of their locations with little capacity for growth/expansion. They remain as such, tied to their 19th century origins through being constrained by, and working with, nature, (Flood planning, low scale/limited building, demolition of much housing as residents moved to new post-war housing suburbs during 1950s-1960s.)

However, during the past seven years, 2012-2019, a number of actions by the local council have created problems in the Inveresk area. These include: a) the change of

¹¹ As in Forster and New-Goderich Streets in Inveresk and in Dunning and Lytton Streets in Invermay.

planning emphasis, b) poor planning decisions, c) failure to recognise the rationale behind existing/previous planning zone provisions d) ad hoc amendments to the Planning Scheme and e) ad hoc amendments to the Flood Inundation Code.

As a result additional traffic congestion and access problems continue to increase across Inveresk and Boland St- Esplanade areas with no apparent solution given the current direction of planning. Due to the 19th century layout, the problems of traffic and parking congestion will become almost insurmountable if the same cavalier attitudes to planning continue.

The current urban trend in both suburbs, in Invermay in particular, is house renovation, by and/or for owner-occupiers, and an increase in conversion to Air-BNB and cottage holiday accommodation, especially in Inveresk, thereby reducing the rental housing stock available for students. Housing availability for a student population is extremely low, particularly compared to the Mowbray-Newnham district.

WILLIS STREET SITE

Similarly, UTas' other intended location, the Willis Street block of land, on the southern side of the North Esk River between Boland Street and City Park, does not meet any 'centre' category. It is currently a car park for use by the general public. The block sits below high tide level and is in the flooding inundation zone, (and was underwater in the 1929 flood). The bank along that section of the river is subject to scouring and high water tables. It is permanently sandbagged in combination with a concrete levee and it is subject to the force of floodwater flows from the South Esk River.¹² The few houses further along Boland Street are subject to tidal rises and falls under the flooring.

Parking and traffic congestion in the area are further complicated by the presence of Centrelink with its entrance on the very busy, narrow Boland St, and less than 100 metres from Willis St. and poor access to bus services. Again, recent planning decisions have already worsened the traffic congestion situation in Boland St and at its junction with Tamar St/Esplanade.

Poor planning decisions in this area are creating unnecessary future long-term problems that will either require costly solutions, or more likely are not solvable and will worsen further. With the planned removal of Willis St as a parking asset, any additional need for parking will compete with visitors to City Park for the very limited parking in the area. Combined with the loss of the Automobile Museum from the area, this has the serious potential to damage tourism and other local businesses.

Given the existing issues and evidence, this UTas proposal is the worst possible use for the nominated sites, and it does not meet any of Launceston City Council planning guidelines, or traffic or land-use policies.¹³

K-MART PLAZA

¹² SES information, personal communication, 2019.

¹³ See **EXTRACT** in next section p. 9

K-Mart Plaza in Henry Street is a stand-alone retail facility “Intended to provide for daily and weekly shopping needs together with a limited range of discretionary shopping requirements.” The K-Mart Plaza has been identified by the Retail Audit as being distinct from District or Neighbourhood Centres. The Plaza includes K-Mart department store, a K-Mart Tyre and Auto Service and a Coles supermarket and some smaller, ancillary retail outlets.¹⁴ It provides ample parking with three points of vehicle access from public streets – Henry St and two off Boland? St. Access is not pedestrian-friendly (see discussion below).

The Plaza has a regional function and serves the eastern suburbs. Nearby establishments include a fruit-veg market, auto accessories, curtain-blinds retailer, pet barn, mower and small machinery, tiling and Laminex outlets, a printery and landscape gardening business. Owners are overwhelmingly opposed to the UTas relocation for a number of reasons. The area has low housing availability, due to the commercial and light industrial composition of the area. Henry Street, which carries high levels of traffic, is the only street in this area allowing east-west access and crosses the tidal North Esk River to the east of the Plaza. With rising sea levels and consequent rises in high tide levels, this low-lying section of the street has experienced of more frequent flooding at high tides with disruptive closures of Henry St towards the eastern suburbs.¹⁵

Access to K-Mart Plaza is mainly by private vehicle. It is within walking distance of Willis St and Inveresk Precinct via Black Bridge (a former rail, now mainly pedestrian, bridge), (From a personal safety point of view, this section of the pedestrian path is not always a safe area to walk.) A single footpath provides the only pedestrian access alongside the busy traffic-dominated Henry-Boland streets and the associated roundabout. There are no pedestrian crossings or safe areas or traffic islands for crossing to/from the Plaza. There is a public bus service, but the only access to or from one bus stop to the Plaza is via a ‘mad dash’ across busy Henry St, mainly by pedestrians going to/from the nearest eastern suburb, and only a very small number from the Inveresk direction.

...

HOUSING, RENTAL AVAILABILITY: INVERESK-INVERMAY

Across the Invermay-Invermay areas combined, the total number of houses/units is approximately 1,039, of which 657 or 48% are rented. Inveresk suburb consists of a very limited stock of available rental accommodation, with very little off-street parking and in some streets, none at all. Most of the Inveresk area is zoned commercial or urban residential combined with restrictive or prohibitive planning provisions for residential building and extensions. Further pressure is being placed on rental supply by an increasing tendency over the past 5 years for house owners in Inveresk and in Invermay streets closest to the city/Inveresk Precinct to convert rental/residential properties to holiday/visitor accommodation (such as Air BNB and/or privately

¹⁴ Icecream parlour, café-bakery, Priceline, butcher, newsagent, key-cutting.

¹⁵ Observation by BMT report author, Feb 2019; ongoing local anecdotal evidence; author’s observations 2018-19.

operated with the tendency accelerated during the past 6-12 months.¹⁶ In 2015/16 120 units funded under the National Rental Affordability Scheme were constructed and opened for UTas students on the Inveresk Precinct in 2015/16.

ACCESS, PUBLIC TRANSPORT, PARKING: INVERESK & MOWBRAY

Apart from being on the same public transport route, comparisons between Mowbray-Newnham and Inveresk reveal important relevant differences. Being on the same public transport route, the bus service is good. However, access, egress and road network to each site are very different.

At Mowbray-Newnham campus, access to, from and within the site is purpose-designed and fully functional, with parking for over 1,500 vehicles. Despite the high rate of off-street parking for local residents/tenants, student parking has spilled from the campus into several hundred metres of on-street parking in neighbouring streets, such is the need for parking. With this level of parking requirement for the campus, it is irresponsible and poor decision-making to inflict this onto Inveresk area. The main carpark at M-N is larger than the first parcels of land that UTas was gifted initially for its relocation, The problems associated with reducing the scale of parking from that currently provided at M-N equation to a much smaller and confined site which has little to no suitable existing infrastructure, demonstrates the nature of future problems associated with moving the campus to the unsuitable site.

¹⁶ Review of CoL development applications and Planning Alert website 2014-2019. There were almost none, if any prior to that time, approx. 10 between 2014-2018, and 5 in the past 6 months.

Limited parking in and around Inveresk/Willis St – and already fully utilised. All Inveresk streets fully occupied, no space for any additional parking.

The removal of public car parking from the current Willis St car park The removal of that parking, together the mooted removal of parking from the circular public car park at Inveresk, and the loss of public and council employee parking at Cimitiere St, removes most of the public off-street car parking spaces on the eastern side of the city...

PUBLIC TRANSPORT, TRAFFIC - MOWBRAY-NEWNHAM

The bus service to North Launceston suburbs – incorporating Inveresk, Invermay, Mowbray, Mayfield, Alanvale, Newnham and Rocherlea – is the highest level of the 5 main Launceston metropolitan bus services areas. It is “a high frequency corridor”, service that operates Monday to Fridays from Launceston CBD, via Inveresk to Mowbray Shopping Area, operating on average every 10 minutes during weekdays until 6pm. At other times services operate at least on an hourly basis.¹⁸ Any talk of increased or improved bus services in relation to Invermay traffic plans is a calculated diversionary tactic intended to create the misleading impression that there is a need to improve public transport access for Invermay, and/or that the service will be improved to cater for a relocated campus.¹⁹

TRAFFIC – INVERESK

The Inveresk Precinct is directly adjacent to the two most highly congested intersections in Launceston (and therefore in Tasmania, outside Hobart). The Victoria (Tamar St) bridge and the Charles St bridge, have approximately 25,000-30,000 & 35,000-40,000 traffic movements²⁰ respectively each per day, and growing rapidly as the direct result of City of Launceston planning decisions.

This growing level of traffic congestion is contrary to Infrastructure Australia’s (IA) stated expectation in “building productive cities and regions”, and it certainly does not “promote best practice in...improved asset utilisation”. However, that did not

¹⁸ GLMPTP, DEIR, p. 50

¹⁹ This deception tactic employed by a presenter at the information session on the Invermay Traffic Management Plan, 24 July 2019, at the Tramsheds, Inveresk

²⁰ Communications, MTT drivers to PB, Per Comms, daily commuters. Compare this with the Coffs Harbour Bypass project. See IA’s website information re traffic through Coffs Harbour CBD with 30,000-35,000 vehicles per day and 12 sets of traffic lights. “In 2018–19, the Australian Government committed up to \$971 million towards a bypass of Coffs Harbour. This builds on the \$5.6 billion currently invested by the Australian Government to duplicate and improve the Pacific Highway. The Coffs Harbour Bypass will reduce travel times and improve travel conditions for all road users by allowing traffic to bypass the CBD. Motorists will be able to avoid 12 sets of traffic lights, saving up to 12 minutes. The bypass will alleviate congestion on the local road network and improve safety and amenity for traffic, pedestrians and cyclists in Coffs Harbour.” See Select Bibliography soon to follow for relevant Launceston Traffic studies.

prevent IA from placing the campus relocation plan on its priority projects list post-2019 election in July 2019.²¹

Three impacts of council planning decisions 2015-2019 have been clearly observable over the past twelve months:

1. The length of time between sets of traffic lights, the congestion minutes is greater, ie the time spent in traffic 'queues' is now greater.
2. The congestion or traffic build-up starts earlier and lasts longer. Build-up starting time has come forward from around 4.15 pm to 2.15 pm. End time has extended from 5.15 pm to 5.45 pm, sometimes later.
3. The length/distance of traffic build-up from Charles St bridge has extended in frequency and in length by kilometres to the Mowbray connector and beyond.²²

The public bus service to Inveresk is increasingly hampered by the traffic congestion.²³

Already the additional developments along Lindsay Street seriously compromising and act against the government provisions at Section 3.7:... With more developments in the pipeline and almost guaranteed to get council approval, the traffic congestion problems are growing rapidly. The UTas relocation plan will not meet any of the LCC Planning Scheme road network and/or traffic provisions. The additional traffic and parking problems that the relocation plan will generate and add to the current situation, the future traffic situation will severely worsen with little prospect for any viable solution.

In relation to traffic management around the two bridges and neighbouring intersections, these extracts from the Launceston Interim Planning Scheme 2015 are relevant and should be taken into consideration and acted upon.

(www.iplan.tas.gov.au) Relative sections include 3.7 *Maximising the effectiveness of transport networks*. ...*Council has developed a hierarchy of roads to maximise the efficiency and effectiveness of its network...*

The road network in Launceston and the pattern of interconnecting state and local roads have some longstanding deficiencies. Key problems for the network include: ... (b) poor east-west links... (c) poor traffic circulation around the CBD; (d) deficient links to ... [named suburbs] areas resulting in 'Rat-running' through residential streets... and (f) almost maximum saturation of north-south links across the North Esk and Tamar rivers.

The deficiencies in the existing network will inform planning ... it is necessary to identify opportunities for future network improvements and to ensure that new developments in the interim does not compromise those improvements.

Clearly, any further development in the area will compromise the situation further. but the unnecessary addition of a university campus will create intractable long-term

²¹ IA, Statement of Expectations (SoE), dot points, p.1; SoE p. 5.

²² Pers comm local business operator, (Peter Winn), author's research and observations, Traffic studies and Lindsay parking plan papers.

²³ Pers cm MTT divrs,

problems. The 'poor traffic circulation around the CBD will worsen severely and will further deter visitors to the CBD, already a major reality for LCC.

The UTas traffic management statements and plans have either been absent, inadequate and/or a demonstration of wilful persistence in face of the evidence throughout this process 2015-2019, and should therefore be dismissed as inappropriate and likely to cause further traffic problems.

PARKING - INVERESK

Similarly, the UTas relocation acts against the parking provisions of the Launceston Interim Planning Scheme. That the latest UTas iteration of parking has moved away from previous plans as per their presentations and funding applications, demonstrates lack of clarity/uncertainty in, and ad hoc approaches to, planning requirements and defiance of all evidence. While the previous proposal was nonsensical, the revised proposal is equally fraught with problems. The previous proposal of 450 underground places on a flood inundation zone/tidal zone has been replaced by a plan for 500 spaces, - revised less than two weeks later to 550 - on a section of the flood inundation area, an area which floods 3-4 times annually.

[The Glebe] area is also subject to high daily traffic levels as it is on the east-west route and only a few hundred metres from the Tamar Street Bridge. With 550 car parking spaces, means a possible 1,100 vehicle movements or more to the area not only adds to the traffic congestion, it contradicts/contravenes the Launceston Interim Planning Scheme.

According to the Planning Scheme, access to parking “...*Must be balanced with the need to achieve high quality urban design outcomes. Requirements to provide car parking within the CBD and surrounds reduces the intensity of development and therefore development viability, and can also negatively impact on the streetscape and heritage values.*

The planning scheme seeks to:

- (a) Ensure a coordinated approach for planning of land use and transport...and enhance Launceston's 'liveability'. Potential impacts of land use on traffic will be considered...(b) ensure an effective, safe, convenient and efficient transport system..."*

Moreover, the City of Launceston Strategic Plan 2014-2024 states among its priorities: “*Priority Area 5 – A city that values its environment. Ten Year Goal – To reduce the impacts on our natural environment and to build resilience to the changing intensity of natural hazards.*”

The Strategic Plan also refers to appropriateness in land use and transport solutions: “*Priority Area 6...Ten Year Goal – To drive appropriate development opportunities as well as infrastructure, land use planning and transport solutions...*” The development of a 500-550 space car park on that land is counter to both Priority Areas 5 and 6.

I refer you to the many questions that I asked at Council from 2015 to 2020. Many of those questions remain. The UTas proposal has been a litany of lies and ridiculous ad hoc plans from the start - such as the underground car park at Willis St and then the Glebe car park and Tasmanian Institute of Agriculture hot houses idea for the Glebe tidal flats.

In the interests of Launceston ratepayers, local Boland St businesses, I urge the Council to dismiss this DA and to start a process for UTas to continue at Newnham and maintain its current campus and infrastructure there at Newnham.

In this time of pandemic and uncertainty for universities across Australia and the world, and given

- climate change and sea level rise that is already affecting the Tamar Estuary
- the complete unsuitability of the Inveresk Site for a university campus,
- the traffic and parking issues across Invermay and Inveresk,
- the original provisions and reasons behind the Invermay Flood Inundation Code,
- all the evidence in favour of retaining and UTas remaining at the Newnham campus, (at a much smaller cost to the public purse!)
- the lack of an open transparent application for an Amendment to the Planning Scheme for the changed site locations by UTas for their Inveresk,

it is also time that the Launceston Council to refuse DA 0320/2020 as well as DA 0321/2020

Basil Fitch

Former Alderman/Councillor Launceston.

To: The General Manager,
Michael Stretton,
Launceston City Council
Monday 28th September 2020

DA 0320/2020

I wish to register my strong opposition to DA 0320/2020 - 7 Willis Street, Educational and Occasional Care – Construction of educational building (Science, Health and Research) being part of the flawed plan by the University of Tasmania to relocate to Inveresk Tidal Flood Zone as verified by the BMT Report.

It is without question that UTAS has continually altered their “plans” to relocate from the totally viable and safe Newnham Campus to the Tidal Flood Zone of Inveresk to the point where it no longer even vaguely resembles the “Disneyland” images initially sold to Council by the now highly discredited, previous Vice Chancellor Peter Rathjen and because of that, I believe this DA should not proceed.

There are major, ongoing and unsolvable traffic issues impacting the whole Inveresk area and this development will only compound these existing and growing, traffic congestion problems. This is despite Councils “Traffic Management Plan” which will not and cannot resolve an issue that will only worsen over future years.

Given the track record to date of UTAS with their ever-changing announcements to suit whatever current story it needs to promote, there is no reason to believe that this proposed development is anything other than just one segment of their general land grab.

Faced with the general economic downturn we are all facing (potentially a Depression), which has also directly impacted on universities nationwide, there is little evidence that anything substantial will occur on the site and certainly not the much vaunted thousands of students pouring into the CBD to reinvigorate this fast dying zone. It is my belief that from the very beginning, Council was sold an undriveable lemon by the previous GM and VC and they are still trying to find a battery charger to make this unnecessary and wasteful relocation vehicle work.

In truth the proposal is now so far from the original “concept” that was sold and bought by both Council and Infrastructure Australia that it bears virtually no resemblance to it and I would argue that preferably it should be cancelled or at the very minimum, be forced to start the process again from the very beginning with full and transparent investigation as to its merits and benefits to the City. A City that has already handed over millions of dollars of land to a non-rent paying occupant. Full and proper due diligence would be required.

It is staggering obfuscation to the highest level that UTAS even recently continued to promote the ludicrous figure of 10000 + new students (in the real world, student numbers have dropped and there is no real fix in site for that). Competition in the university sector is tough and so-called “Associate Degrees” will be about as effective and popular as the Council’s Traffic Management Plan. UTAS on one hand talk of more online courses and we hear of staff losses and then an arbitrary figure of more staff to be employed is flitted out to tantalise and appease. And still nothing substantial appears and smoke and mirrors continue to be the modus operandi.

This has of course all occurred with blind support from the Council and Media alike and in a time of COVID 19 impact and the parallel financial crisis the whole country is now facing. I urge Council to totally reject DA3020/2020 because it is not in the best public interest, it will cause a general loss of community amenity and will detrimentally affect the overall prosperity of the City. It particularly disrespects a community that has been forced into supporting this nonsensical relocation proposal to the benefit of one entity, that being the Corporate, Property Developer UTAS.

I urge you to reject DA0320/2020 on all the above grounds because it provides no guarantees of any short or long-term positives for Launceston.

Yours Sincerely

Leigh Murrell



From: Ray Norman [REDACTED]
Sent: Sunday, 27 September 2020 12:33 PM
To: Contact Us
Cc: Mayor; Councillor Danny Gibson
Subject: REPRESENTATION TO THE CITY OF LAUNCESTON IN REGARD TO DEVELOPMENT APPLICATIONS DA0320/2020 AND DA0321/2020

Saturday, 26 September 2020

REPRESENTATION TO THE CITY OF LAUNCESTON IN REGARD TO DEVELOPMENT APPLICATIONS DA0320/2020 AND DA0321/2020



FOREWORD

The first thing that needs to be said about these development applications is that the proposal is to further develop what has become Launceston's *'Cemetery of Hope'*.

Along with the city's histories of colonialism and its aftermath the development, like almost all that has gone before it, is a *'development'* stained with the surreal and absolute imperative to ignore *'the geography'* in the cause of profits and dividends that were, and by-and-large still are, realisable elsewhere.

The imperative encapsulated in the euphemism *'sticking to your guns'* as always trips up its adherents in time when what has driven the recklessness is ultimately revealed and the *'body count'* is completed.

Remaining determined, resolute and steadfast in the belief that an adopted perspective, often ideologically driven, must prevail despite all evidence to the contrary is worrying. And, given that it all persists whatever compelling evidence is evident, it is at best bewildering. It is especially so here given that *'Council'* as a planning authority has itself declared a climate emergency.

That the analogy of soldiers remaining at their post firing their guns *'come what may'* and at what has been assumed to be *'the enemies of progress'* is a bizarre failure of due process. Moreover, it is an arrogant failure of civic accountability that has brought this so called *'development'* to a point of absurdity in the *'planning paradigm'* it now inhabits.

Over time, *'the place'* has been transformed from what was once, arguably, the most fecund place on the island into what is now essentially something of an *'industrial wasteland'* with all the scars and pockmarks of its layered histories. It is *'a place'* littered with the dross of reckless colonialism and its aftermath. That the area was always an inadequate port and that it was to become an unworkable port needs to be acknowledged.

That all this is both denied and downplayed by the city's planner, in concert with the proponents and the project architects, is evidence of the unfolding and unfortunate folly that the Inveresk cum Invermay precinct has become. That all this has been sequentially compounded upon by geographically inept planning processes over two centuries, it brings the now City of Launceston to a sorry state.

Universities, as corporate entities, are enormously privileged and as *'corporate citizens'* increasingly the justification for these privileges diminish so too should their *'obligations'* be on the rise. [Professor Brian Smidt](#), [Australian National University's \(ANU\)](#) Vice Chancellor, is on the record saying, paraphrased, that in the early 1980s universities ceased to be the curators of knowledge and information and thus they needed to reinvent themselves. Surely, that will mean that they will need to be increasingly contributing to the communities they exist within rather than by default, given *'free kicks'* at every turn.

Originally, universities were communities of scholars and teachers. However, as Prof. Smidt alerts us to, they are now by-and-large traders in services in much the same as banks and insurance companies as they reconfigure themselves in 21st Century context.

At the very least *'the wider community'* has a right to expect that universities be *'lifters rather than leaners'* and contribute equitably to the communities within which they are located. In [2014 Joe Hockey](#) called upon all Australians to 'lift their game' in order to build a better future.

It is more than ironic that what was once the grazing ground of emus water birds and macropods has become a wallow for white elephants.



THE GEOGRAPHY

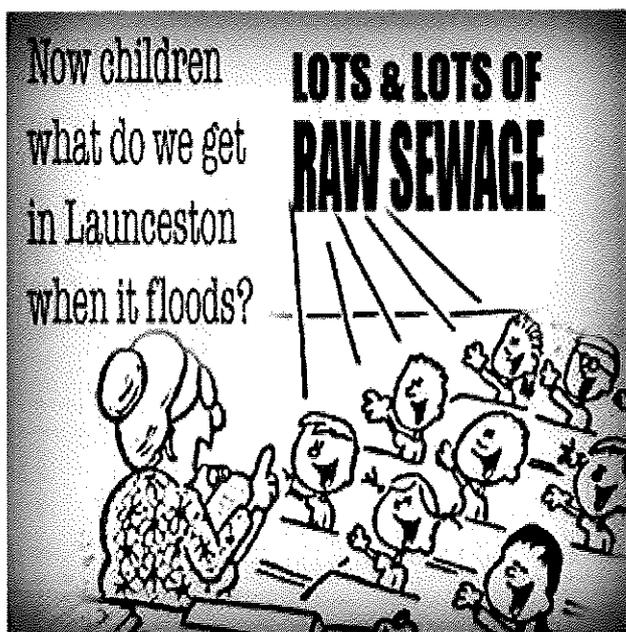
In Launceston *'the spectre of the flood'* colours a significant part of the city's cultural landscape. By now, it should be more than well understood that irrespective of the levy banks, and the supposed flood mitigation, the proposed buildings are to be sited not on a flood plain but rather on a tidal zone – *albeit a highly modified precinct*.

Moreover, the projected inundation mapping should be a concern to a 21st Century Planning Authority. It is somewhat interesting that the Development Application deliberately avoids references to the site and totally ducks the *'flooding issue'*. When you build a building, any building, the first and foremost consideration needs to be its geographic location closely followed by cultural landscaping issues. That this **NOT** the case here alarm bells ring rather loudly!

Historic imaginings of the precinct as a port and industrial district rather quickly proved themselves to be wrong headed largely informed as they were by the imperatives of a colonial military outpost. In a colonial context, it mattered not just so long as the *'spoils of colonialism'* reached the *'motherland'* and in the right pockets.

It is now well understood that despite all the mitigation infrastructure installed to date, the sites are not only likely to be flood prone but are bound to be increasingly exposed to devastation via flooding. There is no longer any ambiguity whatsoever about this. Curiously, the city's planners choose to somewhat surreally ignore and downplay all this in the face of compelling evidence that developments such as those currently in hand ought not proceed.

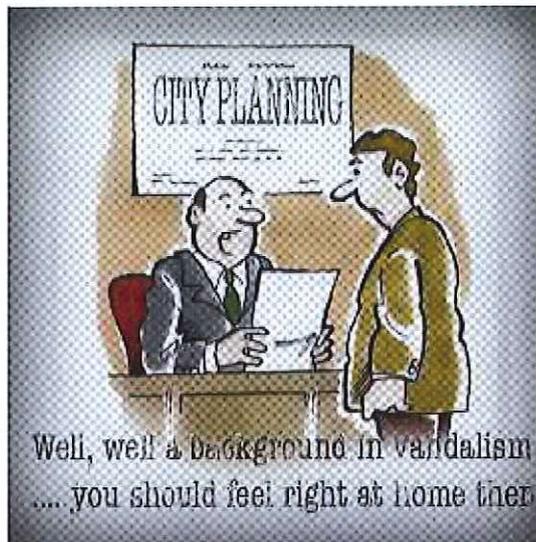
The planning speculation that future flooding events are manageable is bizarre given all the unforeseeable damage and risks. It is a speculation that failed the credibility test elsewhere – *Brisbane and Lismore to name just two*.



However, the insurance industry has apparently made some determinations about the insurability of property in the context of flooding that on the evidence presented in the development applications neither the developers, nor their consulting architects nor the city's planners seem to be in any way mindful of.

This alone should be sounding the loudest possible alarms but it appears yet again that all players have decided to cross their fingers and look away. The individuals involved as likely as not, will be well and truly out of the reach of anyone seeking retribution. This is cynicism writ large!

The city's planner, verbally at least, has conceded that the sites will indeed flood yet is somehow persuaded that even if flooding turns out to be an increasingly frequent event, it will be *"manageable"*. That is, despite all the alternative sites and strategic positioning available.

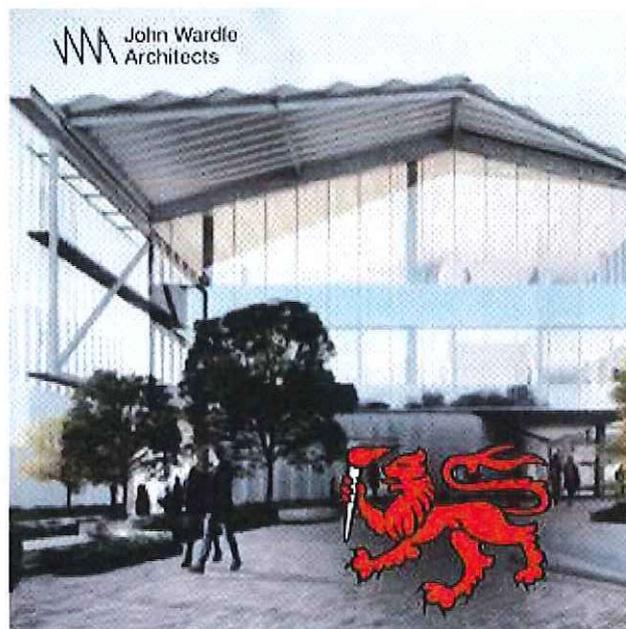


Indeed, the *'science'* tells us that the site is on track to experience potentially catastrophic flooding events – *and more frequently*. The inundation mapping is in hand as is the hydraulic modelling. All of which has been presented to Council and UTAS and it has been catalogued in the press.

The proposition of *'manageability'* is open to challenge in a planning context. This needs no further elaboration. Rather, it is a planning paradigm that needs to be tested for its credibility in the light of these development applications.

That the proposition might have any chance of being endorsed defies logic yet the evidence to support the fact that is being proactively advocated is clear to see.

Looking ahead, on the grounds that the sites are not developable without imposing undue risk to the wider community in multiple ways, these development proposals should be rejected outright. At the very least the proponents should be required to resubmit the applications after further investigation and development.



COMMUNITY SUPPORT

There is a certain irony in the fact than in June it was four years since **1,500 partitioners** brought on a public meeting calling upon council to withdraw its support for the proposals now in hand – *flawed as they are*.

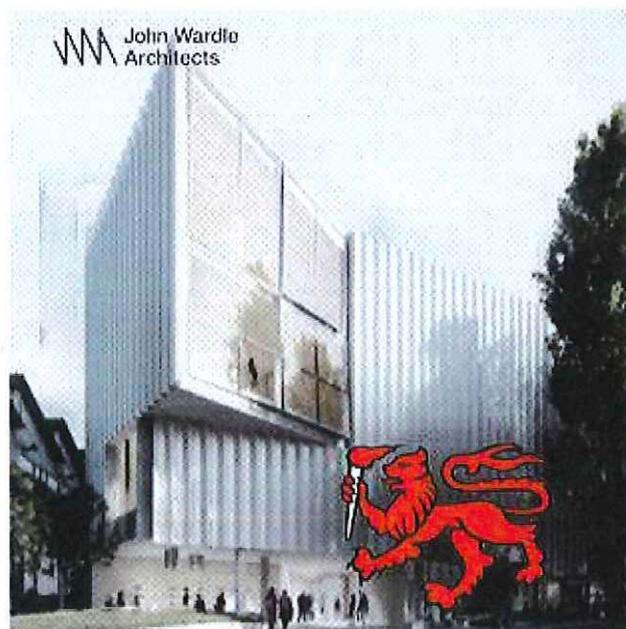
The irony is compounded given that on the very night the meeting was scheduled to be held in Albert Hall there was a raging flood that only missed overtopping the levies by just a few centimetres. And, that is not to mention the multiple leaks in the levy banks that revealed themselves.

When the rescheduled meeting eventually took place the city's '**Aldermen one and all**' were quite prepared to argue the case, in the light of all the evidence, that black was the new white and that UTAS moving towards the CBD would be city's salvation. The passing of time has presented a totally different picture yet the adherence to the surreal recklessness that set the current sequence of events in train seems to persist – *and relentlessly*.

The proposed infrastructure built on another site would still deliver the jobs and short term economic benefits and quite possibly with a greater chance of longer term sustainability. However, the long term sustainability of the current '**tertiary education model**' is far from secure or sustainable. It is an open question as to what that institutional landscape might look like in a decade or two.

With the levies lowering annually due to their geography, and tidal level increasing due to the declared climate emergency, the prospect of the levies holding diminishes. The generations beyond the present 'in power' are mindful of the future '**baby boomers et al**' have left in their wake.

The only salvation the decision makers inclined to endorse this development now might look towards is hopefully being well and truly out of the picture when reality reveals itself.



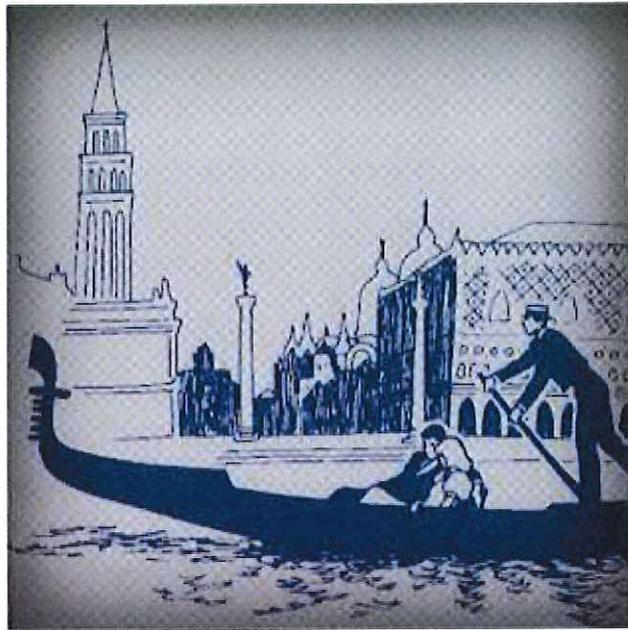
THE ENGINEERING ISSUES

There should be no doubt that the realisation of the development is feasible in an engineering context. The proposed construction methodology not only fits the **20th Century** sensibilities and circumstance of existing infrastructure, it goes a step further to celebrate them.

In a 21st Century context this is more than curious, it is somewhat perverse.

All this by itself is concerning in a 21st Century context given the twin crises of climate breakdown and biodiversity loss. Likewise, culturally, economically and environmentally these factors are the most serious issue of our time.

Considering that globally, buildings and construction play a major part, accounting for nearly **40%** of energy-related carbon dioxide (CO₂) emissions whilst also having a significant impact on our natural habitats. This is non-trivial. That this development proposal clearly ignores all this and that apparently such things do not concern the developer nor their architects it is concerning.



That places like Venice exist it is proof that large infrastructure can indeed be built upon fundamentally unstable foundations in a tidal zone. However, the circumstances that once pertained there have shifted somewhat. However, in a 21st Century context why would a city like Venice need to be built?

Moreover, the Venice proposition is not a circumstance that fits the confluence of two rivers and an estuary on the other side of the planet.

Building in a tidal zone cum flood plain is an esoteric problem rather than anything that calls for a compelling pragmatic solution in the *'Inveresk circumstance'*. Given all the available alternatives – *and they exist a plenty*.

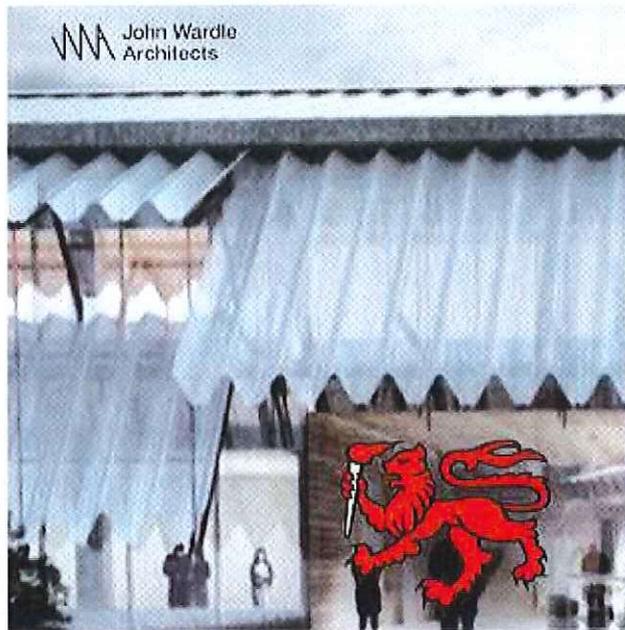
While this development might well provide engineers and architects with the opportunity to *'strut their stuff'* it is an effort that is arguably better spent on issues of sustainability and appropriate resource usage – *and ideally elsewhere*.

Indeed, the project architects for this development, via their professional institute, along with the City of Launceston, have *"declared climate and biodiversity emergency"*. That both appear to be ignoring that rhetoric is evidence that all parties want to walk on both sides of the street.

Someone once said that they had never seen anybody try to walk on both sides of the street except for a drunk wending his/her way home. They tried it, but it was an awkward business. So, it seems that in order to attempt the walk one needs to be intoxicated.

In a particular case where the opportunity exists, implementing credible demonstrations of these very real world 21st Century, ethical and sustainability concerns should not be so readily dismissed unless of course some form of intemperance is involved.

Nonetheless, it seems that everyone involved in this particular project is more than willing to look away while mouthing the rhetoric.



THE SUSTAINABILITY OF THE PROPOSED INFRASTRUCTURE

The carelessness, in a planning context, regarding civic sustainability is more than bewildering two decades into the 21st Century. That the city's *'planner'* asserts that it is not possible to require of developers in Tasmania to be proactive in regard to issues of civic and environmental sustainability as is, and has been, the case in cities elsewhere. Given that the City of Launceston has itself declared a *"climate emergency"* this is at once alarming and bewildering.

Likewise, given that in this instance the project architects appear to be oblivious to such concerns despite being signatories to their profession's *'Sustainability Policy'*. Their apparent recalcitrance here is alarming. More to the point, that their clients too, appear to be oblivious to 21st Century sustainability concerns only compounds the recalcitrance on display.

ARCHITECTUREAU



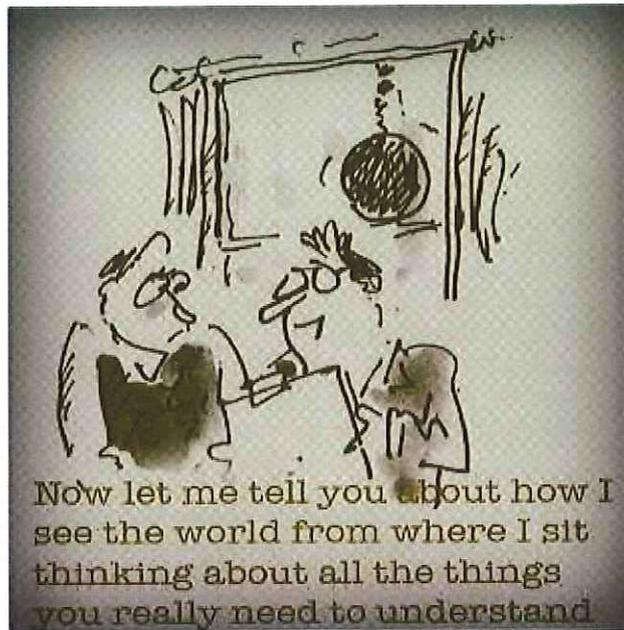
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The project architects' professional body's policy talks about the need for *'urgent action'* in the face the challenges presented by climate change. That they might talk the talk and not walk the walk is worrying. It is a policy that talks about the *'commercial and residential building sectors'* that *"offer significant potential for achieving deep cuts in greenhouse gas emissions by 2050. This potential can be realised by reducing energy demand and increasing the energy efficiency of buildings."*

The architects' institutional policy goes on to talk about *"policy frameworks [that] must be established to achieve greater energy and resource efficiency in the building sector and to facilitate innovation in building design and procurement."* And, it even goes on to talk about *"incentives to encourage the alteration, retrofitting and rebuilding of our current building stock to achieve more sustainable outcomes"* yet despite all that, and the project architects signing on to the policy, and their apparent lack of adherence to it in this case, for all intention's purposes, is there for all to see.

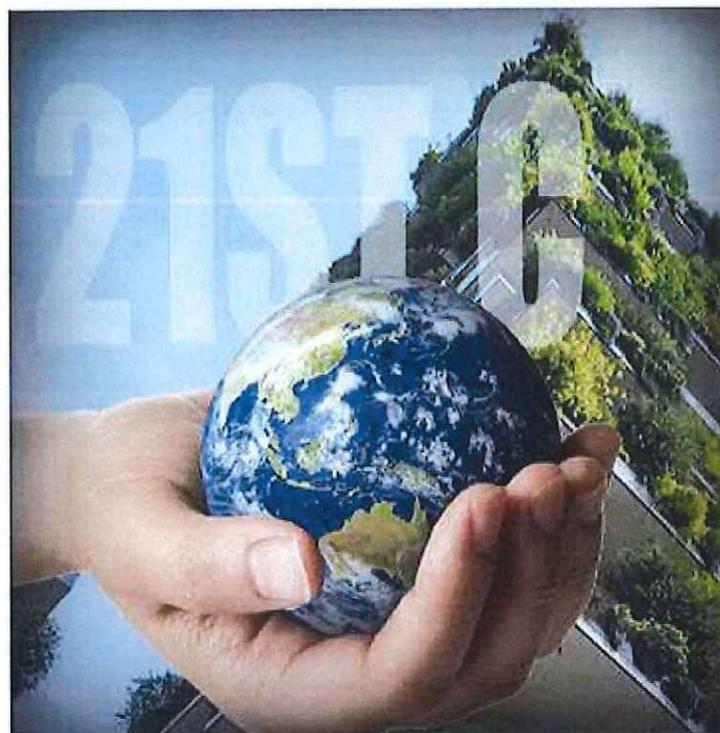
Similarly, the assertion that *'professional planners'* cannot advise planning authorities to *'require'* energy generation on site and water management lacks credibility. A planning authority is a planning authority, authorised to place whatever conditions it sees fit in regard to any development.



Of course, a planning authority can make any kind of requirement it sees fit and if a developer chooses to appeal its determination surely it would be putting its recalcitrance on public display. In the case of UTAS, and given the city's ratepayers overt investment in the development, that would hardly be a good look.

That a *'planner'* in a council's employ is disinclined to be civically responsive, and policy aware in regard to council's declaration of a climate emergency here, it beggars belief. Importantly, the proof is no doubt in the documentation for anyone who cares to look.

Apart from the currently mandatory insulation standards and so on, currently large scale corporate construction still need to be increasingly environmentally sensitive. Thus, calling upon developers to impose minimally upon the community, and its civic infrastructure, is a must looking ahead.



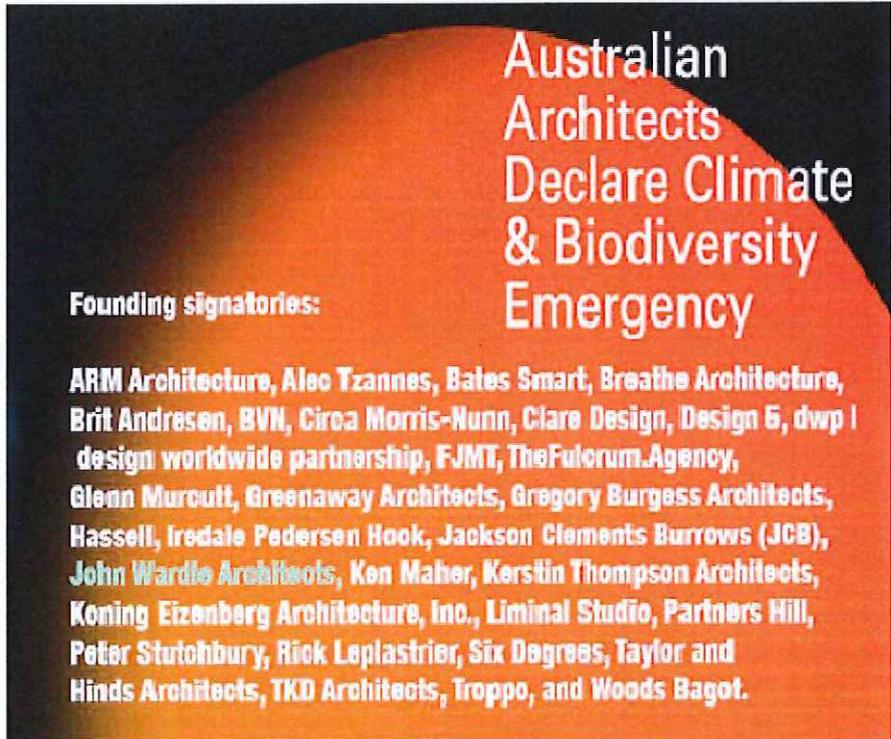
HOW MIGHT ENVIRONMENTAL AND CIVIC SENSITIVITIES AND SENSIBILITIES BE HONOURED?

Firstly, urban buildings increasingly should be required to generate a significant percentage of its anticipatable energy requirements – say 25% plus at least. And, especially so for large corporate structures.

The argument that this is unachievable in an urban circumstance for corporate infrastructure just does not stand up. It is especially so in a domestic circumstance where a property can feasibly and economically be self sustaining in an energy context and onsite water management. Australia wide, and equally so in Tasmania, this is being achieved right now.

What was achieved 25 years ago in a central Sydney suburb is more easily achieved on a much larger scale two decades into the 21st Century. [Michael Mobbs](#) started setting the pace that this project's architects should by now be able to eclipse his achievements.

Concerningly, despite the project architects' sustainability boasts they, along with their clients, and now the city's planners too, seem to lack the will and the wherewithal to even contemplate a proposition where 21st Century sustainability is aimed for.



Australian Architects Declare Climate & Biodiversity Emergency

Founding signatories:

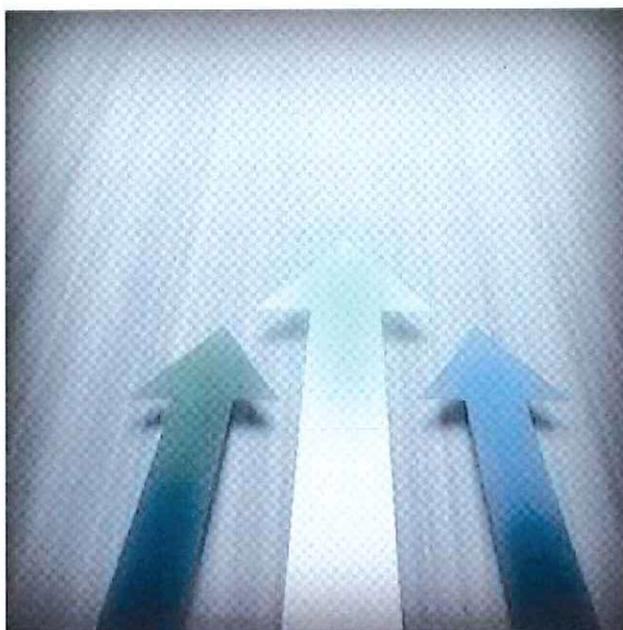
ARM Architecture, Alec Tzannes, Bates Smart, Breathe Architecture, Brit Andersen, BVN, Circa Morris-Nunn, Clare Design, Design 5, dwp | design worldwide partnership, FJMT, TheFulcrum.Agency, Glenn Murcutt, Greenaway Architects, Gregory Burgess Architects, Hassell, Iredale Pedersen Hook, Jackson Clements Burrows (JCB), John Wardle Architects, Ken Maher, Kerstin Thompson Architects, Koning Eizenberg Architecture, Inc., Liminal Studio, Partners Hill, Peter Stutchbury, Rick Leplastrier, Six Degrees, Taylor and Hinds Architects, TKD Architects, Troppo, and Woods Bagot.

SEE <https://au.architectsdeclare.com/>

Moreover, the project architect's stance as a signatory to their profession's declaration is bewildering to say the very least. That, they still accept a commission for UTAS to abandon their Newnham campus for a set of new buildings on a flood plain cum tidal flat, poses uncomfortable questions. That **'the development'** neither demonstrates nor espouses any 21st Century relevant sustainable attributes – *income energy (solar & wind) plus on site water collection and management et al* – this too beggars belief.

A somewhat sobering read is the [Institute of Architects review](#) of this Development Application. Just look for the word **'sustainable'** and a references to the **'cultural landscape'** or indeed a reference to **'geography'**. Either the Institute's **"declared climate and biodiversity policy"** is hollow rhetoric OR this firm of architects signing on to it is more **'cynical window dressing'** than an expression of professional intent going by the Institute of Architects review.

It is also astounding that UTAS might not be seeking to position the university as a 21st Century institution from a marketing perspective. Surely, if they were to do so, focus on the institutions sustainability credentials reflected in its infrastructure in Tasmania and project its 'values' nationally this would enhance its ability to attract students and research funding.



WHAT WAY FORWARD?

Based on the Development Application presented to Council, at the very best, should only consider conditional support. Given community reaction to recent project approvals and the community's reluctant investment of something like '**\$10 Million plus**', in the proposition UTAS is persisting with, Council might well expect protracted appeals against an unconditional approval.

Against the background, now half a decade in the making, it would seem that there are two options to consider. The first being outright rejection of the Development Application given the now known risks and fiscal consequences that will surely impact upon the city's ratepayers – *short, medium and longterm*.

Alternatively, as a '**planning authority**' council might well consider leaving the application on the table and ask that the proponents to consider coming back once they have more thoroughly investigated the 21st Century sustainability options etc. that are open to them and the city.

In providing the proponents with the opportunity to reconsider their application Council would also be providing the developer and their consultants with the opportunity to take a longer and harder look at the context within which universities exist within in the 21st Century.

Importantly, Council would be doing so in the light of all the paradigm shifts in play. The status quo is being disrupted, thus planners and developers alike need to be alert not only to the disruptions but also the trickle down consequences that in this case will surely impact upon the wider community.

When [President of the USA Ronald Regan](#) pointed out that the "*status quo is quite simply Latin for the mess we are it*" he was on the money. World politics might be in a different place in the 21st Century, and in Tasmania too, but President Regan's observation rings as true now as ever it did.

Ray Norman
27.9.2020



SEE <http://lcc63.blogspot.com/2020/09/representation-to-city-of-launceston-in.html>

Ray Norman

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“A body of men holding themselves accountable to nobody ought not to be trusted by anybody.” Thomas Paine

“The standard you walk past is the standard you accept” David Morrison

RAY NORMAN *Local Governance Advocate*
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