

Department for Education, Children and Young People

Child Safety and Youth Justice Operations



Tasmanian
Government

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Mr Scott Hennessy
Secretary
Parliamentary Standing Committee on Public Works
Via email only: publicworks@parliament.tas.gov.au
Cc: Bryce Taplin ([REDACTED])

Dear Scott,

Response to Matters Taken on Notice for the new Tasmanian Youth Justice Facility

Thank you for your letter of 13 April 2026 outlining the additional information the Department committed to providing the Committee in the recent public hearing held 31 March 2026 with respect to the new Tasmanian Youth Justice Facility.

This letter outlines our response to those items and additionally provides the committee with further information on matters associated with the appeal and clarifications of evidence raised during that public hearing.

1) Please confirm if staff at the proposed facility require safety accreditation for the pool to operate.

The operation of a pool at the new facility comes with a range of considerations regarding the health and safety of the intended users of the pool. These are driven by legislative requirements (e.g. *Work Health and Safety Act 2012*), or guidelines (e.g. Royal Life Saving Society Guidelines for Safe Pool Operation), or recommendations (e.g. from the Office of the Custodial Inspector).

No one piece of legislation determines a specific need for accreditation requirements, but the combined requirements will mean that the operation of the pool will need to consider:

- **Microbiological Testing:** The Custodial Inspector of Tasmania explicitly recommends routine microbiological testing to ensure water safety for detainees (*Environmental Health and Hygiene Inspection Report, Inspection of Youth Custodial Services in Tasmania*, Custodial Inspector of Tasmania, 2021)
- **Water Quality Standards:** Under the *Recreational Water Quality Guidelines 2007*, the following is required to be undertaken:
 - Maintain the microbiological water quality of the pool.
 - Monitor the water quality regularly.
 - Maintain a detailed logbook of water chemistry.
- **Physical Barriers:** Despite being in a secure facility, the pool must have a compliant safety barrier to meet the requirements of the *Building Act 2016*.

- **Staffing:** The *Guidelines for Safe Pool Operation (GSPO)* recommend the following in order to ensure that the Operator of the pool is meeting its duty of care obligations and appropriately managing risk:
 - one person over the age of 18 must be present who:
 - holds a current skill set equivalent to that of pool lifeguard
 - is in a position to maintain effective supervision of all persons on, below the surface and the bottom of the swimming pool (or their zone)
 - is able to respond to and reach a person in distress in the swimming pool within 30 seconds.
- **Emergency Management:** Detailed emergency plans must be in place, and all staff must be inducted and trained in these specific procedures.

While the operational details of the new facility are yet to be finalised, the above requirements are expected to be met, particularly in relation to staffing and supervision given the level of supervision proposed within the new facility.

2) Please confirm how much of the \$7.88 million spent on the proposed works was spent on consultancy costs.

As at the end of February 2026, the project has expended \$7.88 million of the allocated \$155.3 million budget.

Of that \$7.88 million dollars, \$6.68 million has been spent on consultants covering:

- initial site selection process, including site identification, assessment of sites and subsequent planning reviews
- detailed studies of the Pontville site, including cultural heritage, natural values, infrastructure feasibility, geotechnical investigation and noise assessment
- development of a functional design brief for the new facility
- topographical and feature survey of the site
- development of a reference design, including research and online discussions to gain information from existing facilities nationally and internationally
- detailed design of the facility including
 - architectural
 - landscaping
 - interior design
 - structural engineering
 - civil engineering
 - hydraulic services engineering (including wet fire)
 - mechanical engineering
 - electrical engineering (including dry fire)
 - fire and safety engineering
 - environmentally sustainable design
 - DDA/access consulting
 - bushfire assessment
 - geotechnical engineering
 - traffic engineering
 - agricultural assessment
 - signage & wayfinding design
 - acoustic design
 - safety In Design reviews
 - audio visual, lighting and information technology
 - security Design and Risk Assessment
- early works design for landscaping and utility services
- town planning to inform the planning applications for the main facility as well as Rifle Range Road

- stakeholder communication including with the local community and Aboriginal Community Controlled Organisations
- cost planning, value management and cost risk modelling
- building surveying
- management of the project.

3) Please confirm if the Tasmanian Botanicals facility, in overall scope, is the largest of its kind in Australia.

Tasmanian Botanicals is understood to be Australia’s largest vertically integrated (meaning they undertake cultivation, processing, manufacture and packaging all on site) medicinal cannabis producers, with significant on-site cultivation and processing capability.

Other Australian operators may have comparable or larger capacity outdoor or controlled-environment cultivation facilities and production outputs, however given the nature of their operations and licence conditions, publicly available information to confirm this unequivocally is limited.

For example, MedTEC Pharma operate a 20-hectare cultivation site for outdoor crops¹ which is over double the size of the total site in which Tasmanian Botanicals operates.

As such, Tasmanian Botanicals could be accurately described as among the largest integrated operations, but not unequivocally the largest by all measures.

4) Clarifications to evidence given

The Department wish to address some items raised during the public hearing by other witnesses that warrant clarification.

Noise Measurements

Both Mr Tudor and Mr Goudsouzian made statements regarding the noise assessment that was undertaken on behalf of the Department.

Mr Tudor indicated that

“...there’s not actually either a new noise sound check because the actual checks on when it was actually originally done was on wet, windy days where noise is obviously impacted.”

Mr Goudsouzian indicated that

“They did the audio test during winter over six days. It rained on five of the six days they did the test. The wind was up to 80 kilometres an hour during that time: nobody was shooting.”

The Department wish for the Committee to be aware that noise monitoring was undertaken during daytime visits to the project site on 10 and 15 September 2024, 26 March 2025 and 30 April 2025.

The conditions during those times are outlined in the table below from Bureau of Meteorology data.

Date	Rainfall ²	Wind ³
10 September 2024	0 mm	N/A – data not available
15 September 2024	3.4 mm	N/A – data not available
26 March 2025	1.0 mm	9am WNW 7 km/h 3pm NW 17km/h
30 April 2025	0 mm	9am NNE 11km/h 3pm SSE 13km/h

¹ <https://www.medtecpharma.com.au/cultivation/>

² Daily Rainfall Total from the Bureau of Meteorology, Brighton station (1.4km from Pontville)

³ Wind Direction and Speed from the Bureau of Meteorology, Campania Station (12.7km from Pontville)

It should be noted that an unattended noise logger was installed at the site near to the position of the proposed facility during the period from 10 to 15 September 2024, to measure background noise levels.

Noise measurements were performed at various locations within the site and off-site close to the shooting range while general shooting activity was underway at the shooting ranges on Sunday 15 September 2024.

Supplementary shooting noise measurements were also performed under controlled conditions with the cooperation of each shooting club individually on the following dates:

- Wednesday 26 March 2025 - Hobart Clay Target Club
- Wednesday 30 April 2025 - Tasmanian Pistol and Rifle Club

Noise levels from over 250 gunshot noise events were analysed in total, clearly demonstrating that shooting was occurring during the noise monitoring period.

Suitability of Sites

Mr Tudor said

“There are over 200 sites that are much, much, much better suited, that would have the infrastructure, could be much easier.”

The site at Pontville was chosen from over 200 sites against a range of criteria and the best site was chosen from this list that presented the least challenges to development of the facility.

Road Infrastructure

Mr Nye said

“Essentially, they're saying they're going to put a big roundabout at the end of Rifle Range Road.”

The Department have never considered a roundabout on the intersection of Rifle Range Road and Brighton Roads, and it is not intending to acquire land to widen Brighton Road.

Cannabis Odour and Harvesting

Mr Goudsouzian said the following with regard to the Tasmania Botanics operation:

“the fumes do not come from the incineration. That's got nothing to do with it. The incineration puts out a bit of smoke. The fumes come from the outdoor crop. It's the blooming and the harvesting of the crop, which happens for weeks at a time, all through the year. It's an outdoor crop. The incineration has got nothing to do with it. You can mulch it, you can do anything; that's completely separate. The fumes come from the crop, from the blooming and the harvesting and the processing of the crop.”

There are likely three sources of odour from the facility, the incineration of waste, the growing of the crop and the on-site processing/manufacture of the product.

Recent odour assessment conducted on behalf of the Department indicates that the farthest reaching odour is the incineration, with the odour from growing and harvesting the outdoor crop being the smallest and contained mostly to the eastern side of the Midlands Highway.

It was claimed that harvesting “...happens for weeks at a time, all through the year...” when in fact the harvest period for the outdoor crop occurs around March across several weeks and only on an annual basis.

5) Additional information with respect to matters subject of appeals

During the public hearing the committee asked several questions regarding the planning appeal or matters the subject of the planning appeal such as odour or noise.

The Department was unable to provide answers to some of those questions to protect the integrity of that independent process undertaken by the Tasmanian Civil and Administrative Tribunal (TASCAT).

Evidence has now been exchanged between parties and so the Department are able to share with the Committee additional information that may be relevant to its consideration of the project. This is included at **Attachment 1**.

In summary, the Department have prepared a document that provides the operational context to two issues that are the subject of the appeal; odour from the Tasmanian Botanics facility and noise from the nearby gun clubs.

If you have any further questions, please contact the Bryce Taplin, Project Manager via email

[REDACTED]

Kind regards,

[REDACTED]

4/5/2026

Peter Whitcombe
Deputy Secretary, Child Safety and Youth Justice Operations

Attachments:

Attachment 1 - New Tasmanian Youth Justice Facility, Operational Assessment of Potential External Impacts

APRIL 2026

New Tasmanian Youth Justice Facility

Operational Assessment of Potential External Impacts

Table of Contents

Version 1.0 – 27/04/2026

1	Executive summary	3
1.1	Summary	3
2	Author credentials and operational experience	5
2.1	Author credentials	5
2.2	Operational experience	6
2.3	Acknowledgement of Expert Witness Code of Conduct	6
3	Purpose, scope and methodology	7
3.1	Purpose	7
3.2	Scope	7
3.3	Methodology	7
4	Existing environment and adjacent uses	9
4.1	Gun Club Operations	9
4.2	Medicinal Cannabis Facility	10
5	Operational context – youth justice environment	11
5.2	Exposure to gun violence	12
6	Children and young people in detention	13
7	Application of the Model of Care	15
8	Operational assessment	17
8.1	Overview	17
8.2	Audibility	17
8.3	Experience on site	17
8.4	Trauma informed practice	18
8.5	Existing residential use	19
8.6	Flexibility across the facility	19
8.7	Staff training and responses	20
9	Overall conclusion	22
10	Attachments / references	23

1 Executive summary

1.1 Summary

- 1.1.1 This report provides an operational assessment of potential impacts associated with nearby land uses on the proposed Tasmanian Youth Justice Facility at 466 Brighton Road Pontville. Specifically, the impacts of noise from adjacent gun-club activities and odour from a medicinal cannabis facility.
- 1.1.2 The assessment has been prepared to support the State's response to appeals currently before the Tasmanian Civil & Administrative Tribunal (TASCAT) regarding the facility's planning permit.
- 1.1.3 The analysis draws on existing technical assessments, including the acoustic report, known operational characteristics of adjacent land uses, and the proposed facility's Model of Care and operational design. It provides an operational and custodial management perspective and does not duplicate technical noise or air-quality assessments.
- 1.1.4 Gun-club operations have been independently assessed by appropriately qualified experts, with findings informed by site specific noise monitoring. The Hobart Pistol and Rifle Club's activities are not discernible above background levels at the project site and are therefore not expected to impact the facility. The Hobart Clay Target Club produces audible gunfire; however, monitoring indicates that noise exposure at the site remains within acceptable ranges based on guidelines used in comparable jurisdictions.
- 1.1.5 Importantly, residential properties have co-existed with these gun-club activities for more than 60 years, and operators reporting no complaints from neighbouring residents, demonstrating long-term compatibility between these land uses and nearby sensitive receptors.
- 1.1.6 In relation to odour, the medicinal cannabis facility has commenced modification of its operations by shifting from incinerating waste to shredding and mulching on site, reducing potential odour-generating activities.
- 1.1.7 From an operational perspective, the facility is designed as a structured, therapeutic, and dynamic environment. Daily programs, routine movement, staff interaction, and ongoing activities inherently create a managed baseline of sensory input.
- 1.1.8 Within this context, intermittent external stimuli fall well within what is typically and effectively managed in youth justice settings. The facility's trauma-informed Model of Care ensures active supervision, and real time staff responses, supported by individual assessment and care planning that enables tailored responses to meet the specific needs of each child and young person when unexpected stimuli arise.

- 1.1.9 The facility's design provides significant operational flexibility, with indoor and outdoor spaces that allow staff to adapt activities in response to changing conditions, including external noise or odour. Such adaptability is a standard feature of contemporary custodial practice and not a novel requirement.
- 1.1.10 All the authors of this report (except one) have visited the site, at different times, and have familiarised themselves with the operational characteristics of the Hobart Clay Target Club.
- 1.1.11 The sixth co-author contributes additional specialist clinical expertise in child-centred, relational, and trauma-informed practice.
- 1.1.12 The co-authors who attended site during gun-club activity confirm that while gunfire is audible, it presents as a dull, intermittent background sound, comparable to everyday noises such as hammering or maintenance activity, and is not jarring or destabilising.
- 1.1.13 Overall, the operational assessment concludes that the facility's design and operating model provide multiple layers of mitigation, and that external noise and odour sources do not present a barrier to safe, effective, or appropriate operation of the new youth justice facility.

2 Author credentials and operational experience

2.1 Author credentials

2.1.1 The report has been prepared by the Department for Education, Children and Young People (DECYP).

2.1.2 Co-authors of the report from DECYP are:

Peter Whitcombe Deputy Secretary, Child Safety and Youth Justice Operations (Lead Author)

Peter Whitcombe is a senior public sector executive and registered social worker with over 25 years' experience across youth justice services, statutory care, and system-level reform. He has held senior executive and general management roles with responsibility for the operational delivery, governance, and reform of youth justice and child protection services within highly regulated and publicly scrutinised environments. Peter brings deep knowledge of youth justice systems, legislation, and practice standards, with a strong commitment to evidence-informed, child-centred, and community-responsive service delivery.

Zoë Robinson, Executive Director, Care and Custodial Services

Zoë Robinson is a senior executive with 15 years' experience across youth justice, child protection, and child rights. She holds a Bachelor of Law, Master of Human Rights and previously served as Commissioner for Children in New South Wales. Zoë brings a strong rights-based and child-centred perspective to her work, informed by direct engagement with children and young people, lived-experience leadership, and collaborative approaches across government and the community sector.

Dr Kristen Webb, Chief Allied Health Advisor

Dr Kristen Webb is a senior leader in youth justice with 33 years' experience in the governance, reform, and operation of custodial and community-based services. Her professional background includes oversight of practice within youth detention environments, system reform initiatives, and alignment of practice with legislative, human rights, and trauma-informed frameworks. Dr Webb has substantial experience working with young people with complex needs involved in the justice system and provides objective, evidence-based advice informed by policy, operational practice, and contemporary youth justice standards, drawing upon both her academic background and her applied practice experience as a psychologist.

Edwina J Poynton, Principal Advisor Out of Home Care

Edwina Poynton is a registered social worker with 42 years' experience across child protection, out-of-home care, and youth justice in Australia, Aotearoa New Zealand, the United Kingdom, and internationally. She holds a Master of Science in Relational Child and Youth Care Studies (Distinction) and has worked in senior advisory roles providing expert advice on child rights trauma informed youth justice, care standards, safeguarding, and service and system reform. Her experience includes the development and implementation of models of care and the provision of expert advice to support Ministerial and system-level decision-making.

Samuel Ledger, Director Youth Justice Operations

Samuel Ledger is an experienced youth justice professional with over 25 years' experience working across custodial and community-based environments. He brings strong operational leadership alongside a system-level understanding of youth justice policy, reform, and service delivery. Sam's work reflects a sustained commitment to evidence-based, trauma-informed, and rights-focused practice, supporting safe, rehabilitative, and developmentally appropriate responses for children and young people in contact with the justice system.

Shane Murdoch, Director, Custodial Youth Justice Services

Shane Murdoch has over 40 years' senior leadership experience across youth justice, custodial settings, and out-of-home care systems in Australia and Aotearoa New Zealand. He has held executive and statutory roles including Acting Director, Youth Custodial Services in Tasmania, where he is leading stabilisation and practice reform at Ashley Youth Detention Centre, and Chief Executive Officer of Cholmondeley Children's Centre, delivering significant organisational, cultural and financial transformation. Shane has also held senior leadership roles with independent advocacy services for care-experienced children and young people nationally and regionally and brings strong governance capability and international expertise in child-centred, relational and trauma-informed practice.

2.2 Operational experience

- 2.2.1 The co-authors of this paper have a combined 175 years of experience working with children and young people who have experienced adverse childhood experiences and trauma, including in the operation of group, secure care and custodial youth justice facilities, in Australia, New Zealand, the United Kingdom, Asia and Europe.
- 2.2.2 In particular, the team has extensive experience managing:
 - Behavioural responses of children and young people in custodial settings
 - Environmental stressors in custodial settings
- 2.2.3 The co-authors are directly responsible for the Ashley Youth Detention Centre and the development and implementation of the Model of Care and operational model for the new facility. Several co-authors will have continuing responsibility for the facility's ongoing operation.

2.3 Acknowledgement of Expert Witness Code of Conduct

- 2.3.1 The co-authors of this report have read and agree to be bound by the TASCAT Expert Witness Code of Conduct dated 1 June 2023.

3 Purpose, scope and methodology

3.1 Purpose

- 3.1.1 This report has been prepared as the State's response to two appeals against the issue of a Planning Permit by the Southern Midlands Council for the development and use of a new Tasmanian Youth Justice Facility (the facility). These appeals are currently before TASCAT.
- 3.1.2 It provides an overview of the operational aspects of the facility that help to mitigate those potential impacts, and justification for why the facility will not impact on these existing adjacent uses.

3.2 Scope

- 3.2.1 The report responds specifically to issues raised by the appellants on the grounds relating to the Attenuation Code, in particular potential noise and odour impacts from nearby/adjacent uses.
- 3.2.2 The Attenuation Code, in this application, is intended to protect existing uses from new sensitive uses (i.e. the facility). Thus, the impact of the existing uses is not necessarily the focus, rather the question is would the development of the facility constrain those existing uses now or into the future.
- 3.2.3 The Government's decision to locate the facility at this site followed an extensive site-selection process, informed by a comprehensive understanding of the adjacent land uses.
- 3.2.4 This report assesses the operational considerations relating to the adjacent uses and provides further information and justification as to why the proposed use would not interfere with or constrain the existing activities of the adjacent gun clubs and medicinal cannabis facility.
- 3.2.5 This report is not a technical report in that it does not address technical compliance with the *Tasmanian Planning Scheme – Southern Midlands*, but it provides the operational context as to how compliance with the scheme will be achieved.

3.3 Methodology

- 3.3.1 This report has been co-authored by senior leaders within the Child Safety and Youth Justice Operations Portfolio of DECYP as outlined in Section 2.
- 3.3.2 Except for one co-author, all have visited the site and have familiarised themselves with the existing environmental setting.

- 3.3.3 All co-authors have undertaken a review of the *Acoustic Engineering, Town Planning Acoustic Report, 466 Brighton Road, Pontville, TAS*, DDEG, October 2025 (acoustic report) and other relevant planning documentation that was submitted to the Southern Midlands Council as part of the Application for Planning Permit.
- 3.3.4 The co-authors are aware of the operational characteristics of the:
- Gun club (frequency, timing, duration of events)
 - Medicinal cannabis facility (type of operations)
- 3.3.5 In preparing this report and forming the opinions expressed, the co-authors have drawn on their extensive experience and have had regard to:
- the proposed facility design
 - the proposed Model of Care,
 - the expected operational model, and
 - child-centred, relational, and trauma-informed practice.

4 Existing environment and adjacent uses

4.1 Gun Club Operations

4.1.1 There are two Gun Clubs within close proximity to the site of the new Tasmanian Youth Justice Facility at 466 Brighton Road Pontville.

4.1.2 The proximity of the project site to the gun clubs was highlighted as part of the site selection process and accepted by Government in selecting the site for the new facility.

4.1.3 The two-gun clubs are the:

- Hobart Pistol and Rifle Club
- Hobart Clay Target Club

4.1.4 The gun clubs have a different operational profile, which is summarised below.

Hobart Pistol and Rifle Club

4.1.5 The Hobart Pistol and Rifle Club operate more frequently, but with lower calibre bullets. It includes both indoor and outdoor ranges.

4.1.6 Shooting occurs most days of the week, with practice, events and courses being run from the facility.

4.1.7 The club reports that they do not receive noise complaints from neighbours.

4.1.8 The noise monitoring, as outlined in the acoustic report, identifies that the activities of this club are not discernible at the site above background noise levels.

4.1.9 As such, this club is not expected to have any impact on the facility, and thus under the Attenuation Code the facility will not have an impact on it.

Hobart Clay Target Club

4.1.10 The Hobart Clay Target Club is an outdoor range, with 12-gauge shotguns used for a variety of shooting events.

4.1.11 They operate a regular, but limited, operation as follows:

- Practice every Wednesday from 10am – 4.30pm.
- Competitions on Sundays – about 2 per month.
- Skeet 3rd Sunday and Down the Line 4th Sunday – 10am to 3pm.
- Night shoots – Saturdays in winter – about 4 per year from 6pm.

4.1.12 Sometimes the club allows members to practice outside these times (e.g. for Olympics).

- 4.1.13 The club notes the presence of their facilities since the 1960s.
- 4.1.14 The noise monitoring, outlined in the acoustic report, identifies that the level of noise hazard to outdoor areas of the proposed facility is within, but at the upper bound of, the acceptable range for amenity based on comparison to shooting noise guidelines from other Australian jurisdictions¹.
- 4.1.15 The acoustic report stated that the general noise levels at the project site are broadly in line with Acoustic Environment Indicator levels for outdoor living areas and schools, suggesting that the combination of general ambient noise and shooting noise is within an acceptable range when averaged over a typical day and that it is considered that the noise from the nearby shooting ranges do not pose an unacceptable noise hazard.
- 4.1.16 The club also reports that they do not receive noise complaints from neighbours.

4.2 Medicinal Cannabis Facility

- 4.2.1 The medicinal cannabis facility that is in proximity to the site is a controlled agricultural/processing facility. It consists of enclosed growing environments, and limited outdoor growing.
- 4.2.2 Processing of the agricultural product is conducted on-site using a vertically integrated model, meaning the full production life cycle of medicinal cannabis is undertaken on site.
- 4.2.3 This consists of the cultivation of the plant, harvesting, processing, manufacturing, packaging, and distribution of the product.
- 4.2.4 In relation to the appeals, the facility generates odour from the incineration of its waste product, as well as from cultivation (indoor and outdoor) and on-site processing/manufacture.
- 4.2.5 The requirement to incinerate waste is expected to reduce significantly because the operator has achieved an approved change to its licence to shred its waste and mulch it on site. DECYP understands that on-farm incineration is exempt from consideration under the Attenuation Code.
- 4.2.6 The cultivation of the cannabis, particularly the outdoor crop, has anecdotally been a source of odour, but no evidence of this had previously been produced. DECYP have undertaken a recent odour assessment to seek to quantify this as an odour source, and while detectable it is understood to have a relatively small odour footprint which would not be expected to be detectable at the site of the facility.
- 4.2.7 The processing/manufacture of the product after its cultivation and harvesting are another source of odour, however recent odour assessment indicates that this has a similar footprint to the incineration and has not been detected at a distance that would impact the facility.

¹ Other jurisdictions' guidelines have been referenced as Tasmania has no established criteria or guidance for noise from outdoor shooting ranges.

5 Operational context – youth justice environment

- 5.1.1 Youth justice facilities operate as structured, therapeutic environments with predictable routines and active supervision. They are intentionally dynamic, with daily programs and movements that create a stable baseline of activity. These characteristics mean the environment already includes managed sensory input, making minor external stimuli less impactful.
- 5.1.2 Normal operational activity expected in the facility, such as movement throughout the facility, staff interaction, door operations, group programs, and outdoor recreational activities, will create a consistent baseline of sound and activity within the facility that is both expected and intentionally managed.
- 5.1.3 The facility is deliberately designed around contemporary, trauma-informed practice. Staff will maintain predictable routines, provide active supervision, and use structured engagement to help stabilise children and young people, build emotional regulation skills, and support participation in activities on site.
- 5.1.4 A conversation upon admission with children and young people, as part of the orientation process, will provide information on the facility and its broader context including potential noises and odour.
- 5.1.5 Children and young people will not be left in uncontrolled environments. Rather, the setting will be intentionally shaped to maintain safety while exposing them to safe, everyday sensory input. Each child or young person's sensory processing needs will be assessed by an occupational therapist to inform the provision of a sensory diet to address and support environmental and regulatory needs².
- 5.1.6 A core feature of the facility Model of Care is around providing meaningful therapeutic, educational, and wellbeing-oriented programming. These programs naturally generate activity, movement, and noise as part of normal operations. Typical examples include:
- Education and vocational training, including classroom learning, hands-on workshops, horticulture, and digital literacy programs.
 - Cultural and identity-based programs, co-designed with Aboriginal community organisations, focusing on connection to culture, country and identity.
 - Health and wellbeing activities, including counselling, allied health sessions, group fitness, recreational sport, and structured physical activity.
 - Life skills programs, such as cooking, budgeting, communication skills, daily living routines, and supported social skill development.

² Lihi Liberman, Efrat Harel, Yafit Gilboa; Sensory Processing Disorders and Emotional Distress Among Young Children Exposed to Traumatic Events. *Am J Occup Ther* May/June 2026, Vol. 80(3), 8003185080. doi: <https://doi.org/10.5014/ajot.2026.051402>

- Creative and expressive activities, including music, art, drama, and other modes of therapeutic self-expression.
- Therapeutic and behavioural programs, such as trauma-informed group sessions, emotion-regulation programs, cognitive-behavioural interventions, and restorative practices.

5.1.7 These programs contribute to a purposeful and active daily environment that is managed, supervised, and intentionally designed.

5.1.8 Within this operational context, occasional external stimuli are neither unusual nor inherently disruptive. Facilities routinely manage far more complex internal stimuli as part of everyday practice. Controlled oversight ensures that such external factors do not impact safety, wellbeing, or the effective functioning of the site.

5.2 Exposure to gun violence

5.2.1 Available data from Tasmania Police indicate that exposure of children and young people to firearm-related incidents in Tasmania is rare. In the 2024-25 reporting period, 11 children (persons under 18 years) were recorded as being involved in or exposed to an incident involving firearm use. In the context of Tasmania's total child and youth population, this represents a very low level of occurrence.

5.2.2 While it remains possible that an individual child or young person entering the facility may have been exposed to a firearm-related incident (which must be acknowledged in trauma-informed practice) the available data indicate that such exposure is uncommon.

5.2.3 As such, the probability of this being a prevalent experience among the detained population is low and therefore represent a limited and manageable risk in the context of the operation of the facility.

5.2.4 This context is important in assessing both the prevalence of gun-related trauma among detained youth and the degree of operational risk posed by indirect exposure to firearm noise at the site.

5.2.5 However, this research also found that children and young people who have experienced trauma often have highly sensitised stress response systems, meaning that sudden loud threatening sounds such as gunfire and a car backfiring act as a trigger. That is, the brain interprets this as immediate danger, even if the child or young person is physically safe.

5.2.6 A trauma informed response is particularly important to avoid the sound having destabilising effects or the escalation into dysregulation or regression.

5.2.7 The early identification of trauma, and trauma-informed responses can mitigate the impacts of gunfire noises, with general and individualised pathways to support any responses required. These include multi-disciplinary assessment, individualised trauma informed plans, highly skilled, knowledgeable and responsive staff and environmental and operational management.

6 Children and young people in detention

- 6.1.1 Children and young people who enter detention are children first. They hold the same inherent rights, dignity and developmental needs as all children and young people. Consistent with the United Nations Convention on the Rights of the Child (UNCRC) and the findings of the Tasmanian Commission of Inquiry into the Tasmanian Government's Responses to Child Sexual Abuse in Institutional Settings (Commission of Inquiry), contact with detention typically follows a long history of harm and unmet need across multiple life domains, rather than a simple pathway of deliberate criminality.
- 6.1.2 Most children and young people in detention have experienced multiple and intersecting forms of trauma prior to entering the youth justice system. Common experiences include family violence, abuse, neglect, exposure to substance misuse, poverty, homelessness and instability in care. Many have also experienced disrupted attachments, repeated placement breakdowns and exclusion from education. These adversities significantly affect a child or young person's sense of safety, trust in adults, emotional regulation and behavioural responses, particularly in high-stress or unpredictable environments.
- 6.1.3 A substantial proportion of children and young people in detention are living with complex, unmet and frequently undiagnosed needs, including neurodevelopmental disability, cognitive impairment, mental ill-health and speech or language difficulties. The Commission of Inquiry recognised that behaviours leading to detention are often trauma-driven responses to earlier harm, and that many children and young people enter the youth justice system with complex needs that have not been fully identified or addressed prior to justice involvement. From a UNCRC perspective, this underscores the importance of strengthening how children's rights to appropriate support, development and protection from harm are realised in practice.
- 6.1.4 Aboriginal children and young people remain significantly over-represented in detention. The Commission of Inquiry identified this over-representation as closely linked to the ongoing impacts of colonisation, intergenerational trauma and structural inequities, alongside long-standing gaps in access to culturally safe, community-led supports. Alignment with the UNCRC and the Commission requires recognition of Aboriginal children and young person's rights to culture, connection to Country, kinship and self-determination, and to environments that are culturally safe, strengths-based and trauma-aware.
- 6.1.5 Consistent with the UNCRC principle that detention must be used only as a measure of last resort and for the shortest appropriate period, the Commission of Inquiry made clear that the use of detention carries heightened obligations. Children and young people do not lose their rights when deprived of liberty; rather, there is an increased collective responsibility to ensure those rights are upheld. Detention environments must therefore be safe, humane, therapeutic and developmentally appropriate, and must actively minimise the risk of re-traumatisation or further harm.

6.1.6 A trauma-informed approach recognises that detention should be carefully designed and operated so that it does not compound trauma or reinforce stigma. Instead, it must support healing, accountability, cultural safety and rehabilitation, while maintaining community safety.

7 Application of the Model of Care

7.1.1 The Youth Justice Facility Model of Care outlines:

- how staff at the facility will deliver services (by meeting the practice standards)
- how children and young people will be supported, from when they enter the facility to when they move back into the community (the relational pathway); it includes the service responsibilities and the main areas of care the service will provide (the care plan domains)
- the organisational framework that will enable the facility Model of Care to work well.

7.1.2 The purpose of this Youth Justice Facility Model of Care is to provide:

- a safe and secure facility for children and young people where healing and wellbeing are the primary focus
- an environment where children and young people are supported to understand and to address the causes of their offending behaviour, to prevent reoffending and enable their successful return to the community
- an environment where children, young people, staff and visitors feel safe and supported
- the community with confidence that children and young people in detention are in a safe, purpose-built facility that provides a high standard of care and support for rehabilitation, which in turn aims to reduce reoffending and strengthen community safety.

7.1.3 Under the facility Model of Care and subsequent operational model, children and young people will be cared for within an environment where the adults are relational, attuned and trauma informed with a care planning and key worker model that ensures a focus on emotional safety, wellbeing and responding to changing needs through regular child centred multidisciplinary planning and reviews.

7.1.4 Assessment and planning processes will be aimed at the early identification of Adverse Childhood Experiences (ACE) and trauma and implementation of trauma-informed responses, with both general and individualised pathways to support and guide responses³.

7.1.5 Individualised care plans will be informed by the knowledge and understanding of the child or young person, including any gunfire related history and circumstances, enabling responses to be tailored to individual children and young people's needs.

7.1.6 Programs that incorporate psychoeducation and emotion coaching to help children and young people to label their physiological, psychological and behavioural reactions will be provided.

³ Gilgoff, R., Singh, L., Koita, K., Gentile, B., Silverio Marques, S. (2020). Adverse Childhood Experiences, Outcomes, and Interventions. *Paediatric Clin N Am* 67 (2020) 259–273 <https://doi.org/10.1016/j.pcl.2019.12.001>

7.1.7 Children and young people will be provided with the supports and connections to enhance the development of protective factors that moderate the impact including consistent, responsive relational care, access to professional support and mental health services, safe peer support, opportunities for explicit strengthening of coping skills and agency, such as giving children and young people roles in solution planning⁴.

⁴ Emerging Minds (2025) <https://emergingminds.com.au/resources/adverse-childhood-experiences-aces-summary-of-evidence-and-impacts>

8 Operational assessment

8.1 Overview

- 8.1.1 The proposed facility is designed (both physically and operationally) to be an active therapeutic environment.
- 8.1.2 The facility's design and operations ensure that intermittent external noise or odour does not disrupt daily functioning. These external factors fall well within what is already managed confidently as part of routine activity.
- 8.1.3 An assessment of various aspects of those stimuli, and how they would be managed, is explored in the following sections.

8.2 Audibility

- 8.2.1 The audibility of a sound in a context is considered a psychophysical phenomenon, which depends on the physical ability of signal detection and psychological, behavioural and contextual reactions of an individual to the sound⁵.
- 8.2.2 Audibility of a sound and its recognition depend on the sound source, factors affecting the sound propagation in the environment and the listener.
- 8.2.3 Factors related to the sound source include its level, dynamic range, signal to noise ratio, duration of the sound, its temporal variability and the frequency bandwidth.
- 8.2.4 Factors associated with the listener include hearing acuity and memory, subject's engagement in a context, response proclivity, experience, attention, familiarity of the signal and the context, stress and expectations⁶.
- 8.2.5 For sounds of longer duration (i.e. industrial sound), it would be detected at lower sound pressure level than very short duration impulsive sounds such as from gunshots and weapons noise⁷. Research has shown that sounds with very short duration (less than 200 ms) are not perceived at the same loudness as they are when the duration is increased⁸, and thus the duration of a sound also affects its audibility in presence of background noise. The background noise level at the listener's location is likely the single most important factor for determining aural non-detectability.

8.3 Experience on site

- 8.3.1 All the authors of this report (except one) have visited the site, at different times, and have familiarized themselves with the operational characteristics of the Hobart Clay Target Club (for example listening to the noise generated while the club is operational to experience the noise generated first-hand). While gunfire can be heard at the site (as reflected in the acoustic report), the character of the sound is not jarring or abrupt when experienced within the setting of the proposed facility.

- 8.3.2 The noise presents as a dull, intermittent background sound which is comparable in perceived intrusiveness to everyday environmental noises such as someone using a hammer, dropping a tool, or carrying out routine maintenance activities. It does not resemble the sharp, close-range sound typically associated with distressing firearm exposure.
- 8.3.3 The facility's design and operational environment further mitigate the impact of this noise. As described elsewhere in the report, youth justice facilities are dynamic settings where movement, staff interaction, daily programs, and routine operational activity naturally create a consistent baseline of sound and activity.
- 8.3.4 Within this context, intermittent external noises blend into the broader sound environment and do not present a significant disruption.
- 8.3.5 Because the environment is intentionally structured, supervised, and built around therapeutic engagement, staff are able to provide real-time reassurance and support if a child or young person reacts to an unexpected sound, be that from the gun clubs or a source such as a vehicle back-firing.
- 8.3.6 This means the occasional, non-startling gunfire noise becomes an opportunity for supported regulation rather than a source of harm or instability.
- 8.3.7 In this way, the nature of the noise, combined with the facility's trauma-informed operational model, ensures it does not create a material operational or wellbeing concern.

8.4 Trauma informed practice

- 8.4.1 Trauma-informed practice provides predictable structure and active supervision.
- 8.4.2 This means that staff can immediately respond to any environmental changes, including external stimuli, through reassurance, reframing, or temporary adjustments to activities.
- 8.4.3 Completely shielding children and young people from external stimuli such as noise or odour can be counterproductive in a therapeutic, rehabilitative environment. Through a careful balance between safety and exposure, a child or young person's development occurs through the interaction with their environment. Implementation of the facility Model of Care affords this balance.

- 8.4.4 The facility is intentionally designed to be an active, structured setting, where children and young people are safely supported through predictable routines, continuous staff supervision, and purposeful daily programs.
- 8.4.5 In this context, occasional exposure to external stimuli which are managed and reframed by staff provides opportunities for children and young people to build coping skills, emotional regulation, and confidence.
- 8.4.6 Trauma-informed approaches emphasise supported exposure, where staff use reassurance, structured engagement, and real-time supervision to help children and young people interpret and respond to changes in their environment.
- 8.4.7 Avoiding all external stimuli would remove these opportunities for growth and may reinforce dependency or sensitivity to everyday environmental variation.
- 8.4.8 In contrast, providing guided and supported responses helps a child or young person become more independent, strengthens their ability to manage normal life experiences, and prepares them for transition back into the community.

8.5 Existing residential use

- 8.5.1 It should be noted that residential properties have been in proximity to both the gun clubs and the medicinal cannabis facility for an extended period (over 60 years for the gun clubs and almost 10 years for the medicinal cannabis facility).
- 8.5.2 Throughout this time, no concerns have been raised with respect to noise from gun-club operations. In particular, the Hobart Pistol and Rifle Club has reported that they do not receive noise complaints from neighbours.
- 8.5.3 This long-standing co-existence demonstrates that the established land uses have operated without generating unacceptable amenity impacts for nearby residents, further supporting the conclusion that intermittent external noise or odour is unlikely to present a material issue for the proposed facility.
- 8.5.4 While there may be complaints regarding the incineration of waste from the medicinal cannabis facility, the change in waste disposal practice is expected to mitigate this significantly.

8.6 Flexibility across the facility

- 8.6.1 The facility has been deliberately designed to provide significant operational flexibility, with a range of indoor and outdoor spaces that can be used interchangeably depending on the needs of children and young people and the conditions at any point in time.

- 8.6.2 Staff can adjust activities or the use of outdoor spaces if needed, giving the facility real-time adaptability that is not available in typical residential or community environments. This flexibility means that when external stimuli are present, staff can seamlessly transition programs or movement indoors, modify schedules, or provide additional support to children and young people.
- 8.6.3 This type of responsiveness is not new or unusual for youth justice environments. As described elsewhere in the report, these facilities already operate as dynamic, therapeutic settings where movement, daily programming, and staff-led engagement naturally create a baseline level of internal activity and sensory input.
- 8.6.4 Staff will routinely manage far more complex internal stimuli, including the sounds of group programs, physical activity, transitions, expressive arts sessions, and daily operational noise such as doors, tools, or equipment. Within this context, intermittent external noise or odour sits comfortably within the range of environmental variation that will already be effectively managed as part of standard practice.
- 8.6.5 The facility offers adaptable indoor and outdoor spaces, allowing staff to modify activities in response to changing conditions, including external stimuli. This flexibility is a normal operational feature and reflects contemporary custodial practice.
- 8.6.6 In combination, the design flexibility of the facility, the indoor-outdoor adaptability of programs, and the therapeutic nature of day-to-day operations demonstrate that managing external stimuli is neither novel nor problematic for youth justice facilities. Rather, it is an inherent feature of contemporary custodial environments, and one that the facility is purposely equipped to manage confidently and safely.

8.7 Staff training and responses

- 8.7.1 Staff will be provided with training, supervision and ongoing support to provide a therapeutic trauma responsive environment for children and young people and respond to any adverse responses with trauma informed practice.
- 8.7.2 This will include ensuring staff have the skills to understand and recognise that sudden loud noises may not just startle but can trigger trauma responses, such as dissociation, aggression, or shutdown.
- 8.7.3 The facility staff will develop routines and use preparatory language and actions. That is, when gunfire is anticipated they will pre-prepare in age and developmentally appropriate ways, including rehearsing strategies to support the individual and assessment-informed needs of the child or young person.
- 8.7.4 The facility leadership team will develop an ongoing relationship with the gun clubs to ensure clear communication. The facility staffing structure includes a capacity for engagement and communication with stakeholders.

8.7.5 Specific operational responses will be developed once the site build has progressed sufficiently to understand the extent of exposure to the noise from the gun clubs within the facility. When and if required, operational responses may include:

- the early identification of ACE and trauma, and trauma-informed responses can mitigate the impacts of gunfire noises, with general and individualised pathways to support and responses⁹. This includes a particular focus on disproportionately affected groups/individuals, based on what is known about their story
- scheduling practices for children and young people that are severely affected that prioritise indoor activity, limiting the need to access outdoor areas during periods of peak usage of the clay target club (potentially in coordination with the operators of the club)
- providing professional, trauma-focused cognitive behavioural therapy, exposure-based processing in safe contexts¹⁰
- physical reduction of sudden auditory exposure will be considered, through white noise machines or music to reduce contrast or use of child-appropriate hearing protection during acute events. These can blunt the intensity of triggers and help retrain baseline safety perception¹¹
- development of a mechanism for ongoing trauma informed environmental assessments and responses.

8.7.6 The co-authors of this paper consider that the impacts from gunfire noise on the children and young people accommodated at the facility can be effectively and appropriately managed and note no further mitigations at the gun clubs' sites will be explored.

⁹ Gilgoff, R., Singh, L., Koita, K., Gentile, B., Silverio Marques, S. (2020). Adverse Childhood Experiences, Outcomes, and Interventions. *Paediatric Clin N Am* 67 (2020) 259–273 <https://doi.org/10.1016/j.pcl.2019.12.001>

¹⁰ Holloway, K., Cahill, G., Tieu, T. et al. (2023). Reviewing the Literature on the Impact of Gun Violence on Early Childhood Development. *Curr Psychiatry Rep* 25, 273–281 (2023). <https://doi.org/10.1007/s11920-023-01428-6>

¹¹ Balk, S., Bochner, R., Ramdhanie, M. & Reilly, B. (2023). Preventing Excessive Noise Exposure in Infants, Children, and Adolescents. *Paediatrics* (2023) 152 (5): e2023063753 <https://doi.org/10.1542/peds.2023-063753>

9 Overall conclusion

- 9.1.1 This operational assessment demonstrates that the proposed new Tasmanian Youth Justice Facility can be safely and effectively operated within the existing environmental context at 466 Brighton Road, Pontville.
- 9.1.2 Residential properties have coexisted with the area for decades without noise complaints, which provides strong evidence of long-term compatibility between these activities and sensitive uses.
- 9.1.3 Odour impacts from the medicinal cannabis facility will also be reduced through changes to waste-handling practices.
- 9.1.4 From an operational risk perspective, the facility is designed as a structured, therapeutic, and dynamic environment where daily routines, programs, and staff-led activity naturally create a managed baseline of sensory input.
- 9.1.5 Within this setting, occasional external stimuli fall well within what youth justice staff routinely manage as part of contemporary custodial practice.
- 9.1.6 The facility's trauma-informed Model of Care further ensures that children and young people receive predictable supervision, real-time support, and structured responses when unexpected stimuli arise, promoting emotional regulation and stability rather than disruption.
- 9.1.7 The design also provides significant operational flexibility, enabling seamless transitions between indoor and outdoor spaces in response to changing conditions, including external environmental stimuli. This adaptability reflects standard practice in modern youth justice environments and ensures the facility can confidently respond to any short-term variations in noise or odour without impacting safety or program delivery.
- 9.1.8 Claims regarding physiological or psychological harm have been assessed through an operational and trauma-informed lens and are not supported when considered in the context of contemporary custodial practice.
- 9.1.9 Overall, the evidence indicates that the external noise and odour sources do not present a barrier to the safe, effective, or appropriate operation of the facility. The combined effect of the facility's design, its trauma-informed operating model, and the demonstrated manageability of adjacent land-use impacts provides a clear basis for concluding that the proposed development is operationally sound and compatible with its surroundings.

10 Attachments / references

1. Acoustic Engineering, Town Planning Acoustic Report, 466 Brighton Road, Pontville, TAS, DDEG, October 2025