

7 February 2026

Mr Roger Howlett
Chairperson
Tasmanian Planning Commission
GPO Box 1691
HOBART TAS 7001
By Email: tpc@planning.tas.gov.au

**Formal Representation: Objection to the North West Transmission Development (NWTD)
Changes to Plans Proposed by Tasmanian Networks Pty Ltd**

Dear Mr Howlett

I refer to your letter dated 22 January 2026 sent to me concerning the changes to plans for the North West Transmission Upgrades Project and inviting submissions in relation to these changes. My submission here should be read in conjunction with my original representation (Representation 25 as published on the Tasmanian Planning Commission (TPC) website).

I will demonstrate in this additional representation, that the proposal by TasNetworks to introduce twin monopoles to certain sections of the transmission line adds weight to my argument in my earlier representation that TasNetworks has done little to ameliorate the impact on prime agricultural land in accordance with *Planning Provision Standard 5.3 Standards for Agricultural Land*. When TasNetworks had the opportunity to do so, through offering monopoles instead of lattice towers to land holders of prime agricultural land, they either remained silent that this opportunity existed or outright rejected landholders' requests¹. A clear indication that TasNetworks is not concerned about ameliorating the impact on prime agricultural land in accordance with Standard 5.3.

I will also submit that should a permit be granted by the TPC for this project, that a permit condition be included that requires TasNetworks to offer the less intrusive twin monopoles (instead of the more intrusive lattice towers) to all landholders of prime agricultural land along the path of the NWTD, but especially in the Sheffield to Heybridge section.

One wonders why, when TasNetworks had the opportunity to be accommodating and provide the opportunity of monopoles instead of lattice towers to landholders of prime agricultural land, and to meet Standard 5.3, they did not. The answer, of course, does not lie in meeting planning

¹ See Attachment 1 which is a copy of an email sent to me rejecting my request for monopoles instead of lattice towers on our property which is prime agricultural land property (original available upon request).

considerations and preservation of prime agricultural land, but in cost. The materials and construction of monopoles are more costly than lattice towers and TasNetworks has incentives to bring their capital expenditure for this project in under budget. Minutes of a meeting of a TasNetworks' NWTG Stakeholder Liaison Group on 21 October 2025 and the related presentation² provides information regarding the Capital Expenditure Sharing Scheme (CESS) that 'offers financial rewards or penalties to Network Service Providers (NSPs) that spend more or less than (the) capex allowance'. This presentation indicates that '... there is a 10% bonus on underspends to NWTG...' under the CESS application that the NWTG has been approved under by the Australian Energy Regulator (See extract from the presentation at Attachment 2).

I read with incredulity TasNetworks' Representation Number 16 dated 16 October 2025 as published on the TPC website. As a landholder who had been actively involved with the project since it was first announced, I had never had the possible use of monopoles mentioned to me nor had other affected landholders with whom I was in contact. They had never been raised as a possibility by TasNetworks in the many many meetings I had held with them. I then read with increasing interest the Stakeholder Communications section of the TPC website dealing with the project and the communication between the TPC and TasNetworks regarding the change to plans and what I considered was the correct position of the Commission that these needed to be exhibited for public and stakeholder comment. I further noted the final letter from TasNetworks indicating that the project director had:

...written to the Hon Kerry Vincent MLC, Minister for Housing and Planning and have requested that he agree to amend the Major Infrastructure Development Approvals (North West Transmission Upgrades Project) Order 2020 to include the proposed 110kv OHTL relocation within the prescribed scope of works that constitute the project.

I took it that this would mean that I, as an affected landholder would be written to by the Minister indicating the change to the Order (we, as affected landholders, of course had been written to by the Minister when the original order had been made under the Major Infrastructure Development Approvals Act 1999). No such communication has arrived.

On the matter of the Major Infrastructure Development Approvals Act 1999, and the various Ministerial Orders and Notices we have been sent, it has always been my understanding that the NWTG project would proceed through the proper planning and approval processes required by the MIDAA and the issue of the required permits by the TPC **before** compulsory acquisition was commenced. I have always stated to my land agent and to TasNetworks officers, that when there was a lawfully approved project (i.e. a project with proper approvals including permits issued under the Land Use Planning Act by the TPC) then lawful negotiations for acquisition of the easement could commence. I have conducted myself according to the law and under the various notifications and orders that I have received Under the MIDAA. At the time I am writing this representation, landholders have had the compulsory acquisition processes commenced against them (i.e. on 14 January 2026) despite no permit from your Commission. When enquiries are made about why the processes required by the MIDAA were not being followed, TasNetworks responses are that the compulsory acquisition process had been commenced under their normal operations and licence powers under the Electricity Supply Industry Act 1995 and the Electricity Supply Industry Amendment Act 2003 and that under these normal operations powers there is no requirement to have a permit issued under the Land Use Planning Act 1993 before compulsory acquisition can commence. This all despite TasNetworks indicating in their submission to your Commission (and in the various notices and brochures that we have received) that they are following the required processes (See Figure 7.1 on page 154 of the Part A Report Introduction of TasNetworks' original application and the discussion in Section 7).

² [NWTG Stakeholder Liaison Group](#) sighted 6 February 2026

Specific Comments to the ‘Changes to Plans Document’

Comments to the document ‘Remaining North West Transmission Developments Towers to Poles – Response to Further Information Request dated 19 November 2025’ Document	
Page 2	The stated reasons for the introduction of monopoles are that these areas are ‘... highly constrained from a construction standpoint, due to narrow easements, problematic topography and proximate residential uses.’ There is no mention made of attempts to ameliorate the impact on prime agricultural land (i.e Standard 5.3).
Page 5	TasNetworks states that the application is being assessed by the TPC under the Major Infrastructure Development Approvals Act 1999, yet compulsory acquisition has been commenced (14 January 2026) for operational purposes under the Land Acquisitions Act 1993 and permits have been issued by the TPC.

Comments against specific Planning Provisions		
	Standards for Agricultural land	
5.3.1	Conversion of Agricultural Land	
	<i>Objective: That use must protect land for agricultural use by minimising the conversion of land to non-agricultural use.</i> <i>The use must minimise the conversion of agricultural land to non-agricultural use, having regard to:</i> <i>The area of land being converted to non-agricultural use;</i> <i>Whether the use precludes the land from being returned to agricultural use; and</i> <i>Whether the use confines or restrains existing</i>	TasNetworks claims that ‘Using poles in lieu of towers will further reduce potential impacts on current land uses and users’. This claim is not supportable for several reasons: - Firstly, no evidence is provided that there is ‘in the first place’ any reduction of potential impacts on agricultural land. In fact, in my original representation I point out that there will be significant impacts on agricultural land across the entire proposed development and in particular on prime cropping and food producing land on sections of the line between Sheffield and Heybridge. In summary, there will be significant impact on agricultural land because of the footprint of lattice type towers and the restrictions on food producing agricultural activities around the towers and underneath the transmission lines through the proposed easements. - Secondly, the reasons given for the introduction of the less intrusive monopole arrangements at page 2 of the response document clearly state that these areas are ‘... highly constrained from a construction standpoint, due to narrow easements, problematic topography and proximate residential uses.’ Absolutely no

	<i>or potential agricultural use on the site or adjoining sites</i>	mention is made of ‘protection of land for agricultural use by minimising the conversion of land to non-agricultural use’. - Thirdly, in the second paragraph in their response to 5.3.1 TasNetworks indicates that the impacts on productive agricultural land specifically, will therefore be minimised... (through the introduction of monopoles versus lattice towers)’. This would be correct IF the areas where the monopoles that are proposed to be introduced are in fact productive agricultural land. Most are not. - Towers T6A and B, T7A and B, T8A and B and T9A and B are perhaps on either cropping or grazing land – it is difficult to tell from the maps provided. - Towers 43A and B through to 46A and B are on grazing/dairy land, not productive cropping land (these locations are close to our own property at Gawler). - Towers 86A through to 88B appear to be in bushland and on the verge of grazing land – not productive cropping land. - Towers 91A through to 94B are either in bushland or in the case of 93A through to 94B in suburban locations on the outskirts of Burnie. - Similarly Towers 95A through to 100 B are through the suburban corridor in Burnie. They are not on productive cropping land. - Yes, there are some towers that are on potential cropping land. However, the majority are either on grazing land (where towers are less intrusive to farming operations³) or bush land or suburban locations. - The argument cannot be made that there is a significant effect on the prime agricultural land of the introduction of the monopole option.
5.3.2	Conversion of prime agricultural land	
	<i>Objective: That use on prime agricultural land must protect land for agricultural</i>	See arguments above in 5.3.1.

³ See my original representation for an explanation as to why the presence of lattice towers on cropping ground lowers agricultural productivity.

	<i>use by minimising the conversion of land to non-agricultural use. The use located on prime agricultural land must be for the major infrastructure project, provided that:</i> <i>a. The area of land being converted to the use is minimised;</i> <i>b. Adverse impacts on the surrounding agricultural use are minimised; and</i> <i>c. The site is reasonably required for operational efficiency.</i>	
	Standard for Visual Impacts	
5.8.1	Visual Impact	
	Objective That: a. Destruction of vegetation does not cause an unreasonable reduction of landscape values; b. Building and works do not cause an unreasonable reduction of landscape values	Although I will leave it to others such as tourism organisations and operators to give further evidence, one wonders how the visual amenity of the beautiful coastal landscapes around the Heybridge area are not adversely affected by the increase of tower height of the lattice towers in the Heybridge Spur. I for one do believe that visual amenity will be adversely affected.

If a major reason for the introduction of monopoles is technical reasons, (for example the cross over of the existing 110kv line), then it would follow logically that the introduction of monopoles onto prime agricultural land (and which would lessen the impact on this food producing land) would be an equal if not weightier consideration given the prominence of a specific criterion for the assessment of the project to minimise the effect on agricultural land.

Essentially my argument is why, if it is good enough to introduce monopoles for technical purposes as stated at page 2 of the explanatory document (e.g to aid the cross over of the 110kv

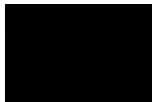
line) why is it not good enough to introduce monopoles, which are less intrusive than lattice towers (because of the small tower footprint and construction requirements – see page 12 of the introductory document), to areas along the proposed transmission line that are classed as prime agricultural land and are highly productive food producing and cropping locations.

Conclusion

Simply put, TasNetworks' request to the TPC in the North West Transmission Upgrades Project Change to Plans, reinforces the point in my original representation that the project does not meet Standard 5.3 Standards for Agricultural Land. TasNetworks have not, when they had the opportunity, done what they could to 'protect land for agricultural use by minimising the conversion of land to non-agricultural use'. They have not used the opportunity for the introduction of less intrusive monopoles onto prime agricultural land.

I would therefore respectfully request that if a permit is to be granted by the TPC for the overall project, that a permit condition be provided that monopoles (instead of lattice towers) be offered to land holders of prime agricultural land.

Yours sincerely

A black rectangular box redacting the signature of Stephen Allen.

Stephen Allen

(E: )

Attachment 1

Copy of email sent to me on 16 December 2025 in response to my request for monopoles instead of lattice towers

Hi Steve,

On 20 November 2025 you contacted me and advised that you were requesting poles be constructed on your Gawler property rather than the proposed steel lattice towers. Following discussions with the project engineering team and the project director, I have been provided with the following to share with you:

“Lattice towers are recognised as the prudent and efficient construction approach for the project. And as such are what have been requested under our permitted construction methodology across the project route.

One specific exemption is required were dual-mono poles are proposed where the new OHTL is proposed to be built on the existing OHTL alignment due to easement and operational space constraints. These specific locations have been identified and noted with the Planning Commission. This is so that we can maintain critical 220 kV connection and fibre optic communications.

These spatial constraints and new line alignment overlap issues are not present at this site [your property]. Therefore, an exemption under these conditions will not be available under our permitted construction methodology and cannot be accommodated at this site.”

cheers

Attachment 2

Screen shot slide 23 of the presentation I refer to

