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To: switch; Gina Goodman
Subject: Central Coast draft LPS - TasNetworks Submission
Attachments: Central Coast LPS - TasNetworks Review.pdf

Hi Central Coast Council – Planning Department

Thank you for providing TasNetworks the opportunity to review and comment on the draft Local Provisions Schedule.

Please see attached TasNetworks representation.

If you require any further information please don't hesitate to contact me.

Regards



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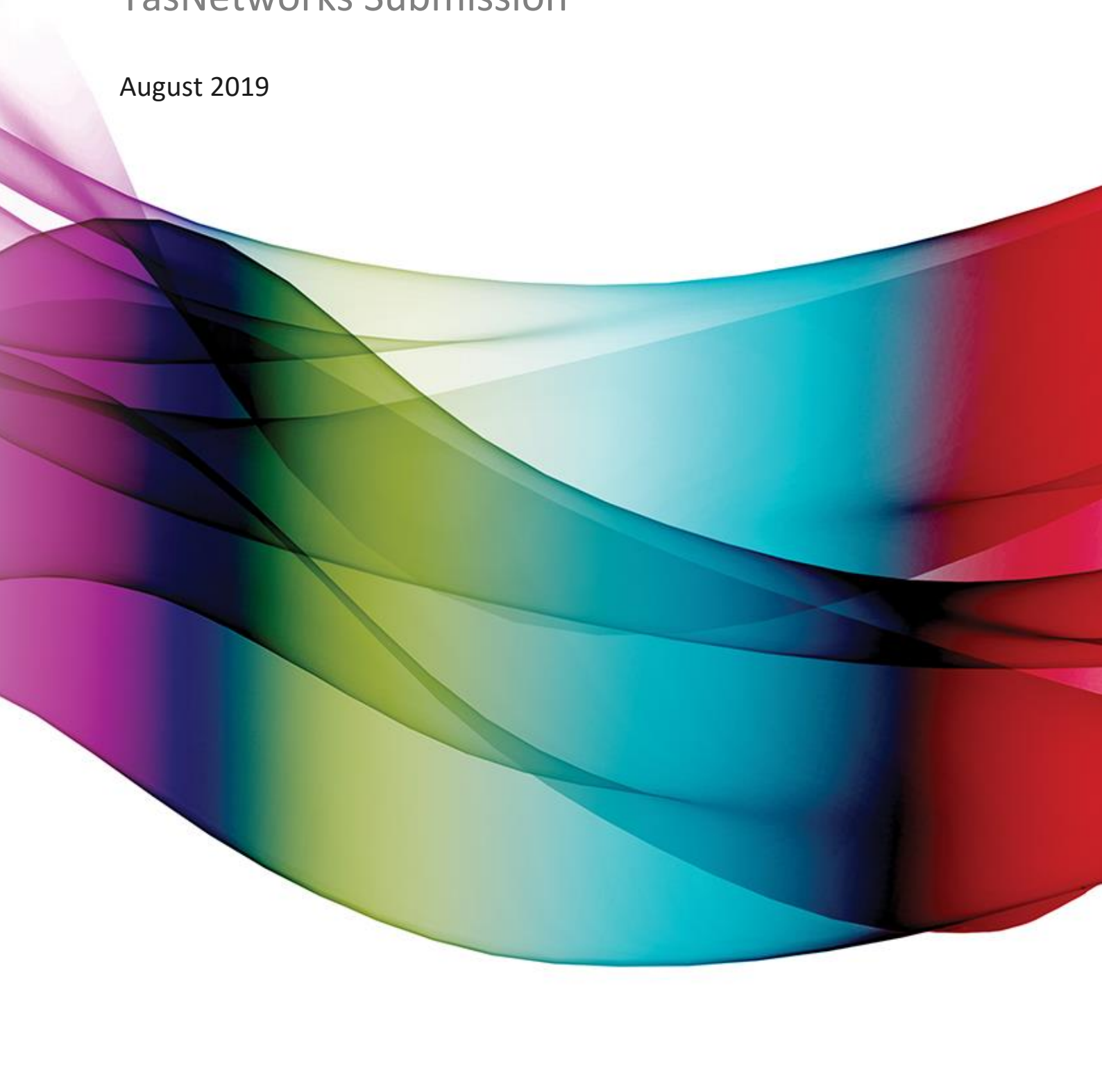
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Central Coast Council - Draft Local Provisions Schedule

TasNetworks Submission

August 2019

A large, abstract graphic at the bottom of the page consisting of overlapping, flowing, translucent shapes in a spectrum of colors including purple, blue, green, yellow, and red, creating a sense of movement and energy.

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1. Who is TasNetworks?

TasNetworks was formed on 1 July 2014, through a merger between Aurora Energy's distribution network (the poles and wires) and Transend Networks (the big towers and lines). We're a Tasmanian state-owned corporation that supplies power from the generation source to homes and businesses through a network of transmission towers, substations and powerlines.

Transmission

TasNetworks own, operate and maintain 3564 circuit kilometres of transmission lines and underground cables, 49 transmission substations and six switching stations across the state.

Distribution

TasNetworks own, operate and maintain 22,400km of distribution overhead lines and underground cables, 227,000 power poles, 18 large distribution substations and 33,000 small distribution substations. There's also 20,000 embedded generation and photovoltaic (PV) grid-connected installations connected to the distribution network.

Communications

TasNetworks own, operate and maintain communication network infrastructure to enable safe and efficient operation of the electricity system.

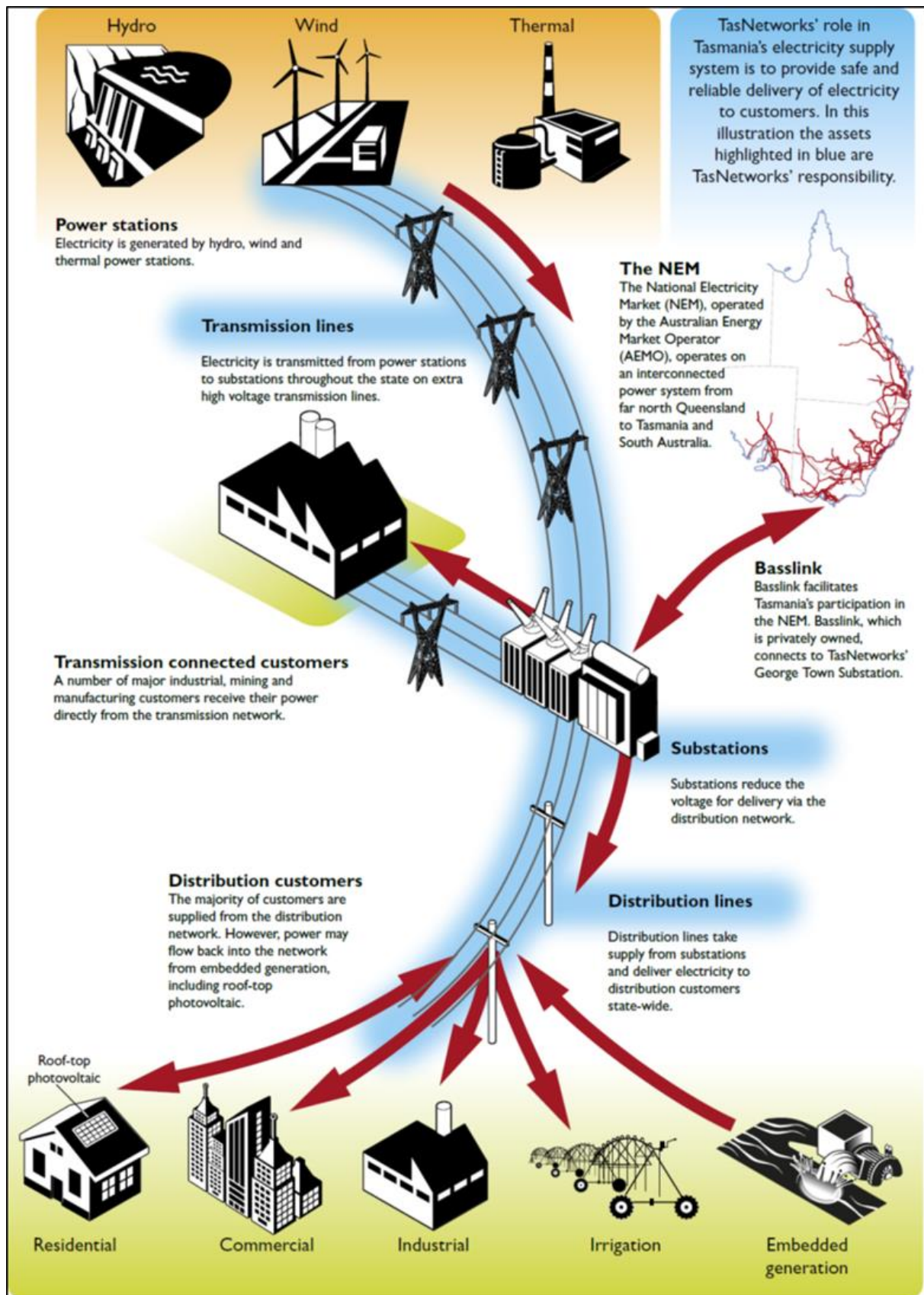


Figure 1 TasNetworks' Role in Tasmania's Electricity Supply System

2. Executive Summary

TasNetworks, as a referral agency, has been notified of the public exhibition of Central Coast Council's draft Local Provisions Schedule (LPS) under section 35B of the *Land Use Planning and Approvals Act 1993* (LUPAA). Council has been given direction by the Tasmanian Planning Commission to publicly exhibit the LPS and invite representations. TasNetworks has undertaken a review of the LPS and makes the following representation with a view of seeking a state-wide consistent approach to major electricity infrastructure.

TasNetworks assets within the Central Coast Local Government Area include one substation, four electricity transmission corridors and one communication facility. The communication facility is co-located with the substation.

Electricity transmission infrastructure is protected by the Electricity Transmission Infrastructure Protection Code (the Code) under the State Planning Provisions. The Code applies to transmission lines, terminal (or transmission) substations and switching stations and transmission communication assets. The Code purpose is:

- To protect use and development against hazards associated with proximity to electricity transmission infrastructure;
- To ensure that use and development near existing and future electricity transmission infrastructure does not adversely affect the safe and reliable operation of that infrastructure;
- To maintain future opportunities for electricity transmission infrastructure.

The LPS includes the ETIPC Overlay maps which is based on data provided by TasNetworks. As part of its review, TasNetworks has examined the ETIPC Overlay maps to ensure that it applies to all relevant assets and that the locations of these assets is correct.

The LPS also includes the spatial application of zoning and overlays via the mapping. In preparing this representation, TasNetworks has reviewed the LPS maps for each of its assets. This representation seeks to ensure:

- Utilities zoning is applied to existing substations and communication facilities;
- Impacts on the strategic benefits and development potential of existing corridors through the application of the Landscape Conservation Zone are mitigated;
- The Natural Asset Code – Priority Vegetation Overlay is not applied to part of a substation or communication site that is cleared of native vegetation.

These submissions are consistent with those previously made by TasNetworks on the draft Brighton LPS and the draft Meander Valley LPS as well as the State Planning Provisions and Interim Planning Schemes.

The LPS and the potential impact on future development has also been reviewed. These considerations include whether there is a permissible approval pathway for Utilities under the Particular Purpose Zones or Specific Area Plans; and any Local Area Objectives or Site

Specific Qualifications. TasNetworks representation is made having regard to the LPS requirements under LUPAA.

3. Overview

3.1. Glossary

The following table provides the definitions of the terms used throughout this submission.

Table 1 Definitions

Term	Definition
Commission	Tasmanian Planning Commission
Council	Central Coast Council
D	Discretionary
ESI exemption	Activities classified as ‘work of minor environmental impact’ for the purposes of Regulation 8 of the <i>Electricity Supply Industry Regulations 2008</i> .
ETC	Electricity Transmission Corridor
ETIPC	Electricity Transmission Infrastructure Protection Code
Guideline	<i>Guideline No. 1 – Local Provisions Schedule Zone and Code Application</i> (Tasmanian Planning Commission, 2018)
IPA	Inner Protection Area
IPS	Interim Planning Scheme
LGA	Local Government Area
LPS	Local Provision Schedule
NPR	No Permit Required
P	Permitted
SPP	State Planning Provisions
TPS	Tasmanian Planning Scheme
UWA	Unregistered Wayleave Agreement

3.2. Existing Assets

Central Coast LGA is located in TasNetworks North Western planning geographic area. An operationally significant part of the Tasmanian transmission electricity network is contained within the boundaries of the Central Coast LGA. These include:

- A number of transmission lines which:
 - o Provide critical power transfer from wind farms in the far north west via 220kV transmission lines between Burnie and Sheffield; and
 - o Transfer power to Ulverstone Substation via 110kV lines.
- Ulverstone Substation which has 110kV transmission assets and is the main 22kV distribution supply point for local customers in the Central Coast LGA; and
- A communication site used in operation of the transmission electricity network.

Notification and negotiation of work or changes in land use around these assets is critical for the safety and operation of the electricity network, the safety of people working on these assets and the general public whether living near or traversing the transmission network areas.

The following table and figure details TasNetworks' assets within the Central Coast LGA.

Table 2 TasNetworks Assets in Central Coast

Asset	Location
Substation sites (terminal)	1. Ulverstone Substation
Substation sites (zone)	None in this municipal area
Communication sites	1. Ulverstone Substation Communication Site
Electricity Transmission Corridors	1. Sheffield – Burnie 220kV (Line reference TL 504) 2. Sheffield – Burnie 110kV (Line reference TL 441) 3. Ulverstone Spur 110kV (Line reference TL 443) 4. UWA only (no physical assets)

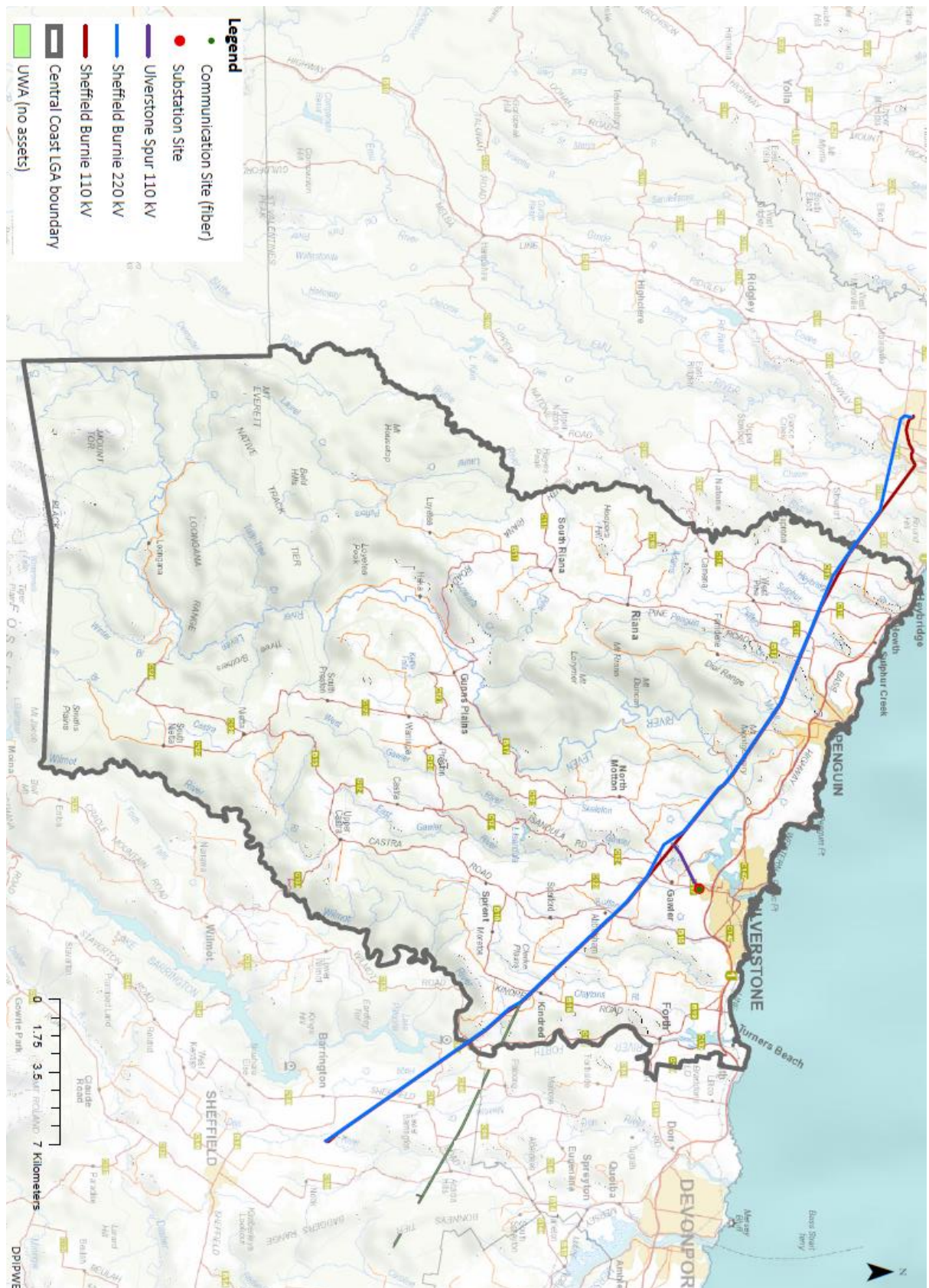


Figure 2 TasNetworks Assets within Central Coast LGA

3.3. Planned Future Development

As Tasmania's transmission and distribution network service provider, we have a responsibility to ensure the infrastructure to supply Tasmanians with electricity evolves to meet customer and network requirements in an optimal and sustainable way. We achieve this through our network planning process to ensure the most economic and technically acceptable solution is pursued.

The Australian Energy Market Operator (AEMO) has prepared an Integrated System Plan (ISP) that identifies a number of Renewable Energy Zones (REZ) in Tasmania¹. The REZs in Tasmania are North West, North East and Central.

Taking into account current connection applications, feasibility assessment activities underway for additional interconnection via Project Marinus, and building on AEMO's ISP, TasNetworks has prepared the North West Tasmania Strategic Transmission Plan (the North West Plan). The objective of the North West Plan is to produce a preliminary staged augmentation pathway that will facilitate the establishment of REZ's in the North West and Central areas to maximise the economic benefit to Tasmania. The plan is based on several assumptions, and produces a limited number of alternate staged plans to support flexible delivery. Figure 3 presents the Renewable Energy Zones in Tasmania.

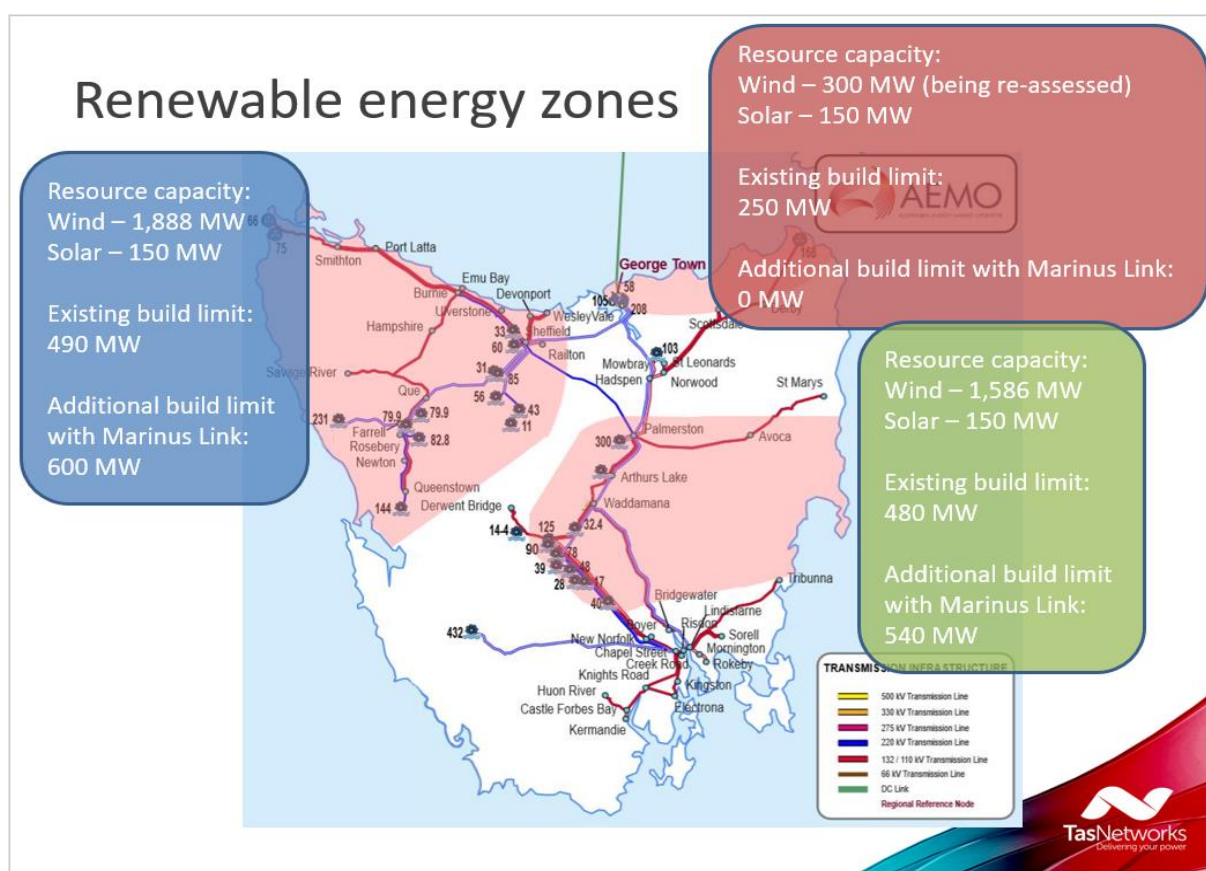


Figure 3 Renewable Energy Zones in Tasmania

¹ [Link to AEMO Integrated System Plan 2018](#)

Figure 4 illustrates the ultimate network that could be developed to support establishment of the REZ's in North West and Central Tasmania including additional generation and interconnection. You will note this could include activities in the Central Coast Municipal Area.

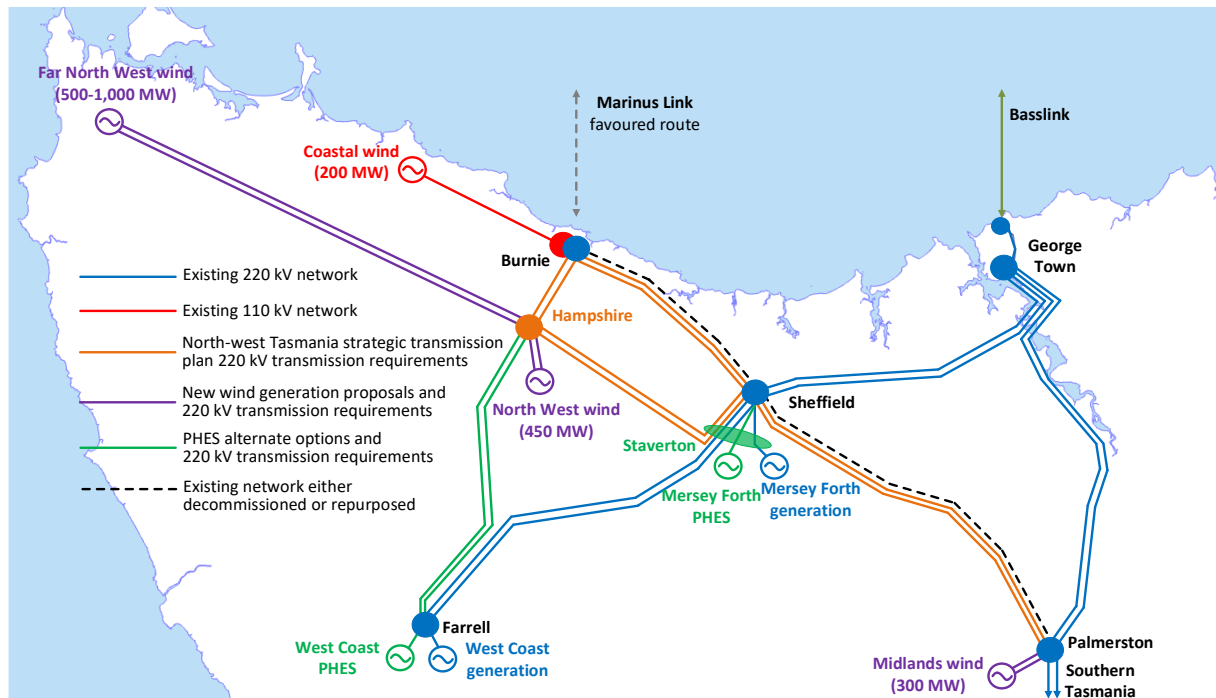


Figure 4 Extract from TasNetworks' Annual Planning Report² and the North West Plan.

Integrated more broadly into the network planning process is our [network transformation road map 2025](#). This ensures that what we do in the next 10 to 15 years facilitates an efficient and orderly transition of the network to its new roles in a changing energy sector. This includes consideration of impact of large scale wind farms, solar systems, pumped hydro (battery of the nation) batteries, electric vehicles, and a potential second inter connector. Given this context, it is important that the LPS provides for appropriate approval pathways for potential future TasNetworks development works.

² [Link to TasNetworks' Annual Planning Report 2019](#)

4. Submission

4.1. Overview

TasNetworks is seeking state-wide consistency across all LPSs in the treatment of its assets. TasNetworks policy position is summarised in Table 3 and is further detailed below.

Table 3 Policy Position – Submission Summary

LPS Mapping / Controls	Submission	Rationale
Zoning	- Substations (terminal and zone) to be zoned Utilities - Communication sites to be zoned Utilities where the communications facility is the primary use of the site	- Reflects the primary use of the site and the nature of the asset - Reflects the long asset lifespan - Utilities zone allows for the future operation, maintenance modification and development requirements of the asset (this is particularly important for communications sites as these do not enjoy any ESI Act exemptions once established) - Clear message to the community about the existing and long term use of the site.
	No specific zoning is to be applied to ETC	- Allows for other compatible uses to occur in corridor - Corridors are protected by ETIPC
	Landscape Conservation Zone (through LPS rezoning) is not applied to ETC	- Conflicts with the existing use of the land for electricity transmission - Diminishes strategic benefit of existing corridors making consideration of new corridors more likely - More onerous approvals pathway for augmentation of assets - Sends conflicting message to public regarding the ongoing use of the land
Natural Asset Code – Priority Vegetation Overlay	Not to be applied to - Substations or communication sites where the site is cleared of native vegetation	- Assets are required to be cleared for safety and maintenance - Clearing of vegetation is exempt under ESI Act - Where asset already exists impact on the natural assets have already been

LPS Mapping / Controls	Submission	Rationale
		assessed/ approved and will continue to be impacted for the lifespan of the asset - Supports strategic value of the site - Clear messaging to community regarding the use of the site.
Utilities Use Approval Status	In all zones, PPZ and SAPs the Use Class for Utilities and Minor Utilities must be either - No Permit Required, - Permitted or - Discretionary Utilities must not be Prohibited	The ability to consider Utilities Use Class in all zones is a requirement for the effective planning and development of linear utility infrastructure, which is required to be located in a range of areas and will be subject to multiple zonings.
SAPs	Not to apply to substations	To ensure that future development on these sites is not unreasonably affected by SAP.
PPZs or SAPs use and development standards	Are drafted with at least a discretionary approval pathway. For example: - No absolute height limit - Allow subdivision for utilities	- Consistent with policy in SPPs that enables consideration of Utilities in all zones and no finite quantitative development standards.
ETIPC	Is mapped and applied to relevant transmission infrastructure	Consistent with policy in SPPs

4.2. Zoning

This review has identified that the Ulverstone Substation and co-located communication site is partially zoned Utilities. The substation site is comprised of three individual titles, one of which is zoned Utilities. TasNetworks requests that the Utilities zoning be applied to all three titles that make up the Ulverstone Substation and co-located communication site. The area requested for Utilities zoning reflects the 'substation facility' identified in the Electricity Transmission Infrastructure Protection Code for the Ulverstone substation site.

No specific zoning, including the Landscape Conservation Zone, has been applied to the Electricity Transmission Corridors which is consistent with TasNetworks policy position.

4.3. Overlays – Natural Asset Code – Priority Vegetation Overlay

This review has identified that the Natural Asset Code – Priority Vegetation Overlay has not been applied to the Ulverstone Substation site. This is consistent with TasNetworks policy position. The following provides further context regarding vegetation clearance and TasNetworks exemption for future reference to Council.

The Priority Vegetation Overlay applies to threatened vegetation communities as identified by Council. It is understood that the values determined by council are based off the Regional Ecosystem Model and the data source is considered variable.

It is noted that under the *Electricity Supply Industry Act 1996* and associated *Electricity Supply Industry Regulations 2008* vegetation clearance for the safe and reliable operation of electricity infrastructure is classified as ‘work of minor environmental impact’ and as such, is not considered development for the purposes of LUPAA and is not subject to that Act in any way.

The SPP provides for vegetation clearance exemptions under Table 4.4. Relevant to TasNetworks this includes: Clause 4.4.1(b) *harvesting of timber or the clearing of trees, or the clearance and conversion of a threatened native vegetation community, on any land to enable the construction and maintenance of electricity infrastructure in accordance with the Forest Practices Regulations 2007*. TasNetworks also has agreement with Parks and Wildlife Services in relation to Reserve Activity Assessments – Electricity Entities Operation Plan. This Plan identifies works that do not require formal assessment and includes those that relate to existing infrastructure within the existing transmission infrastructure footprint.

4.4. Utilities Approval Status

The draft LPS may include provisions that modify the application of the SPPs to a particular area via the PPZ, SAP or site specific provisions. This review identifies that no such provisions apply to existing assets.

The LPS provisions have also been reviewed to assess the potential impact on future Utilities use and development. This review has identified some SAP provisions do impact on the approval pathways for Utilities infrastructure. TasNetworks submits that this is inconsistent with the SPPs, which provide for the permissible consideration of Utilities in all zones. Representation is therefore made to make amendments to allow for the permissible consideration of Utilities under the use, development and subdivision standards consistent with the SPP policy approach and the state-wide nature of TasNetworks’ assets. This is outlined in more detail below.

4.5. ETIPC

Transmission infrastructure assets are often protected within easements. These are not however always easily apparent to developers and land owners. The application of the ETIPC Overlay provides for the spatial protection of these assets and then the opportunity

for TasNetworks and developers to negotiate outcomes at the planning phase of a development. It also provides an opportunity to highlight the ongoing responsibilities associated with the easement.

TasNetworks has reviewed and is satisfied that the ETIPC Overlay mapping appropriate reflects TasNetworks assets within Central Coast LGA.

TasNetworks wishes to note that this review was undertaken based on PDF documentation. It is acknowledged that Council has no obligation to provide electronic mapping and Councils must prioritise their resource allocation in preparation of the LPS, given the linear and state wide nature of TasNetworks assets, web based interactive mapping would result in a more efficient and accurate assessment.

4.6. SPP Issues

Please note, this aspect of TasNetworks' representation should not be taken as a request to change or amend the SPPs. However, this information is provided to highlight fundamental land use conflict issues and unreasonable fettering of the development potential for existing electricity transmission corridors that could occur as each LPS implements the SPPs across the State.

4.6.1. Exemptions

In this representation, TasNetworks would like to highlight a failing in the SPPs that causes a fundamental conflict between existing electricity transmission easement rights and SPP Exemptions and will prevent implementation of the purpose of the ETIPC. This failing is resulting from not applying the Code, in particular, the Electricity Transmission Corridor (ETC) and Inner Protection Area (IPA) to certain exemptions that would:

- On almost every occasion, conflict with easement rights (and have the potential to impact human safety) and compromise the Purpose of the Code; and
- Unless managed appropriately, have the potential to conflict with easement rights (and have the potential to impact human safety) and the Purpose of the Code.

Where the Code does not apply, easement rights still exist but can only be enforced once a breach has occurred or (at best) is imminent. This can result in a costly process of removal or relocation and in the interim, could pose a safety risk. When the Code applies, it provides developers, Council and TasNetworks an opportunity to avoid or manage this issue early in the application process. See Appendix 1 for benefits that can be realised by considering electricity transmission assets in the planning process and conflict examples.

4.6.2. Scenic Protection Code

Whilst the Scenic Protection Code has not been utilised within the draft Central Coast LPS, it has been applied in the Meander Valley LGA and could be applied in other Municipal areas as a result of the LPS process.

The Scenic Protection Code does not apply to sites in the Utilities Zone. As a result, assuming a Utilities zoning, TasNetworks' substations are not subject to the application of this Code, thus supporting the continued and consolidated use and development of these sites for electricity infrastructure.

TasNetworks' recognises that the Council may wish to regulate other activities in the Electricity Transmission Corridor that could impact on scenic values. However, application of the Scenic Protection Code to new electricity transmission use and development within an existing electricity transmission corridor has a number of impacts:

- unreasonably diminishes the strategic benefit of the ETC;
- devalues the substantial investment already made in the establishment of these corridors;
- imposes unreasonable development standards relating to scenic protection to electricity transmission use and development in an existing electricity transmission corridor;
- conflicts with the purpose of the ETIPC.

If the Scenic Protection Code in the SPPs were amended to ensure that, where this Code intersects with an ETC, it does not apply to electricity transmission use and development in that ETC, these impacts could be largely mitigated. This approach recognises the presence of this substantial electricity infrastructure:

- its place in a broader state-wide network that is essential to the safe and reliable provision of electricity to Tasmania (as recognised in the Regional Land Use Strategy);
- implements the purpose of the ETIPC;
- facilitates continued use or augmentation of existing corridors and ensures that future development (that is not otherwise exempt) can be efficiently provided.

The purpose of the Scenic Protection Code is to recognise and protect landscapes that are identified as important for their scenic values. In accordance with the Commission's Guidelines the Code is applied where: *SPC2 The scenic protection area overlay and the scenic road corridor overlay should be justified as having significant scenic values requiring protection from inappropriate development that would or may diminish those values.*

The ETIPC Code Purpose is to:

- *To protect use and development against hazards associated with proximity to electricity transmission infrastructure.*
- *To ensure that use and development near existing and future electricity transmission infrastructure does not adversely affect the safe and reliable operation of that infrastructure.*
- *To maintain future opportunities for electricity transmission infrastructure.*

The application of the Scenic Protection Code to electricity transmission use and development in an ETC is inconsistent with the ETIPC purpose to retain electricity

transmission infrastructure in these locations and to maintain future development opportunities.

For works that do not have the benefit of ESI exemptions, it would be difficult to comply with the Scenic Protection Code standards. Further, these assets form part of a wider network that is essential to the safe and reliable provision of electricity to Tasmania which is recognised in the regional land use strategy.

Please note that these issues have been previously raised and discussed with Meander Valley Council and the Commissioners throughout the draft Meander Valley LPS process.

5. Amendments by Asset

5.1. Ulverstone Substation

The Ulverstone Substation is located at 56 Gawler Road, Ulverstone and is the only substation within the Central Coast LGA. The substation site includes 110kV transmission assets and is the main 22kV distribution supply point for local customers within Central Coast LGA.

The site is comprised of three titles all of which are owned by TasNetworks. These are known as Certificate of Title 123004 Folio 1; Certificate of Title 13262 Folio 12 and Certificate of Title 13262 Folio 13.

The following figure is an extract from the TPS – Draft Central Coast LPS – Zones Mapping (Map 8 of 21). The Zones Mapping identifies one of the three titles associated with the Ulverstone Substation site as being within the Utilities Zone. All three titles make up the Ulverstone Substation site and the site in its entirety is required to be zoned Utilities to preserve the strategic benefit of the substation and to reflect the primary purpose of the site. Further, it is noted that the ETIPC identifies all three titles as being part of the Substation facility for this site.

TasNetworks therefore requests that the Draft LPS Zones Mapping be amended to apply the Utilities zoning to all three titles that make up the Ulverstone Substation site.

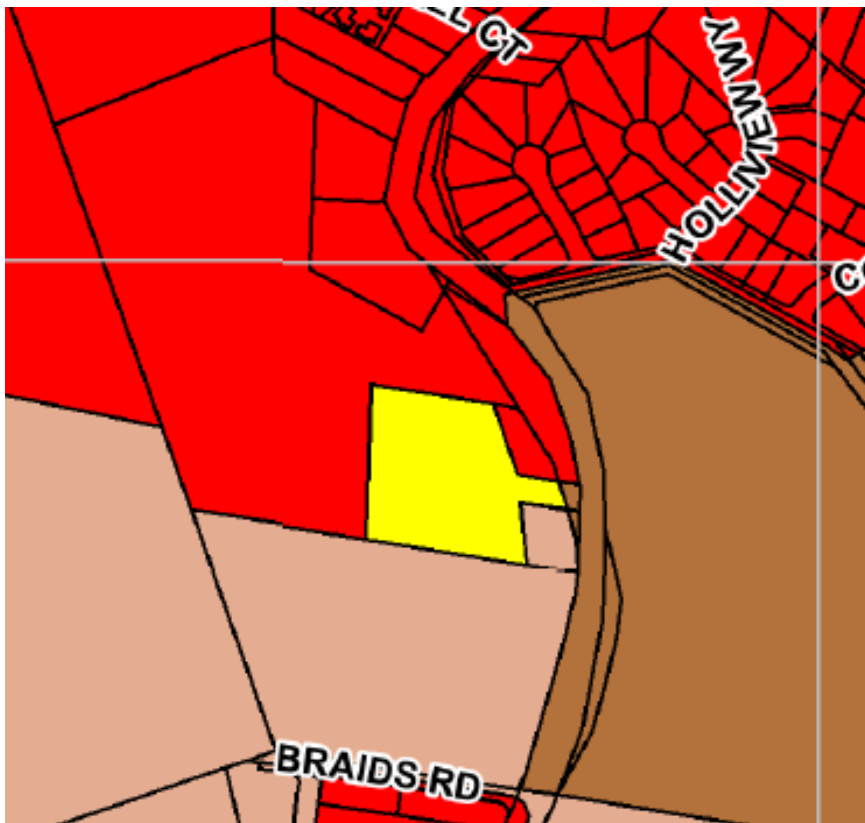


Figure 5 LPS Mapping Zoning of Ulverstone Substation

The following table provides an overview of the TPS – Draft Central Coast LPS – Code Overlay Maps with regard to the Ulverstone Substation site.

Table 4 Ulverstone Substation – Overlay Maps

Code	Applied to Ulverstone Substation (Y/N)	Map Reference
Parking Precinct Plan	N	-
Electricity Transmission Infrastructure	Y	Map 2 of 7
Natural Assets – Priority Vegetation Area	N	Map 8 of 21
Coastal Erosion Hazard	N	Map 10 of 10
Coastal Inundation Hazard	N	Map 10 of 10
Flood-Prone Areas	N	Map 1
Bushfire-Prone Areas	Y	Map 8 of 21
Landslip Hazard	Y	Map 8 of 21

As detailed above the Electricity Transmission Infrastructure Mapping (Map 2 of 7) has been applied to the Ulverstone Substation site. An extract of this map is shown in the following figure. The mapping appropriately identifies the Ulverstone Substation site, in its entirety, within the Substation Facility (brown) and the Substation Facility Buffer Area (brown hatching) overlays. TasNetworks is supportive of this mapping with relation to the substation site.

Having said this, the Electricity Transmission Corridor (ETC) and the Inner Protection Area (IPA) in relation to the Substation Facility and Substation Facility Buffer Area overlays are not appropriately detailed. The ETC and IPA must be shown in their entirety. TasNetworks requests that the interactive mapping includes independent mechanisms that identify each overlay in their entirety independently. That is, the mapping identifies the extent of the IPA, ETC as well as the Substation Facility and Substation Facility Buffer Area. This request is consistent with the TPC issued Guideline No. 1 Local Provisions Schedule: zone and code application.

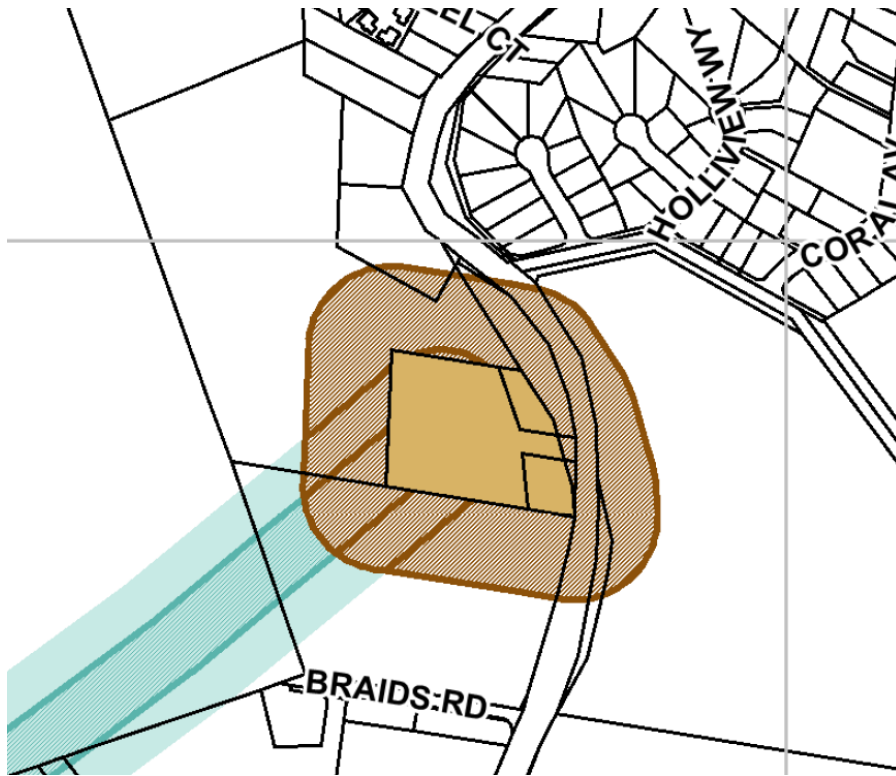


Figure 6 LPS Mapping – Electricity Transmission Infrastructure: Ulverstone Substation

Table 5 and Table 6 provide an overview assessment of the proposed LPS planning controls applied to the site against the TasNetworks planning policy position with respect to substations. This identifies that an amendment is required to appropriately reflect the zoning and overlays associated with the site.

Table 5 Substation Policy Position Summary

Zoning	Overlay	ETIPC	SAP / PPZ
Zoned Utilities	Priority Vegetation - Not applied where the site is cleared of native vegetation	Applied	Not applied or - Utilities use is NPR, P or D. - No finite discretionary development standards

Table 6 Substation Assessment Overview

Asset	Consistent with zone policy (Y/N)	Consistent with code (Overlay) policy (Y/N)	Amendment Required (Y/N)	Amendment Request
1. Ulverstone Substation	N	N	Y	- Amend zoning map to apply Utilities zoning to entire site. - Amend ETIPC to identify all overlays independently.

5.2. Communication sites

Communication between power generators and TasNetworks control room is required to enable safe and reliable operation of the electricity transmission network in Tasmania.

There is one TasNetworks operated communication site within the Central Coast LGA. This communication site is co-located with the Ulverstone Substation at 56 Gawler Road, Ulverstone. As the communication site is connected via fibre rather than microwave transmission, the Electricity Transmission Infrastructure Protection Code – Communication Station Buffer is not required. This is reflected in the LPS mapping.

The following tables provide an overview assessment of the proposed LPS planning controls applied to the communication facility against the TasNetworks communication site policy. TasNetworks is supportive of how the LPS considers the communication site.

Table 7 Communication Site Policy Position Summary

Zoning	Overlay	ETIPC	SAP / PPZ
Communication sites to be zoned Utilities	Priority Vegetation Overlay - Not applied where the site is cleared of native vegetation	Applied to transmission communication backbone sites	Not applied; or - Utilities use is NPR, P or D. - No finite discretionary development standards

Table 8 Communication Site Assessment Overview

Asset	Consistent with zone policy (Y/N)	Consistent with code (Overlay) policy (Y/N)	Amendment Required (Y/N)
1. Ulverstone Substation Communication Site	Y	Y	N

5.3. Electricity Transmission Corridors

There are four electricity transmission corridors that extend through the Central Coast LGA. These include:

- The Sheffield – Burnie 220kV;
- The Sheffield – Burnie 110kV;
- The Ulverstone Spur 110kV; and
- A UWA only (no physical assets).

These corridors are identified in the following figure and are located within Inner Protection Area and Electricity Transmission Corridor of the TPS – Draft Central Coast LPS – Code Overlay Maps - Electricity Transmission Infrastructure Maps 1-7. This mapping is supported by TasNetworks.

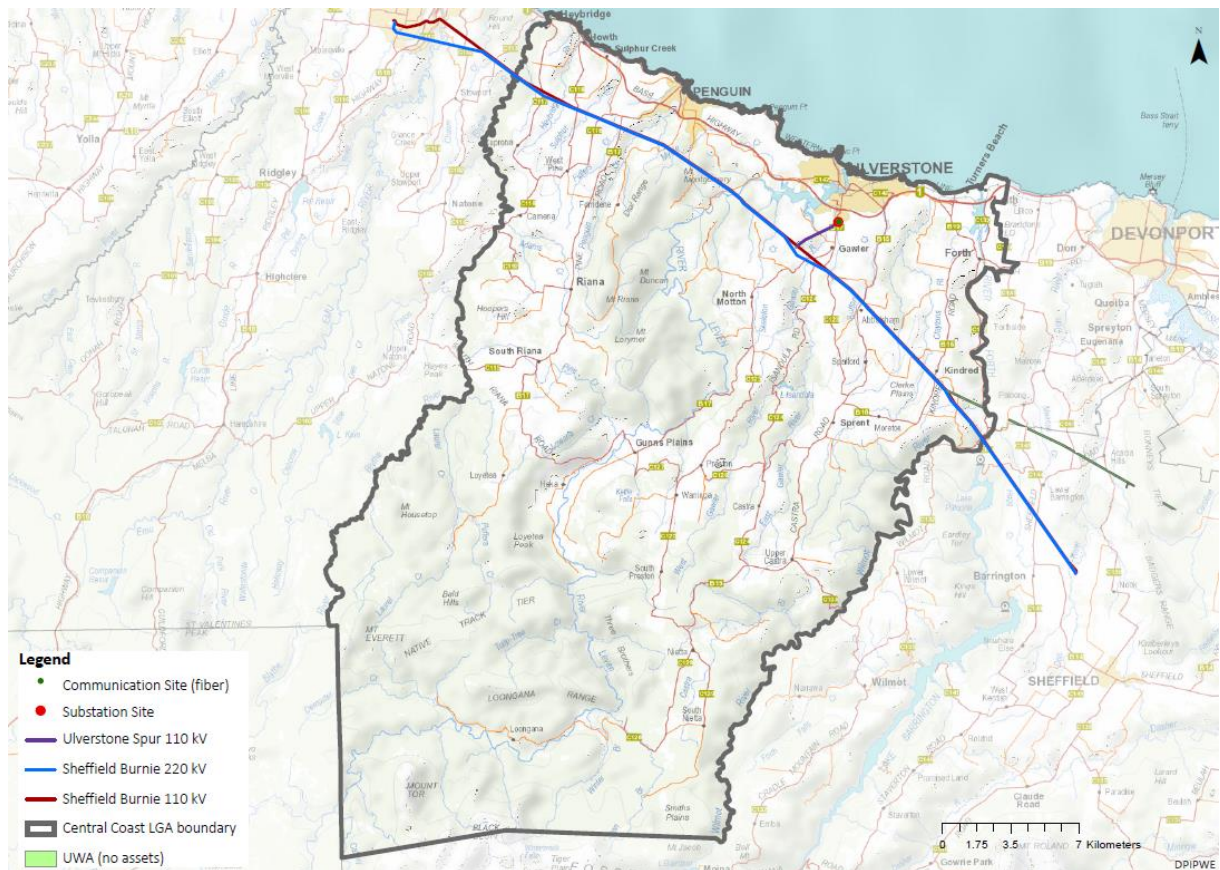


Figure 7 Electricity Transmission Infrastructure within Central Coast LGA

There are a range of zones applied to the land underneath these corridors and as the SPP allows for consideration Utilities in all zones this is acceptable to TasNetworks.

The introduction of the Landscape Conservation Zone in the SPPs has caused a number of unforeseen issues for TasNetworks. Primarily the Landscape Conservation Zone – Zone Purpose is *to provide for the protection, conservation and management of landscape values*. This is considered to conflict with the Purpose of the ETIPC which is to *maintain future opportunities for electricity transmission infrastructure*. It is noted that the Landscape Conservation Zone has not been applied to any of TasNetworks corridors in the Central Coast LGA. This is supported by TasNetworks.

It is noted that the Scenic Management Code was not implemented in the LPS.

Table 9 Electricity Transmission Corridor Policy Position Summary

Zoning	Overlay	ETIPC	SAP / PPZ
- No specific zoning applied to ETC; - Landscape Conservation Zone not applied to ETC	Scenic Protection Code not applied to ETC	Applied	Not applied or - Utilities use is NPR, P or D. - No finite discretionary development standards

Table 10 Electricity Transmission Corridor Assessment Overview

Asset	Consistent with zone policy (Y/N)	Consistent with code (Overlay) policy (Y/N)	Amendment Required (Y/N)
1. Sheffield – Burnie 220kV	Y	Y	N
2. Sheffield – Burnie 110kV	Y	Y	N
3. Ulverstone Spur 110kV	Y	Y	N
4. UWA	Y	Y	N

5.4. Particular Purpose Zones and Specific Area Plans

The following table provides an overview of TasNetworks policy position regarding Particular Purpose Zones (PPZ) and Specific Area Plans (SAP).

The LPS includes five Specific Area Plans. None of which are applied to any of TasNetworks corridors or the Ulverstone Substation site. This is supported by TasNetworks.

It is noted that the LPS does not include the use of Particular Purpose Zones.

Table 11 PPZ and SAP Policy Position Summary

Application	Policy
Use Standards in PPZ or SAP	- Use Class for Utilities or Minor Utilities must be either NPR, P or D. Must not be Prohibited - Use standards must include Utilities as an excluded use (e.g. hours of operation)
Development Standards in PPZ or SAP	- Are not drafted without a discretionary approval pathway (e.g. not include an absolute height limit) - Allow subdivision for Utilities use in all zones

The following provides an assessment of the SAPs within the LPS. Amendments are sort for four out of the five SAPs to allow for utilities development pathway and compatibility with SPP drafting guidelines.

It is acknowledged that the LPS seeks to transition four the five SAPs through Schedule 6. TasNetworks seek to discuss the implications associated with the direct transition of the SAPs further with the TPC and Council.

Table 12 SAP Assessment Overview

Instrument	Clause	Amendment
S1.0 Forth SAP	1.5 Use Table	Use Table to include Utilities as a Discretionary Use
S2.0 Leith SAP	No comment	

Instrument	Clause	Amendment
S3.0 Penguin SAP	3.7.1 Building design	P1 Building height must: (a)... (c) <i>Except if required for Utilities</i>, be not more than 10m
S4.0 Revell Lane SAP	4.8.1 Lot size	A1 Each lot, or a lot proposed on a plan of subdivision, <i>excluding for public open space, a riparian or littoral reserve or Utilities</i>, must...
S5.0 Turners Beach SAP	5.7.1 Setbacks and building envelope for all buildings	P2.2 Building height... (a)... (g)... and, <i>except if required for Utilities</i>, is not more than 7.5m

6. Appendix

6.1. Appendix 1 SPP Issues

Benefits of considering electricity transmission assets in the planning process for new development

The following benefits can be realised if impact on electricity transmission assets are considered in the planning process. (See Table 1 for the list of relevant exemptions):

- Removes the incorrect perception that buildings and other works exempt under the SPPs can safely occur in a transmission line or underground cable easements without the need to consider asset easement rights or operational requirements.
- Empowers the Planning Authority to request further information, condition or refuse a development that conflict with the Code requirements and Purposes.
- Saves developers, Councils, TasNetworks and the community time, cost and distress associated with easement right enforcement after a building, structure or other works have either commenced construction or have been built.
- Reflects the reality with respect to what can and cannot safely occur in an electricity easement.
- Saves developers project delay and cost required as a result of reworking proposals to ensure easement rights are not compromised later in the process.
- Increases the chances of considering the impact of new development on electricity assets early in the planning assessment process, before significant expenditure on project preparation has occurred.
- Prevents land use conflict between existing critical electricity transmission assets and new development.
- Protects human safety.
- Aligns the planning considerations and electricity easement rights.
- Avoids increased acquisition or construction cost for future assets as a result of encroachment (eg: dwelling encroachments within strategically beneficial easements may not cause operational issues for existing assets. However, dwelling acquisition and increased community and social impact of processes required to remove dwellings in the easement if it is required later can be avoided if encroachment is prevented in the first place.
- Supports compliance with AS 7000.

- The strategic benefit of existing electricity easements and the strategic purpose of the Code is preserved.

Conflict Examples

Table 1 presents examples of exempt development where TasNetworks believes conflict with easement rights can occur.

Colour coding indicates the following:

Conflicts with easement rights and may be capable of management to ensure appropriate alignment with easement rights.

Conflicts with easement rights. In almost all cases, this exemption will pose a safety and operational hazard for overhead and underground transmission lines and cables.

Table 1 Exemptions and land use conflict with electricity transmission assets

SPP exemption	Comment
4.3.6 unroofed decks	If not attached to a house and floor level is less than 1m above ground level. A deck of this nature can pose an impediment to safe access and due to other exemptions can be roofed without further assessment which is in conflict with easement rights and could compromise safety. A deck over the operational area required for an underground cable would always be unacceptable.
4.3.7 outbuildings	One shed: up to 18m², roof span 3m, height 2.4m, fill of up to 0.5m. Up to two shed: 10m², sides 3.2m, height 2.4m. Similar to PD1. This type of building almost always poses a safety and operational hazard for transmission lines, cables and human safety. This type of building over the operational area required for an underground cable always poses an unacceptable safety risk.
4.3.8 outbuildings in Rural Living Zone, Rural Zone or Agriculture Zone	4.3.8 Provides for an unlimited number of outbuilding per lot as follows:

SPP exemption	Comment
4.3.9 agricultural buildings and works in the Rural Zone or Agriculture Zone	Floor area 108m², height 6m, wall height 4m. Already subject to the Local Historic Heritage Code. Slightly broader than PD1. 4.3.9 New and broader than PD1 exemptions. Provides for unlimited number of outbuilding per lot as follows: Must be for agricultural use, floor area 200m², height 12m. Already subject to the Local Historic Heritage Code and the Scenic Protection Code. TN COMMENT: These exemptions create a new and potentially more dangerous conflict with electricity transmission lines and cables where a larger and higher building can be constructed in an electricity transmission easement without the need for planning approval. Buildings of this nature can severely impede TasNetworks' ability to safely access, operate and maintain electricity transmission lines. If built, these buildings could also present a threat to human safety. As a result, in almost all cases, if built, buildings covered by these exemptions would necessitate the enforcement of easement rights, either during or after construction and after the planning and building (exemption), process has occurred. This will likely mean relocating the proposal, a further planning assessment and added cost and time to a development. The nature of electricity transmission line assets (ie: running from isolated generation locations into populated areas) means the zones mentioned in this exemption are almost certain to contain (and appropriately so) electricity transmission assets. The cost of removing substantial agricultural buildings from easements required for new assets also adds to future asset construction costs.

SPP exemption	Comment
4.3.11 garden structures	Unlimited number, 20m², 3m height max. Already subject to the Local Historic Heritage Code. If not managed appropriately, this type of structure has the potential to compromise clearances and the safe and reliable operation of transmission lines and underground cables. Depending on location within an easement, could also present a threat to human safety. Cost of removal is limited, however still requires post breach enforcement of easement rights.
4.5.1 ground mounted solar energy installations	Each installation can be 18m² area. Already subject to the Local Historic Heritage Code. This type of activity has the potential to compromise clearances or adversely impact easement access (especially during emergency repair conditions).
4.5.2 roof mounted solar energy installations	Already subject to the Local Historic Heritage Code. This would likely only apply to existing buildings within easements. Encroachment is likely existing, however, this exemption has the potential to compromise clearances in what may be a compliant situation.
4.6.8 retaining walls	4.6.8 Allows for retaining 1m difference in ground level. This exemption is already subject to the Local Historic Heritage Code and the Landslip Hazard Code. Reflects what was in PD1.
4.6.9 land filling	
	4.6.9 Allows for filling of up to 1m above ground level. This exemption is already subject to the Natural Assets Code, Coastal Erosion Hazard Code, Coastal Inundation Hazard Code, Flood-Prone Areas Hazard Code and Landslip Hazard Code. Reflects what was in PD1. TN COMMENT: This type of activity has the potential to compromise ground clearances for existing transmission lines and safe operational separation for underground transmission cables. Subject to appropriate management, this type of activity can usually occur within transmission line easements, however, may pose a more challenging risk for underground cables.

SPP exemption	Comment
4.6.13 rain-water tanks	Rainwater, hot water & air conditioner exemptions with the 1.2m stand were already included in PD1 and were carried through to the draft and finalised SPPs. This was one exemption in the draft SPPs and was modified by the Commission into four exemptions. TasNetworks requested the original exemption be subject to the Code. 4.6.13: attached or located to the side or rear of a building and can be on a stand height 1.2m high. Subject to the Local Historic Heritage Code. 4.6.14 attached or located to the side or rear of a building with no height limit. Subject to the Local Historic Heritage Code. 4.6.15 no height limit, no requirement is be located near a building. Limited when storage of hazardous chemicals is of a manifest quantity and Coastal Erosion Hazard Code, Coastal Inundation Hazard Code, Flood-Prone Areas Hazard Code, Bushfire-Prone Areas Code or Landslip Hazard Code, applies and requires a permit for the use or development. 4.6.16 must be attached or located to the side or rear of a building, max 1kL capacity, on a stand up to 1.2m high and subject to the Local Historic Heritage Code. TN COMMENT: These exemptions allow for water tanks on stands and some have no height limit. These developments have the potential to compromise access to the easement, compromise ground clearances for existing transmission lines and safe operational separation for underground transmission cables. Depending on location in the easement, these developments could pose a threat to human safety. Subject to appropriate management, this type of activity may occur within transmission line easements, however, may pose a more challenging risk for underground cables.
4.6.14 rain-water tanks in Rural Living Zone, Rural Zone, Agriculture Zone or Landscape Conservation Zone	
4.6.15 fuel tanks in the Light Industrial Zone, General Industrial Zone, Rural Zone, Agriculture Zone or Port and Marine Zone	
4.6.16 fuel tanks in other zones	