

From: "Caroline Lindus" <caroline@eraplanning.com.au>
Sent: Tue, 3 May 2022 12:41:04 +1000
To: "Council" <council@warwyn.tas.gov.au>
Cc: "1920-099 Guildford and Hellyer Wind Farms" <1920-099guildfordhellyerwindfarms@eraplanning.com.au>
Subject: Representation to Waratah Wynyard draft LPS
Attachments: Letter_Submission to WWC LPS re Guildford_final.pdf

Good afternoon,
Please find attached a submission on behalf of our clients, Epuron, to the exhibition of the Waratah Wynyard draft LPS.

Regards,

Caroline



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PRINCIPAL PLANNER AND
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We acknowledge and respect Tasmanian Aboriginal people as the Traditional Owners of lutruwita/Tasmania. They are the original custodians of our land and waters. We respect their unique ability to care for country and deep spiritual connection to it. We honour Elders past, present and emerging whose knowledge and wisdom has and will ensure the continuation of culture and traditional practices.

3 May 2022

General Manager
Waratah Wynyard Council
PO Box 168
WYNYARD TAS 7325

By email: council@warwyn.tas.gov.au

Dear Sir/Madam,

**GUILDFORD DEVELOPMENT SITE
WARATAH WYNYARD LOCAL PROVISIONS SCHEDULE**

ERA Planning and Environment act for Epuron in relation to the development of a wind farm in the broader Guildford region. This area is currently used for a range of uses, predominantly forestry but also some recreational uses (such as Talbots Lagoon) and transport uses including a rail line.

In early 2021 ERA obtained a permit for a Meteorological mast at a site north of Talbots lagoon to assess suitability of the broader area for a future wind farm development. Work is continuing on a potential wind farm at this general location, and to that end, consideration is given to the proposed zonings of the land in question to ensure that they are consistent with the existing and future preferred uses of the area.

The existing zoning of this land is Rural Resource predominantly, with some land zoned Utilities which covers the Ridgley Highway, and the Melba train line. It is pleasing to note that the Local Provisions Schedule will continue to zone this land Rural, with a similar application of the Utilities zone.

It is noted however that the site currently doesn't include the waterway and coastal protection overlay, or the biodiversity protection overlay; however under the LPS, the Natural Assets Code will apply in the form of the waterway and coastal protection area, and priority vegetation area.

While the forestry operations that occur on site will meet the exemption requirements under C7.4.1, the application of these overlays, on parcels of land that are highly modified as working forestry coupes, will result in additional unnecessary controls. The priority vegetation overlay is considerably more extensive than the threatened vegetation communities as mapped on the LIST, and appears to be applied across all native vegetation, irrelevant of its status.

We appreciate that the regional ecosystem mapping project may have been utilised to assist in the mapping of the priority vegetation. However, its broad application, and in an area which is dominated by forestry uses, in our opinion serves to diminish the value of the overlay. We accept a desire to protect significant vegetation values such as known threatened vegetation communities; however it is our view that the application of the priority vegetation overlay should be restricted to those values only.

Under the Section 8a Guideline No. 1; the priority vegetation area overlay must include threatened native vegetation communities as identified in TASVEG Version 3 mapping, as published on the DPIPWE website and available on the LIST. Similarly, land containing threatened flora species and the immediately surrounding area can be included based on the Natural Values Atlas. Beyond this application the Guidelines indicate that other areas to be included should be

based on field verification, analysis or mapping, undertaken by or on behalf of the planning authority. Similarly, if there are areas of local importance that should be included, this should also be based on field verification, analysis or mapping. There is no supporting documentation to suggest that field verification, analysis or mapping has been undertaken by the planning authority to support the inclusion of all native vegetation in these areas.

The waterway and coastal protection area is applied to the myriad of creeks and rivulets that run across the site. It is noteworthy that this overlay doesn't currently apply to the watercourses on site and under the LPS, will result in additional standards against which developments will need to be assessed. However, it is accepted this is common practice and is not disputed.

It is noted that the landslide hazard code applies to the site under both the Interim Scheme and the LPS and no concerns are raised in regard to this overlay.

ERA welcome further discussion regarding the potential impacts of the transition from the Interim Scheme to the LPS and the impact on future developments at the Guildford site.

Yours sincerely,



Caroline Lindus
Principal Planner