
From: Jacqui Blowfield <jacqui@ireneinc.com.au>
Sent: Monday, 24 October 2022 4:41 PM
To: TPC Enquiry
Subject: Central Highlands draft Local Provisions Schedule
Attachments: Response Submission - CH LPS - Ireneinc obo NTAG.pdf

Response submission attached

Regards
Jacqui Blowfield
SENIOR PLANNER

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24 October 2022

Claire Hynes
Delegate (Chair)
Tasmanian Planning Commission

By email: tpc@planning.tas.gov.au

Dear Ms Hynes

**RESPONSE SUBMISSION - CENTRAL HIGHLANDS DRAFT LPS
ZONING LIAWENEE, TODS CORNER, ST PATRICKS PLAINS**

I write in accordance with the TPC directions dated 28 September 2022 to provide a response in relation to the submission by ERA on behalf of Epuron/Korea Zinc and landowners (available on the TPC website 17 October 2022).

As background, Ireneinc made a representation (number 36) on 22 October 21 during the public exhibition, we subsequently provided additional submissions (13 September 2022), in accordance with TPC directions prior to the hearings. Both the original representation and the subsequent further submission related to the appropriate zoning for the Central Plateau, identified in the draft LPS as Agriculture, proposing Landscape Conservation Zone rather than Agriculture Zone and provides background information and reasons for this conclusion.

ERA response indicates:

- ERA represents wind farm interests - i.e. a wind farm developer (Epuron/Korea Zinc) and six windfarm host landholders of the broader St Patricks Plains area. It is noted ERA also has an interest in wind farm developments being a consultant to ReCFIT who is responsible for roll out of wind farms in Tasmania.
- ERA have indicated opposition to Landscape Conservation Zone at St Patricks Plains but have made no submission regarding Liawenee and Tods Corner.
- ERA have indicated Landscape Conservation Zone as being not appropriate as follows:

NTAG has no legal ownership, or business interest, the submission has *“been entirely submitted as a basis to try and stop the development of windfarms at this site”, and “attempt to try and use the zoning as a tool to limit further development on the site.”*

“No clear evidence has been given as to why this (Landscape Conservation Zoning) would be considered appropriate or necessary.”

“Unclear exactly the extent to which it (Landscape Conservation) should be applied.”

It is not based on broader consideration of Landscape Conservation Zone in the broader municipality.

Sustainable Timbers Tasmania land should not be zoned Landscape Conservation.

The land does not meet the purpose statement and application guidelines for Landscape Conservation Zoning.

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Landscape Conservation Zone is not consistent with the current rural resource use. The zoning will impact on current agricultural operations and limit some types of resource development.

The proposed Landscape Conservation Zone area at St Patricks Plains has transmission line utilities, the Highlands Power Trail and historic hydro infrastructure on the site; and is inconsistent with the zone application guidelines because broad areas of “untouched bushland” is required.

We disagree with the above and provide the following by way of clarification:

NTAG OWNERSHIP OR INTEREST

We submit that the community more broadly, as well as neighbours from the area, have a legitimate interest in the area. Natural justice requires such views be considered. Forty-five representations were received on the draft LPS and of these scenic and landscape protection was an issue in a third of them.

NTAG are a community organisation who represent the views of a considerable number of people, attached to this submission are letters of support for NTAG’s position from locals and the broader Tasmanian community, obtained by a handful of people in only 1½ weeks and containing 110 signatures.

Our submissions in relation to the zone have not been focused on a particular proposal for a windfarm but rather are about ensuring a unique landscape has appropriate planning controls for developments in these important areas. This is demonstrated in that our representation and submission have not proposed Landscape Conservation Zone over the entire wind farm area. The Bowden holdings (241119/1; 148905/2; and 148905/1) is not part of the suggested Landscape Conservation Zone area (has twenty turbines planned by Korea Zinc/Epuron on lot 241119/1).

EVIDENCE FOR LANDSCAPE CONSERVATION ZONE

Our original representation (36, dated 22 October 2021) includes documentation by two independent experts on the biodiversity values of areas proposed for Agriculture Zoning including St Patricks Plains as well as Liawenee and Tods Corner. For example Bell identifies eight threatened species (of which six are nationally threatened) and 16 rare species requiring assessment (12 of which have less than 5 known records). Sympathetic management of habitat is essential for the conservation and viability of a number of species in the area.

In addition, the scenic values of the area are identified and well documented in Representation 35. Epuron/Korea Zinc itself says the *“visual impact is a key social impact associated with the proposed wind farm. Given the elevation of the proposed site, and the length of the blades, the turbines will be highly visible and have the potential to impact the visual amenity of the area.”*¹

Mapping of Threatened Native Vegetation Communities and records of significant threatened species are outlined in both representation and further submission.

THE EXTENT TO WHICH LANDSCAPE CONSERVATION ZONE SHOULD APPLIED

The 2021 representation indicated the general areas at Liawenee, Tods Corner and St Patricks Plains that were suggested as being appropriate for consideration of the Landscape Conservation Zone. The additional September 2022 submission included mapped information on the lots that we were specifically recommending as being appropriate, precise lot information can be provided required.

Forestry resource land is excluded from the lots identified, including mapped Permanent Timber Production Zone land, Future Potential Production Forest (Crown), Future Potential Production Forest

¹ Notice of Intent St Patricks Plains Wind farm, Epuron 2019 p9

(HES), along with areas of ERA clients titles which did not meet the criteria we had identified for the Landscape Conservation Zone.

LPS ZONING GUIDELINES AND ZONE PURPOSE

The area is a natural alpine and subalpine plain with native ecosystems present and characterised by moorland, sedgeland, rushland, peatland, alpine heathland, wetlands, with isolated stands of highland eucalypts and extensive areas of threatened native vegetation communities (see the maps in representation and submission previously). The Plains are not a result of recent clearing.

The area is known to have both Aboriginal Cultural Heritage significance as well as Historic Cultural including the Steppes Historic Site, and historic hydro features (acknowledged by ERA).

Therefore, the area does satisfy the Landscape Conservation Zone purpose statement by protecting significant ecological, cultural and scenic values, and providing compatible use/development that does not adversely impact on the protection, conservation and management of these landscape values.

The area also satisfies the Landscape Conservation Zone application guidelines by applying to land with landscape values such as ... 'large areas of native vegetation, or areas of important scenic values (LCZ.1), and large areas of bushland or native vegetation which are not otherwise reserved but contains threatened native vegetation communities, threatened species or other areas of locally or regionally important native vegetation (LCZ.2).

TPS LANDSCAPE CONSERVATION ZONE COMPARISON TO IPS RURAL RESOURCE ZONE

ERA suggest there is no rationale for zoning these areas as Landscape Conservation as a translation from the existing Scheme's Rural Resource Zone; that the zoning will 'impact on current operations'; and limitations on some type of resource development will occur.

The zoning of the land will not affect existing operations of properties given the provisions of the TPS cannot take away existing use rights, additionally provide for 'Development for Existing Discretionary Uses' as permitted uses (Cl 7.2) as well as Changes to Existing Non-conforming Use (Cl 7.1).

Landscape Conservation Zone ensures landscape values are considered as part of development standards in rural areas because they are absent in the Rural Zone. A seamless transition of landscape provisions from the old Rural Resource to Rural Zoning is not possible given the differences in the purpose and specific standards of these 2 zones.

ERA raises concern regarding limitations created, however there are currently Scheme provisions for the Rural Resource Zone (of the CHIPS) including, limitations on building above 10m. Some of the land that ERA raise concerns relate to information provided in Representation 12 (by Ellis) this outlines the current and future land use of the area as being:

Climate: At an altitude of 900 m, this land is fit for dry sheep grazing only and winters are severe with average maximum temperatures not exceeding 10°C (see attached data from BOM). This precludes any form of cropping due to snow and frosts that occur throughout the year.

Land Capability: In addition to climatic limitations, large areas of the property are subject to inundation during winter months. The open areas of the property have limited potential due to the rocky nature of the land. Historically carrying capacity is comparatively low (our property at Bothwell runs 3 to 5 sheep per acre; St Patricks Plains runs 1 sheep per 3 to 5 acres).

Property Potential: Opportunities for diversification on the Central Highlands Plateau lie more in tourism/recreation and perhaps even in renewable energy, rather than in agricultural

development. Agricultural use of the land has reached its potential due to climatic conditions. There is a reason why little has changed agriculturally in this area in the last 35 years.

St Patricks Plains has a unique natural landscape (as do the other areas identified for LCZ), the existing Planning Scheme and the current Rural Resource Zone provide considerations of landscape values and character, the TPS Rural Zone does not and at the same time provide additional uses and limited development standards which area in combination in no way equivalent to the current controls which apply.

TRANSMISSION LINE UTILITIES, HIGHLANDS POWER TRAIL AND HISTORIC HYDRO INFRASTRUCTURE

Its acknowledged that existing infrastructure is located in the area, however Transmission lines are relatively small component in the board landscape with most at a distance from key viewpoints. It is considered that again the existing infrastructure would not be affected by the zoning and is compatible with historic European heritage that contributes to the Landscape Conservation values of the area (along with the Steppes Historic site).

In conclusion, the Landscape Conservation Zone remains in our opinion the appropriate for the land identified for the areas of Liawenee, Tods Corner and St Patricks Plains. It allows landscape protection and resource development in a balanced manner, in a way that best approximates the considerations available through the current interim planning scheme. The current proposed alternative zoning does not provide sufficient protections, given the Rural Zone fails to protect the known scenic and landscape values of the area as landscape character, ridgeline and skyline impacts are not included (currently an integral component of IPS Rural Resource Zone).

Yours faithfully



Jacqui Blowfield
Senior Planner

IRENEINC PLANNING & URBAN DESIGN

Tasmanian Planning Commission
Central Highlands Draft LPS

Dear Delegates

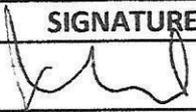
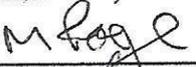
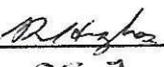
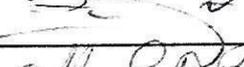
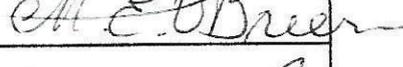
Protection of landscape character and scenic values of the Central Plateau.

The diverse landscape character and scenic values of the Central Plateau are highly valued by residents, shack owners, business owners, tourists and regular visitors to the area such fishers.

The uniqueness of the area needs to be recognised and protected in the Central Highlands Local Provisions Schedule of the Tasmanian Planning Scheme. We support the submissions of Mr David Ridley and those on behalf of NTAG (Representations 35 & 36 respectively) in relation to the need for Zone or Code controls which provide protection.

Yours sincerely

[Name and Addresses listed below]

FULL NAME	ADDRESS	SIGNATURE
MATTHEW MCCORMICK	4 VIRGINIA CRT SANDY BAY TAS	
JEREMY DARCY	310 WATTLE CROVERO	
CRAIG LAZKOO	22 Park St ROSS TAS	
MARK PAGE	352 GLENLISK ROAD	
Steve Page	16 Granton Heights Rd	
Neil McComd	5 Surf Pl	
Jack Beaman	4 Coral Pl.	
Jaxon McCormick	4 virginia crt sandy bay	Jaxon McCormick
ROD HUGHES	348 HUNGRY FLATS ROAD, TUNNACK.	
JOHN TOOLEY	PENSTOCK PLAINS (LESFEE)	
DAVID O'BRIEN	200 PENSTOCK ROAD PENSTOCK	
MARILYN O'BRIEN	200 PENSTOCK RD SHANNON	
CARE SMITH	194 Penstock Rd, SHANNON	

Hamish Maxwell - 199 Penstock Rd, Shannon
Stewart



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[Name and Addresses listed below]

FULL NAME	ADDRESS	SIGNATURE
Angela Donaldson	2 Shannon Rd Shannon	A. Donaldson
Adrian	Invermay	[Signature]
NATH ROWEN	LINDSAY ST INVERMAY	[Signature]
A Howell	10 Graham St	[Signature]
M Howell	10 Graham St	[Signature]
K Webster	10 Grahams	[Signature]
W. Kelly	3/103 Hobart St	[Signature]
M-Taylor	Kinross Place Invermay	MICHAEL
Shae	Hope Street Invermay	[Signature]
Foley Joe	83 Cherry Rd	[Signature]
STEPHEN MILLS	5 DOLERITE CRES	[Signature]
Ronald Bramich	Selbourne	[Signature]
FRANK WATSON	8 BEATTY ST NOWBOROUGH	[Signature]

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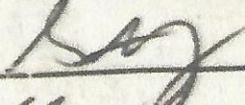
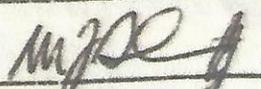
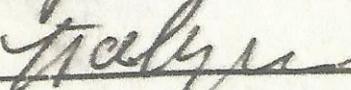
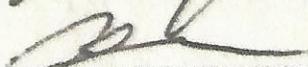
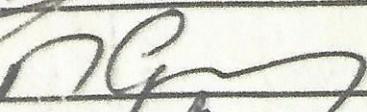
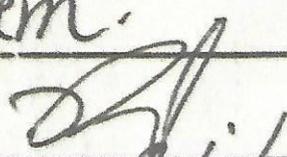
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(Name and Addresses listed below)

FULL NAME	ADDRESS	SIGNATURE
Shane Long	6 Bone Rd	
LEIGH SPARRETT	6 CROWTHER ST.	
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Tim Colgrave	14 Richard St Prospect	
Jeff Clausen	103 Devoit Rd	
Neil Greenway	8 Winstan St, Madbury	
NIGEL CLARK	163 ELPHINSTON RD	
JANE CLARK	163 Elphinstone Rd	
Lucy Millwood	9 Santorini St, Legana	LM.
DYNIS BIRD	31 WYATT ST WILTON	
ROONEY KNOTT	40 MORRIS PROSPECT	

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 [Name and Addresses listed below]

FULL NAME	ADDRESS	SIGNATURE
DAVID RIDLEY	3 MONKS ST SHANNON	<i>[Signature]</i>
* [Redacted]	[Redacted]	[Redacted]
Marilyn Linnell	28 Sun Valley Drive	<i>[Signature]</i>
STEVEN LINNELL	28 SUN VALLEY DRIVE	<i>[Signature]</i>
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Will Allo	2/10 Opel Drive	<i>[Signature]</i>
* [Redacted]	[Redacted]	[Redacted]
George Dale	10 Shannon Rd Shannon	<i>[Signature]</i>
Carol Dale	10 Shannon Rd Shannon	<i>[Signature]</i>
CHRIS BARNETT	1 SHANNON RD SHANNON	<i>[Signature]</i>
Penny Barnett	1 Shannon Rd Shannon	<i>[Signature]</i>
PEW WADDINGTON	12 SHANNON R.	<i>[Signature]</i>
Kathy Waddington	12 Shannon Rd	<i>[Signature]</i>

* Redacted by signers request for privacy reasons.
 (Original available to TPC)

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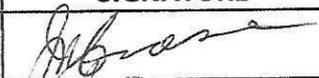
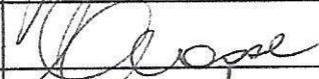
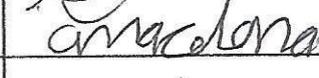
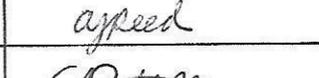
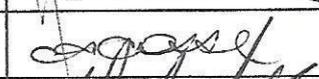
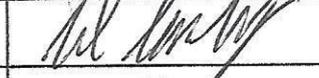
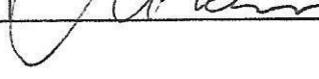
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[Name and Addresses listed below]

FULL NAME	ADDRESS	SIGNATURE
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Kaylene Crosse	BRIGHTON TAS	
Aidan macdonald	bridge watertus	
Andrew Reed	New Town, Hobart	
Christopher Benzik	Brighton TAS	
MARK ASPINALL	LOUDERBROOK TAS	
MAUREEN SADEWASSER	OLD BEACH	
Angela Crosse	BRIDGEWATER	
Danny Conroy	LONGHELY TAS	
Royce Windsor	Bellevue TAS	
D. Travaglia	Margate TAS	
MARIN DRIZ	MIENA	
Tim Urban &	Collinsvale Tas	

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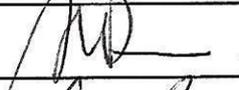
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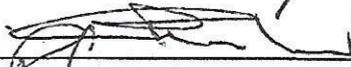
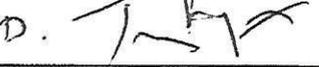
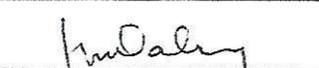
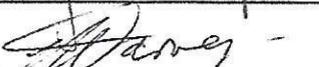
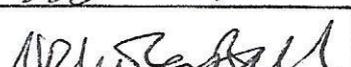
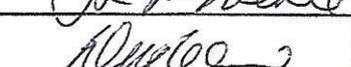
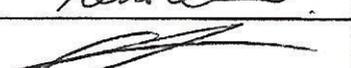
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TIM HAINSWORTH	401 LANCES TIER RD.	
JANICE DALEY	6369 LYELL HIGHWAY Ouse	
MICHAEL HARVEY	909 VICTORIA VALLEY RD	
NICHOLA BALL	5 CHURCH ST OUSE	
Tamara McMichael	57 Fitzroy Cr Oregon	
Fiona Ouslow-Agnew	195 Alma Rd. Orford	
Eophie ONSLOW	195 Alma Rd. Orford	
Michael Agnew	195 ALMA Rd ORFORD	