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**Subject:** Launceston Local Provisions Schedule - TasNetworks Submission  
**Attachments:** TasNetworks submission Launceston LPS.pdf

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Dear Chief Executive Officer

Please find attached TasNetworks submission regarding the Launceston draft LPS.

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

It would be appreciated if you could please provide a receipt of confirmation of this representation.

Regards



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# Launceston Council draft Local Provisions Schedule

TasNetworks' Submission

September 2021

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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). TasNetworks is 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

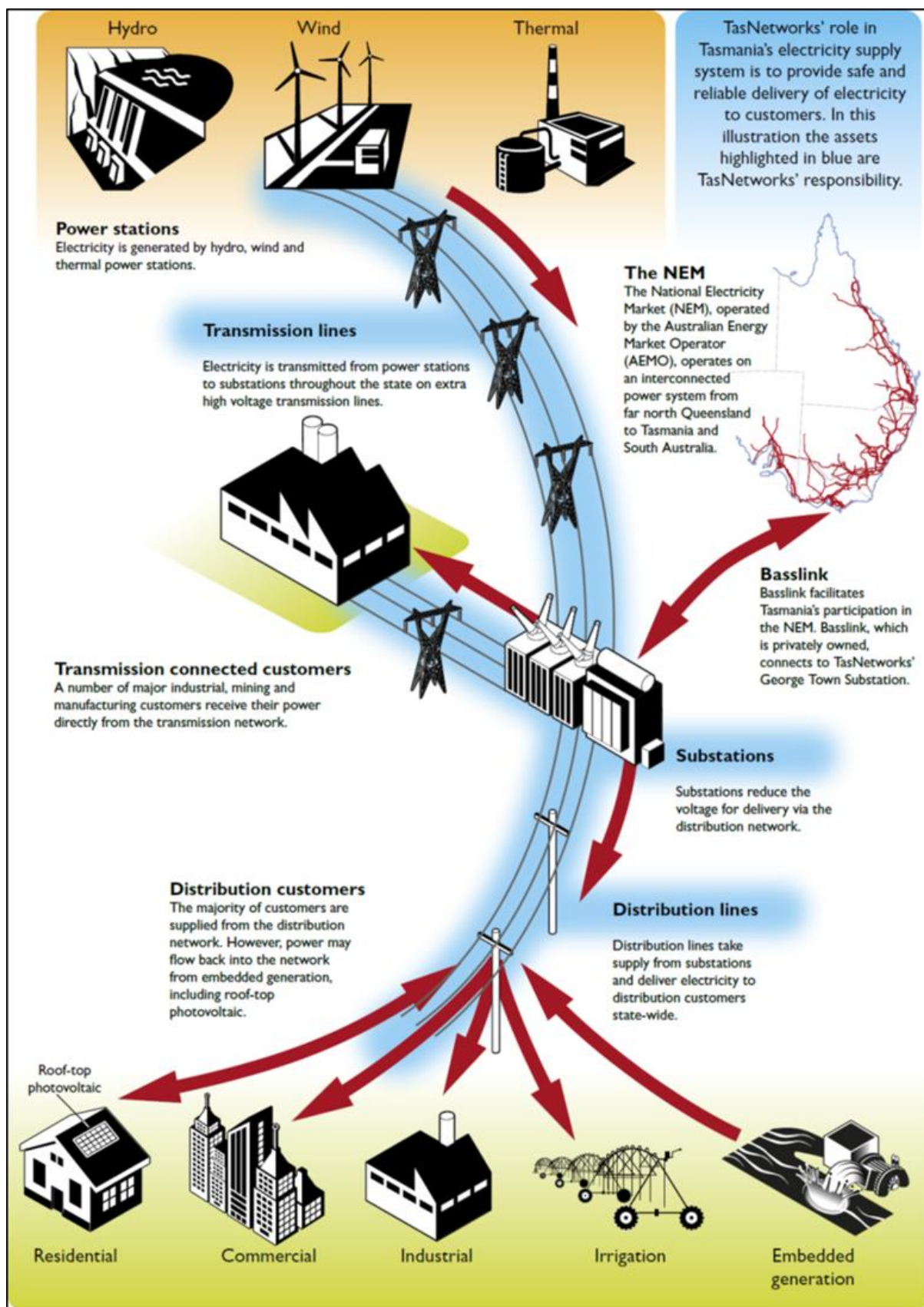
TasNetworks own, operate and maintain 3564 circuit kilometres of transmission lines and underground cables, 49 transmission substations and six switching stations across the State.

### 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 Launceston 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 (Commission) to publicly exhibit the draft LPS and invite representations. TasNetworks has undertaken a review of the draft LPS and makes the following representation with a view of seeking a state-wide consistent approach to major electricity infrastructure.

TasNetworks assets within the Launceston Council Local Government Area include: three substations, four communication sites and nine electricity transmission corridors.

Electricity transmission infrastructure is protected by the Electricity Transmission Infrastructure Protection Code (ETIPC) under the State Planning Provisions (SPP). The ETIPC applies to transmission lines, terminal substations, switching stations and radio transmission communication assets. The purpose of the ETIPC 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; and*
- *To maintain future opportunities for electricity transmission infrastructure.*

The draft 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 draft LPS also includes the spatial application of zoning and overlays via the mapping. In preparing this representation, TasNetworks has reviewed the draft 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; and
- The Scenic Protection Code – Scenic Protection Area has not been applied to substations, communication site or corridors.

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 (PPZ) or Specific Area Plans (SAP); and any Local Area Objectives or Site Specific Qualifications. TasNetworks representation is made having regard to the draft LPS requirements under LUPAA.

These submissions are consistent with those previously made by TasNetworks (formerly Transend) on the Meander Valley, Brighton, Central Coast, Burnie, Glamorgan Spring Bay, Clarence, Circular Head, Devonport, Glenorchy, West Coast, Sorell and Southern Midlands draft LPS's as well as the draft State Planning Provisions and Interim Planning Schemes.

### 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	Launceston 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)
interim scheme	Launceston Interim Planning Scheme 2015
IPA	Inner Protection Area
LGA	Local Government Area
LPS	Launceston draft Local Provisions Schedule
LUPAA	<i>Land Use Planning and Approvals Act 1993</i>
NPR	No Permit Required
P	Permitted
PPZ	Particular Purpose Zone
SAP	Specific Area Plan
SPP	State Planning Provisions
SSQ	Site Specific Qualification
UWA	Unregistered Wayleave Agreement

#### 3.2. Existing Assets

Launceston Council LGA is located in TasNetworks northern planning geographic area. An operationally significant part of the Tasmanian transmission electricity network is contained within the boundaries of the Launceston Council LGA. This includes:

- Transmission lines which:



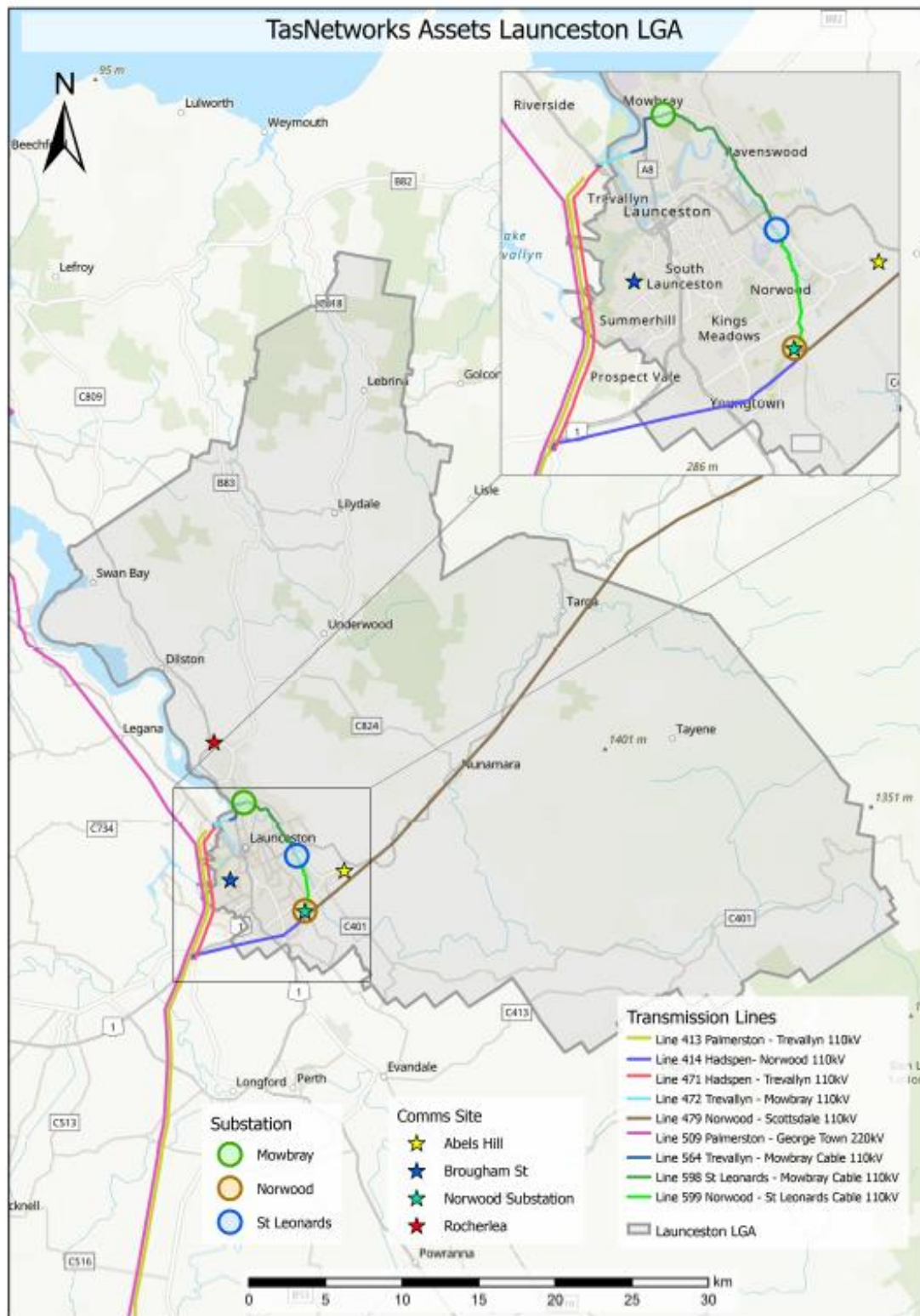
- Form part of the transmission supply 'ring' around greater Launceston via a combination of 110kV overhead transmission lines and underground 110kV cables via Mowbray, St Leonards and Norwood Substations;
  - Supply customer loads and in the North East of Tasmania via a 110kV transmission line from Norwood Substation;
  - Provide critical north/south power transfer between major industrial loads and DC interconnector at George Town and hydropower in central and southern Tasmania via 220kV transmission lines between George Town and Hadsphen; and
  - Transfer power to/from Musselroe Wind Farm in the far North East to the rest of the network and the DC interconnector via a 110kV line connected to Norwood substation.
- Mowbray Substation provides a critical role in facilitating the supply of power to distribution customers in the northern suburbs of Launceston. The substation also provides a firm 110kV supply to St Leonards Substation via Trevallyn Substation;
  - St Leonards Substation provides a critical role in facilitating the supply of power to distribution customers in the eastern suburbs of Launceston. The substation also provides a firm 110kV supply to Mowbray Substation via Norwood Substation;
  - Norwood Substation provides a critical role in facilitating the supply of power from Musselroe Wind Farm to the National Electricity Market. The substation provides a firm 110kV supply to St Leonards Substation and Mowbray Substation. The substation also provides electricity to distribution customers in the southern suburbs of Launceston. This includes the backup supply to the Launceston General Hospital; and
  - Communication sites used in operation, metering and control of the transmission electricity network.

The following table and figure provide more detail regarding these assets. 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.

**Table 2 TasNetworks Assets in Launceston LGA**

Asset type	Location
Substation sites	<ul style="list-style-type: none"> <li>- Mowbray Substation</li> <li>- St Leonards Substation</li> <li>- Norwood Substation</li> </ul>
Communication sites	<ul style="list-style-type: none"> <li>- Rocherlea Communication Site</li> <li>- Brougham Street Communication Site</li> <li>- Norwood Substation Communication Site</li> <li>- Abels Hill Communication Site</li> </ul>
Electricity Transmission Corridors	<ul style="list-style-type: none"> <li>- Line 472 Trevallyn – Mowbray 110kV</li> <li>- Line 413 Palmerston – Trevallyn 110kV</li> <li>- Line 509 Palmerston – George Town 220kV</li> <li>- Line 471 Hadsphen – Trevallyn No.2 110kV</li> <li>- Line 414 Hadsphen – Norwood 110kV</li> <li>- Line 479 Norwood – Scottsdale 110kV</li> <li>- Trevallyn – Mowbray Cable 110kV</li> </ul>

Asset type	Location
	<ul style="list-style-type: none"> <li>- St Leonards – Mowbray Cable 110kV</li> <li>- Norwood – St Leonards Cable 110kV</li> </ul>



**Figure 2 TasNetworks Assets within Launceston LGA**

### 3.3. Planned Future Development

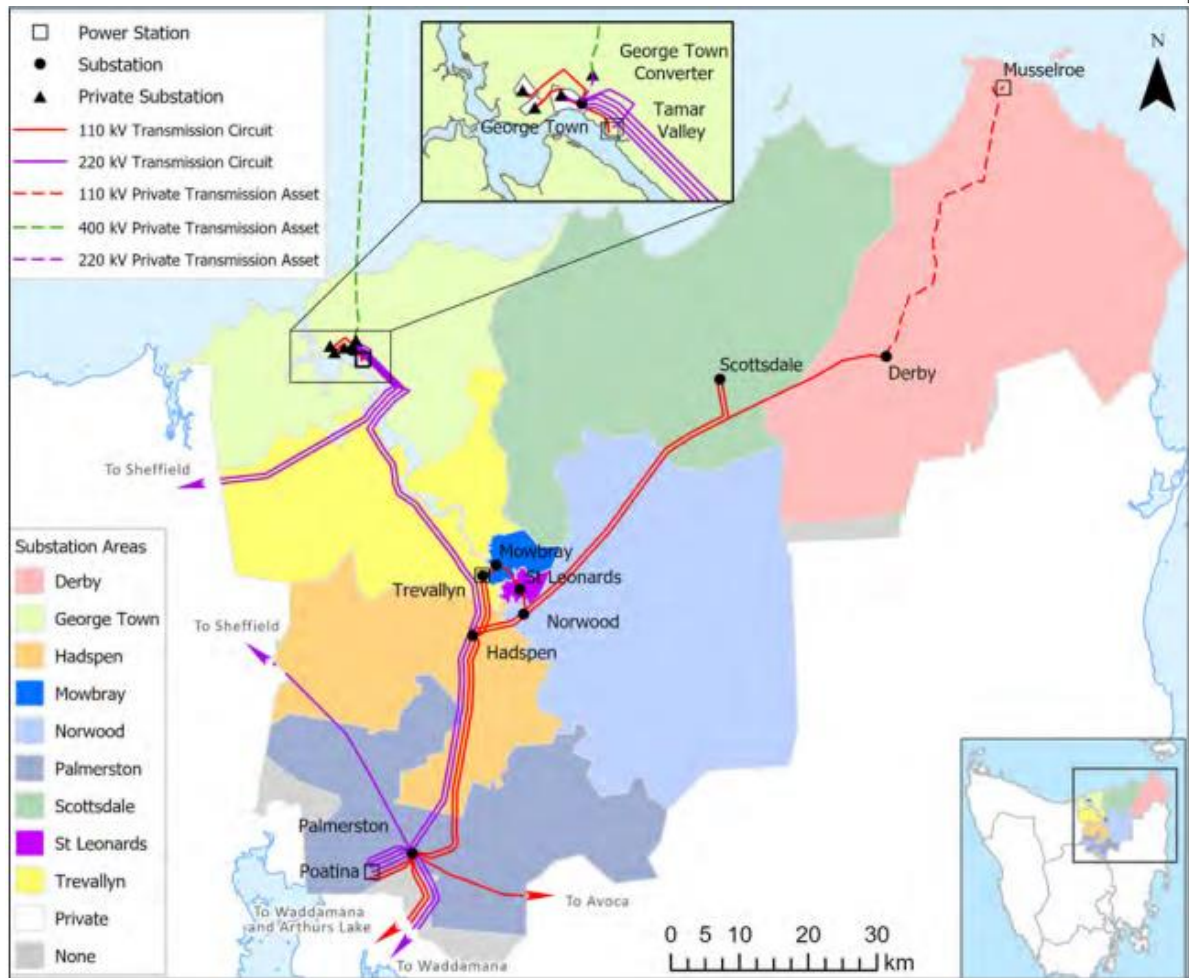
As Tasmania's transmission and distribution network service provider, TasNetworks has a responsibility to ensure the infrastructure to supply Tasmanians with electricity and to meet customer and network requirements in an optimal and sustainable way. We achieve this through our network planning process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

The need for network changes can arise for a number of factors. Annually, TasNetworks undertakes a planning review that analyses the existing distribution and transmission networks and considers their future requirements to accommodate changes to load and generations, and whether there are any limitations in meeting the required performance standards.

The Launceston municipal area is identified as being within the Northern area, as stated in [TasNetworks Annual Planning Report 2020](#). The Report details that the Northern planning area is diverse, with the urban and commercial areas in Greater Launceston and the Tamar. Industrial load in and around George Town, including major energy users are connected directly to the transmission network, along with large rural areas of the Northern Midlands and the North East of Tasmania. The following figure identifies the Northern area with substation supply areas.

The area is supplied from the backbone of the 220kV transmission network at Hadspen, George Town and Palmerston (near Poatina) substations. Hadspen Substation also provides a 110kV to Launceston and north-east Tasmania, with Palmerston Substation providing supply to the Northern Midlands. George Town Substation predominantly supplies the industrial load in the area, and it provides the connection point for the Basslink undersea cable to mainland Australia. There are two major energy users and one other transmission connected customer, all supplied from the George Town Substation.

Musselroe Wind Farm is connected to Derby Substation via the 100kV network. Tamar Valley and Poatina power stations provide significant generation into the backbone network at George Town and Palmerston substations, respectively.



**Figure 3 TasNetworks Northern planning area network**

## 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. Appendix 1 provides more detailed analysis on an asset by asset basis.

#### Legend for Table 3:

Consistent with Policy Position, supported	
Inconsistent with Policy Position, amendments are possible to achieve consistency	
Inconsistent with Policy Position, Schedule 6 transition prevents amendments required for consistency	

**Table 3 Policy Position – Submission Summary and Launceston LPS evaluation**

LPS Mapping	Policy Position	Rationale	Launceston LPS evaluation summary / submission
Zoning	<ul style="list-style-type: none"> <li>- Substations (terminal and zone) to be zoned Utilities</li> <li>- Communication sites to be zoned Utilities where the communications facility is the primary use of the site.</li> </ul>	<ul style="list-style-type: none"> <li>- Reflects the primary use of the site and the nature of the asset</li> <li>- Reflects the long asset lifespan</li> <li>- 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)</li> <li>- Clear message to the community about the existing and long term use of the site.</li> </ul>	LPS is consistent with this Policy Position, supported.
	No specific zoning is to be applied to ETC	<ul style="list-style-type: none"> <li>- Allows for other compatible uses to occur in corridor</li> <li>- Corridors are protected by ETIPC</li> </ul>	LPS is consistent with this Policy Position, supported.
	Landscape Conservation Zone (through LPS rezoning) is not applied to ETC	<ul style="list-style-type: none"> <li>- Conflicts with the existing use of the land for electricity transmission</li> <li>- Diminishes strategic benefit of existing corridors making consideration of new corridors more likely</li> <li>- More onerous approvals pathway for augmentation of assets</li> </ul>	<p>Inconsistent with Policy Position, not supported.</p> <p>Landscape Conservation Zone is applied to:</p> <ul style="list-style-type: none"> <li>- Line 413 Palmerston – Trevally 110kV</li> <li>- Line 509 Palmerston – George Town 220kV</li> <li>- Line 471 Hadsphen – Trevallyn No.2 110kV</li> </ul>

LPS Mapping	Policy Position	Rationale	Launceston LPS evaluation summary / submission
		<ul style="list-style-type: none"> <li>- Sends conflicting message to public regarding the ongoing use of the land</li> </ul>	
Natural Asset Code – Priority Vegetation Overlay	Not to be applied to <ul style="list-style-type: none"> <li>- Substations or communication sites where the site is cleared of native vegetation</li> </ul>	<ul style="list-style-type: none"> <li>- Assets are required to be cleared for safety and maintenance</li> <li>- Clearing of vegetation is exempt under ESI Act</li> <li>- Where asset already exists impact on the natural assets have already been assessed / approved and will continue to be impacted for the lifespan of the asset</li> <li>- Supports strategic value of the site</li> <li>- Clear messaging to community regarding the use of the site.</li> </ul>	Amendment sought, inconsistent with Policy Position. Remove priority vegetation overlay from: <ul style="list-style-type: none"> <li>- Norwood Substation</li> <li>- Norwood Substation Communication Site</li> <li>- Brougham Street Communication Site</li> </ul> Code has been applied to developed / cleared parts of the site.  Note: vegetation clearance exemptions from the application of a planning scheme for electricity infrastructure.
Scenic Protection Code Overlay	Not to be applied to <ul style="list-style-type: none"> <li>- Substations,</li> <li>- Communication sites, or</li> <li>- ETC</li> </ul>	<ul style="list-style-type: none"> <li>- Assets are required to be cleared for safety and maintenance</li> <li>- Where asset already exists impact on scenic quality / natural assets have already been assessed / approved and will continue to be impacted for the lifespan of the asset.</li> </ul>	LPS is consistent with Policy Position, supported.
SAPs / PPZs	Not to apply to substations	To ensure that future development on these sites is not unreasonably affected by SAP.	LPS is consistent with Policy Position, supported.



LPS Mapping	Policy Position	Rationale	Launceston LPS evaluation summary / submission
			Invermay/Inveresk Flood Inundation SAP is applied to Mowbray Substation site. The SAP does not conflict with the substation.
Utilities Use Approval Status	<p>In all zones, PPZs and SAPs the Use Class for Utilities and Minor Utilities must be either</p> <ul style="list-style-type: none"> <li>- No Permit Required,</li> <li>- Permitted or</li> <li>- Discretionary</li> </ul> <p>Utilities must not be Prohibited</p>	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.	<p>Inconsistent with Policy Position. Schedule 6 transition prevents amendments required for consistency.</p> <p>Utilities Use Class is Prohibited in the following PPZ/SAPs:</p> <ul style="list-style-type: none"> <li>- Franklin Village PPZ 8.0</li> <li>- North Bank Silos PPZ 9.0</li> <li>- Birch Avenue Storage Centre PPZ 10.0</li> <li>- Launceston Plaza Retail SAP 9.0</li> </ul>
PPZs or SAPs use, development and subdivision standards	<p>Are drafted with at least a discretionary approval pathway. For example:</p> <ul style="list-style-type: none"> <li>- No absolute height limit</li> <li>- Allow subdivision for utilities</li> </ul>	<ul style="list-style-type: none"> <li>- Consistent with policy in SPPs that enables consideration of Utilities in all zones and no finite quantitative development or subdivision standards.</li> </ul>	<p>Inconsistent with Policy Position. Schedule 6 transition prevents amendments required for consistency.</p> <p>Subdivision for Utilities or subdivision that may be required for public use by the Crown, a council or a State authority is Prohibited in the following PPZ/SAPs:</p> <ul style="list-style-type: none"> <li>- Franklin Village PPZ 8.0</li> <li>- North Bank Silos PPZ 9.0</li> <li>- Birch Avenue Storage Centre PPZ 10.0</li> <li>- Drivers Run SAP 5.0</li> <li>- Cataract Gorge Subdivision SAP 7.0</li> <li>- Forestry Area SAP 8.0</li> </ul>

LPS Mapping	Policy Position	Rationale	Launceston LPS evaluation summary / submission
			Cataract Gorge Management SAP 11.0 includes finite building height standards.
ETIPC	Is correctly mapped and applied to relevant transmission infrastructure	Consistent with policy in SPPs	Amendment sought, inconsistent with Policy Position. - Please align the Substation Facility with the title boundary at St Leonards Substation.
Local Area Objectives	Are drafted in a manner that does not conflict with the ETIPC if they apply over an area within the Code	<ul style="list-style-type: none"> <li>- Potential impact on future development</li> <li>- Diminishes strategic benefit of existing corridors making consideration of new corridors more likely</li> <li>- More onerous approvals pathway for augmentation of assets</li> <li>- Sends conflicting message to public regarding the ongoing use of the land</li> </ul>	LPS is consistent with Policy Position, supported.

## 4.2. 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 that could occur as each LPS implements the SPPs across the State.

### 4.2.1. 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. Please refer to Appendix 2 for benefits that can be realised by considering electricity transmission assets in the planning process and conflict examples.

### 4.2.2. Scenic Protection Code

The Scenic Protection Code does not apply to sites in the Utilities Zone. As a result, assuming a Utilities zoning, TasNetworks' substations and communication sites 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 a Council may wish to regulate other activities in the ETC that could impact on scenic values. However, the application of the Scenic Protection Code to new electricity transmission use and development within an existing ETC, has a number of impacts in conflict with the continued use of these corridors including:

- Not recognising the already established vegetation clearance and scenic quality;
- Not recognising the existing and continued use of these corridors, including vegetation clearance, for significant linear infrastructure on a state wide basis;
- Unreasonably diminishes the strategic benefit of the ETC;
- Devalues the substantial investment already made in the establishment of these corridors;
- Unreasonably fetters augmentation of existing corridors by imposing 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; and

- Supports a misconception in the community that where the Scenic Protection Code (tree preservation) is applied, vegetation clearance will be limited, when in fact vegetation clearance for transmission lines is required and authorised by separate regulatory regimes in these locations.

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 and:

- 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; and
- 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 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, Brighton, Central Coast, Glamorgan Spring Bay, Clarence, Circular Head, Devonport, Glenorchy City, West Coast, West Tamar, Sorell and Southern Midlands councils as well as the Commissioners throughout the draft LPS assessment process and will continue to be raised as part of this process.

#### 4.2.3. Landscape Conservation Zone

The introduction and subsequent rezoning of land within the ETC to the Landscape Conservation Zone has created 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 potentially conflict with the Purpose of the ETIPC which is *to maintain future opportunities for electricity transmission infrastructure*.

Additionally, development approval for augmentation of an existing corridor under the Landscape Conservation Zone is more onerous than if under the Environmental Living or Rural Resource Zones in the

interim scheme or the Rural Zone under the SPP. For example, the Acceptable Solution building height requirement in the Landscape Conservation Zone is 6m as opposed to 12m under the Rural Zone.

Further, TasNetworks has concern regarding the rezoning of land within an ETC to the Landscape Conservation Zone and the inconsistent messaging it provides to the public. That being that the land is for 'conservation', where in fact clearing of vegetation within the ETC is exempt and augmentation of corridors can occur.

TasNetworks acknowledges that the introduction of the Landscape Conservation Zone is per SPP drafting guidelines however would like to open discussions with Council and relevant stakeholders regarding the impacts that this change in zoning has on the continued operation of electricity transmission infrastructure across the State.

## 5. Appendix 1 – Detailed Assessment

### 5.1. Substations

There are three substations located within Launceston LGA. These are:

- Mowbray Substation;
- St Leonards Substation; and
- Norwood Substation.

The following table details TasNetworks planning Policy Position with respect to substations.

**Table 4 Substations Policy Position Summary**

Zoning	Overlay	SAP / PPZ	ETIPC
Zoned Utilities	<ul style="list-style-type: none"><li>- Priority Vegetation not applied where the site is cleared of native vegetation</li><li>- Scenic Protection not applied</li></ul>	<p>Not applied or</p> <ul style="list-style-type: none"><li>- Utilities use is NPR, P or D.</li><li>- No finite discretionary development standards</li></ul>	Applied

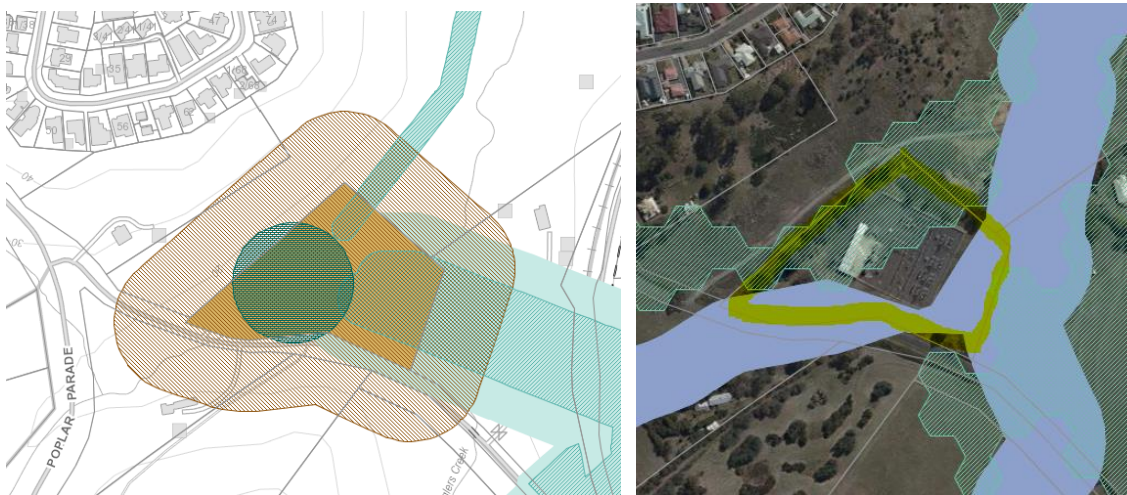
Mowbray Substation is zoned Utilities. Neither the Priority Vegetation layer nor the Scenic Protection Code are applied to the site, however, the ETIPC has been applied correctly. This is consistent with TasNetworks Policy Position. The Invermay/Inveresk Flood Inundation SAP has been applied to the site however it is noted that this SAP transitioned under Schedule 6 of LUPAA.

St Leonards Substation is zoned Utilities. Neither the Priority Vegetation layer nor the Scenic Protection Code have been applied to the site. Neither a SAP nor a PPZ have been applied to the site. This is consistent with TasNetworks Policy Position. The ETIPC has largely been applied to the site correctly, however, the Substation Facility extends outside of the title boundary. TasNetworks can provide updated mapping to correct this error. This is shown in the following figure.



**Figure 4 St Leonards Substation ETIPC**

Norwood Substation is zoned Utilities. The Scenic Protection Code and the ETIPC have been applied to the site correctly and neither a SAP nor a PPZ have been applied to the site. This is consistent with TasNetworks Policy Position. As shown in the following figure, the Natural Assets Code – Priority Vegetation Overlay has been applied to a portion of the site that is developed and cleared of native vegetation. As such, TasNetworks requests that this overlay be removed from the site where there is no vegetation and the site is developed. This request is consistent with how other LPSs have applied the overlay.



**Figure 5 Norwood Substation ETIPC and Priority Vegetation overlay**

## 5.2. Communication Sites

There are four communication sites with Launceston LGA that are operated by TasNetworks and are required to be protected through the ETIPC Overlay. This are:

- Norwood Substation Communication site;
- Brougham Street Communication site;
- Rocherlea Communication site; and
- Abels Hill Communication site.

The following table details TasNetworks planning Policy Position with respect to communication sites.

**Table 5 Communication Sites Policy Position Summary**

Zoning	Overlay	SAP / PPZ	ETIPC
Zoned Utilities	<ul style="list-style-type: none"> <li>- Priority Vegetation not applied where the site is cleared of native vegetation</li> <li>- Scenic Protection not applied</li> </ul>	Not applied or <ul style="list-style-type: none"> <li>- Utilities use is NPR, P or D.</li> <li>- No finite discretionary development standards</li> </ul>	Applied



The Norwood Substation Communication site is co-located at the Norwood Substation. As detailed in the previous section of this report and in Figure 5 (above), TasNetworks requests the Priority Vegetation Overlay be removed from the cleared and developed parts of the site.

Brougham Street Communication site is zoned Utilities. The Scenic Protection Code and the ETIPC have been applied to the site correctly and neither a SAP nor a PPZ have been applied to the site. This is consistent with TasNetworks Policy Position. However, shown in the following figure the Natural Assets Code – Priority Vegetation Overlay has been applied to a portion of the site that is developed and cleared of native vegetation. As such, TasNetworks requests that this overlay be removed from the site where there is no vegetation and the site is developed. This request is consistent with how other LPSs have applied the overlay.



**Figure 6 Brougham Street Communication Site – Priority Vegetation layer**

TasNetworks makes no representation regarding the Rocherlea and Abel Hills Communication sites, as these are represented in the draft LPS and are consistent with TasNetworks Policy Position.

### 5.3. Electricity Transmission Corridors

There are nine TasNetworks Electricity Transmission Corridors that extend across the West Tamar LGA. These are:

- Line 472 Trevallyn – Mowbray 110kV;
- Line 413 Palmerston – Trevallyn 110kV;
- Line 509 Palmerston – George Town 220kV;
- Line 471 Hadspen – Trevallyn No.2 110kV;
- Line 414 Hadspen – Norwood 110kV;
- Line 479 Norwood – Scottsdale 110kV;
- Trevallyn – Mowbray Cable 110,000;
- St Leonards – Mowbray Cable 110,000; and

- Norwood – St Leonards Cable 110,000.

These corridors are shown in Figure 2. The following table details TasNetworks Policy Position regarding the ETC.

**Table 6 ETC Policy Position Summary**

Zoning	Overlay	ETIPC	SAP / PPZ
<ul style="list-style-type: none"> <li>- No specific zoning applied to ETC;</li> <li>- Landscape Conservation Zone not applied to ETC</li> </ul>	<ul style="list-style-type: none"> <li>- Scenic Protection Code not applied to ETC</li> </ul>	Applied	Not applied or <ul style="list-style-type: none"> <li>- Utilities use is NPR, P or D.</li> <li>- No finite discretionary development standards</li> </ul>

A range of zones have been applied to the land subject to these corridors and as the SPP allows for consideration of Utilities in all zones this is acceptable to TasNetworks. Notwithstanding this, the Landscape Conservation Zone (green) has been applied to the ETC, as shown in the following figure:

- Line 413 Palmerston – Trevally 110kV;
- Line 509 Palmerston – George Town 220kV; and
- Line 471 Hadsphen – Trevallyn No.2 110kV;



**Figure 7 Landscape Conservation Zone (green) and ETIPC (blue)**

As detailed in section 4.2.3 of this report, the introduction and subsequent rezoning of land within the ETC to the Landscape Conservation Zone has created 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 potentially conflict with the Purpose of the ETIPC which is *to maintain future opportunities for electricity transmission infrastructure*.

TasNetworks acknowledges that the introduction of the Landscape Conservation Zone is per the SPP drafting guidelines, however, TasNetworks would like to open discussions with Council and relevant stakeholders regarding the impacts that this change in zoning has on the continued operation of electricity transmission infrastructure across the State.

The Inner Protection Area (IPA) and Electricity Transmission Corridor (ETC) have been mapped correctly in the draft LPS.

A number of SAPs have been applied over the ETC, these include Invermay / Inveresk Flood Inundation SAP, Cataract Gorge SAP, Southern Gateway SAP, Relbia and Glenwood Road Subdivision SAP and the Forestry Area SAP. These are discussed in detail in the following section.

#### 5.4. Particular Purpose Zones (PPZ) and Specific Area Plans (SAP)

The following table provides an overview of TasNetworks Policy Position regarding PPZs and SAPs.

**Table 7 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
Development Standards in PPZ or SAP	- Are not drafted without a discretionary approval pathway (e.g not include a finite development standard - an absolute height limit) - Allow subdivision for Utilities use in all zones

The draft LPS contains ten PPZs. It is understood that all of these PPZs are transitioning under Schedule 6. TasNetworks acknowledges that comments regarding these PPZs cannot be considered by the Planning Authority due to the transitioning provisions. Notwithstanding this, it is important to highlight that the PPZ Franklin Village, PPZ North Banks Silos and PPZ Birch Avenue Storage are all drafted inconsistent with the SPPs, as they prohibit the Utilities Use Class and don't allow for subdivision for Utilities. This drafting is inconsistent with the SPPs.

The draft LPS contains 15 SAPs. These SAPs comprise of nine SAPs that are transitioning under Schedule 6 as well as three Codes that are also transitioning. It is understood that the draft LPS include three new SAPs. These are:

- Western Hillside SAP 13.0;
- Southern Gateway SAP 14.0; and
- Central Area SAP 15.0.

All three SAPs are drafted consistent with TasNetworks Policy Position.

With regards to the remaining 12 SAPs that are transitioning, it is noted that the subdivision provisions for Drivers Run SAP 5.0, Cataract Gorge Subdivision SAP 7.0 and Forestry Area SAP 8.0 are not consistent with the SPPs. These SAPs are drafted in a manner that prohibits subdivision for Utilities or subdivision that may be required for public use by the Crown, a council or a State authority. Further, Launceston Plaza Retail SAP 9.0 prohibits Utilities Use Class and Cataract Gorge Management SAP 11.0 includes a finite building height standard. Both of which are inconsistent with the drafting of the SPP. TasNetworks acknowledges that comments regarding these SAPs cannot be considered by the Planning Authority due to the transitioning provisions.

## 6. Appendix 2 – SPP Issues

**In addition to TasNetworks' request regarding the Scenic Protection Code application, this appendix outlines the 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 8 below 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 8 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 8 Exemptions and land use conflict with electricity transmission assets**

SPP exemption	Comment
4.3.6 unroofed decks	<p>If not attached to a house and floor level is less than 1m above ground level.</p> <p><b>TasNetworks Comment:</b></p> <p>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.</p> <p>A deck over the operational area required for an underground cable would always be unacceptable.</p>
4.3.7 outbuildings	<p>One shed: up to 18m<sup>2</sup>, roof span 3m, height 2.4m, fill of up to 0.5m.</p> <p>Up to two shed: 10m<sup>2</sup>, sides 3.2m, height 2.4m.</p> <p>Similar to PD1.</p> <p><b>TasNetworks Comment:</b></p> <p>This type of building almost always poses a safety and operational hazard for transmission lines, cables and human safety.</p> <p>This type of building over the operational area required for an underground cable always poses an unacceptable safety risk.</p>
4.3.8 outbuildings in Rural Living Zone, Rural Zone or Agriculture Zone	<p>4.3.8</p> <p>Provides for an unlimited number of outbuilding per lot as follows:</p> <p>Floor area 108m<sup>2</sup>, height 6m, wall height 4m.</p>
4.3.9 agricultural buildings and works	<p>Already subject to the Local Historic Heritage Code.</p>

SPP exemption	Comment
<p>in the Rural Zone or Agriculture Zone</p>	<p>Slightly broader than PD1.</p> <p>4.3.9</p> <p>New and broader than PD1 exemptions.</p> <p>Provides for unlimited number of outbuilding per lot as follows:</p> <p>Must be for agricultural use, floor area 200m<sup>2</sup>, height 12m.</p> <p>Already subject to the Local Historic Heritage Code and the Scenic Protection Code.</p> <p><b>TasNetworks Comment:</b></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>
<p>4.3.11 garden structures</p>	<p>Unlimited number, 20m<sup>2</sup>, 3m height max. Already subject to the Local Historic Heritage Code.</p> <p><b>TasNetworks Comment:</b></p> <p>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.</p>



SPP exemption	Comment
	Cost of removal is limited, however still requires post breach enforcement of easement rights.
4.5.1 ground mounted solar energy installations	<p>Each installation can be 18m<sup>2</sup> area. Already subject to the Local Historic Heritage Code.</p> <p><b>TasNetworks Comment:</b></p> <p>This type of activity has the potential to compromise clearances or adversely impact easement access (especially during emergency repair conditions).</p>
4.5.2 roof mounted solar energy installations	<p>Already subject to the Local Historic Heritage Code. This would likely only apply to existing buildings within easements.</p> <p><b>TasNetworks Comment:</b></p> <p>Encroachment is likely existing, however, this exemption has the potential to compromise clearances in what may be a compliant situation.</p>
4.6.8 retaining walls	<p>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.</p> <p>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.</p> <p><b>TasNetworks Comment:</b></p> <p>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.</p>
4.6.9 land filling	
4.6.13 rain-water tanks	<p>Rainwater, hot water &amp; air conditioner exemptions with the 1.2m stand were already included in PD1 and were carried through to the draft and finalised SPPs.</p> <p>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.</p> <p>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.</p>
4.6.14 rain-water tanks in Rural Living Zone, Rural Zone, Agriculture Zone or Landscape Conservation Zone	

SPP exemption	Comment
<p>4.6.15 fuel tanks in the Light Industrial Zone, General Industrial Zone, Rural Zone, Agriculture Zone or Port and Marine Zone</p> <p>4.6.16 fuel tanks in other zones</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p><b>TasNetworks Comment:</b></p> <p>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.</p>