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Cc: Odin Kelly
Subject: I2021159718 - TasNetworks submission regarding West Tamar LPS
Attachments: TasNetworks submission West Tamar LPS.pdf

Attention Strategic Planner

Please find attached a representation on behalf of TasNetworks regarding the draft West Tamar 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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West Tamar Council

Draft Local Provisions Schedule

TasNetworks' Submission

April 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). 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 power lines.

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.

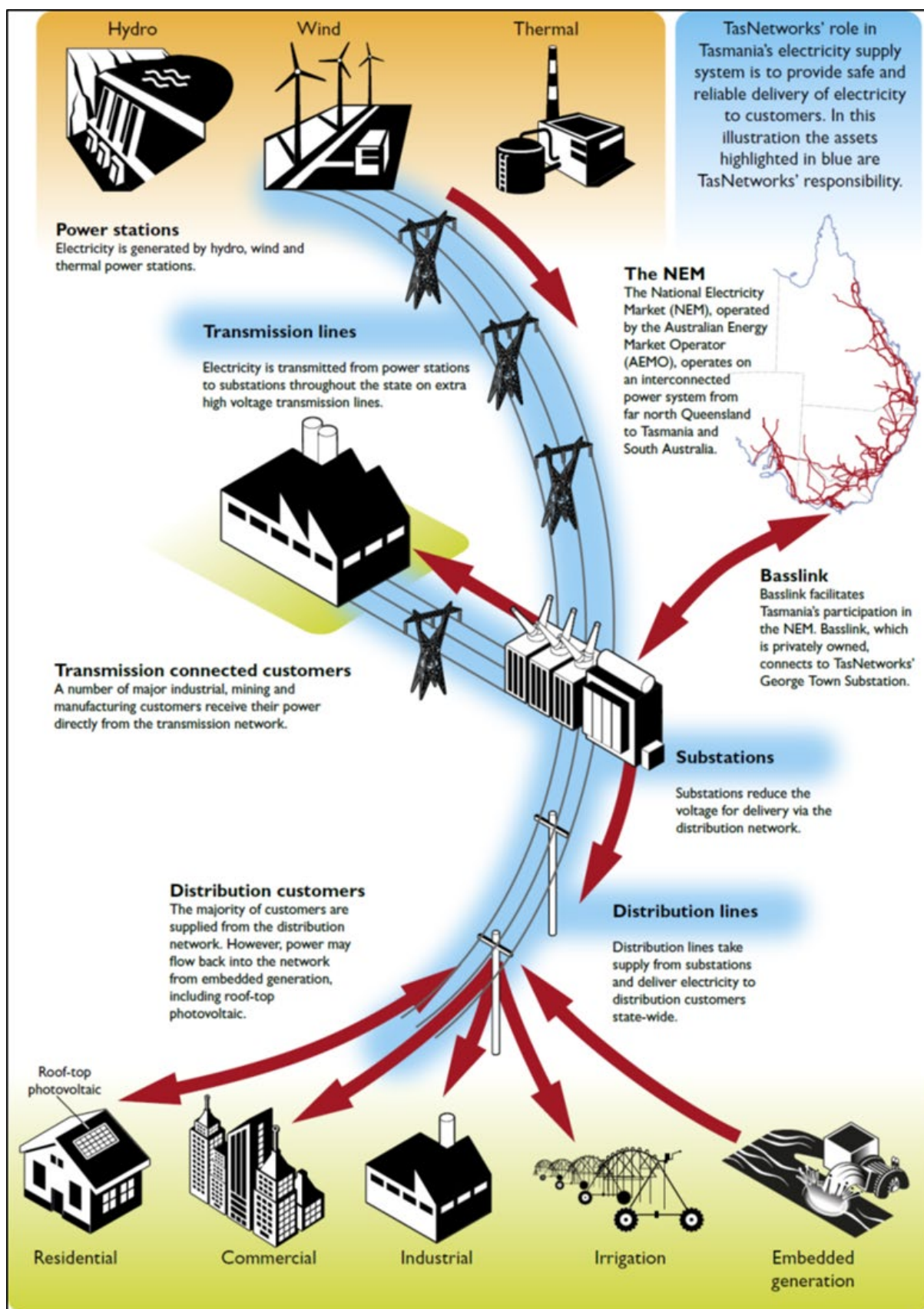


Figure 1 TasNetworks' role in Tasmania's Electricity Supply System

2. Executive Summary

TasNetworks, as a referral agency, has been notified of the public exhibition of West Tamar 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 West Tamar Council Local Government Area include one substation, one communication site and six 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 and 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;*
- *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 (and formerly Transend) on the Meander Valley, Brighton, Central Coast, Burnie, Glamorgan Spring Bay, Clarence, Circular Head, Devonport, Glenorchy and West Coast 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	West Tamar 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	West Tamar Interim Planning Scheme 2013
IPA	Inner Protection Area
LGA	Local Government Area
LPS	West Tamar 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

West Tamar 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 West Tamar Council LGA. This includes:

- Transmission lines which:
 - o Provide critical east/west power transfer from wind farms in the far north west, hydropower in the Mersey, Forth and West Coast to major industrial loads and DC interconnector at George Town via the 220kV transmission lines between Sheffield and George Town;
 - o 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 Hadspen; and
 - o Transfer power to/from Trevallyn substation via 110kV lines.
- Trevallyn Substation is a transmission substation located near Launceston and provides a critical role in transforming electrical power to distribution level for the supply of distribution zone substations, and retail customers in the surrounding area. Trevallyn Substation also provides a connection point for an adjacent generator station. This site is critical for the security and reliability of electricity supply in the Launceston region.
- A communication site 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 West Tamar LGA

Asset type	Location
Substation sites	- Trevallyn Substation
Communication sites	- Holwell Communication Site
Electricity Transmission Corridors	<ul style="list-style-type: none"> - Line 471 Hadspen – Trevallyn No.2 110kV - Line 472 Trevallyn – Mowbray 110kV - Line 413 Palmerston – Trevallyn 110kV - Line 509 Palmerston – George Town 220kV - Line 510 Sheffield – George Town 220kV - Unregistered Wayleave Agreement easement (UWA)

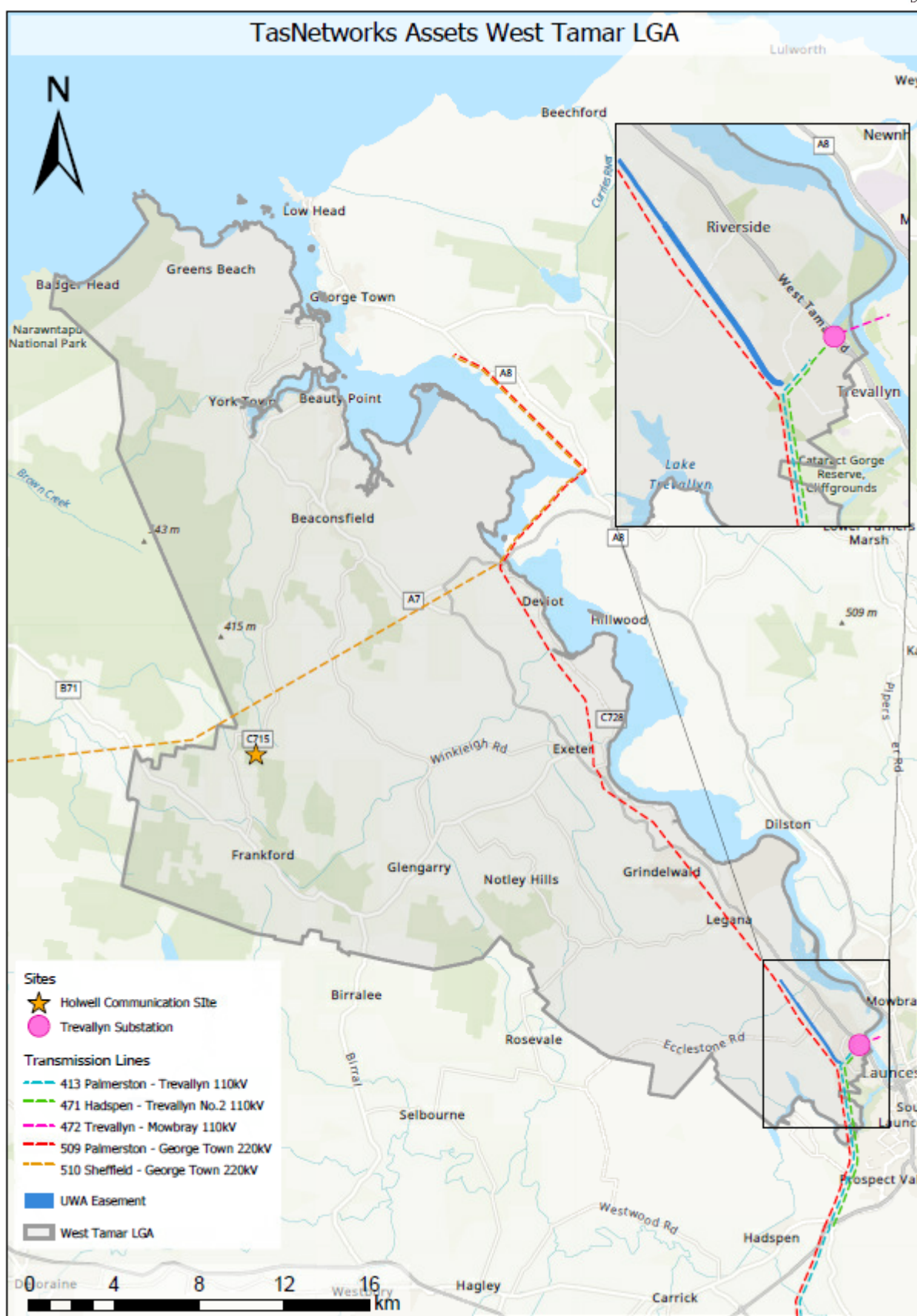


Figure 2 TasNetworks Assets within West Tamar LGA

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 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 West Tamar municipal area is identified as being within Northern area within [TasNetworks Annual Planning Report 2020](#). The Report details the Northern planning area is diverse with the urban and commercial area in Greater Launceston and the Tamar, industrial load in and around George Town including major energy users connected directly to the transmission network, and 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 220kV transmission network at Hadspen, George Town and Palmerston (near Poatina) substations. Hadspen Substation also provides an 110kV to Launceston and north-east Tasmania, and Palmerston Substation provides 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 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.

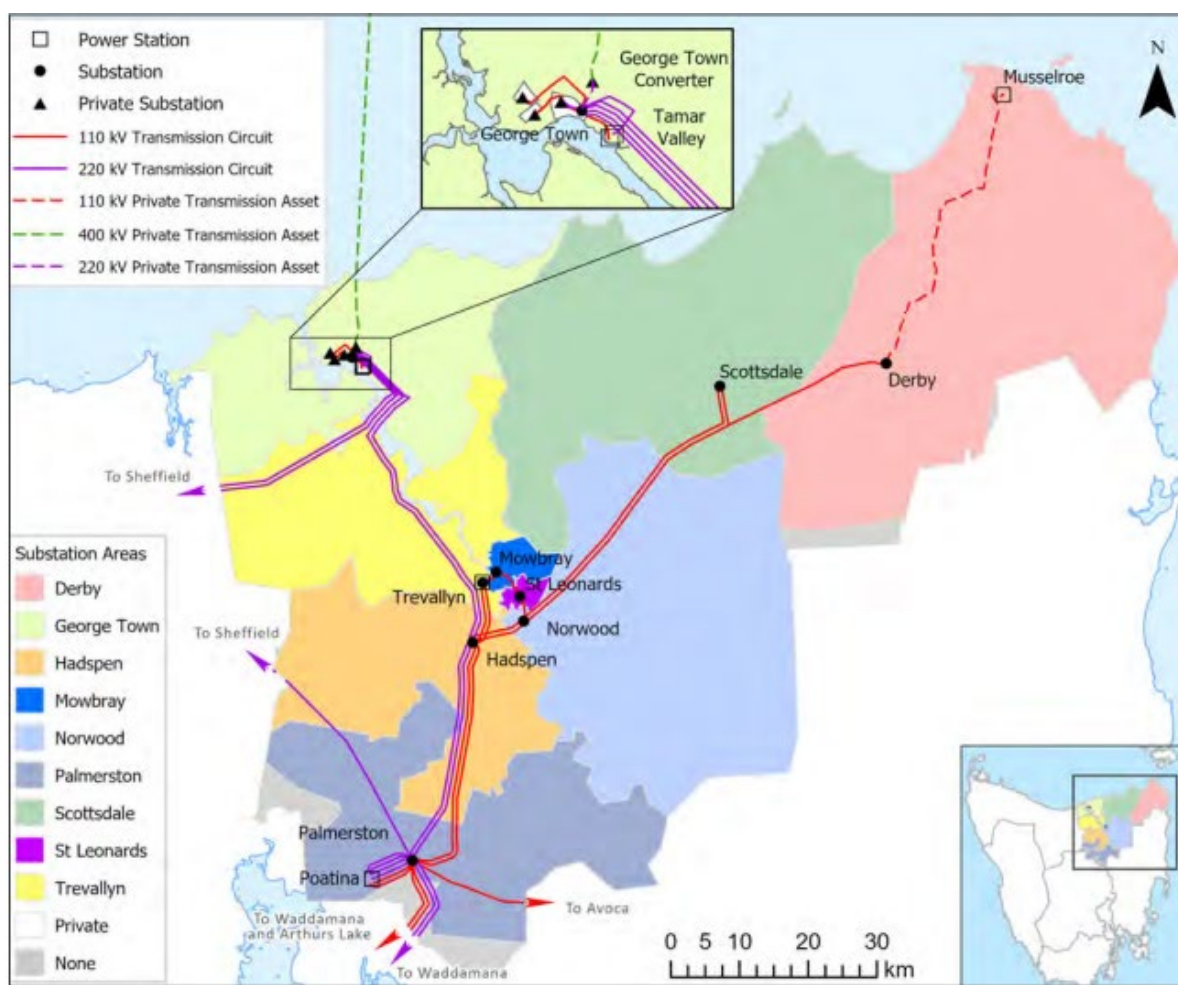


Figure 3 TasNetworks Northern planning area network

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 West Tamar LPS evaluation

LPS Mapping	Policy Position	Rationale	West Tamar LPS evaluation summary / submission
Zoning	<ul style="list-style-type: none"> - 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. 	<ul style="list-style-type: none"> - 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. 	<p>LPS is consistent with this policy position for:</p> <ul style="list-style-type: none"> - Trevallyn Substation
	No specific zoning is to be applied to ETC	<ul style="list-style-type: none"> - Allows for other compatible uses to occur in corridor - Corridors are protected by ETIPC 	<p>Amendment sought, inconsistent with policy position. The following asset should be rezoned Utilities:</p> <ul style="list-style-type: none"> - Holwell Communication Site
	Landscape Conservation Zone (through LPS rezoning) is not applied to ETC	<ul style="list-style-type: none"> - Conflicts with the existing use of the land for electricity transmission - Diminishes strategic benefit of existing corridors making consideration of new corridors more likely 	<p>LPS is consistent with this policy position, supported.</p>

LPS Mapping	Policy Position	Rationale	West Tamar LPS evaluation summary / submission
		<ul style="list-style-type: none"> - 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 <ul style="list-style-type: none"> - Substations or communication sites where the site is cleared of native vegetation 	<ul style="list-style-type: none"> - 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 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. 	Amendment sought, inconsistent with policy position. Remove priority vegetation overlay from: <ul style="list-style-type: none"> - Trevallyn Substation - Holwell Substation 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"> - Substations, - Communication sites, or - ETC 	<ul style="list-style-type: none"> - Assets are required to be cleared for safety and maintenance - Where asset already exists impact on scenic quality / natural assets have already been assessed / approved and will 	Inconsistent with policy position. Schedule 6 transition prevents amendments required for consistency Scenic Protection Code has been applied to numerous ETCs.

LPS Mapping	Policy Position	Rationale	West Tamar LPS evaluation summary / submission
		continue to be impacted for the lifespan of the asset.	
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.
Utilities Use Approval Status	In all zones, PPZs and SAPs the Use Class for Utilities and Minor Utilities must be either <ul style="list-style-type: none"> - 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.	Inconsistent with policy position. Schedule 6 transition prevents amendments required for consistency <ul style="list-style-type: none"> - Windsor Community Precinct SAP prohibits Utilities Use Class
PPZs or SAPs use, development and subdivision standards	Are drafted with at least a discretionary approval pathway. For example: <ul style="list-style-type: none"> - No absolute height limit - Allow subdivision for utilities 	<ul style="list-style-type: none"> - Consistent with policy in SPPs that enables consideration of Utilities in all zones and no finite quantitative development or subdivision standards. 	LPS is consistent with policy position, supported. <ul style="list-style-type: none"> - Beaconsfield Quarry SAP - Residential Supply and Density SAP

LPS Mapping	Policy Position	Rationale	West Tamar LPS evaluation summary / submission
ETIPC	Is correctly mapped and applied to relevant transmission infrastructure	Consistent with policy in SPPs	<p>Amendment sought, inconsistent with policy position. Please remove the Communication Site layer of the ETIPC from</p> <ul style="list-style-type: none"> - Trevallyn Substation (CT137349/3) - Trevallyn Intake (CT127958/1)
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"> - Potential impact on future development - 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 	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. See 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, 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:

- Does not recognise the already established vegetation clearance and scenic quality;
- Does not recognise 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;
- 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;
- 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 and West Coast 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

TasNetworks only transmission substation located within the West Tamar LGA is the Trevallyn 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">- Priority Vegetation not applied where the site is cleared of native vegetation- Scenic Protection not applied	<p>Not applied or</p> <ul style="list-style-type: none">- Utilities use is NPR, P or D.- No finite discretionary development standards	Applied

Trevallyn Substation is located at Elouera Street, Trevallyn (CT137349/4). The site is owned by TasNetworks and is zoned Utilities in the draft LPS which is supported by TasNetworks.

As shown in the following figure the Natural Assets Code – Priority Vegetation Overlay has been applied to a portion of the Trevallyn Substation 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.

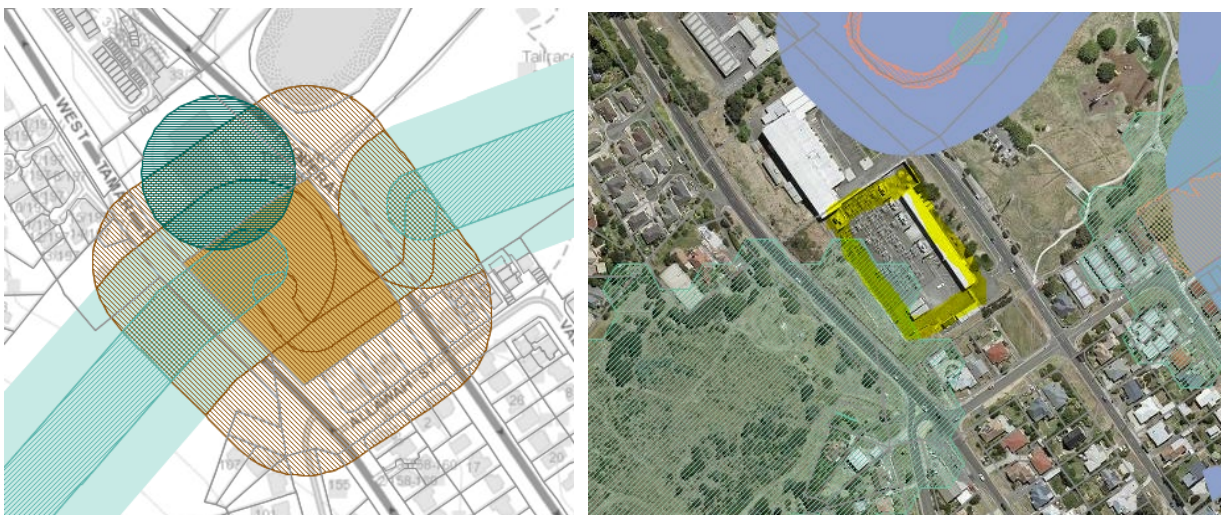


Figure 4 Trevallyn Substation ETIPC and Priority Vegetation overlay

The Scenic Protection Code has not been applied to the substation. Nor has a Particular Purpose Zone (PPZ) or a Specific Area Plan (SAP). This is supported by TasNetworks.

As shown in the above figure the Electricity Transmission Infrastructure Protection Code (ETIPC) has been applied to the site consistent with TasNetworks requirements.

5.2. Communication Sites

There is one communication site within West Tamar LGA that is operated by TasNetworks and required to be protected through the ETIPC Overlay. This is the Holwell Communication Site.

The following table details TasNetworks planning policy position with respect to communication sites.

Table 5 Communication Site Policy Position Summary

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

Holwell Communication Site is located at Holwell Road, Howell (PID 1755421). The site is zoned Rural under the LPS. This zoning is not supported by TasNetworks. TasNetworks requests that the sites be rezoned to Utilities. The Utilities Zone is considered appropriate for TasNetworks communication infrastructure as it forms a key part of the broader electricity network and is considered as major utilities. This submission is in line how similar communication sites have been represented in other LPSs.

As shown in the following figure the Natural Assets Code – Priority Vegetation Overlay has been applied to the whole site despite the majority of the site is 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.



Figure 5 Holwell Communication Site – Priority Vegetation layer

The Scenic Protection Code has not been applied to the substation. Nor has a PPZ or a SAP. This is supported by TasNetworks.

The Electricity Transmission Infrastructure Protection Code (ETIPC) has been applied to the site consistent with TasNetworks requirements.

The draft LPS has identified two additional communication sites – Trevallyn Substation (CT137349/3) and the Trevallyn Intake (CT127958/1). Whilst it is acknowledged that the layer has been provided from LIST Map, these sites are no longer in use and are to be decommissioned. As such, it is requested that the draft LPS ETIPC Communication Site layer be removed from these sites.

5.3. Electricity Transmission Corridors

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

- Line 471 Hadspen – Trevallyn No.2 110kV
- Line 472 Trevallyn – Mowbray 110kV
- Line 413 Palmerston – Trevallyn 110kV
- Line 509 Palmerston – George Town 220kV
- Line 510 Sheffield – George Town 220kV
- An Unregistered Wayleave Agreement (UWA)

These corridors are shown in Figure 2. The following table details TasNetworks policy position regard ETC.

Table 6 ETC Policy Position Summary

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

A range of zones have been applied to the land underneath these corridors and as the SPP allows for consideration of Utilities in all zones this is acceptable to TasNetworks. The Landscape Conservation Zone has not been utilised in the draft LPS and therefore hasn't been applied to any of the corridors which is supported by TasNetworks.

The Scenic Protection Code has been carried forward from the Interim Scheme and applied over the West Tamar Highway and Frankford Highway. The Scenic Protection Code intersects with the ETIPC ETC and IPAs in numerous instances as shown in the following figure. As the Scenic Protection Code has transitioned from the Interim Scheme and in line with drafting guidelines TasNetworks acknowledges that it is outside the remit of this representation. Notwithstanding this, please refer to section 4.2.2 which raises TasNetworks concerns regarding the Scenic Protection Code.



Figure 6 Scenic Protection Code (purple) and ETIPC (blue)

The Inner Protection Area (IPA) and Electricity Transmission Corridor (ETC) has been mapped correctly in the draft LPS. The Residential Supply and Density Specific Area Plan has been applied to ETC which is discussed 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 includes three SAPs

- WTA-S1.0 Windsor Community Precinct SAP
- WTA-S2.0 Beaconsfield Quarry SAP
- WTA-S3.0 Residential Supply and Density SAP

It is understood that the Windsor Community Precinct SAP is transitioning under Schedule 6.

TasNetworks acknowledges that comments regarding this SAP cannot be considered by the Planning Authority due to the transitioning provisions. Notwithstanding this, TasNetworks would like to highlight that the SAP is drafted inconsistent with the SPP and TasNetworks policy position as it prohibits Utilities as a Use Class.

TasNetworks notes that the Beaconsfield Quarry SAP and the Residential Supply and Density SAP are drafted consistent with the SPP and TasNetworks policy position and make no representation regarding these SAP.

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 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 (e.g.: 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 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>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 18m², roof span 3m, height 2.4m, fill of up to 0.5m.</p> <p>Up to two shed: 10m², sides 3.2m, height 2.4m.</p> <p>Similar to PD1.</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>

SPP exemption	Comment
<p>4.3.9 agricultural buildings and works in the Rural Zone or Agriculture Zone</p>	<p>Floor area 108m², height 6m, wall height 4m.</p> <p>Already subject to the Local Historic Heritage Code.</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 200m², height 12m.</p> <p>Already subject to the Local Historic Heritage Code and the Scenic Protection Code.</p> <p>TN COMMENT:</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 (i.e.: 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>

SPP exemption	Comment
4.3.11 garden structures	<p>Unlimited number, 20m², 3m height max. Already subject to the Local Historic Heritage Code.</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> <p>Cost of removal is limited, however still requires post breach enforcement of easement rights.</p>
4.5.1 ground mounted solar energy installations	<p>Each installation can be 18m² area. Already subject to the Local Historic Heritage Code.</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>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>
4.6.9 land filling	
	<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>TN COMMENT:</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>

SPP exemption	Comment
4.6.13 rain-water tanks	<p>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.</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> <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>TN COMMENT:</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>
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	