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**To:** GCC Corporate Mail  
**Subject:** TasNetworks submission on the draft GCC LPS  
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Attention Lyndal Byrne

Please see attached TasNetworks representation regarding the Glenorchy draft Local Provisions Schedule.

Please don't hesitate to contact me if you require any further clarification.

It would be appreciated if you could please confirm receipt of this representation.

Regards

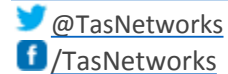


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# Glenorchy City Council draft Local Provisions Schedule

TasNetworks' Submission

September 2020

## Contents

1.	Who is TasNetworks?.....	4
2.	Executive Summary.....	6
3.	Overview .....	7
3.1.	Glossary .....	7
3.2.	Existing Assets .....	8
3.3.	Planned Future Development .....	11
4.	Submission .....	12
4.1.	Overview.....	12
4.2.	SPP Issues .....	18
4.2.1.	Exemptions.....	18
4.2.2.	Scenic Protection Code .....	18
5.	Appendix 1 – Detailed Assessment.....	20
5.1.	Substations .....	20
5.2.	Communication Sites.....	20
5.3.	Electricity Transmission Corridors.....	22
5.4.	Particular Purpose Zones (PPZ) and Specific Area Plans (SAP) .....	25
6.	Appendix 2 – SPP Issues .....	27

## Index of Figures

Figure 1	TasNetworks' role in Tasmania's Electricity Supply System .....	5
Figure 2	TasNetworks Assets within Glenorchy LGA .....	10
Figure 3	Goat Hill Communication Site subject to the Priority Vegetation Overlay .....	22
Figure 4	ETC and Landscape Conservation Zone .....	23
Figure 5	ETC and Scenic Protection Code .....	24

## Index of Tables

Table 1	Definitions.....	7
Table 2	TasNetworks Assets in Glenorchy LGA .....	9
Table 3	Policy Position – Submission Summary and Glenorchy LPS evaluation.....	13
Table 4	Substations Policy Position Summary .....	20
Table 5	Communication Sites Policy Position Summary .....	21
Table 6	ETC Policy Position Summary .....	22
Table 7	PPZ and SAP Policy Position Summary .....	25
Table 8	Exemptions and land use conflict with electricity transmission assets .....	28

## 1. Who is TasNetworks?

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

### Transmission

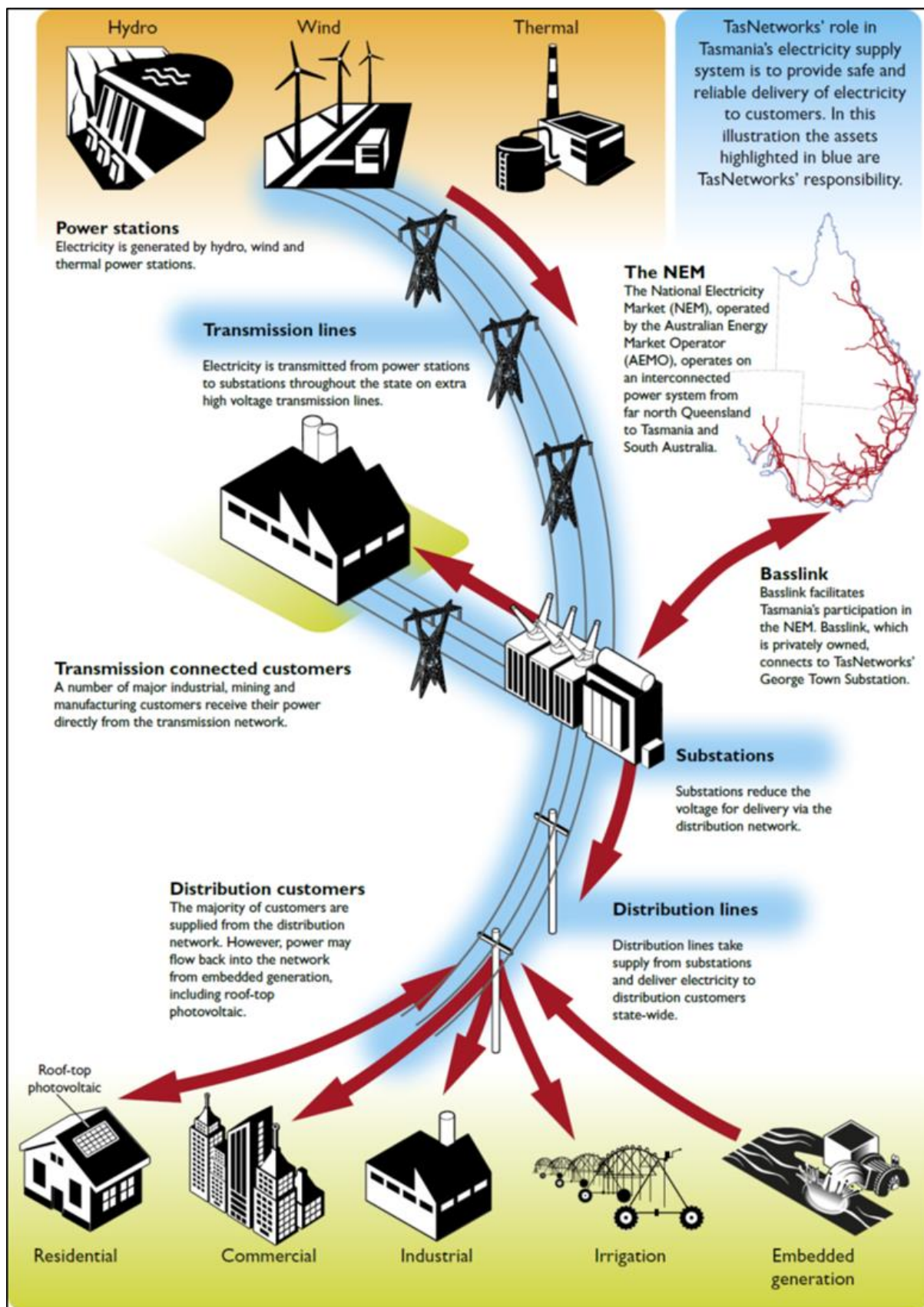
TasNetworks own, operate and maintain 3564 circuit kilometres of transmission lines and underground cables, 49 transmission substations and six switching stations across the state.

### Distribution

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

### Communications

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



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



## 2. Executive Summary

TasNetworks, as a referral agency, has been notified of the public exhibition of Glenorchy City 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 Glenorchy City Council Local Government Area includes two substations, three communication sites and 11 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 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 and Devonport 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	Glenorchy City 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	Glenorchy Interim Planning Scheme 2015
IPA	Inner Protection Area
LGA	Local Government Area
LPS	Glenorchy 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

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

- A number of transmission lines which:
  - Provide critical power transfer from the north of the state and power stations on the Derwent-Nive hydropower scheme to major load centres in the greater Hobart region via 220kV transmission lines between Liapootah and Chapel Street;
  - Provide critical power transfer from power stations on the Derwent-Nive hydropower scheme to major load centres in the greater Hobart region via 110kV transmission lines between New Norfolk and Chapel Street;
  - Provide critical power transfer from Gordon Power Station (Tasmania's largest generator) to major load centres in the greater Hobart region via 220kV transmission lines between Gordon and Chapel Street;
  - Provide critical power transfer between load centres in greater Hobart's western shores via the 110kV transmission lines between Chapel Street and Creek Road; and
  - Provide connection to load centres at Glenorchy and Risdon 110kV transmission lines.
- Transmission substations including:
  - Chapel Street Substation which is the 220kV electricity transmission connection point for the Hobart West locality. At the site electrical power is transformed to lower voltage suitable for transmission to other substation across the Greater Hobart region, and for distribution to commercial, industrial and residential customers. The site is critical for the security and reliability of electricity supply to the Greater Hobart region.
  - Risdon Substation is also located in the Hobart West locality and provides a critical role in transforming electrical power to sub-transmission voltage levels, suitable for supplying a network of radial zone substations across the Greater Hobart region, and for also supplying electrical power via the distribution network to commercial, industrial and residential customers. Risdon Substation also provide direct electrical connection to an adjacent large-scale zinc smelter.
- A number of communication sites used in operation of the transmission electricity network. Each of the sites have a degree of importance in either regional or state operational capability to provide metering and control of the 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 Glenorchy LGA**

Asset type	Location
Substation sites	<ul style="list-style-type: none"> <li>- Chapel Street Substation <ul style="list-style-type: none"> <li>o 15 Albion Street, Glenorchy</li> </ul> </li> <li>- Risdon Substation <ul style="list-style-type: none"> <li>o 112 Ashbolt Crescent, Lutana</li> </ul> </li> </ul>
Communication sites	<ul style="list-style-type: none"> <li>- Chapel Street Substation Communication Site <ul style="list-style-type: none"> <li>o 15 Albion Street, Glenorchy</li> </ul> </li> <li>- Risdon Substation Communication Site – fibre connection <ul style="list-style-type: none"> <li>o 112 Ashbolt Crescent, Lutana</li> </ul> </li> <li>- Goat Hill Communication Site <ul style="list-style-type: none"> <li>o 365A Collinsvale Road, Collinsvale</li> </ul> </li> </ul>
Electricity Transmission Corridor	<ul style="list-style-type: none"> <li>- Line 403 Lindisfarne – Risdon 110kV</li> <li>- Line 404 Creek Road – Risdon 110kV</li> <li>- Line 430 Chapel Street – Creek Road (east) 110kV</li> <li>- Line 431 Chapel Street – Creek Road (west) 110kV</li> <li>- Line 432 Chapel Street – Knights Road 110kV</li> <li>- Line 462 New Norfolk – Chapel Street Junction 110kV</li> <li>- Line 463 New Norfolk – Creek Road 110kV</li> <li>- Line 481 Chapel Street – Chapel Street Junction 110kV</li> <li>- Line 500 Liapootah – Chapel Street 220kV</li> <li>- Line 516 Gordon – Chapel Street 220kV</li> <li>- Unregistered Wayleave Agreement</li> </ul>



**Figure 2 TasNetworks Assets within Glenorchy 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 Glenorchy municipal area is identified as being within the Greater Hobart area within TasNetworks [Annual Planning Report 2019](#). The Report identifies a new asset retirement and replacement project associated with the replacement of low voltage underground cables in the Glenorchy area. This committed project will likely fall under the ESI Regulation exemptions.

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

## 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 Glenorchy LPS evaluation**

LPS Mapping	Policy Position	Rationale	Glenorchy 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>	<p>Consistent with policy position, supported</p> <p>The following assets are zoned Utilities</p> <ul style="list-style-type: none"> <li>- Chapel Street Substation</li> <li>- Chapel Street Substation Communication Site</li> <li>- Risdon Substation</li> <li>- Goat Hill Communication Site</li> </ul>
	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> </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 431</li> <li>- Line 463</li> <li>- Line 432</li> </ul>

LPS Mapping	Policy Position	Rationale	Glenorchy LPS evaluation summary / submission
		<ul style="list-style-type: none"> <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>	<ul style="list-style-type: none"> <li>- Line 516</li> <li>- Line 500</li> <li>- Line 462</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>	<p>Amendment sought to remove priority vegetation overlay from:</p> <ul style="list-style-type: none"> <li>- Goat Hill Communication Site</li> </ul> <p>Code has been applied to developed / cleared parts of the site</p> <p>Note: vegetation clearance exemptions from the application of a planning scheme for electricity infrastructure.</p> <p>LPS is consistent with this policy position for</p> <ul style="list-style-type: none"> <li>- Code has been applied to Chapel Street Substation and Communication Site, but not to developed parts of the site.</li> <li>- Code has not been applied to Risdon Substation</li> </ul>
Scenic Protection Code Overlay	Not to be applied to <ul style="list-style-type: none"> <li>- Substations,</li> </ul>	<ul style="list-style-type: none"> <li>- Assets are required to be cleared for safety and maintenance</li> </ul>	<p>Inconsistent with policy position, not supported - transitioning through Schedule 6.</p> <p>Code has been applied to</p>



LPS Mapping	Policy Position	Rationale	Glenorchy LPS evaluation summary / submission
	<ul style="list-style-type: none"> <li>- Communication sites, or</li> <li>- ETC</li> </ul>	<ul style="list-style-type: none"> <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>	<ul style="list-style-type: none"> <li>- Line 431</li> <li>- Line 463</li> <li>- Line 432</li> <li>- Line 462</li> <li>- Line 516</li> <li>- Line 500</li> </ul> <p>LPS is consistent with this policy position as Code has not been applied to</p> <ul style="list-style-type: none"> <li>- Chapel Street Substation and Communication Site</li> <li>- Risdon Substation</li> <li>- Goat Hill Communication Site</li> </ul>
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 this policy position, supported
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>	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.	LPS is consistent with policy position, supported.

LPS Mapping	Policy Position	Rationale	Glenorchy LPS evaluation summary / submission
	Utilities must not be Prohibited		
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><b>Inconsistent with policy position, not supported – transitioning through Schedule 6.</b></p> <ul style="list-style-type: none"> <li>- GLE P1.0 PPZ Future Road Corridor (subdivision)</li> <li>- GLE P2.0 Technopark (building height)</li> <li>- GLE S1.0 Claremont Peninsula SAP (building height &amp; subdivision)</li> <li>- GLE S2.0 Wilkinsons Point and Elwick Bay SAP (subdivision)</li> <li>- GLE S3.0 Hilton Hill and Environs SAP (subdivision)</li> <li>- GLE S4.0 Black Snake Rural Village SAP (subdivision)</li> <li>- GLE S5.0 656 Main Road Berriedale SAP (building height)</li> </ul> <p>LPS is consistent with this policy position and is supported for:</p> <ul style="list-style-type: none"> <li>- GLE S6.0 Hobart Showground SAP</li> <li>- GLE S7.0 Whitestone Point SAP</li> <li>- GLE S8.0 Glenorchy Activity Centre Urban Design SAP</li> <li>- GLE S9.0 Berriedale Potential Dispersive Soils SAP GLE S10.0 Beedhams Bay Potential Acid Sulfate Soils SAP</li> <li>- GLE S11.0 MONA SAP</li> </ul>

LPS Mapping	Policy Position	Rationale	Glenorchy LPS evaluation summary / submission
ETIPC	Is correctly mapped and applied to relevant transmission infrastructure	Consistent with policy in SPPs	Consistent with policy position, supported
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>	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 Council, Brighton Council, Central Coast Council, Glamorgan Spring Bay Council, Clarence Council, Circular Head Council and Devonport Council as well as the Commissioners throughout the draft LPS assessment process and will continue to be raised as part of this process.

## 5. Appendix 1 – Detailed Assessment

### 5.1. Substations

Chapel Street Substation and Risdon Substation are both located within the Glenorchy municipality and are both protected through the ETIPC.

The Chapel Street Substation is located at 15 Albion Street, Glenorchy and is comprised of a number of titles which are known as CT 35341/1, CT 142966/1, CT 35340/2, CT 35340/1 and CT 35340/1.

The Risdon Substation is located at 112 Ashbolt Crescent, Lutana and is comprised of a number of titles known as CT 199803/10, CT 30/7889, CT 205469/1 and CT 222848/1.

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	Not applied <ul style="list-style-type: none"><li>- Scenic Protection (SP)</li><li>- Priority Vegetation (PV) - where the site is cleared of native vegetation</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

Both substations are zoned Utilities within the draft LPS which is supported by TasNetworks. The Utilities zoning reflects the primary and future use of the site and is consistent with the zone application guidelines issued by the State and TasNetworks policy position for substations.

The Priority Vegetation Overlay of the Natural Assets Code has been applied to the Chapel Street Substation, however not to developed areas of the site. TasNetworks has no objection to this application. The Scenic Protection Code has not been applied to either of the substation sites which is also supported by TasNetworks.

No PPZs or SAPs have been applied over substation sites which is supported by TasNetworks. Both of the sites are mapped correctly through the ETIPC.

TasNetworks is supportive of how both the Chapel Street and Risdon substations are reflected in the draft LPS.

### 5.2. Communication Sites

There are three communication sites within Glenorchy municipality that are operated by TasNetworks. These are:

- Chapel Street Substation Communication Site
- Risdon Substation Communication Site (fibre connection)
- Goat Hill Communication Site 365A Collinsvale Road, Collinsvale (CT 6594/1)

The Risdon Substation Communication Site is located at Risdon Substation and is provided with a fibre connection. As such, this communication site does not form part of the electricity transmission backbone and is not required to be identified in the ETIPC. No representation is made regarding this communication site.

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

**Table 5 Communication Sites Policy Position Summary**

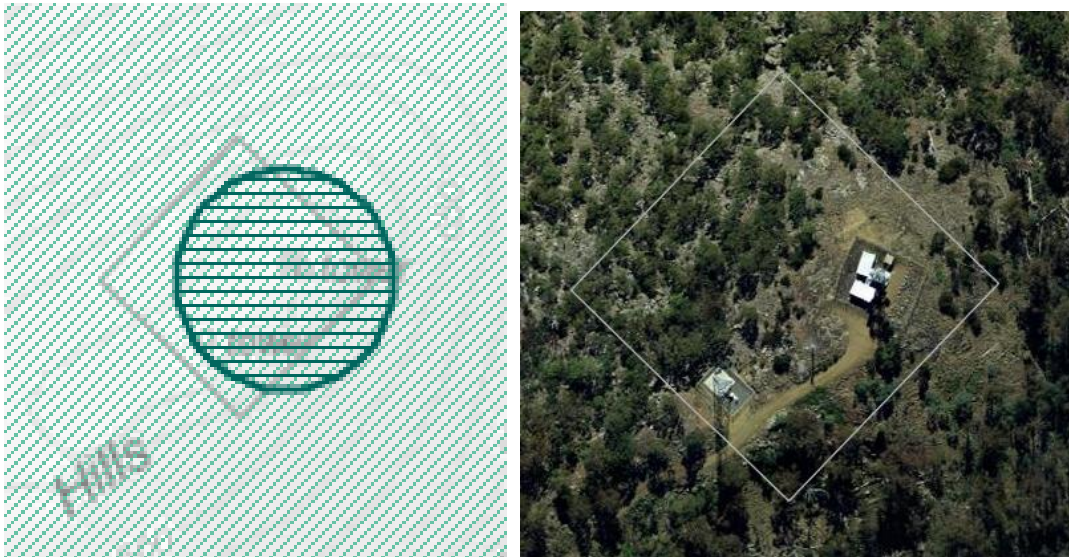
Zoning	Overlay	SAP / PPZ	ETIPC
Zoned Utilities	Not applied - Scenic Protection (SP) - Priority Vegetation (PV) - where the site is cleared of native vegetation	Not applied or - Utilities use is NPR, P or D. - No finite discretionary development standards	Applied

The Chapel Street Substation Communication Site is co-located with the Chapel Street Substation site. As detailed above, the site is zoned Utilities, is not subject to the Scenic Protection Code, the Priority Vegetation overlay has not been applied to developed parts of the site. Further, no PPZs or SAPs have been applied to the site and the ETIPC has been applied correctly. TasNetworks is supportive of how this asset is reflected in the draft LPS.

The Goat Hill Communication Site is zoned Utilities which is supported by TasNetworks. This zoning acknowledges that TasNetworks communication infrastructure forms a key part of the broader electricity network and is considered as major utilities.

The site is located within its own title and is partially cleared of vegetation. However as shown in the following figure the site in its entirety is subject to the Priority Vegetation Overlay of the Natural Assets Code. TasNetworks requests that this overlay be removed from the site where it is cleared of vegetation and developed.





**Figure 3 Goat Hill Communication Site subject to the Priority Vegetation Overlay**

The Scenic Protection Code has not been applied to the Goat Hill Communication Site which is supported by TasNetworks. The ETIPC has been applied appropriately to the site.

### 5.3. Electricity Transmission Corridors

There are 11 TasNetworks Electricity Transmission Corridors that extend across the Glenorchy municipal area. These are:

- Line 430 Chapel Street – Creek Road (east) 110kV
- Line 431 Chapel Street – Creek Road (west) 110kV
- Line 463 New Norfolk – Creek Road 110kV
- Line 432 Chapel Street – Knights Road 110kV
- Line 481 Chapel Street – Chapel Street Junction 110kV
- Line 462 New Norfolk – Chapel Street Junction 110kV
- Line 516 Gordon – Chapel Street 220kV
- Line 500 Liapootah – Chapel Street 220kV
- Line 404 Creek Road – Risdon 110kV
- Line 403 Lindisfarne – Risdon 110kV
- Unregistered Wayleave Agreement (between Claremont and Berriedale)

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

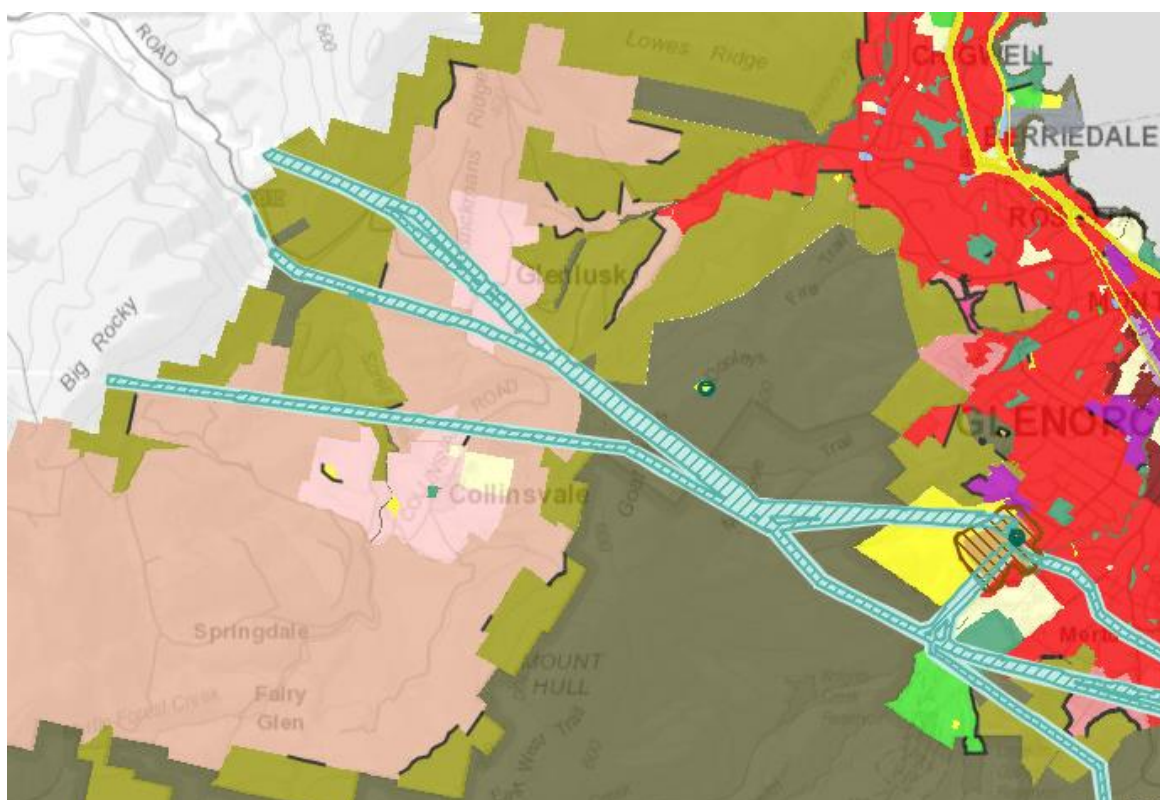
**Table 6 ETC Policy Position Summary**

Zoning	Overlay	ETIPC	SAP / PPZ
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<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>
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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. Notwithstanding this, Landscape Conservation Zone (green) has been applied to the following ETC as shown in the following figure:

- Line 431 Chapel Street – Creek Road (west) 110kV
- Line 463 New Norfolk – Creek Road 110kV
- Line 432 Chapel Street – Knights Road 110kV
- Line 516 Gordon – Chapel Street 220kV
- Line 500 Liapootah – Chapel Street 220kV
- Line 462 New Norfolk – Chapel Street Junction 110kV



**Figure 4 ETC and 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*.

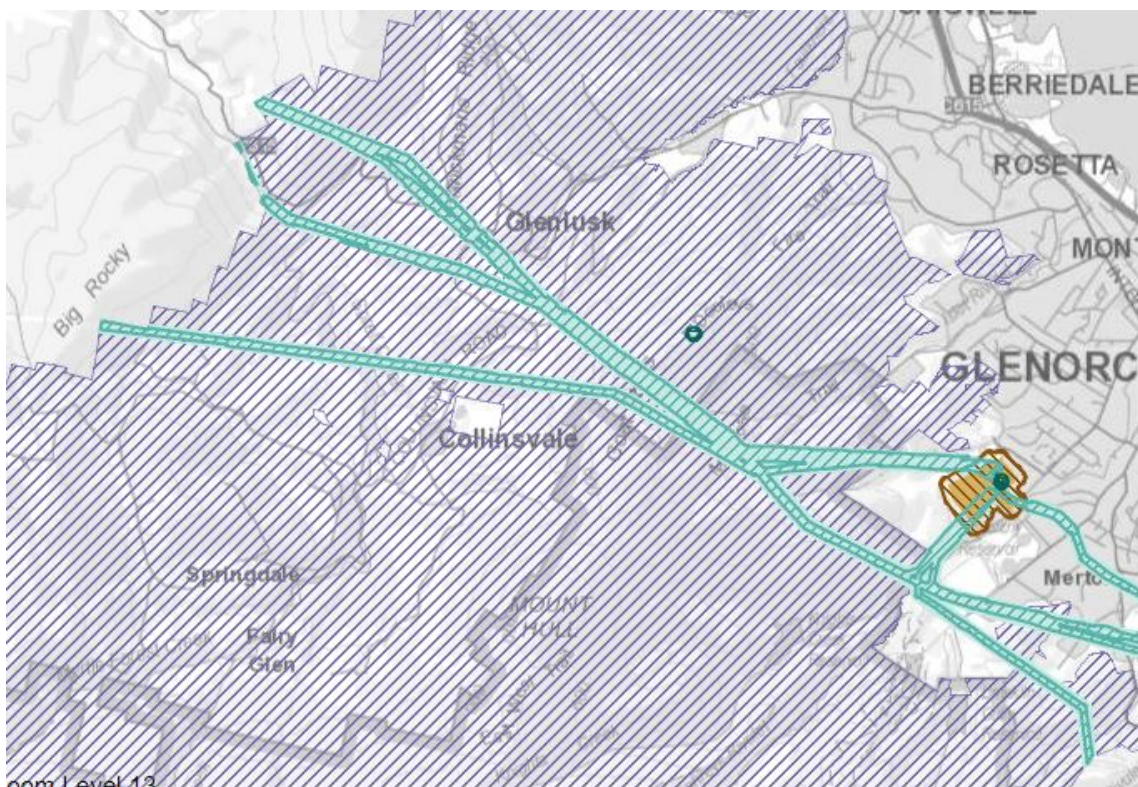


Additionally, development approval for augmentation of an existing corridor under the Landscape Conservation Zone is more onerous than if under the Environmental Living or Rural Resource Zones in the interim scheme or the Rural Zone under the SPP. For example the Acceptable Solution building height requirement 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.

The Scenic Protection Code has been applied to the same six ETC that the Landscape Conservation Zone has been applied to. It is understood that this Code has transitioned through Schedule 6. As detailed in section 4.2.2 of this report TasNetworks would like to highlight that the purpose of the Scenic Protection Code has the potential to conflict with the purpose of the ETIPC.



**Figure 5 ETC and Scenic Protection Code**

No PPZs or SAPs have been applied to any of the ETC which is supported by TasNetworks. It is noted that two Site Specific Qualifications GLE 22.1 and GLE 23.1 associated with the Landscape

Conservation Zone use classification and definition of Wellington Park are applied over ETC. These SSQ are transitioning through schedule 6 and not considered to have any significant impact on the ETC. The Electricity Transmission Infrastructure Protection Code has been applied correctly to the ETCs.

#### 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	<ul style="list-style-type: none"> <li>- Use Class for Utilities or Minor Utilities must be either NPR, P or D. Must not be Prohibited</li> </ul>
Development Standards in PPZ or SAP	<ul style="list-style-type: none"> <li>- Are not drafted without a discretionary approval pathway (e.g not include a finite development standard - an absolute height limit)</li> <li>- Allow subdivision for Utilities use in all zones</li> </ul>

The draft LPS includes two PPZ and 11 SAP. Of which, it is understood that all are transitioning under schedule 6 except for:

- GLE S9.0 Berriedale Potential Dispersive Soils SAP; and
- GLE S10.0 Beedhams Bay Potential Acid Sulfate Soils SAP

With regards to GLE S9.0 Berriedale Potential Dispersive Soils SAP, TasNetworks notes that the subdivision provision that includes No Acceptable Solution is 'in addition' to the SPP General Residential and Landscape Conservation zones subdivision provisions which allow subdivision for Utilities. As such TasNetworks has no objection to this drafting. TasNetworks has no objection to the drafting of GLE S10.0 Beedhams Bay Potential Acid Sulfate Soils SAP.

It is understood that the following PPZ and SAP are transitioning under schedule 6.

- GLE P1.0 PPZ Future Road Corridor
- GLE P2.0 Technopark
- GLE S1.0 Claremont Peninsula SAP
- GLE S2.0 Wilkinsons Point and Elwick Bay SAP
- GLE S3.0 Hilton Hill SAP
- GLE S4.0 Black Snake Rural Village SAP
- GLE S5.0 656 Main Road Berriedale SAP
- GLE S6.0 Hobart Show Ground SAP
- GLE S7.0 Whitestone Point SAP

- GLE S8.0 Glenorchy Activity Centre Urban Design SAP
- GLE S11.0 MONA SAP

TasNetworks acknowledges that comments regarding these PPZ and SAP cannot be considered by the Planning Authority. Notwithstanding this, TasNetworks would like note that GLE-P2.0, GLE-S1.0 and GLE-S5.0 are drafted inconsistent to the SPP and TasNetworks policy position as they include finite development standards for building height.

Similarly, GLE-P1.0, GLE-S1.0, GLE-S2.0, GLE-S3.0 and GLE-S4.0 all include subdivision standards that are inconsistent with the SPP and TasNetworks policy position as the current drafting either prohibits or requires a discretionary pathway for subdivision. The ability to consider subdivision for Utilities in all zones is a requirement for the effective planning and development of linear utility infrastructure.

## 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 (eg: dwelling encroachments within strategically beneficial easements may not cause operational issues for existing assets. However, dwelling acquisition and increased community and social impact of processes required to remove dwellings in the easement if it is required later can be avoided if encroachment is prevented in the first place.
- Supports compliance with AS 7000.

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

## Conflict Examples

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

Colour coding indicates the following:

Conflicts with easement rights and may be capable of management to ensure appropriate alignment with easement rights.
Conflicts with easement rights. In almost all cases, this exemption will pose a safety and operational hazard for overhead and underground transmission lines and cables.

**Table 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 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>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 108m<sup>2</sup>, 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 200m<sup>2</sup>, height 12m.</p> <p>Already subject to the Local Historic Heritage Code and the Scenic Protection Code.</p> <p><b>TN 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>

SPP exemption	Comment
4.3.11 garden structures	<p>Unlimited number, 20m<sup>2</sup>, 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 18m<sup>2</sup> 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><b>TN 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>

SPP exemption	Comment
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> <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>TN 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>
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	