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**PLANNING AND DEVELOPMENT (DRAFT VARIATION 351) CONSULTATION  
NOTICE 2015 NI2015 - 220**

Thank you for the opportunity to provide comment on the draft variation to the Territory Plan (DV 351).

We act for Woodhaven Investments Pty Ltd ('Woodhaven'). We have been instructed to provide the following comments on Woodhaven's behalf.

Woodhaven Investments Pty Ltd is the registered proprietor of Blocks 12 and 15 Section 99 Holt (Belconnen Golf Course) and Block 16 Section 99 Holt (FUA). Blocks 15 and 16 Section 99 Holt are directly impacted on by the proposed Variation and Block 12 is likely to be subject to some impact as the West Belconnen Urban Development progresses.

Woodhaven's comments are set out below.

**Figure 3 Territory Plan Zone Map Changes**

Figure 3 shows a new Transport and Services Zone on Block 1559 Belconnen District (TSZ2 – Services) and portions of Blocks 1606 and 1607 Belconnen District that are also designated as TSZ2 – Services. That part of the Transport and Services Zone that is on Blocks 1606 and 1607 is located at the southeastern corner of Block 1559.

The dimensions of the substation area to be located on Blocks 1606 and 1607 cannot be determined from Figure 3. The land proposed for zoning does not appear on ACTMAPi, and its dimensions can only be guessed at. Woodhaven understands that this land is intended for a 132kV zone substation to be established when the proposed West Belconnen development reaches about 3000 dwellings.

In the location shown in Figure 3 the zone substation would adversely affect residents in the proposed residential estate in the adjacent FUA on Block 16 Section 99 Holt. This adverse effect would arise through the close proximity of the zone substation to dwellings at the northern end of Block 16.

Dwellings would be affected visually by the facility's structures and security fencing which would be in the immediate foreground of dwellings in the proposed estate's Section AL and AI. There is also a potential for the dwellings to be adversely affected by noise from machinery associated with the facility's principal function. It is noted that the comments by EPA on page 16 draw attention to the requirement for noise mitigation at property boundaries of adjacent residential development.

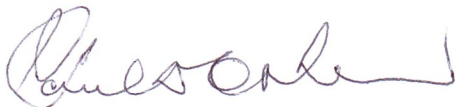
However, the wording of the West Belconnen Concept Plan at Rule 34 might be read as placing the onus for noise mitigation and other impacts of electrical transmission facilities and structures on residential users in the vicinity. The wording is uncertain and requires further drafting to ensure that:

- a. existing dwellings in the vicinity of the transmission lines and substations are not burdened with requirements for noise mitigation or security against Extremely Low Frequency Electromagnetic Radiation (ELF EMR) where emissions might be properly and more fairly dealt with in the design and location of noise and EMR sources; and,
- b. the duty imposed on the supply authority with respect to noise mitigation, referred to by the EPA in its comments on the draft variation, is not clouded by a lack of precision in the wording of Mandatory Rule 34.

A second issue arises out of the specification of the location of the 132kV zone substation in Figure 3. Defining such a small and specific location for the substation could prevent a more suitable location being established elsewhere. As the substation would appear to be some years away, it would seem unnecessary to prescribe its precise location at this time. It is suggested that either an area having an area that is the width of the substation and which extends along the southern and western boundaries of Block 1559 be added to the TSZ 2 zone, or the site be omitted until its precise location is determined in conjunction with affected stakeholders.

Rule 25 refers to '*Woodhaven Green*'. By inference this appears to refer to Block 16 Section 99 Holt. Woodhaven Investments have never used the name *Woodhaven Green* for its proposed estate, and has not yet chosen a name to be used. If Rule 25 refers to Block 16 Section 99 Holt, it should say as much, and not rely on an appellation devised without referral to the landholder.

Yours sincerely



Paul D Cohen  
Director