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File No: R/2019/18

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By email: [may.patterson@planning.nsw.gov.au](mailto:may.patterson@planning.nsw.gov.au)

Dear May,

### **Power Sydney's Future – SSI 8583 – City of Sydney Response - R/2019/18**

Thank you for your correspondence dated 11 October inviting the City to comment on the EIS for 'Powering Sydney's Future' (PSF), a major project involving a high-voltage electricity transmission line from Potts Hill to Alexandria. Within the City of Sydney LGA the works will include an upgrade of the Beaconsfield West substation and new underground transmission lines. The transmission route crosses into the LGA at the intersection of the Princess highway and Barwon Park Road. Thereafter the proposed route is as follows:

- South down Barwon Park Road or just inside Sydney Park;
- East, just inside the southern boundary of Sydney Park;
- Under the southernmost wetland in Sydney Park by way of under-bore;
- Continuation of the under-bore Under Euston Road; and
- Connecting with the Beaconsfield West Substation on Burrows Road.

The City notes that the entire project, which traverses several local government boundaries, will take approximately 24 months to complete and, notwithstanding mitigation measures, will involve significant disruption to residents, traffic flows and local amenities. Nonetheless for reasons set out below, the City generally supports the project as a vital piece of infrastructure renewal that will secure reliable electricity supply to Sydney CBD for decades.

Over the last three years the City has been in a position to provide information and feedback to Transgrid on the PSF project and to gain an understanding of the need for and challenges presented by it. The City is one of 11 members of the TransGrid Advisory Council (TAC). Membership of the TAC represents a broad range of customers and energy consumer interests and is convened by Transgrid to, among other matters, both challenge and provide constructive advice on major projects, policies and other TransGrid initiatives.

The underlying need for the PSF project is the normal deterioration over time in the capacity of the existing high voltage transmission capacity serving the City. A second consideration is the potential growth in demand for electrical power in the City arising from population growth and major new electrical loads such as the Light Rail project.

The City supports various initiatives in its LGA to improve energy efficiency, increase local generation via rooftop PV, install battery storage and implement demand management (DM) measures. Such initiatives reduce carbon emissions and mitigate future load growth. The City notes that TransGrid has also taken steps to secure a level of demand management in the City. While these initiatives may have taken a bit of pressure off the timing of the PSF project, the underlying need still remains.

The City, with others, encouraged TransGrid to modify the original scope of the PSF project so that ongoing focus on DM measures would not be compromised. TransGrid has subsequently adopted a potential two stage project. Two sets of conduits and common junction pits are being constructed at this time but only a single set of cables, adequate to serve the medium term, are being installed now. This approach creates a more equitable distribution of costs between present and future consumers, avoids major future disruption if installing extra cabling does become necessary and meanwhile maintains economic incentives for DM measures.

Early proposals for the cable route within the City of Sydney LGA involved crossing Sydney Park from a point on Barwon Park Road to the Beaconsfield substation by a fairly direct route. This would have caused major disruption to Park users during construction and left lasting impacts on Park amenities. Fortunately City and TransGrid were able to share information and work towards a better solution. In the process the City was able to gain a better understanding of the problems, compounded by the WestConnex project, that TransGrid faced with routes that avoided the Park altogether. Meanwhile TransGrid gained an appreciation of various means to minimise Park impacts and was able to establish the feasibility of skirting around the Park as now proposed.

While generally supportive of the project, the City has a number of concerns with potential residual impacts on Sydney Park and nearby residents. There is considerable potential to mitigate these concerns during detailed design. The attached Appendix outlines the concerns and, where appropriate, sets out consent conditions to address them.

Should you wish to speak with a Council officer about this submission please contact David Zabell, Senior Planner, on 9265 9333 or at [dzabell1@cityofsydney.nsw.gov.au](mailto:dzabell1@cityofsydney.nsw.gov.au).

Yours sincerely,



pp

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Manager Green Infrastructure

**Kim Woodbury**  
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**Chief Operations Office**  
**City of Sydney**

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## **POWERING SYDNEY'S FUTURE – SS 8583 – CITY OF SYDNEY RESPONSE**

### **APPENDIX – SPECIFIC CONSIDERATIONS AND GENERAL CONDITIONS**

#### **1. SPECIFIC CONSIDERATIONS**

##### **1.1. Tree Protection**

The general route selected by TransGrid takes into account the high value of mature trees alongside Barwon Park Road and in Sydney Park. When the route is refined during detailed design tree removal should be avoided, as far as practical, and impacts on trees adjacent works should be mitigated.

A significant number of trees have already been removed from the south east corner of Sydney Park to accommodate the widening of Euston Road for the WestConnex Project. TransGrid's proposal to lay cables by way of under-boring the wetland in this part of the Park, rather than going around the wetland, will avoid the need for further tree removal and is strongly supported.

The protection and retention of all medium and high value trees is a priority for the City, reflecting the value they hold for the community. The City of Sydney Street Tree Master Plan includes general street tree protection measures and conditions that should be followed - see Section 8 of the document linked here:

[http://www.cityofsydney.nsw.gov.au/\\_data/assets/pdf\\_file/0010/130240/STMP2011\\_150501-PartD.PDF](http://www.cityofsydney.nsw.gov.au/_data/assets/pdf_file/0010/130240/STMP2011_150501-PartD.PDF)

Existing street trees must be considered during the development of detailed design for the PSF works. In accordance with AS4970-2009 Protection of Trees on Development Sites, a Project Arborist must be engaged to assist with tree management advice during the various stages of the design and construction process.

##### **1.2. Impacts on Biodiversity**

Sydney Park is home to native nocturnal fauna that could be impacted by light spill from night works, such as the Powerful Owl, Eastern Bentwing Bat, and potentially the Large Footed Myotis (another bat species). Measures should include mitigating light spill and timing works appropriately to avoid displacing affected fauna.

### **1.3. Heritage and Urban design**

The works adjoin the rear of a heritage listed terrace row at Numbers 2-34 Campbell Road, Alexandria. The City requests that pre and post construction dilapidation reports are undertaken and submitted to Council.

During the detailed design phase the City would like the opportunity to provide Transgrid with feedback and possibly advice on the urban design of the upgraded Beaconsfield West substation.

### **1.4. Impact to public domain and construction management**

Any conditions of consent should require Construction Noise and Vibration Management Plans and Construction Traffic Management Plans to be developed in consultation with Council. The City's Parks Operations Manager is to be contacted prior to finalising the route of the transmission line through Sydney Park and be consulted in the preparation of a construction management plan to maintain access for the community and to protect significant elements of the park.

### **1.5. Park Maintenance – Depot Operation**

The proposed cable route will have some impact on the operation of the Sydney Park Depot and Nursery and park maintenance generally. The City expects TransGrid contractor to work with City's Parks Operations Manager to ensure that at all times vehicular access to the depot is maintained and worker and visitor health and safety is not compromised. This may require special measures to control noise, dust and other emissions as well as plant and vehicle movements.

A water treatment plant is being developed at the Depot with practical completion scheduled for July 2020. Recycled water will be trucked off-site in tankers for watering of street verge plantings and maintenance of this activity very important during hot, dry periods.

### **1.6. Environmental Risks and Management**

Sydney Park is located on old landfill sites. In common with most landfills, methane gas is generated at the Park. Earlier this year the NSW EPA made a declaration with respect to the Sydney Park and adjacent pathways and roadways (Declaration Number 20181108; Area Number 3433). The City is working with the EPA and has put forward a voluntary management proposal for Sydney Park.

There is potential for the civil works needed to lay cable, create joining pits etc., to create methane gas or leachate migration paths even if the works themselves are not over landfill. There is also a risk of creating pathways for surface water to infiltrate the landfill and exacerbate leachate generation.

Design details and work processes need to be developed to avoid these risks. Obviously the landfill capping layer needs to be restored but this may not be sufficient and does not address potential risks during construction. Control of stormwater, detailing of drainage materials and use of cut-offs etc., need to be considered.

The City has some methane and leachate monitoring wells that may need to be removed or whose function could be compromised by the PSF project. The City would like to work closely with TransGrid on relocating any affected wells so that sufficient number are in place to serve the monitoring function envisaged under the City's voluntary management proposal.

### **1.7. Site Hydrology and Water Use**

There is a major stormwater culvert in that part of the Park where the cable route runs parallel with Campbell Road. Care will be need if this need to be relocated or diverted. This culvert is one of two major sources of stormwater used to replenish water In the Park's wetland system. Ideally any interruption to this source should be of short duration.

Presently Transgrid proposes to complete the final part of the cable route by way of under-boring the wetland in the south east corner of the Park. This is supported by the City. As indicated above, locating the cables south of the wetland is not supported due to the impact this would have on the remaining trees at this corner of the Park.

Any change of plan resulting in the route going around the northern end of the wetland would also be problematic. Excavation in this area would interfere with the wetland water circulation system. This system consist of a rising main taking pumped water from Wetland 5 to the highest wetland, Wetland 1. Water then flows under gravity through the lower wetland back to Wetland 5. This system helps maintain water levels and keep the water oxygenated.

Another concern with works in the area around the north of Wetland 5 is the presence of recycled water infrastructure, namely a raw water rising main and treated water reticulation pipes.

### **1.8. Sydney City Farm**

The City Farm is being developed adjacent Barwon Park Road south of the Park Depot. It appears feasible to install the cables between Barwon Park Road and the Farm as proposed by TransGrid, but care will be needed to avoid negative impact on the Farm and Farm users. The gap between the Farm and the road is narrow. Restoration would be needed for any part of the Farm affected by the PSF project and the City anticipates close liaison with Transgrid to achieve this.

## **2. GENERAL CONDITIONS OF CONSENT**

The following general conditions of consent are recommended regarding the protection and reinstatement of the public domain:

### **2.1. Photographic Record/Dilapidation Report**

A photographic recording of the public domain site frontages is to be prepared and submitted to Council's satisfaction prior to the commencement of construction.

The recording must include clear images of the building facade adjoining the footpath, the footpath, nature strip, kerb and gutter, driveway crossovers and laybacks, kerb ramps, road carriageway, street trees and plantings, parking restriction and traffic signs, and all other existing infrastructure along the street.

The form of the recording is to be as follows:-

- (a) A PDF format report containing all images at a scale that clearly demonstrates the existing site conditions;
- (b) Each image is to be labelled to identify the elements depicted, the direction that the image is viewed towards, and include the name of the relevant street frontage;
- (c) Each image is to be numbered and cross referenced to a site location plan;
- (d) A summary report, prepared by a suitable qualified professional, must be submitted in conjunction with the images detailing the project description, identifying any apparent existing defects, detailing the date and authorship of the photographic record, the method of documentation and limitations of the photographic record;
- (e) Include written confirmation, issued with the authority of both the applicant and the photographer that the City of Sydney is granted a perpetual non-exclusive license to make use of the copyright in all images supplied, including the right to make copies available to third parties as though they were Council images. The signatures of both the applicant and the photographer must be included.

Any damage to the public way including trees, footpaths, kerbs, gutters, road carriageway and the like must immediately be made safe and functional by the applicant. Damage must be fully rectified by the applicant in accordance with the City's standards prior to the completion of works.

## **2.2. Preservation of Survey Marks**

All works in City streets must ensure the preservation of existing permanent survey marks (a brass bolt, or a lead plug holding a brass tack, covered by a cast iron box). At least forty-eight hours prior to the commencement of any works in the public way within 1 metre of a permanent survey mark contact must be made with the City's Project Manager Survey / Design Services to arrange for the recovery of the mark.

Prior to the commencement of construction, a survey plan, clearly showing the location of all permanent survey marks fronting the site and within 5 metres on each side of the frontages must be submitted to Council.

At least forty-eight hours prior to the commencement of any works in the public way within 1 metre of a permanent survey mark contact must be made with the City's Senior Surveyor to arrange for the recovery of the mark.

A fee must be paid to the Council for the replacement of any permanent survey mark removed or damaged in accordance with the City's Schedule of Fees and Charges (Reinstatement of Survey Box).

## **2.3. Protection of Survey Infrastructure**

Prior to the commencement of any work on site, a statement prepared by a Surveyor registered under the *Surveying and Spatial Information Act 2002* must be submitted to Council verifying that a survey has been carried out in accordance with the Surveyor General's Direction No. 11 – Reservation of Survey Infrastructure. Any Permanent Marks proposed to be or have been destroyed must be replaced, and a "Plan of Survey Information" must be lodged at the NSW Land Registry Services.

#### **2.4. Defects Liability Period – Public Domain**

All works to the City's public domain, including rectification of identified defects, are subject to a 6 month defects liability period from the date of final completion. The date of final completion will be nominated by Council on the Certificate of Practical Completion for public domain works.

#### **2.5. Protection of Stone Kerbs**

- (a) Any stone kerbs are to be retained and properly protected during excavation and construction works.
- (b) To avoid damage to stone kerbs during excavation and construction works for the development, temporary removal and storage of the stone kerbs may be approved by Council. Removed, serviceable stone kerbs (i.e. those that are in good condition as agreed by Council officers) must be re-installed in accordance with the City of Sydney's standard details and specifications after the construction works have been completed. Note: A temporary concrete kerb will need to be constructed to retain the footpath until the stone kerbs can be reinstalled. The removed stone kerbs are to be reinstalled prior to the completion of the works to the satisfaction of the Council. Note: all costs associated with the works are to be at no cost to the Council.
- (c) Damaged kerbs are to be replaced to match existing to Council's satisfaction or as otherwise advised by Council officers.
- (d) Where new crossings or temporary crossings are to be constructed to access the property, the affected kerb stones should be salvaged and reused wherever possible.
- (e) All new driveway laybacks and kerbs are to be constructed with stone kerbs to match existing stones or as specified by City officers. All unused stone kerbs are to be salvaged and returned to the City's store.
- (f) Council approval is required before kerbs are removed.
- (g) Council approval is required prior to the cutting of existing stone kerbs for stormwater kerb outlets.

#### **2.6. Public Domain Damage Deposit (Modified)**

- (a) A Public Domain Damage Deposit calculated on the basis of an indicative 500 square metres of concrete site frontage must be lodged with Council in accordance with the City of Sydney's adopted Schedule of Fees and Charges. The Public

Domain Damage Deposit must be submitted as an unconditional bank guarantee or insurance bond as per the Council's Performance Bond Policy in favour of Council as security for repairing any damage to the public domain in the vicinity of the site (Guarantee).

- (b) The Guarantee must be lodged with Council prior to an approval for demolition being granted or a Construction Certificate being issued, whichever is earlier.
- (c) The Guarantee in this condition will be retained in full until the project is completed and any defects rectified to Council's satisfaction.

### **2.7. Reinstatement – Public Domain**

All reinstatement of the public domain should be made in accordance with the following Council documents:

- Public Domain Manual
- Sydney Streets Technical Specification
- Inclusive and Accessible Public Domain Guidelines

### **2.8. Inspections – Public Domain**

All reinstatement must be inspected and approved by a City of Sydney officer prior to the release of any bonds.