



# INNER WEST COUNCIL

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## **Powering Sydney's Future (SSI-8583) - Potts Hill to Alexandria transmission cable project**

Thank you for providing Innerwest Council an opportunity to comment on the Environmental Impact Statement for the project Powering Sydney's Future – Potts Hill to Alexandria transmission cable project

### **General Comments**

During construction, vehicle access to properties are to be retained all the time, obstruction to driveways are to be avoided and minimise temporary loss of on-street parking, impact on road network performance and delays in travel time.

Proposed Night works should be minimised, but it is recognised there will be some situations where this is unavoidable. In these situations, the reason for night works should be explained to affected parties. Adequate notice needs to be given to all residents and business operators affected by works to allow them enough time to plan for the consequences. Council to be kept informed of the progress well ahead of works. Regular project interface meetings with Council are likely to be needed, and Council to be given the opportunity to be represented on other relevant working groups. The project's complaints procedures (including direct points of contact to project staff) to be effective so that complainants don't need to seek Council's support in advocating solutions. The project is to make good all affected areas to a high standard, with a process of 'signoff' of all works by Council and other relevant parties. Opportunities should be taken for the project to go beyond a 'make good' standard to bring about a significant community benefit. Proposed Bedwin Road bicycle bridge as part of the project is an example.

Wherever night works are proposed, enough additional notice should be given to affected residents to enable them to plan for the consequences, and a generous approach to mitigation be adopted, e.g. offer of alternative accommodation. Project workers to be encouraged to be considerate of residents and business owners, e.g. toolbox talks discourage workers from idling their vehicles or making other noise in residential streets, particularly in the early morning period.

Inner West Council continues to strongly support the creation of a stand-alone cycling bridge adjacent to Bedwin Road Bridge at St Peters, an opportunity created by the construction of the Transgrid cable bridge. Council would like Transgrid and/or RMS to design and construct infrastructure necessary to connect this bridge to the surrounding bicycle network.

Regarding the width of the trench Council's preference is to use 'Trefoil Trench Configuration for Two Cable Circuits' in order to minimise disruption to traffic during construction and enable Council to undertake future stormwater upgrade works in the vicinity without relocating Transgrid cables.

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EIS section 3.3.3.1 has incorrectly documented that 'Cooks River Corridor is also known as The Green Way'. The Cooks River Corridor is not known as The Green Way. They are two different corridors. The Green Way runs in a north/south direction and links the Cooks River Corridor to Iron Cove.

EIS has incorrectly documented Peace Park as IWC (Inner West Council) Park. The proposed laydown area at Peace Park Ashbury is located in Canterbury Bankstown LGA, not Inner West LGA.

Proposed works has a significant impact on Council's road, traffic, stormwater and water quality infrastructure. Details of construction and restoration methodology is require for Council review prior to the commencement of construction. Council request Transgrid to liaise and consult with Council throughout the design development and construction stages, in order to ensure that all the restoration works are carried out in a very high standard, minimise disruption to Transgrid Cables during renewal/replacement/upgrade to Council infrastructure assets in future and opportunities are taken for the project to bring about a significant community benefit.

Appendix N (Groundwater Report) has identified that temporary dewatering may be required during construction and the dewatering discharge options include discharge to stormwater or sewer. A qualified water quality expert is to undertake testing of ground water to detail the full range of pollutants within the ground water discharge prior to discharging into Council's stormwater drainage system. This testing is to finalise a treatment plan and ensure compliance with water quality criteria under ANZECC/ARMCANZ 2000 guidelines. Should the ANZECC / ARMCANZ 2000 guidelines be silent on any elements or chemicals appearing in test samples the water discharge is to comply with endorsed guidelines and recommendations issued by the EPA.

### **Impact on Council Trees**

Inner West Council is concerned that the number of tree removals has not been quantified in the EIS. There is currently an unknown number of street trees and/or vegetation located along the project route that will be affected by the project. The supporting tree report included in the EIS is a 'retention value report' not an Arboricultural Impact Assessment (AIA). In this regard, the proposed development works must be supported by an actual AIA prepared by a qualified Arborist who has a minimum qualification in arboriculture of AQF Level 5 and who does not remove or prune trees in the Inner West Council Local Government Area. The report must be in accordance with Section 2.3.5 of the Australian Standard Protection of Trees on Development Sites (AS 4970—2009)). In particular, the report should clearly detail the following:

- Assess the impact of the proposed development works on all trees within 5 metres of the site boundaries (including trees located within the verge and on neighbouring properties, that may be affected by the proposed development);
- Demonstrate that the impact on the trees is acceptable and /or recommend measures that will satisfactorily mitigate the impact to an acceptable level;
- Identify total trees to be removed, retained, transplanted or pruned; and
- Recommend appropriate tree protection measures and include a tree protection plan prepared in accordance with Sections 3 and 4 of the Australian Standard Protection of Trees on Development Sites (AS 4970—2009).

If it is determined that the proposed works would cause unreasonable impact to the existing tree(s), located on or within proximity to the site and proposed works, and those impacts cannot be overcome by the adoption of suitable alternative excavation and construction methods, the applicant will need to submit to Inner West Council a suitable tree replacement strategy with advanced containerised trees and 12 month establishment and maintenance program. A replacement ratio of 2:1 should be adopted to compensate for lost mature canopy in lieu of small replacement planting.

There is no mention of any resident notification regarding tree removal. Council requests that the community are consulted with on the proposed tree removals. An outline of the proposed consultation methods will be required.

### **Impact on Park Land**

Route Option 5a in the vicinity of Henson Park is not supported due to potential impacts on playground equipment and shade structure footings and park surfaces of the proposed underboring. The proposed 'grassed verge' route location between the park and tennis club comprises a 3m wide fenced pedestrian corridor with centrally located 1.5m pedestrian path connecting Centenary Street and Amy

Street. The installation would require demolition and restoration of this path connection. Further information on location and depth of underboring, restoration and management of subsidence, park use and pedestrian impacts is required.

Concerns are raised in relation to route Option 4b in the vicinity of Johnson Park which includes underboring of Johnson Park due to potential impacts on play equipment footings and park surfaces. Further information on the boring methodology is needed.

Council has reviewed route options through Camdenville Park in detail with Transgrid and accepts that alternative routes outside the park are not feasible due to the location of services in May Street. The new cable will potentially constrain future use and development of the park. Council has commenced discussions with Transgrid to ensure planned park upgrade works, including level changes and construction in the vicinity of the cable are accommodated in the detailed design and construction.

The proposed laydown area at Camdenville Park is supported pending resolution of conditions of site use. The laydown area will in part support the construction of the Bedwin Road cable bridge and cycleway.

Details of park pedestrian and vehicle access management and construction and restoration methodology will be required for Council review before construction. As noted by the EIS, soil contamination and landfill gas require management at park sites, in particular Henson Park and Camdenville Park.

### **Impact on Traffic and Transport**

In general terms, this assessment is comprehensive and appears to have considered all the main traffic/transport issues. Consideration of traffic/transport for this project should reflect Council's transport priorities (as per Council's draft Integrated Transport Strategy) – top priority to walking, then cycling, then public transport, then private motor vehicles. Any temporary walking route created for construction should be safe (i.e. separated from moving vehicles) involve minimum diversions, be wheelchair accessible and be of adequate width. Similarly, any temporary marked or separated cycleway diversions created for construction should be safe, involve minimum diversions and be of adequate width. Wherever bicycles are in a mixed traffic situation, posted traffic speeds should be appropriately reduced. Impacts on bus services to be minimised. Project to work closely with Council, residents and business operators to minimise the impacts of loss of kerbside parking. Although significant impacts from project worker parking demand are not anticipated, it will be necessary to ensure that these impacts are minimised in areas where parking is already in short supply, e.g. toolbox talks to encourage workers to travel by means other than car and to avoid parking in areas where there is already high parking demand.

### **Impact on Urban Ecology**

Concerns are raised in relation to route option 4a due to its proximity to Green Way bush care site.

Inner West Council, like other Councils in the project area, is taking a catchment approach to improving stormwater quality. Inner West Council has spent considerable funding on water sensitive urban design (WSUD) devices such as streetscape swales and rain gardens to improve water quality. Impacts and mitigation measures have not been identified in the EIS should the cable route be located adjacent to these devices. Compensation or replacement for any loss or damages to devices need to be clearly stated. One identified area of potential impact is at Scouller Street, Marrickville. Inner West Council received a Federal Government grant to build rain gardens on the corners of Scouller and Juliett Streets. Council has put significant resources into designing, installing and maintaining these WSUD devices which included working in collaboration with the local residents.

Executive summary (Appendix H) states “the project area (as shown in Figure 2 to 10) is largely located in urban and disturbed areas, including within existing road reserves, open space areas and at existing substation sites. No Threatened Ecological Communities (TECs) or threatened species listed under the *Biodiversity Conservation Act 2016* or under the Commonwealth *Environmental Protection and Biodiversity Conservation Act 1999* were recorded within the project area”. While the project area is located in urban and disturbed areas, the remaining vegetation remnants, exotics and weeds still play an important role in providing habitat to many species including threatened species. These areas should not be undervalued. Construction precinct 3 is partly located with the Bandicoot Protection Zone (Marrickville Council DCP 2011).

The Marrickville DCP 2011 (2.13 including Biodiversity map) and Marrickville Biodiversity Strategy 2011-2021 should both be referenced and included in the sources of information used (section 1.1.3 – Appendix H). These documents are still in use until Inner West Council DCP and Biodiversity Strategies are completed. This is relevant to the management of biodiversity and bushcare sites which Council manages including Johnson Park bushcare and others in the LGA (Local Government Area). It should be clearer whether the reference for Bushcare Sites (Inner West Environmental Group, 2019) is referencing the IWE (Inner West Environmental Group) website or a document.

Regarding section 1.4.1.2 PCT 1281 Sydney Turpentine-Grey Ironbark Open Forest on shale in the lower Blue Mountains and Sydney Basin Bioregion (unvalidated) - Appendix H, it should be noted that the Johnson Park bushcare site is now managed by Inner West Council with volunteer support from Inner West Environment Group and the general community. This vegetation and planting here is to create and enhance habitat for small birds and the endangered population of bandicoots. This site is located within the Bandicoot Protection Area (Marrickville Council DCP 2011).

Validated vegetation map 20 (Appendix H) shows the presents of Potential Habitat Bearing Trees at Scouller Street and Juliett Street. It should be clearer what make these trees 'Potential habitat bearing tree' or should the wording be changed 'Potential hollow bearing tree'.

### **Stormwater and Flood**

The surface Water and Flooding Report (Appendix L) adequately addresses latent flood risk during construction. However, substantial concerns are raised regarding the route and interaction with Council stormwater assets, which do not appear to have been considered in the current suite of reports. In this regard, it is noted that the stormwater and flooding report notes Sydney Water's stormwater assets, but does not include Council assets, in particular Council's 1500mm open channel within Centennial Street. The location of conflicts with existing and proposed pipelines are noted below. Given the narrow road widths and constraints in delivering all assets in this area, the service trench should be the 1.6m width arrangement as outlined in Figure 4-10 (Trefoil Trench Configuration).

The proposed route conflicts with Council's existing stormwater network at the following locations:

1. Queen St / Hanks St intersection, Ashfield
2. Hanks St / Old Canterbury Rd intersection, Ashfield
3. Old Canterbury Road, near Elizabeth Avenue – 1200mm trunk drainage pipeline across road & twin 450mm pipelines along northbound lane
4. Arlington St / Constitution Road, Dulwich Hill – 300mm pipeline across Arlington Street
5. Constitution Rd, Dulwich Hill (W of LR Station) – 300mm pipelines west of station
6. Constitution Rd, Dulwich Hill (E of LR Station) – 525mm pipelines east of station
7. Denison Rd, Dulwich Hill – 300mm pipeline across road
8. Hill St / Denison Rd intersection – 375mm pipeline across road
9. Pigott St / Denison Rd intersection – 375mm pipeline across road
10. Herbert St / Wardell Rd intersection – 450mm pipeline across road
11. Wardell Rd – existing 375mm pipeline within northbound lane
12. Wardell Rd / Pile Street intersection – substantial drainage network as multiple catchment come together; pipelines and culverts up to 900mm diameter and width/height
13. Pile St – 450mm pipelines cross road at 35 and 51 Pile Street
14. Pile St / Livingston Rd intersection – 525mm and 750mm pipelines cross intersection
15. Livingston Rd – 750mm pipeline in northbound lane
16. Centennial Street – 1500mm high Council culvert beneath road
17. Surrey Street – 300mm pipeline in eastbound lane and across Essex Street intersection
18. Charles St / Illawarra Rd intersection – 300x450mm culvert across Charles St intersection
19. Illawarra Rd – 1300x2700mm Sydney Water culvert; 375mm Council pipeline beneath kerb on both lanes
20. Addison Rd – 2130x2750mm Sydney Water culvert; Council pipeline in eastbound lane and 900mm pipeline across road
21. Enmore Rd – Council pipeline in southbound lane
22. Scouller St / Juliett St intersection – raingarden within kerb blisters and 300mm pipeline across Scouller St junction

23. Llewellyn St / Edgeware Rd intersection – 1000x2000mm Sydney Water culvert crossing Llewellyn Rd; 1400x2500mm Sydney Water culvert within northbound lane (to Victoria Road)
24. Edgeware Road – 450mm Council pipeline in southbound lane
25. Campbell St / May St intersection – substantial network at intersection – recently upgraded by Westconnex works
26. Princes Highway – 375mm RMS pipeline across intersection
27. Barwon Park Rd – 450mm Council pipeline across road and beneath kerb in northbound and southbound lanes
28. Barwon Park Rd / Campbell Rd intersection – pipeline across intersection upgraded by Westconnex

Council has proposed future flood mitigation works at the following locations.

1. Wardell Rd – Upgrades to existing pipeline
2. Pile Street – Upgrade existing 450mm pipeline to 900mm pipeline
3. Hawkhurst St / Centennial Street – Provide new 600mm pipeline
4. Enmore Rd - Upgrade existing pipeline to 900mm diameter in southbound lane
5. Sydenham Rd – Provide new 1200mm pipeline from Park Rd to Malakoff St
6. Charles Street & Illawarra Road - New 600mm pipeline
7. Addison Rd – Upgrade existing Council pipelines to 600mm
8. Addison Rd – Upgrade existing Sydney Water culvert to 3200x2000mm culvert at Enmore Rd

Council request Transgrid to liaise and consult with Council during the design development stage in order to avoid any potential conflict with Council's future flood mitigation works at the above locations.

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