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## WOLLONGONG CITY COUNCIL

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Director Assessment Policy Department of Planning and Environment GPO Box 39 Sydney NSW 2001

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Dear Sir/Madam

## NSW Code of Practice for Authorised Network Operators

Thank you for the opportunity for Wollongong City Council to make comment on the proposed NSW Code of Practice for Authorised Network Operators following lease of part of NSW's transmission and distribution network to private interests. The principal purpose of the code is to provide for how Authorised Network Operators (ANOs) must exercise their assessment and self-determination powers under Part 5 of the EP&A Act when conducting environmental assessments.

One of the main activities involved in maintenance of the transmission and distribution system in urban areas such as the Wollongong LGA is contractors for the networks lopping of trees under power lines. Council regularly receives complaints from resident about the outcomes of tree pruning activities in that the trees have been excessively pruned resulting in misshaped trees that following successive pruning events can have poor shape and form and spoil the streetscape of the area. When the resident contacts the network to complain about the standard of work they are informed that the work is undertaken by trained aborists pruning to Australian standards. The ANOs need to understand and to demonstrate their adherence to AS4373 as detailed in the Electricity supply Act.

While it is acknowledged that there is a need to prune trees for safety reasons, the current situation will continue to result in ongoing complaints to the ANOs and Council about the impacts of pruning on street trees. The state government should initiate a program to work with Councils to undertake pilot programs to develop alternative strategies. Such strategies could include working in a joint long-term program with Councils to replace existing trees with more appropriate trees that will not require pruning at all or at a reduced frequency. This will have the benefit of reducing operating costs for the ANOs as well as improving the current streetscape.

Please contact me should you require further information.

This letter is authorised by

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