

Our Ref: 6322; 6321  
Contact: Mark Pepping



20 August 2015

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

Department of Planning  
Received  
24 AUG 2015  
Scanning Room

Dear Sir/Madam

**Re: Draft NSW Code of Practice for Authorised Network Operators**

I refer to the exhibition of the Draft NSW Code of Practice for Authorised Network Operators which has been drafted to ensure the environmental impact of electricity network development in NSW is assessed according to best practice principles, following the lease of the poles and wires.

Council appreciates the opportunity afforded to the community to comment on the draft Code. In response, Council would like to make the following submission for consideration by the State Government prior to finalisation of the Code. It is further noted that aspects of Council's submission could and should be incorporated into future regulatory documents associated with the leasing program.

**Submission**

Communities across NSW have for many years seen local streetscapes many with historical significance spoilt by the severe butchering of trees which is said to protect the utility infrastructure.

No one is denying the need to ensure the supply of power to households, businesses and community organisations in particular is an essential part of modern society. However, the magnitude of the pruning work and the regularity of it to 'protect such assets has seen many trees become structurally dangerous, diseased, die prematurely and altered the streetscapes to an extent of ugliness with rows of deformed trees.

There is also a move towards replacing timber poles with concrete poles in rural locations justified by lower maintenance costs. However, concrete poles erected close to rural road verges are a major traffic hazard. Any driver likely to strike a concrete pole in car with or without passengers will surely suffer severe injuries and likely deaths or in worst case scenarios multiple deaths. No community particularly small rural communities should deal with such tragedies. Many Councils are undertaking projects and programs of improving road safety and eliminating hazards. The location of concrete poles close to the road way increases those traffic hazards for drivers.

Civic Centre, Elizabeth St, Moss Vale, NSW 2577. PO Box 141, Moss Vale. t. (02) 4868 0888 f. (02) 4869 1203  
e. mail@wsc.nsw.gov.au DX 4961 Bowral ABN 49 546 344 354

www.wsc.nsw.gov.au

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It has been observed that the powers bestowed on Utility providers have been abused insofar as their lack of consultation with stakeholders such as local councils and communities on the installation of concrete pole replacements. Many of the poles have been installed on council road reserves with little or no notification and consultation. Poles have also been erected in heritage sensitive locations both the natural environment and built environment.

The Code lists a number of compulsory rules network operators must adhere to, including:

- set standards for environmental assessment practices
- community and government consultation
- identifying assessment material that should be made publicly available.

Many Councils are undertaking 'strategic' work in relation to streetscapes and tree planting. It should be stipulated that future lessees of the poles and wires work with Councils in identifying long term tree strategies to replace inappropriate trees with more suitable species that still contribute to the streetscape but do not interfere with the operation of the electricity infrastructure. The continuation of contractors simply topping trees every 2 years or so until they become a tree stump is not acceptable.

In relation to future pole replacements, councils and their local communities should be consulted in regard to the particulars of the pole replacement particularly where the poles are being replaced with a different material and in a different location. Future replacement must meet Australian Standards as well as local environmental amenity and appearance.

Council sees that the State Government is making appropriate steps to ensure that under any future leasing of poles and wires that councils and communities will have rights to be consulted. Where such consultation does not occur, severe penalties should be imposed on the lessee for such breaches.

Council thanks the Department to offer this submission and looks forward to further consultations in the future.

Should you require any further information or have queries regarding Council's submission, please contact me on 4868 0851 or email [mark.pepping@wsc.nsw.gov.au](mailto:mark.pepping@wsc.nsw.gov.au)

Yours sincerely



Mark Pepping  
**Deputy General Manager**  
**Corporate Strategy and Development Services**