



12 August 2022

Matthew Hindson
Senior Manager Customer Connections
Ausgrid
33 Kangoo Road
Somersby NSW 2250

By email: assetstandards@ausgrid.com.au

Dear Matthew,

RE: NS141 Revision 3 Consultation Feedback

The Urban Development Institute of Australia (UDIA) NSW is the key industry body representing the leading participants in the urban development sector in NSW, with over 450 member companies.

UDIA appreciates Ausgrid's concerted focus on improving customer service for the development sector. Our members meet quarterly with Ausgrid staff to discuss where improvements can be made to Ausgrid's operations to better support their developer customers and by extension, future retail customers.

Ausgrid is currently exhibiting network standard *NS141: Site Selection and Preparation for Kiosk Type Substations Revision 3* for industry consultation. This network standard impacts UDIA's members as it provides the guidelines to developers, consultants and local government for site selection and location of kiosk substations within the Ausgrid network area.

UDIA supports positive changes for electricity infrastructure supply and the applicable network standards. UDIA and Ausgrid agree that safety is the highest priority, and it is pleasing to see Ausgrid's draft revision is focused on delivering a safe outcome that is also practical.

The draft revision is in direct response to UDIA's concerns that kiosk substations impose a market and amenity burden where they are located. Previously, Ausgrid has not supported location on the back of side or corner lots, where the impact is lower.

We are grateful for Ausgrid's efforts to address our concerns through the draft revision which provides an approval pathway to locate substations on side or corner lots. In general, we believe the revision is positive. We do have several comments aimed at providing more clarity, which are outlined in detail below.

**Urban Development
Institute of Australia
NEW SOUTH WALES**

PO Box Q402,
QVB Post Office NSW 1230
Level 5, 56 Clarence Street
Sydney NSW 2000
e udia@udiansw.com.au
t 02 9262 1214
w www.udiansw.com.au
abn 43 001 172 363

We are also pleased that the draft revision puts more emphasis on Ausgrid's preference that the kiosk should be located on park boundaries or public land areas, where servicing access is easier. Developers also prefer kiosk placement in public reserves where the infrastructure burden is shared by all residents instead of diminishing amenity on a single lot. However, we note that many councils resist kiosks on council-owned land. We strongly encourage additional efforts by Ausgrid to educate councils about this preferred placement.

Recommendations

Our detailed comments are outlined in the appendix below and in the attached NS141 mark-up. UDIA recommends that Ausgrid:

- 1. Provide more clarity on technical terms and guidance, as outlined in our submission's appendix.**
- 2. Increase efforts to educate councils about Ausgrid's preferred placement on park boundaries and public land.**

Conclusion

UDIA NSW is grateful for the dedication of Ausgrid staff to work with its customers in the development industry to improve efficiency and address concerns.

Should you have any questions on our submission or wish to schedule a meeting for further discussion, please contact our Regional Manager Elizabeth York at eyork@udiansw.com.au or 0434 914 901.

Yours sincerely,



Steve Mann
UDIA NSW CEO

Attachments:

- Appendix
- NS141 mark-up

APPENDIX – UDIA DETAILED COMMENTS

We have reviewed the proposed NS141 revisions and provide the following comments for consideration.

Refer to tables below and attached NS141 mark-up.

PAGE - CLAUSE	TEXT	COMMENT
Pg 5 – 2.1.1	Kiosk substations shall be located in areas that are well drained and are clear of underground or overhead obstructions. To minimise soil erosion effects and long-term movement of the kiosk assembly, the kiosk site shall be level, or made level using suitable retaining structures.	What is the criteria for well drained and clear of ? What slope is suitable outside of the kiosk easement? Max 1:4?
Pg 5 - 2.21	Kiosk substations shall not be installed in the following areas, unless Ausgrid determines that there is no reasonable alternative: <ul style="list-style-type: none"> • areas prone to stormwater run-off; • areas subject to declared 1 in 100 year floods; • areas less than one metre above the highest tidal surge inundation limit; • ocean-front areas where storm wave erosion could affect the site, or where storm wave conditions could cause access difficulties; • exposed ocean-front locations subject to salt laden winds or coastal environments which demonstrate accelerated corrosion to existing infrastructure; • unstable areas; and • roadway areas including kerb blisters or similar traffic control narrowing 	<p>Stormwater run-off: Does Ausgrid consider a difference between a civil designed 'dry' basin and a 'wet' basin?</p> <p>Roadway areas could be misinterpreted as being any roadway area. Should this refer to the 2.3.2 requirements?</p>
Pg 6 – 2.3.2.1	The following requirements shall be addressed for kiosk substations on footpath sites .	Recommend a definition of what a footpath site is. Is it only for sites within the road reserve. Or does it include sites within private land next to road reserve (i.e. off-street locations)?

PAGE - CLAUSE	TEXT	COMMENT
Pg 7 – 2.3.3.2.b)	The permanent on-title restriction on the use of land shall apply: a) Over a portion of the lot(s) based on a site-specific engineering-based clearance distance determined by Ausgrid; or b) Over the entire lot(s) impacted, and over any immediately adjacent lot sharing a common backyard boundary.	Does backyard refer only to the back fence? What about common side boundary lots?
Pg 8 – 2.4.1.4	For L type kiosks, site contours shall be such that the top of the kiosk base is not more than 120 mm below, and not more than 240 mm above, the finished ground level. Refer to drawing 151190 for details and requirements for K type kiosks.	Should this be "is not less than 120mm below"?
Pg 8 – 2.4.1.6	Unless specified otherwise by Ausgrid, kiosks installed on footpath sites shall be oriented with the high voltage end facing the oncoming traffic i.e. such that the side door (HV connection / tap changer access) is on the property side of the kiosk and not on the road side.	Should this be moved to the Footpath sites requirements section (2.3.2.1) or does it also apply to off-street locations?
Pg 10 – 2.7.1	Kiosks shall be protected from damage by vehicles in areas classified as high risk for vehicle impact, such as adjacent to driveways, etc.	Would be useful to outline any further instances where this would be applicable.
Pg 11 – 2.8.4	Ausgrid shall not be responsible for damage to landscaping where excavation for cable works or equipment replacement occurs in the future.	Who is responsible ? The land owner at the time?
Pg 11 – 2.10.1	In all off-street kiosk site locations, an easement shall be provided at the development stage to minimise ongoing land title problems. The following site criteria shall also apply: • for URD areas, kiosk substations shall be sited on park boundaries, access lanes and public land where available;	We agree, however this has been rejected by many Councils across many projects. Understanding and agreement of this requirement needs to be resolved directly between Councils and Ausgrid and cannot be left to the developer / ASP3 to get project specific approval each time.
Pg 12 – 3.2	A heavy truck with a vehicle-mounted crane is required to install or remove the kiosk and equipment. Access routes, where required, shall be suitable under all weather conditions and constructed to withstand the loading.	Please advise a suitable loading to be applied.
Pg 12 – 3.3	The access route shall be a minimum of 4 metres wide, have a minimum of 4 metres headroom and be continuous from the property boundary to the kiosk site.	What are the turning circle requirements?

PAGE - CLAUSE	TEXT	COMMENT
Pg 12 – 4.1.1	<p>The oil containment measures for kiosks are designed to fully contain any oil that may leak from the transformer. To further minimise any risk to the environment, the location of kiosk substations in the following situations shall be avoided wherever reasonably practicable:</p>	<p>If it is not reasonably practicable? What are the requirements and suggested mitigations?</p>
Pg 13 – 4.4.2	<p>ASP/3s shall be responsible for liaising and negotiating with other authorities, organisations and persons to obtain all necessary consents.</p>	<p>Noted. However, the resolution of placing kiosks on public land requires Ausgrid's intervention.</p>
Pg 13 – 5.4	<p>Kiosk substation housings shall be separated from building ventilation system air intake and exhaust duct openings, by not less than 6 metres (measured by shortest string line between housing and duct). This applies irrespective of whether the building ducted ventilation system is mechanical or natural, and irrespective of whether or not fire dampers are installed in the ducts:</p> <ul style="list-style-type: none"> - For the purposes of the Item above, Ausgrid does not regard openable windows, that provide natural ventilation to one building compartment only, as a building ventilation system opening; 	<p>Clarify, does this apply to garage doors such as those found in multi-dwelling building car-parks?</p>