



Planning,
Industry &
Environment

Gateway determination report – PP-2022-1525

Local heritage listing of 18 electricity substations in the
Woollahra Local Government Area

July 22



Published by NSW Department of Planning, Industry and Environment

dpie.nsw.gov.au

Title: Gateway determination report – PP-2022-1525

Subtitle: Local heritage listing of 18 electricity substations in the Woollahra Local Government Area

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Table 1 Reports and plans supporting the proposal

Relevant reports and plans
Planning Proposal – Local Heritage Listing of Ausgrid Electricity Substations (March 2022)
Heritage Review – Ausgrid Section 170 Register (Woollahra Municipal Council, March 2022)
Woollahra Local Planning Panel Meeting Agenda and Minutes (17 March 2022)
Woollahra Environmental Planning Committee Meeting Agenda and Minutes (4 April 2022)
Woollahra Ordinary Council Meeting Minutes (26 April 2022)

1 Planning Proposal

1.1 Overview

The planning proposal seeks to amend the Woollahra Local Environmental Plan (LEP) 2014 to list 18 sites within the Local Government Area (LGA) as local heritage items. All 18 sites are currently used by Ausgrid as electricity substations.

The planning proposal is supported by the following report:

- Heritage Review – Ausgrid Section 170 Register, prepared by Woollahra Municipal Council, dated March 2022.



Table 2 Planning proposal details



LGA	Woollahra
PPA	Woollahra Municipal Council
NAME	Local heritage listing of 18 Ausgrid electricity substations
NUMBER	PP-2022-1525
LEP TO BE AMENDED	Woollahra Local Environmental Plan 2014
ADDRESS	Multiple addresses
DESCRIPTION	Multiple sites across the LGA
RECEIVED	13/05/2022
FILE NO.	IRF22/1696
POLITICAL DONATIONS	There are no donations or gifts to disclose and a political donation disclosure is not required
LOBBYIST CODE OF CONDUCT	There have been no meetings or communications with registered lobbyists with respect to this proposal



1.2 Site description and surrounding area

The planning proposal relates to 18 sites scattered across the Woollahra LGA. The sites are located in the suburbs of Bellevue Hill, Darling Point, Double Bay, Paddington, Point Piper, Rose Bay, Vaucluse, Watsons Bay and Woollahra. Each site accommodates an electricity substation. Electricity substations are installations containing high-voltage switchgear, transformers, regulators or converters for the purpose of switching, transforming or converting electricity. Each site is identified and described in **Table 3**.

Table 3 Site details

Site identification	
Site 1 – Dover Road	
Address	73A Dover Road, Rose Bay (Lot 1 DP 121861)
Substation no.	94
Description	Single-storey Inter-War Californian Bungalow style substation featuring a gabled roof, symmetrical façade and tuck-pointed face brickwork.
Site context	The surrounding area is characterised by single and two-storey dwelling houses. The site is zoned R3 Medium Density Residential under the LEP. The site is not located within a heritage conservation area or in the vicinity of listed heritage items.
Map	 <p>Figure 1 – The site shown by the red outline (Source: Planning Proposal)</p>
Site Photo	 <p>Figure 2 - The site as viewed from Dover Road (Source: Planning Proposal)</p>

Site identification	
Site 2 - Wyuna Road	
Address	Wyuna Road, Point Piper (Lot and DP not available)
Description	A single-storey Inter-War Modernist style substation building featuring a curved front elevation and public access stairs leading to the flat concrete roof, which functions as a viewing platform. The facades are constructed with rough dressed sandstone blockwork.
Site context	The site is located within a public road reserve between Wunulla Road and Wyuna Road, and is opposite the Royal Motor Yacht Club at 21 Wunulla Road, Point Piper. The site is zoned R2 Low Density Residential. It is not located in the vicinity of any listed heritage items and is not within a heritage conservation area.
Substation no.	99
Map	 <p>Figure 3 – The site shown by the red outline (Source: Planning Proposal)</p>
Site photo	 <p>Figure 4 - The site as viewed from Wyuna Road (Source: Planning Proposal)</p>

Site identification	
Site 3 – William New	
Address	65 William Street, Double Bay (Lot 1 DP 172768)
Description	A single-storey, Inter-War substation with Art Deco detailing and features tuck pointed face bricks. Note: The Planning Proposal and heritage report make reference to 'movable content' associated with the substation in the item description (this will be further discussed in this report).
Site context	The site is irregular in shape and is located adjacent to a Sydney Water stormwater channel. The site is zoned R3 Medium Density Residential. It is not within a heritage conservation area or in the vicinity of listed heritage items.
Substation no.	135
Map	 <p>Figure 5 – The site shown by the red outline (Source: Planning Proposal)</p>
Site photo	 <p>Figure 6A (left) - The site as viewed from William Street (Source: Planning Proposal) Figure 6B (right) – Interior view c. 2008 (Source: Council, reproduced from James Pennington)</p>

Site identification

Site 4 – James Street

Address	James Street, Woollahra (Lot 1 DP 587872)
Description	A two-storey Inter-War Art Nouveau style substation building featuring tuck pointed face brickwork on the ground floor with smooth render above.
Site context	A Victorian terrace at 42 John Street borders the site to the south and west. The site is zoned R2 Low Density Residential. It is not located in the vicinity of any heritage items but is within the Woollahra Heritage Conservation Area (C15).
Substation no.	160

Map


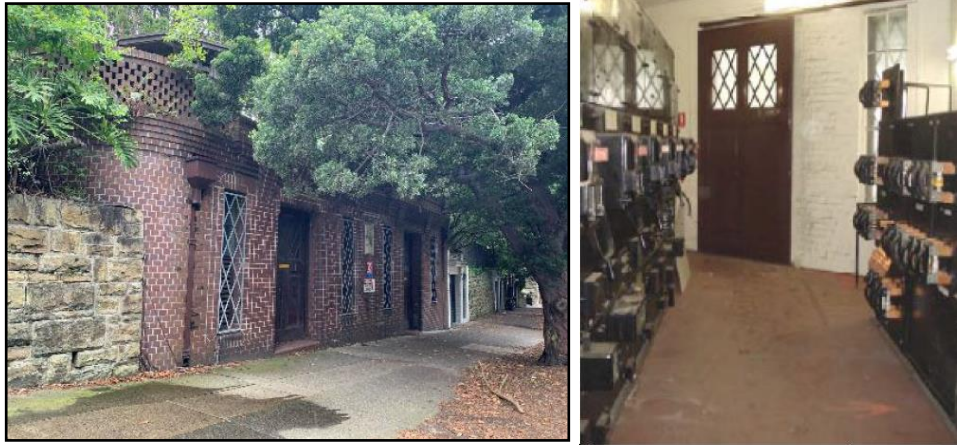




Figure 7 – The site shown by the red outline (Source: Planning Proposal)


Site photo







Figure 8 - The site as viewed from James Street (Source: Planning Proposal)



Site identification	
Site 5 – Wolseley Road	
Address	582 New South Head Road, Point Piper (Lot 1 DP 1103924)
Description	A single-storey Inter-War Stripped Classical style substation featuring face brickwork and an accessible roof via a gate from Wolseley Road. Note: The Planning Proposal and heritage report make reference to 'moveable content' associated with the site in the item description.
Site context	The site is zoned R2 Low Density Residential and is adjoined to the north by a two-storey Inter-War building of brick construction. The site is in the vicinity of three local heritage items being: Cranbrook School (Item 44), bus stop shelter / former tram stop (Item 215), and street name inlay (Item 675). The site is not located within or near a heritage conservation area.
Substation no.	173
Map	 <p>Figure 9 – The site shown by the red outline (Source: Planning Proposal)</p>
Site photo	 <p>Figure 10A (left) - The site as viewed from New South Head Road (Source: Planning Proposal); Figure 10B (right) – Interior view, C 2011 (Source: Council, reproduced from James Pennington)</p>



Site identification	
Site 6 – Birriga Road	
Address	116 Birriga Road, Bellevue Hill (Lot Y DP 415489)
Description	A single-storey rendered brick substation building in the Inter-War Georgina Revival style, featuring an entrance portico under a projecting hipped roof. Note: The Planning Proposal and heritage report make reference to 'moveable content' and brick fence on the site in the item description.
Site context	The site is zoned R3 Medium Density Residential. It is adjoined to the north-east by a local heritage item, being an Inter-War residential flat building and interiors, shops, garage and grounds at 285 O'Sullivan Road (Item 50). The site is not located in a heritage conservation area.
Substation no.	185
Map	 <p>Figure 11 – The site shown by the red outline (Source: Planning Proposal)</p>
Site photo	 <p>Figure 12 - The site as viewed from Birriga Road (Source: Planning Proposal)</p>



Site identification	
Site 7 – Hoddle Street	
Address	33 Hoddle Street, Paddington (Lot 1 DP 187153)
Description	A single-storey substation of face brickwork construction designed in the Inter-War Functionalist style. Note: The Planning Proposal and heritage report make reference to 'moveable content' associated with the site in the item description.
Site context	The site is zoned R2 Low Density Residential. Existing development on adjoining sites include terrace houses and a residential flat building. The site is not located in the vicinity of any heritage items but is within the Paddington Heritage Conservation Area (C8).
Substation no.	189
Map	 <p>Figure 13 – The site shown by the red outline (Source: Planning Proposal)</p>
Site photo	 <p>Figure 14 - The site as viewed from Hoddle Street (Source: Planning Proposal)</p>

Site identification	
Site 8 – Olphert Avenue	
Address	29A Olphert Avenue, Vacluse (Lot 28 DP 666593)
Description	A single-storey substation designed in the Inter-War Free Classical style of rendered brickwork construction, which is setback from the street frontage.
Site context	The site is zoned R2 Low Density Residential and is adjoined by dwelling houses. The site is not located in the vicinity of any listed heritage items or within a heritage conservation area.
Substation no.	193
Map	 <p>Figure 15 – The site shown by the red outline (Source: Planning Proposal)</p>
Site photo	 <p>Figure 16 - The site as viewed from Olphert Avenue (Source: Planning Proposal)</p>



Site identification	
Site 9 – Marathon Road	
Address	2A Marathon Road, Darling Point (Lot 1 DP 315729 & Lot A DP 415567)
Description	A single-storey substation of face brickwork construction designed in the Inter-War Stripped Classical style.
Site context	The site is zoned R3 Medium Density Residential. Development on the adjoining site to the west and north is a multi-storey residential flat building. The site is located in the vicinity of several local heritage items on Marathon Road (Items 140 to 143).
Substation no.	199
Map	 <p>Figure 17 – The site shown by the red outline (Source: Planning Proposal)</p>
Site photo	 <p>Figure 18 - The site as viewed from Marathon Road (Source: Planning Proposal)</p>



Site identification	
Site 10 – Bundarra Road	
Address	101 Drumalbyn Road, Bellevue Hill (Lot A DP 320729)
Description	A single-storey substation of face brickwork construction in the Inter-War Stripped Classical style. The front fence is also constructed with similar bricks. Note: The Planning Proposal and heritage report make reference to 'moveable content' and brick fence on the site in the item description.
Site context	The site is zoned R3 Medium Density Residential and is bounded on three sides by road frontages. Existing development on the adjoining site to the north is a four-storey Inter-War residential flat building. The site is not located in the vicinity of any listed heritage item or within a heritage conservation area.
Substation no.	299
Map	 <p>Figure 19 – The site shown by the red outline (Source: Planning Proposal)</p>
Site photo	 <p>Figure 20 - The site as viewed from Drumalbyn Road (Source: Planning Proposal)</p>



Site identification	
Site 11 – Black Street	
Address	1 Dalley Avenue, Vaucluse (Lot 35 DP 1108999)
Description	A single-storey substation designed in the Inter-War Mediterranean style featuring rendered brick walls and hipped roof with Spanish roof tiles. Note: The Planning Proposal and heritage report make reference to 'moveable content' and the front fence on the site in the item description.
Site context	The site is zoned R2 Low Density Residential. The adjoining sites consist of dwelling houses of varying ages and styles. The site is not located in the vicinity of any listed heritage items or within a heritage conservation area.
Substation no.	314
Map	 <p>Figure 21 – The site shown by the red outline (Source: Planning Proposal)</p>
Site photo	 <p>Figure 22 - The site as viewed from Dalley Avenue (Source: Planning Proposal)</p>



Site identification	
Site 12 – Plumer Road	
Address	7 Plumer Road, Rose Bay (Lot 1 DP 1079372)
Description	A single-storey substation of face bricks and tiled hipped roof construction designed in the Inter-War Georgian Revival style. The building is set back from the street frontage. Note: The Planning Proposal and heritage report make reference to 'moveable content' and the brick fence on the site in the item description.
Site context	The site is zoned R3 Medium Density Residential, and is adjoined by a three-storey Inter-War residential flat building and a row of Art Deco shops with residential uses above. The site is within the Balfour Road Heritage Conservation Area (C9). It is not located in the immediate vicinity of any listed heritage item.
Substation no.	315
Map	 <p>Figure 23 – The site shown by the red outline (Source: Planning Proposal)</p>
Site photo	 <p>Figure 24 - The site as viewed from Plumer Road (Source: Planning Proposal)</p>

Site identification	
Site 13 – Drumalbyn Road	
Address	13 Drumalbyn Road, Bellevue Hill (Lot 1 DP 328329)
Description	A single-storey substation designed in the Post-War Modernist style with curved walls and rough dressed sandstone blockwork construction. The substation is set into the existing landform and uses the same sandstone blocks as retaining walls to the neighbouring properties.
Site context	The site is zoned R2 Low Density Residential. The adjoining sites consist of dwelling houses of varying ages and styles, elevated above the street level. The site is not located within the vicinity of any listed heritage items or within a heritage conservation area.
Substation no.	318
Map	 <p>Figure 25 – The site shown by the red outline (Source: Planning Proposal)</p>
Site photo	 <p>Figure 26 - The site as viewed from Drumalbyn Road (Source: Planning Proposal)</p>

Site identification	
Site 14 – March Street	
Address	2A March Street, Bellevue Hill (Lot 1 DP 607315)
Description	A single-storey substation designed in the Inter-War Modernist style featuring cement rendered masonry, a parapeted roof and a reinforced concrete awning supported on sandstone block columns at the entry. The substation is setback from the March Street Reserve frontage and has sandstone blockwork entrance and perimeter walls. Note: The Planning Proposal and heritage report make reference to the front and side stone walls in the item description.
Site context	The site is zoned R2 Low Density Residential. The adjoining sites consist of dwelling houses of varying ages and styles. The site is not located in the vicinity of any listed heritage items or within a heritage conservation area.
Substation no.	357
Map	 <p>Figure 27 – The site shown by the blue outline (Source: Planning Proposal)</p>
Site photo	 <p>Figure 28 - The site as viewed from March Road Reserve (Source: Planning Proposal)</p>

Site identification	
Site 15 – Boronia Road	
Address	29 Boronia Road, Bellevue Hill (Lot O DP 17114)
Description	A single-storey substation designed in the Post-War Modernist style, featuring a flat roof and rendered brick and sandstone blockwork construction. It is setback from the street frontage and has a low rendered masonry front fence and sandstone block side wall. Note: The Planning Proposal and heritage report make reference to the front fence and side stonewall in the item description.
Site context	The site is zoned R3 Medium Density Residential. The adjoining sites consist of dwelling houses of varying ages and style. The site is not located within the vicinity of any listed heritage items or within a heritage conservation area.
Substation no.	361
Map	 <p>Figure 29 – The site shown by the blue outline (Source: Planning Proposal)</p>
Site photo	 <p>Figure 30 - The site as viewed from Boronia Street (Source: Planning Proposal)</p>

Site identification	
Site 16 – Rupertswood Avenue	
Address	1A Rupertswood Avenue, Bellevue Hill (Lot 1 DP 184315)
Description	A single-storey substation in the Inter-War Mediterranean style featuring rendered brick facades and a gabled roof with rounded tiles. The building is setback from the street frontage.
Site context	The site is zoned R2 Low Density Residential and is adjoined by dwelling houses of varying ages and styles. It is in the vicinity of two local heritage items, being “The Provost (or Ancher) House – house and interiors” at 1 Rupertswood Avenue (Item 39) and “Danbury – house and interiors, gateposts and gate” at 7 Rupertswood Avenue (Item 54). The site is not located within a heritage conservation area.
Substation no.	364
Map	 <p>Figure 31 – The site shown by the red outline (Source: Planning Proposal)</p>
Site photo	 <p>Figure 32 - The site as viewed from Rupertswood Avenue (Source: Planning Proposal)</p>

Site identification	
Site 17 – Dunbar Street	
Address	14 Robertson Place, Watsons Bay (Lot 1 DP 231114)
Description	A single-storey substation designed in the Inter-War Mediterranean style featuring rough cast rendered brickwork and pitched gable roof with ceramic tiles. Note: The Planning Proposal and heritage report make reference to “moveable content” in the item description.
Site context	The site is zoned R2 Low Density Residential and is adjoined by a townhouse development to the south and west. It is not located within the vicinity of any listed heritage item but is within the Watsons Bay Heritage Conservation Area (C14).
Substation no.	592
Map	 <p>Figure 33 – The site shown by the red outline (Source: Planning Proposal)</p>
Site photo	 <p>Figure 34 - The site as viewed from Dunbar Street (Source: Planning Proposal)</p>

Site identification

Site 18 – Comber Street

Address	148 Boundary Street, Paddington (Lot 1 DP 219492)
Description	A single-storey substation designed in the Inter-War Functionalist style that features a concrete flat roof and face brickwork. The building is setback from the street frontage with a short brick fence at the property alignment. Note: The Planning Proposal and heritage report make reference to 'moveable content' on the site.
Site context	The site is zoned R2 Low Density Residential and is adjoined by dwelling houses of varying ages and styles. It is not located in the vicinity of any listed heritage items but is within the Paddington Heritage Conservation Area (C8).
Substation no.	622

Map



Figure 35 – The site shown by the red outline (Source: Planning Proposal)

Site photo

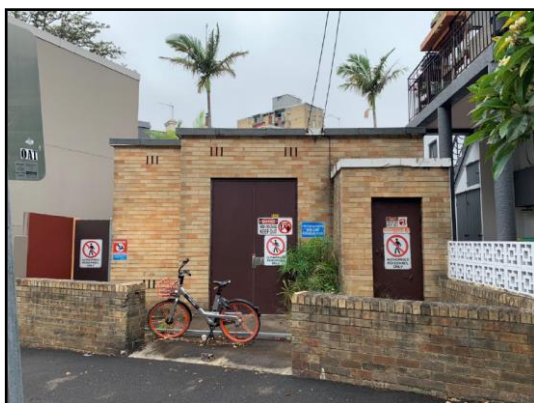


Figure 36 - The site as viewed from Boundary Street (Source: Planning Proposal)

1.2.1 Heritage Context

The specific heritage context of each site has been identified, where relevant, in **Table 3** above.

Section 170 of the *NSW Heritage Act 1977* requires all State agencies to establish and keep a 'Heritage and Conservation Register' (Section 170 Register). All items identified on the Section 170 Register should have an accompanying heritage inventory sheet available to the public.

The 18 substations are currently identified on the Section 170 Register maintained by Ausgrid but are not listed in any environmental planning instrument made under the *Environmental Planning and Assessment Act 1979*.

Ausgrid has recently undertaken a review of its Section 170 Register. Ausgrid informed Council in writing on 22 December 2021 that it does not consider these 18 sites to meet the criteria for inclusion in the Register pursuant to Clause 22 of the *Heritage Regulation 2012*, which provides that:

- (1) *The following classes of items of the environmental heritage are prescribed for the purposes of section 170(4)(a) of the Act –*
 - (a) *items that are listed as heritage items under an environmental planning instrument made under the Environmental Planning and Assessment Act 1979,*
 - (b) *items that are subject to an interim heritage order,*
 - (c) *items that are listed on the State Heritage Register,*
 - (d) *items identified by the government instrumentality concerned as having State heritage significance.*

Council understands Ausgrid would remove the 18 substations from its Section 170 Register as an outcome of the recent review. Council considers that once these substations are removed, they would have no heritage protection.

Additional background is explained in **Section 1.3**.

1.3 Background

The following background is relevant to the planning proposal:

- 22 December 2021 – Council received correspondence from Ausgrid advising it has undertaken a review of its Section 170 Register. The review finds that the 18 substations do not meet the criteria for listing on the Section 170 Register pursuant to Clause 22 of the *Heritage Regulation 2012*. Council subsequently undertook their own heritage review of the sites and concluded all 18 substations fulfil the criteria for local heritage listing.
- 1 March 2022 – Council advised Ausgrid that they intend to proceed with heritage listing of the 18 substations. Ausgrid confirmed it would retain the items on the Section 170 Register for 12 months to allow time for the heritage listing to occur.
- 17 March 2022 – the Woollahra Local Planning Panel (LPP) supported the planning proposal.
- 4 April 2022 – the Woollahra Environmental Planning Committee (EPC) recommended Council endorse the planning proposal and forward it to the Department of Planning and Environment (DPE) for Gateway determination.
- 26 April 2022 – Council resolved to endorse the planning proposal and forward it to the Department for Gateway determination
- 13 May 2022 – the planning proposal was submitted to the Department for Gateway determination.

The Woollahra Heritage Gap Analysis was endorsed by Council on 22 November 2021. In the Gap Analysis, Goal 4C – *Review other / previous heritage listing and assessments* includes the action

to “Review, assess and list items on other statutory and non-statutory heritage register” as this has the potential “to identify environmental heritage that meets the NSW heritage criteria and is not currently listed in Schedule 5”. This review of the electricity substations is consistent with the above goal and action.

2 Proposal

2.1 Objectives or intended outcomes

The objective of the planning proposal is to recognise the local heritage significance of the 18 electricity substations and provide them with statutory protection.

The planning proposal contains objectives and intended outcomes that adequately explain the intent of the proposal.

2.2 Explanation of provisions

The planning proposal seeks to amend the Woollahra LEP 2014 to:

- Insert a local heritage listing for each of the 18 substations in Part 1 (Heritage items) of Schedule 5 (Environmental heritage); and
- Amend the Heritage Map (Sheet HER_001, HER_002, HER_003A, HER_003B, HER_003D, HER_004, HER_005, HER_006) to identify the 18 additional heritage items at their respective addresses.

The explanation of provisions in the planning proposal adequately explains the intended changes to the Woollahra LEP 2014.

The planning proposal includes item numbers for the proposed heritage listing and acknowledges these are indicative only and will be confirmed at the finalisation stage.

2.3 Mapping

The planning proposal includes mapping showing the proposed changes to the Heritage Map sheets. The maps identify the substation sites and include colour layer denoting the proposed heritage listing. The maps are suitable for community consultation.

3 Need for the planning proposal

The planning proposal is based on the recommendations of the Heritage Review report undertaken by Council’s heritage officers. The review concluded that all 18 sites meet the threshold for listing as local heritage items.

The review was undertaken generally in accordance with the *Assessing Heritage Significance* guideline published by the NSW Heritage Office in 2001. It is also consistent with the relevant principles and guidelines of the *Australian ICOMOS Charter for Places of Cultural Significance 2013* (the Burra Charter).

Each site was assessed against the seven criteria included in the Heritage Office Guideline. If an item meets one of the seven listing criteria at a local level and retains the integrity of its key attributes, it can be considered to have local heritage significance. The key findings of this assessment are summarised below in **Table 4**.

Table 4 Summary of Heritage Review

Site	a) historic	b) association	c) aesthetic	d) social	e) research potential	f) rarity	g) representative- ness
73A Dover Road, Rose Bay (‘Dover Road’ - Electricity Substation No. 94)	✓	✗	✓	✗	?	✓	✓
Wyuna Road, Point Piper (‘Wyuna Road’ - Electricity Substation No. 99)	✓	✗	✓	✗	?	✓	✓
65 William Street, Double Bay (‘William New’ - Electricity Substation No. 135, including moveable content)	✓	✗	✓	✗	?	✗	✓
James Street, Woollahra (‘James Street’ - Electricity Substation No. 160)	✓	✗	✓	✗	?	✓	✓
582 New South Head Road, Point Piper (‘Wolseley Road’ - Electricity Substation No. 173, including moveable content)	✓	✗	✓	✗	?	✗	✓
116 Birriga Road, Bellevue Hill (‘Birriga Road’ - Electricity Substation No. 185, including moveable content and brick fence)	✓	✗	✓	✗	?	✗	✓
33 Hoddle Street, Paddington (‘Hoddle Street’ - Electricity Substation No. 189, including moveable content)	✓	✗	✓	✗	?	✓	✓
29A Olphert Avenue, Vaucluse (‘Olphert Avenue’ - Electricity Substation No. 193)	✓	✗	✓	✗	?	✗	✓
2A Marathon Road, Darling Point (‘Marathon Road’ - Electricity Substation No. 199)	✓	✗	✓	✗	?	✗	✓

Site	a) historic	b) association	c) aesthetic	d) social	e) research potential	f) rarity	g) representative- ness
101 Drumalbyn Road, Bellevue Hill (‘Bundarra Road’ - Electricity Substation No. 299, including moveable content and brick fence)	✓	✗	✓	✗	?	✗	✓
1 Dalley Avenue, Vaucluse (‘Black Street’ - Electricity Substation No. 314, including moveable content and front fence)	✓	✗	✓	✗	?	✗	✓
7 Plumer Road, Rose Bay (‘Plumer Road’ - Electricity Substation No. 315, including moveable content and brick fence)	✓	✗	✓	✗	?	✗	✓
13 Drumalbyn Road, Bellevue Hill (‘Drumalbyn Road’ - Electricity Substation No. 318)	✓	✗	✓	✗	?	✓	✓
2A March Street, Bellevue Hill (‘March Street’ - Electricity Substation No. 357, including front and side stone walls)	✓	✗	✓	✗	?	✗	✓
29 Boronia Road, Bellevue Hill (‘Boronia Road’ - Electricity Substation No. 361, including front fence and side stonewall)	✓	✗	✓	✗	?	✗	✓
1A Rupertswood Avenue, Bellevue Hill (‘Rupertswood Avenue’ - Electricity Substation No. 364)	✓	✗	✓	✗	?	✗	✓
14 Robertson Place, Watsons Bay (‘Dunbar Street’ - Electricity Substation No. 592, including moveable content)	✓	✗	✓	✗	?	✗	✓
148 Boundary Street, Paddington (‘Comber Street’ - Electricity Substation No. 622, including moveable content)	✓	✗	✓	✗	?	✗	✓

Criterion (a) Historical Significance

With regard to 'historical significance', all of the sites have cultural significance at a local level on account of:

- The sites are examples of critical infrastructure built by the then Metropolitan Council of Sydney, and later the Sydney County Council, during the rapid expansion of the electricity network into the Woollahra Municipality in the early to mid-twentieth century.
- The sites are indicative of the evolution of substation design in the Woollahra area in the early to mid-twentieth century and reflect the prevailing architectural styles of their time.
- Several of the substations also demonstrate the authority's policy of placing finely designed buildings in what it considered to be 'high class' suburbs.

Criterion (b) Associative Significance

Council's heritage review does not find any strong or special association with the life or works of a person, or group of persons, of importance in the cultural or natural history of the local area.

Criterion (c) Aesthetic Significance

With regard to 'aesthetic significance', all of the sites have cultural significance at a local level on account of:

- Each building retains its original design integrity, is architecturally distinctive and demonstrates the evolution of substation design through the period of rapid expansion of the electricity network into the Woollahra Municipality.

Criterion (d) Social Significance

Council did not undertake any community survey with regard to the social significance of the sites. Further investigation would be needed to ascertain their social significance. There is insufficient evidence at this time to confirm the sites meet this criterion.

Criterion (e) Research Potential

The heritage report does not indicate these sites to have potential to yield new or further scientific or archaeological information. The substations were the first structures to be erected on each site and their archaeological potential is low. Additionally, as access to the interior of the substations was not given, it is unknown if there is any significant and intact historical equipment present within the sites. The Department considers the sites do not meet this criterion based on the current information.

Criterion (f) Rarity

With regard to 'rarity', five of the sites (Dover Road, Wyuna Road, James Street, Hoddle Street and Drumalbyn Road) are found to have cultural significance at a local level on account of:

- Their unusual design language within the Woollahra LGA, which was a response to the built context reflective of the social status of the suburbs at the time.
- Drumalbyn Road and Wyuna Road incorporate specific design responses to the topography of the sites.

Criterion (g) Representativeness

With regard to 'representativeness', all of the sites have cultural significance at a local level on account of:

- The subject collection of substations illustrates the principal characteristics of this type of infrastructure in terms of form, scale and technical arrangement.

In the assessment against the Representativeness criterion, the Heritage Review has included text that is not relevant to the subject matter (page 36). However, the heritage inventory sheets

attached to the report as well as the assessment against the ‘Guidelines for inclusion/exclusion’ provide sufficiently clear indication that the sites satisfy this criterion. A Gateway condition is recommended to require the Heritage Review to be revised to address this issue prior to exhibition.

In summary, each of the 18 sites has met at least three of the criteria for heritage listing at a local level. The Department considers there is sufficient merit for the planning proposal to proceed to Gateway determination.

The planning proposal and heritage review make reference to ‘movable content’ for several substations (No. 135, No. 173, No. 185, No. 189, No. 299, No. 314, No. 315, No. 592 and No. 622). One of the limitations noted in the planning proposal is that an inspection of the interior was not carried out, as the majority of the substations are in active operation and Ausgrid did not provide permission for access at the time.

The planning proposal and heritage review do not include any detailed description of the ‘moveable content’, it is unclear as to whether they refer to the electrical equipment and/or other elements such as signage. Interior photographs (date back to 2012 or older) for only three of the above-mentioned substations were provided and there is no assessment of these contents against the 7 listing criteria under the Heritage Office guideline. As such, a Gateway condition is recommended to require additional details relating to the ‘moveable contents’, including a description of such contents and discussion of their significance, to be included in a revised planning proposal and supporting inventory sheets prior to exhibition.

An administrative condition is also recommended to ensure the item description and property addresses are consistent between the planning proposal and heritage inventory sheets as minor discrepancies have been noted (the planning proposal states that street numbering was not available to several substations, which contradicts details in the inventory sheets).

4 Strategic assessment

4.1 Region Plan

The following table provides an assessment of the planning proposal against relevant aspects of the Greater Sydney Region Plan: *A Metropolis of Three Cities*.

Table 5 Regional Plan assessment

Regional Plan Objectives	Justification
Objective 13: Environmental heritage is identified, conserved and enhanced	<p>Objective 13 states that ‘<i>Heritage identification, management and interpretation are required so that heritage places and stories can be experienced by current and future generations</i>’. It notes that environmental heritage should be protected for its social, aesthetic, economic, historic and environmental values.</p> <p>Environmental heritage is defined as ‘<i>the places, buildings, works, relics, movable objects and precincts of State or local heritage significance</i>’.</p> <p>The Heritage Review considers the various sites should be identified as local heritage items under the Woollahra LEP 2014 as each item has reached the threshold for listing at a local level.</p> <p>The planning proposal is consistent with this objective as it seeks to recognise and protect the identified heritage values.</p>

4.2 District Plan

The sites are all located in the Woollahra LGA, within the Eastern City District and the Greater Cities Commission (formerly Greater Sydney Commission) released the Eastern City District Plan on 18 March 2018. The plan contains planning priorities and actions to guide the growth of the district while improving its social, economic and environmental assets.

The planning proposal is consistent with the priorities for liveability in the plan as outlined below.

The Department is satisfied the planning proposal gives effect to the District Plan in accordance with section 3.8 of the *Environmental Planning and Assessment Act 1979*. The following table includes an assessment of the planning proposal against the relevant direction and action.

Table 6 District Plan assessment

District Plan Priorities	Justification
Planning Priority E6 – Creating and renewing great places and local centres and respecting the District's heritage	<p><u>Action 20 - Identify, conserve and enhance environmental heritage</u></p> <p>The planning proposal is consistent with the District Plan as it identifies sites that have been assessed to have local heritage significance for statutory listing. This listing in Schedule 5 of the LEP would facilitate conservation of the environmental heritage and provide ongoing protection of its values in the local government area.</p>

4.3 Local

The proposal states that it is consistent with the following local plans and endorsed strategies. It is consistent with their strategic direction and objectives, as stated in the table below:

Table 7 Local strategic planning assessment

Local Strategies	Justification
Woollahra Strategic Planning Statement 2020 (LSPS)	<p><u>Planning Priority 5 – Conserve our rich and diverse heritage</u></p> <p>The planning proposal is consistent with this Priority as it would result in the local heritage listing of 18 sites in the Woollahra LGA identified to carry significant values. The proposal would conserve, protect and promote their values in the LGA.</p> <p>The planning proposal is consistent with the objectives of the Woollahra LSPS.</p>
Woollahra Community Strategic Plan 2030 (CSP)	<p>The Woollahra Community Strategic Plan, <i>Woollahra 2030</i>, presents a long term vision for Woollahra, describes the community, identifies current and future challenges and presents Council's goals and strategies.</p> <p>The planning proposal is consistent with the theme of 'quality places and spaces'. Specifically, the planning proposal would contribute to achieving Strategy 4.3 'protect our heritage, including significant architecture and the natural environment' as it would facilitate conservation of the electricity substations for future generations to use and appreciate.</p>

4.4 Local planning panel (LPP) recommendation

On 17 March 2022, the Woollahra LPP considered a report on the planning proposal for the local heritage listing of the 18 electricity substations. The LPP advised of their support subject to the planning proposal being corrected to clarify the 'technological' criterion of the NSW Heritage Office guideline as being 'unknown'. This change was requested on the basis there may be some intact original equipment within the substations but internal access to the substations had not been available, and it was therefore not possible to assess if the sites contain potential to yield technological value. The associated inventory sheets for each item were subsequently updated to reflect this requested change.

The LPP recommended Council proceed with the proposal and forward it to the Department for a Gateway determination.

4.5 Section 9.1 Ministerial Directions

The planning proposal's consistency with relevant section 9.1 Directions is discussed below:

Table 8 9.1 Ministerial Direction assessment

Directions	Consistent/ Not Applicable	Reasons for Consistency or Inconsistency
3.2 Heritage Conservation	Yes	<p>This Direction requires that a planning proposal must contain provisions which facilitate the conservation of items, places, buildings, works, relics, moveable objects or precincts of environmental heritage significance, as identified in a study of the environmental heritage of the area.</p> <p>The planning proposal is informed by a Heritage Review with an assessment of significance undertaken in accordance with the NSW Heritage Office guideline.</p> <p>The report concluded the subject sites satisfy at least three of the assessment criteria for local heritage listing under the guideline.</p> <p>The proposal will facilitate the conservation and protection of these sites and is therefore consistent with this Direction.</p>
6.1 Residential Zones	Yes	<p>This Direction applies to any planning proposal that would affect land within an existing residential zone. All of the sites are located within R2 or R3 zones.</p> <p>There is no proposed change to the current residential zoning of any of the sites or to the applicable development standards.</p> <p>The listing of the sites as local heritage items would require any future development application for the sites to be assessed against the provisions of Clause 5.10 <i>Heritage Conservation</i> under the Woollahra LEP 2014.</p> <p>The planning proposal is consistent with this Direction.</p>

4.6 State environmental planning policies (SEPPs)

The planning proposal is consistent with all relevant SEPPs.

Under the SEPP (Transport and Infrastructure) 2021, electricity substations are a component of *electricity transmission or distribution network*. The SEPP identifies exempt development and development permitted without consent relating to electricity transmission or distribution network. The proposed heritage listing would not affect the operation of this SEPP.

5 Site-specific assessment

5.1 Environmental

The planning proposal relates only to the listing of the sites as items of local heritage significance and does not propose any changes to the LEP controls that would facilitate intensification of land use.

There are no critical habitat areas, threatened species, populations or ecological communities or their habitats present on the subject sites.

There are no likely negative environmental impacts that would arise as a result of the planning proposal.

5.2 Social and economic

The following table provides an assessment of the potential social and economic impacts associated with the proposal.

Table 9 Social and economic impact assessment

Social and Economic Impact	Assessment
Social	The planning proposal is unlikely to result in any adverse social impact. Listing the 18 sites as heritage items will help conserve their heritage significance and allow the items to be appreciated by the local community.
Economic	There would be a minor economic impact for the land or asset owner/operator as the heritage listing of the properties may require specialist heritage studies to form part of a development application for proposed work, or prior to any work being undertaken. However, the proposal does not change the zoning or development standards applicable to the sites and will facilitate conservation of their heritage significance.

5.3 Infrastructure

There is no significant infrastructure demand that will result from the planning proposal. The planning proposal does not involve any amendments to the planning controls that will facilitate intensified development. The heritage listing does not affect the functioning of the operating substations.

6 Consultation

6.1 Community

Council proposed a community consultation period of 28 days.

This timeframe is consistent with the Department's *Local Environmental Plan Making Guideline 2021* (LEP Making Guideline) timeframe of 20 working days for a standard planning proposal. A Gateway condition has been included to require the planning proposal to be exhibited for 20 working days, consistent with the benchmark timeframes in the Guideline.

6.2 Agencies

The planning proposal states that Council intends to consult with Ausgrid, Energy Australia and Heritage NSW.

The Department concurs with Council's plan to consult with the above organisations/agencies on the planning proposal and provide 21 days for comment.

7 Timeframe

Council's program in the planning proposal indicates a timeframe of 6 months (by December 2022, assuming Gateway determination to be issued in June 2022) to complete the LEP. The proposed timeframe would be within the benchmark under the LEP Making Guideline for a 'standard' proposal.

The Department agrees with the proposed timeframe to complete the LEP.

8 Local plan-making authority

Council requested to exercise its functions as a Local Plan-Making authority.

The proposed heritage listing is considered a local matter, and the Department recommends that Council be authorised to be the local plan-making authority for this proposal.

9 Assessment Summary

The planning proposal is supported to proceed with conditions for the following reasons:

- The proposed heritage listing is supported by a Heritage Review and inventory sheets which determined that the 18 electricity substations are of local heritage significance.
- The heritage review has been undertaken in accordance with the NSW Heritage Office Guidelines.
- The proposal will recognise and provide ongoing protection of the heritage significance of the sites.
- The proposal is consistent with the Eastern City District Plan, Council's Local Strategic Planning Statement, the relevant SEPPs and the Section 9.1 Ministerial Directions.

Based on the Department's assessment, the following amendments to the planning proposal should be made prior to exhibition:

- Include details of the 'moveable contents' on the relevant sites, including description of such contents and discussion of their heritage significance, in the planning proposal and the inventory sheets in the heritage review report prior to public exhibition.

- Update the heritage review report to include assessment comments against the representativeness criterion [criterion (g)] under the Heritage Office Guideline, *Assessing Heritage Significance*, 2001 that are specific to the subject substations.
- Update the planning proposal and inventory sheets in the heritage review report to ensure the item description and property addresses are consistent.

10 Recommendation

It is recommended the delegate of the Minister determine that the planning proposal should proceed subject to the following conditions:

1. The planning proposal is to be revised, prior to exhibition, to:
 - Include details of the 'moveable contents' on the relevant sites, including description of such contents and discussion of their heritage significance in the planning proposal and inventory sheets within the heritage review report.
 - Update the heritage review report to include assessment comments against the representativeness criterion [criterion (g)] under the Heritage Office Guideline, *Assessing Heritage Significance*, 2001 that are specific to the subject substations.
 - Update the planning proposal and inventory sheets within the heritage review report to ensure the item description and property addresses are consistent.
2. Consultation is required with the following public authorities / organisations:
 - Heritage NSW (Department of Planning and Environment)
 - Ausgrid
 - Energy Australia
3. The planning proposal should be made available for community consultation for a minimum of 20 working days.
4. The planning proposal must be exhibited not more than 2 months from the date of the Gateway determination.
5. The planning proposal must be reported to Council for a final recommendation not more than 4 months from the date of the Gateway determination.
6. The timeframe for completing the LEP is to be on or before 31 January 2023.
7. Given the nature of the proposal, Council should be authorised to be the local plan-making authority.



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