From:	Cornelis Duba
To:	Nicholas Gunn
Cc:	DPE CSE Information Planning Mailbox
Subject:	NSW Planning, Industry & Environment Request SEARs SSD-9440668 Tallawong Primary School
Date:	Friday, 2 October 2020 3:48:01 PM
Attachments:	image001.png image027.png image008.png image010.png EE FPJ 4603 Permission to Remove Service July 2007.pdf SW08773 Work near underground assets.pdf SW Work near overhead power lines.pdf ENA EMF What We Know.pdf EE Safety Plumbing.pdf EE Safety on the job.pdf EE MDI0044 Easements and Property Tenure.pdf EE Guide for Padmount Substations.pdf EE FPJ 6007 Technical Review Request Aug 2019.pdf

Hello Nicholas

I refer to the your below email of 30 September 2020 regarding the request for Secretary's Environmental Assessment Requirements (SEARs) for State Significant Development SSD-9440668 for Tallawong Primary School for construction of a two-storey school building consisting of 44 teaching spaces to accommodate up to 1000 students at 91 Schofields Road, Rouse Hill (Lot 11 DP 27220) in Blacktown City LGA. Submissions need to be made to the Department by 13 October 2020.

As shown in the below site plans from Endeavour Energy's G/Net master facility model (and extract from Google Maps Street View) there are:

- No easements benefitting Endeavour Energy (active easements are indicated by red hatching).
- Low voltage and 132,000 volt / 132 kilovolt (kV) high voltage underground earth cables, underground earth cables and underground pilot cables (carrying protection signals or communications between substations).
- Extended low voltage underground service conductor coming from a low voltage pillar on the road verge to a customer owned / private pole (indicated by the green circle) on the site from which there are low voltage overhead power lines going to the point of attachment for the existing dwelling.

Please note the location, extent and type of any electricity infrastructure, boundaries etc. shown on the plan is indicative only. In addition it must be recognised that the electricity network is constantly extended, augmented and modified and there is a delay from the completion and commissioning of these works until their capture in the model. Generally (depending on the scale and/or features selected), low voltage (normally not exceeding 1,000 volts) is indicated by blue lines and high voltage (normally exceeding 1,000 volts but for Endeavour Energy's network not exceeding 132,000 volts / 132 kV) by red lines (these lines can appear as solid or dashed and where there are multiple lines / cables only the higher voltage may be shown). This plan only shows the Endeavour Energy network and does not show electricity infrastructure belonging to other authorities or customers owned electrical equipment beyond the customer connection point / point of supply to the property. This plan is not a 'Dial Before You Dig' plan under the provisions of Part 5E 'Protection of underground electricity power lines' of the *Electricity Supply Act 1995* (NSW).

Endeavour Energy has noted the following in the Draft SEARs report.

14. Utilities

- In consultation with relevant service providers:
  - assess of the impacts of the development on existing utility infrastructure and service provider assets surrounding the site.
  - identify any infrastructure upgrades required off-site to facilitate the development and any arrangements to ensure that the upgrades will be implemented on time and be maintained.
  - provide an infrastructure delivery and staging plan, including a description of how infrastructure requirements would be co-ordinated, funded and delivered to facilitate the development.

The following is a combination of the various requests for SEARs for other State Significant Development referred to Endeavour Energy which attempts to capture are the possible 'Utilities' related matters.

Prepare an Infrastructure Management Plan in consultation with relevant agencies / authorities to:

- *address the existing capacity of the site to service the proposed development and any extension or augmentation, property tenure or staging requirements for the provision of utilities, including arrangements for electrical network requirements, drinking water, waste water and recycled water and how the upgrades will be co-ordinated, funded and delivered on time and be maintained to facilitate the development; and*
- *identify the existing infrastructure on the site or within the network which may be impacted by the construction and operation of the proposal and the measures to be implemented to address any impacts on this infrastructure.*

Endeavour Energy's further recommendations and comments are as follows:

- Network Capacity / Connection

Endeavour Energy has noted that the Scoping Report for the Request for SEARs does not appear to address the suitability of the site for the development in regard to whether electricity services are available and adequate for the development.

Applicants should not automatically assume that the presence of electricity infrastructure in the locality and / or nearby similar development means that adequate supply is immediately available to facilitate their proposed development.

The availability of electricity supply to a site is based on a wide range of factors eg. the age and design of the network; other development in the locality utilising previously spare capacity within the local network; the progress of nearby / surrounding sites including electricity infrastructure works eg. a smaller and isolated development that may not of its own accord require a substation may require a substation to facilitate the development and from which the spare capacity is made available to subsequent nearby development.

Distribution substations are required to transform the high voltage of the distribution feeder (usually at 11,000 volts / 11 kV) to the secondary system voltage (400/230 volts) to supply customers / developments. Distribution substations are divided into ground mounted substations most commonly being a padmount substations installed a complete unit on a concrete foundation / plinth and usually associated with underground distribution and pole mounted substations where there is overhead distribution.

Pole mounted substations (indicated by the symbol on the site plan from Endeavour Energy's G/Net master facility model) have comparatively limited capacity of 25 kilovolt amperes (kVA) up to a maximum of 400 kVA. Padmount substations (indicated by the symbol PS on the site plan from Endeavour Energy's G/Net master facility model) can accommodate loads from 315 kVA up to 1,500 kVA (typically 500 kVA). Accordingly there is a significant variation in the number and type of premises able to be connected to a substation ie. a single distribution substation may serve one large building, or many homes.

As shown in the below site plan from Endeavour Energy's G/Net master facility model, whilst there are a number of distribution substations in proximity of the site which are likely to have some spare capacity, it may not be sufficient to facilitate the proposed development. As well as the capacity of distribution substations, other factors such as the size and rating / load on the conductors and voltage drop (which can affect the quality of supply particularly with long conductor runs) etc. need to be assessed.

As shown in the below site plan from Endeavour Energy's G/Net master facility model, whilst there are a number of distribution substations in proximity of the site eg. padmount substation no. 29499 is located on the opposite side of Schofields Road, which are likely to have some spare capacity, but is unlikely to be sufficient to facilitate the proposed development. As well as the capacity of distribution substations, other factors such as the size and rating / load on the conductors and voltage drop (which can affect the quality of supply particularly with long conductor runs) etc. need to be assessed.

Accordingly an extension and / or augmentation of the existing local network may be required. However the extent of the works will not be determined until the final load assessment is completed. Endeavour Energy's preference is to alert proponents / applicants (and Council) of the potential matters that may arise as further development of areas continues to occur.

In due course the applicant for the proposed development of the site will need to submit an appropriate application based on the maximum demand for electricity for connection of load via Endeavour Energy's Network Connections Branch to carry out the final load assessment and the method of supply will be determined. Straightforward applications can be completed online and permission to connect may be provided immediately if submitting a complying application.

Depending on the outcome of the assessment, any required padmount substation will need to be located within the property (in a suitable and accessible location) and be protected (including any associated cabling) by an easement and associated restrictions benefiting and gifted to Endeavour Energy. Please refer to the attached copies of Endeavour Energy's:

- Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights'.
- Guide to Fencing, Retaining Walls and Maintenance Around Padmount Substations.

For more complex connections, advice on the electricity infrastructure required to facilitate the proposed development (including asset relocations) can be obtained by submitting a Technical Review Request to Endeavour Energy's Network Connections Branch, the form for which FPJ6007 is attached. The response to these enquiries is based upon a desktop review of corporate information systems, and as such does not involve the engagement of various internal stakeholders in order to develop a 'Connection Offer'. It does provide details of preliminary connection requirements which can be considered by the applicant prior to lodging a formal application for connection of load.

Further details are available by contacting Endeavour Energy's Network Connections Branch on business days via Head Office enquiries on telephone: 133 718 or (02) 9853 6666 from 9am - 4:30pm or on Endeavour Energy's website under 'Home > Residential and business > Connecting to our network' via the following link:

http://www.endeavourenergy.com.au/ .

Alternatively the applicant may need to engage an Accredited Service Provider (ASP) of an appropriate level and class of accreditation to assess the electricity load and the proposed method of supply. The ASP scheme is administered by Energy NSW and details are available on their website via the following link or telephone 13 77 88:

https://energy.nsw.gov.au/government-and-regulation/legislative-and-regulatory-requirements/asp-scheme-and-contestable-works .

Endeavour Energy is urging applicants /customers to engage with an Electrical Consultant prior to finalising plans to in order to assess and incorporate any required electricity infrastructure. In so doing the consideration can also be given to its impact on the other aspects of the proposed development.

- Network Asset Design

Endeavour Energy's Company Policy 9.2.5 'Network Asset Design', includes the following requirements for electricity connections to new urban subdivision / development:

5.11 Reticulation policy

5.11.1 Distribution reticulation

In order to improve the reliability performance of and to reduce the operating expenditure on the network over the long term the company has adopted the strategy of requiring new lines to be either underground cables or where overhead is permitted, to be predominantly of covered or insulated construction. Notwithstanding this strategy, bare wire overhead construction is appropriate and permitted in some situations as detailed below.

In areas with the potential for significant overhanging foliage, CCT is used to provide increased reliability as it is less susceptible to outages from wind-blown branches and debris than bare conductors. CCT must only be used in treed[2] areas as the probability of a direct lightning strike is low. In open areas where the line is not shielded from a direct lightning strike, bare conductors must generally be used for 11kV and 22kV reticulation.

Non-metallic Screened High Voltage Aerial Bundled Cable (NMSHVABC) must be used in areas which are heavily treed and where it is not practicable to maintain a tree clearing envelope around the conductors.

[2] A "treed" area is one with a substantial number of trees adjacent to the line, in each span. In these situations CCT is used to provide increased reliability as it is less susceptible to outages from wind-blown

5.11.1.1 Urban areas

Reticulation of new residential subdivisions will be underground. In areas of low bushfire consequence, new lines within existing overhead areas can be overhead, unless underground lines are cost justified or required by either environmental or local council requirements.

Where underground reticulation is required on a feeder that supplies a mixture of industrial, commercial and/or residential loads, the standard of underground construction will apply to all types of load within that development.

Where ducting is used, adequate spare ducts and easements must be provided at the outset to cover the final load requirements of the entire development plan.

Extensions to the existing overhead 11kV/22kV network must generally be underground. Bare wire will be used for conductor replacements and augmentations except in treed areas where CCT or NMSHVABC must be used.
Extensions to the existing overhead LV network and augmentations must either be underground or ABC. Conductor replacements greater than 100m in route length must utilise aerial bundled cable.

- Earthing

The construction of any building or structure (including fencing, signage, flag poles, hoardings etc.) whether temporary or permanent that is connected to or in close proximity to Endeavour Energy's electrical network is required to comply with Australian/New Zealand Standard AS/NZS 3000:2018 'Electrical installations' as updated from time to time. This Standard sets out requirements for the design, construction and verification of electrical installations, including ensuring there is adequate connection to the earth. It applies to all electrical installations including temporary builder's supply / connections.

Inadequate connection to the earth to allow a leaking / fault current to flow into the grounding system and be properly dissipated places persons, equipment connected to the network and the electricity network itself at risk from electric shock, fire and physical injury. The earthing system is usually in the form of an earth electrode consisting of earth rods or mats buried in the ground. It should be designed by a suitably qualified electrical engineer / ASP following a site-specific risk assessment having regard to the potential number of people could be simultaneously exposed, ground resistivity etc.

Endeavour Energy's 'Design certification checklist for ASP L3' the design must comply with Endeavour Energy's 'Earthing Design Instruction EDI 001 – Earthing design risk assessment' in which schools, pre-schools, day care centres are regarded as a 'special location' – please see the following extract of EDI 001.

The representative contact scenarios for any risk event are as follows:

e) *Special*: implies an area within close proximity to or within a premise where there is a high likelihood that shoes will not be worn and/or the risks associated with the earthing system has the potential to be exposed to a number of people simultaneously through contact with affected metalwork. Examples include schools, pre-schools, day care centres, aquatic centres, recreational swimming areas and beaches. This classification must be assessed on a case-by-case basis and may not involve a societal assessment depending on the scenario.

The applicant should check with their ASP responsible for the network connection to the site that for any future padmount substation the earthing has been designed to comply with the 'special location' requirements under EDI 100.

For details of the ASP scheme please refer to the above point 'Network Capacity / Connection'.

- Flooding and Drainage

Endeavour Energy has noted that the Scoping Report for the Request for SEAR indicates that 'The majority of the site is not identified as being flood prone or within major creeks land under SEPP (SRGA) 2006, however a small portion of the western boundary is subject to flood planning'.

Endeavour Energy requires the electricity network needed to service an area / development to be fit for purpose and meet the technical specifications, design, construction and commissioning standards based on Endeavour Energy's risk assessment associated with the implementation and use of the network connection / infrastructure for a flood prone site. Risk control has focused typically on avoiding the threat, but where this is not possible, reducing the negative effect or probability of flood damage to assets by implementing good design and maintenance practices.

Distribution substations should not be subject to flood inundation or stormwater runoff ie. the padmount substation cubicles are weatherproof not flood proof and the cable pits whilst designed to be self-draining should not be subject to excessive ingress of water. Section 7 'Substation and switching stations' of Endeavour Energy's Mains Construction Instruction MCI 0006 'Underground distribution construction standards manual' provides the following details of the requirements for flooding and drainage in new padmount substation locations.

7.1.6 Flooding and drainage

Substations are to be located such that the risk of flooding or stormwater damage is minimal.

As a minimum the level at the top of the transformer footing, HV and LV switchgear, shall not be lower than the 1:100 year flood level.

All drains within the substation site area or in the vicinity shall be properly maintained to avoid the possibility of water damage to Endeavour Energy's equipment.

In areas where, as determined by the Network Substation Manager, there is a high water table or a heightened risk of flooding, indoor substations will not be permitted.

All materials used in the construction below the substation (ground level) shall be capable of withstanding prolonged immersion in water without swelling or deterioration.

Figure 51 - Example substation raised above 1:100 flood level

- Prudent Avoidance

The electricity industry has adopted a policy of prudent avoidance by doing what can be done without undue inconvenience and at modest expense to avert the possible risk to health from exposure to emissions form electricity infrastructure such as electric and magnetic fields (EMF) and noise which generally increase the higher the voltage ie. Endeavour Energy's network ranges from low voltage (normally not exceeding 1,000 volts) to high voltage (normally exceeding 1,000 volts but not exceeding 132,000 volts / 132 kV).

In practical terms this means that when designing new transmission and distribution facilities, consideration is given to reducing exposure and increasing separation distances to more sensitive uses such as residential or schools, pre-schools, day care centres or where potentially a greater number of people are regularly exposed for extended periods of time.

These emissions are usually not an issue but with Council's permitting or encouraging development with higher density, reduced setbacks and increased building heights, but as the electricity network operates 24/7/365 (all day, every day of the year), the level of exposure can increase.

Endeavour Energy believes that irrespective of the zoning or land use, applicants (and Council) should also adopt a policy of prudent avoidance by

the siting of more sensitive uses eg. the office component of an industrial building, away from and less susceptible uses such as garages, non-habitable or rooms not regularly occupied eg. storage areas in a commercial building, towards any electricity infrastructure – including any possible future electricity infrastructure required to facilitate the proposed development.

Where development is proposed near electricity infrastructure, Endeavour Energy is not responsible for any amelioration measures for such emissions that may impact on the nearby proposed development.

Please find attached a copy of Energy Networks Association's 'Electric & Magnetic Fields – What We Know' which can also be accessed via their website at https://www.energynetworks.com.au/electric-and-magnetic-fields and provides the following advice:

Electric fields are strongest closest to their source, and their strength diminishes rapidly as we move away from the source.

The level of a magnetic field depends on the amount of the current (measured in amps), and decreases rapidly once we move away from the source.

Typical magnetic field measurements associated with Endeavour Energy's activities and assets given the required easement widths, safety clearances etc. and having a maximum voltage of 132,000 volt / 132 kV, will with the observance of these separation distances not exceed the recommended magnetic field public exposure limits.

Endeavour Energy's Network Environment Assessment Section has provided the following advice:

As far as Network Environment Assessment Section is aware there are no restrictions in legislation that stop schools, pre-schools, day care centres being placed next to electricity infrastructure.

Prudent avoidance measures must however be implemented. Prudent avoidance was a policy recommended by former Chief Justice of the High Court of Australia, Sir Harry Gibbs, as a result of an inquiry he conducted into community needs and high voltage transmission lines including issues in relation to EMF back in 1991. The findings in the Gibbs report are consistent with subsequent inquiries and are still relevant today.

Prudent avoidance is defined as doing what can be done without undue inconvenience and at modest expense to avert the possible risk to health from exposure to new high voltage transmission facilities. In practical terms, this means designing new transmission and distribution facilities having regard to their capacity to produce EMFs, and siting them having regard to the proximity of houses, schools and the like.

Although the Gibbs report was particularly aimed at electricity distributers to consider when placing their infrastructure, and bearing in mind that there are schools, pre-schools, day care centres adjacent to our infrastructure in various locations right across our franchise area, it is nonetheless Endeavour Energy's recommendation it that such 'sensitive uses' not be built adjacent to major electricity infrastructure.

Should such a development proceed, the design of the schools, pre-schools, day care centres should also consider prudent avoidance measures such as any rooms which the children will occupy (class rooms, play areas, sleeping rooms, eating areas) be arranged such that they are on the side of the site/building which is furthest away from the electricity infrastructure.

There is scientific consensus that health effects have not been established but that the possibility cannot be ruled out. Accordingly, if there are any concerns regarding the location of the schools, pre-schools, day care centres in proximity to the electricity infrastructure, in order to make an informed conclusion, the applicant may need to commission an independent review to provide an overall assessment including electric and magnetic field measurement and advice. Applying a precautionary approach early on in the design process will hopefully result in the adoption of prudent avoidance principles benefitting the eventual development of the site.

Although not part of Endeavour Energy's electricity network, the applicant should consider wiring the new building and locating high electricity consuming devices away from areas occupied by children.

- Vegetation Management

The planting of large trees near electricity infrastructure is not supported by Endeavour Energy. Particularly for overhead power lines, ongoing vegetation management / tree trimming is a significant network cost and falling trees and branches during storms are a major cause of power outages.

Suitable planting needs to be undertaken in proximity of electricity infrastructure (including any new electricity infrastructure required to facilitate the proposed development). Only low growing shrubs not exceeding 3.0 metres in height, ground covers and smaller shrubs, with non-invasive root systems are the best plants to use. Larger trees should be planted well away from electricity infrastructure (at least the same distance from overhead power lines as their potential full grown height) and even with underground cables, be installed with a root barrier around the root ball of the plant.

Landscaping that interferes with electricity infrastructure may become a potential safety risk, cause of bush fire, restrict access, reduce light levels from streetlights or result in the interruption of supply. Such landscaping may be subject to Endeavour Energy's Vegetation Management program and/or the provisions of the *Electricity Supply Act 1995* (NSW) Section 48 'Interference with electricity works by trees' by which under certain circumstances the cost of carrying out such work may be recovered.

- Dial Before You Dig

Before commencing any underground activity the applicant is required to obtain advice from the ***Dial Before You Dig*** **1100** service in accordance with the requirements of the *Electricity Supply Act 1995* (NSW) and associated Regulations. This should be obtained by the applicant not only to identify the location of any underground electrical and other utility infrastructure across the site, but also to identify them as a hazard and to properly assess the risk.

- Demolition

Demolition work is to be carried out in accordance with Australian Standard AS 2601—2001: 'The demolition of structures' as updated from time to time. All electric cables or apparatus which are liable to be a source of danger, other than a cable or apparatus used for the demolition works shall be disconnected ie. the existing customer service lines will need to be isolated and/or removed during demolition. Appropriate care must be taken to not otherwise interfere with any electrical infrastructure on or in the vicinity of the site eg. streetlight columns, power poles, overhead power lines and underground cables etc.

- Removal of Electricity Supply

Approval for the permanent disconnection and removal of supply must be obtained from Endeavour Energy's Network Connections Branch (contact via Head Office enquiries on telephone: 133 718 or (02) 9853 6666 from 8am - 5:30pm) by Accredited Service Providers (ASP) with the relevant class of Authorisation for the type of work being carried out. The work could involve:

  - The disconnection and removal of an underground service cable or overhead service line,
  - Removal of metering equipment.

The written request must be submitted to Endeavour Energy using Form FPJ4603 ' Permission to Remove Service / Metering by Authorised Level 2 Accredited Service Provider' which must be accompanied by Notification of Service Works (NOSW) forms provided as a result of service work activity performed by a Level 2 ASP. The retailer must also provide written agreement for the permanent removal of supply.

For details of the ASP scheme please refer to the above point 'Network Capacity / Connection'.

- Public Safety

Workers involved in work near electricity infrastructure run the risk of receiving an electric shock and causing substantial damage to plant and equipment. I have attached Endeavour Energy's public safety training resources, which were developed to help general public / workers to understand why you may be at risk and what you can do to work safely. The public safety training resources are also available via Endeavour Energy's website via the following link:

http://www.endeavourenergy.com.au/wps/wcm/connect/ee/nsw/nsw+homepage/communitynav/safety/s afety+brochures .

If the applicant has any concerns over the proposed works in proximity of the Endeavour Energy's electricity infrastructure to the road verge / roadway, as part of a public safety initiative Endeavour Energy has set up an email account that is accessible by a range of multiple stakeholders across the company in order to provide more effective lines of communication with the general public who may be undertaking construction activities in proximity of electricity infrastructure such as builders, construction industry workers etc. The email address is Construction.Works@endeavourenergy.com.au .

- Emergency Contact

In case of an emergency relating to Endeavour Energy's electrical network, the applicant should note the Emergencies Telephone is 131 003 which can be contacted 24 hours/7 days. Endeavour Energy's contact details should be included in any relevant risk and safety management plan.

I appreciate that not all the foregoing issues may be directly or immediately relevant or significant to the request for SEARs / Development Application. However in keeping with the Department's aim of earlier and better engagement, Endeavour Energy's preference is to alert proponents / applicants of the potential matters that may arise should development within closer proximity of the existing and/or required electricity infrastructure needed to facilitate the proposed development on or in the vicinity of the site occur.

Could you please pass on a copy of this submission and the attached resources to the applicant? Should you wish to discuss this matter, or have any questions, please do not hesitate to contact me or the contacts identified above in relation to the various matters. Due to the high number of development application / planning proposal notifications submitted to Endeavour Energy, to ensure a response contact by email to property.development@endeavourenergy.com.au is preferred.

With the current COVID-19 health risk, as many as possible of Endeavour Energy staff are working from home. As a result there is only a small contingent located at the Huntingwood head office for essential operations. Although working from home, access to emails and other internal stakeholders is now somewhat limited and as a result it may take longer than usual to respond to enquiries. Thank you for your understanding during this time.

Yours faithfully
Cornelis Duba
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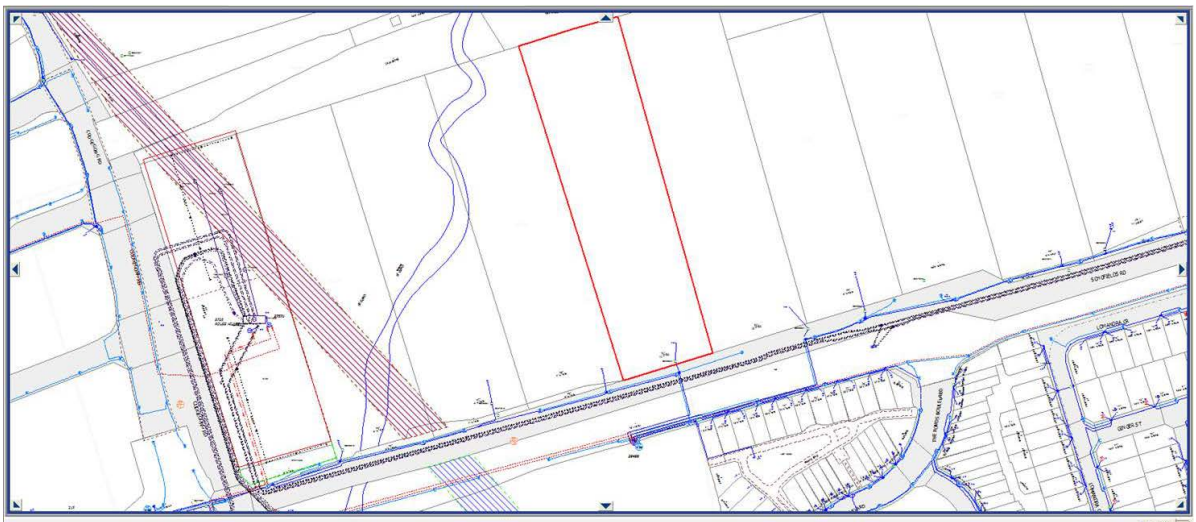

G3E_FID	Feature Name	Component Name	G3E_CID	G3E_ID	LOT	SECTION	DP
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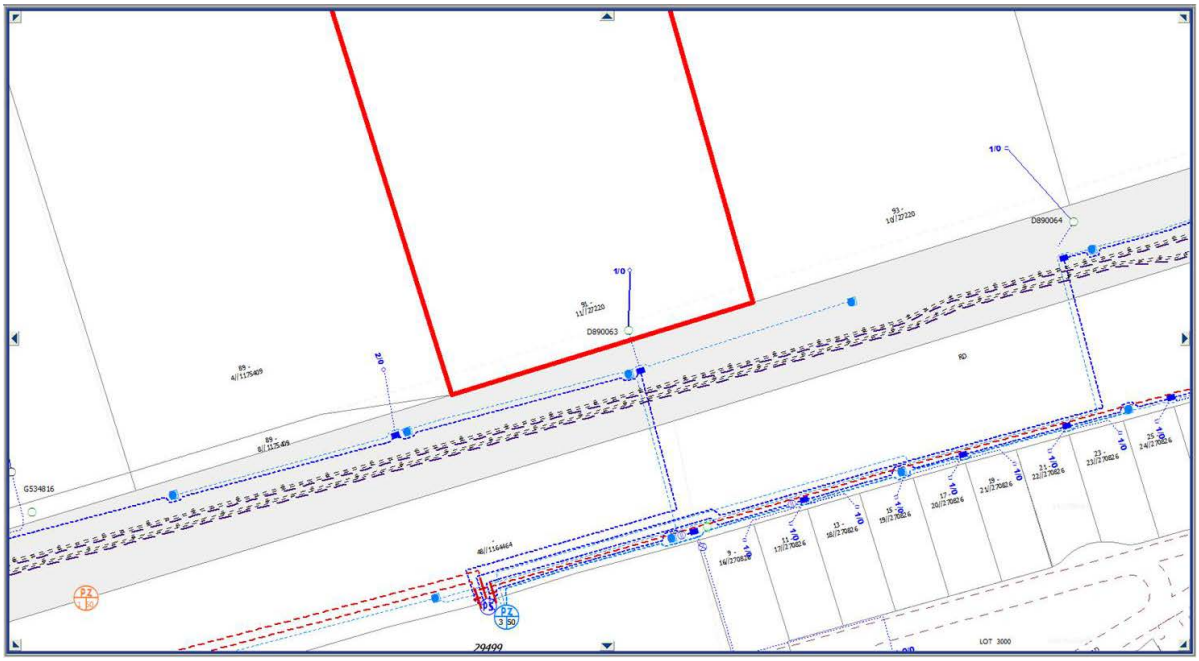

From: Nicholas Gunn <Nicholas.Gunn@planning.nsw.gov.au>
Sent: Wednesday, 30 September 2020 2:50 PM
To: Property Development <Property.Development@endeavourenergy.com.au>
Subject: Request for input - SEARs - Tallawong Primary School (SSD-9440668) - Endeavour Energy

NSW GOVERNMENT | Planning, Industry & Environment

Attention: Mr Cornelis Duba
Development Application Specialist
Endeavour Energy

-via email-
property.development@endeavourenergy.com.au

Dear Mr Duba

The Department of Planning, Industry and Environment has received a request for Secretary's Environmental Assessment Requirements (SEARs) for the Tallawong Primary School SSD-9440668. The proposed development is a State Significant Development under the Environmental Planning and Assessment Act 1979.

Please provide input into the draft SEARs (attached) for the proposal including details of any key issues and assessment requirements by **Tuesday 13 October 2020**.

All relevant documents may be viewed on the Department's website at:
https://www.planningportal.nsw.gov.au/major-projects/project/40176

If you have any questions, please contact Nicholas Gunn on (02) 9995 5818 or via email at Nicholas.gunn@planning.nsw.gov.au

Kind regards

Nicholas Gunn
Planner, School Infrastructure Assessments

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The Department of Planning, Industry and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.