

The Secretary
NSW Department of Planning, Industry and Environment

14 December 2020

ATTENTION: Bruce Zhang, Senior Environmental Assessment Officer

Dear Sir or Madam

I refer to the Department's below email of 13 November 2020 regarding the exhibition of the Environmental Impact Statement (EIS) for State Significant Development SSD-10448 Aspect Industrial Estate for earthworks, infrastructure and roads across the entire site, and the staged construction of warehouse and logistics facilities with associated car parking across 11 developable lots at Mamre Road, Kemps Creek (Lots 54-58 DP 259135) in the Penrith City Council Local Government Area (LGA). Submissions need to be made to the Department by 18 December 2020.

Please refer to Endeavour Energy's submission made by email to the Department on 17 April 2020 regarding the Request for Secretary's Environmental Assessment Requirements (SEARs) for State Significant Development SSD-10448 Aspect Industrial Estate. The recommendations and comments provided therein remain valid.

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

- Network Capacity / Connection

Endeavour Energy has noted the following in the Civil Infrastructure Report addressing the suitability of the site for the development in regard to whether electricity services are available and adequate for the development.

11.3.2. Proposed Electrical

Significant consultation has been undertaken with Endeavour Energy regarding electrical servicing strategies for the Broader Western Sydney Employment Area (BWSEA) which includes the wider Mamre Road Precinct and the Site.

The Endeavour Energy 'Western Sydney Priority Growth Area – Area Plan April 2018' indicates the proposed high voltage network to be delivered as part of the wider Endeavour Energy electrical network required to service the Aerotropolis.

With regards to the wider Mamre Road precinct and the Site, Endeavour Energy has advised the following indicative servicing strategy:

- At present Endeavour Energy are investigating the suitability of 22kV reticulation for the Greater Western Sydney Aerotropolis Area which will encompass the Mamre Road Precinct and the Site. Hence, 22kV underground cable and 22kV Padmount Substations will be reticulated for the supply network;
- The South Erskine Zone Substation will be the ultimate point of supply for the Site with cross-feeder/cross-zone ties to Mamre Zone Substation and Kemps Creek Zone Substation;

- South Erskine Park Zone Substation is due to be commissioned in the 3rd quarter of 2022;
- Temporary connection arrangements may be provided from the existing network along Mamre
- Road from Kemps Creek Zone Substation or Mamre Zone Substation depending on feeder loads at the time.

As part of the Mirvac AIE design development, Mirvac has engaged an Accredited Service Provider Level 3 (ASP3) and has formally made formal subdivision and connection of load applications to Endeavour Energy for provision of an electricity network for AIE with Design Briefs received from Endeavour Energy for these applications.

Endeavour Energy's Asset Planning and Performance Branch has provided the following advice:

As part of the South Erskine Park Zone Substation (ZS) establishment project, Endeavour Energy will convert the existing high voltage network along Mamre Road from 11 kilovolt (kV) overhead to 22 kV overhead where it is not already constructed for 22 kV operation to provide limited initial 22 kV capacity to initial developments currently underway along Mamre Road.

All 11 kV pole mounted substations will be swapped out for 22 kV units if they are still required or cannot be consolidated to a fewer quantity. At present the existing overhead network is along the eastern side so it will remain on the eastern side until it is undergrounded by the proposed Mamre Road widening or forced underground by development.

Developer activity along Mamre Road will ultimately require additional 22 kV feeders from South Erskine Park ZS and these will likely be installed along the eastern side as well and cross-over to the western side at strategic locations / intersections.

We would advise any developer with frontage to Mamre Road to install TYPE-26 ducts if they can establish final levels and final electricity alignment as part of their development. Previous discussions with various stakeholders indicate this is difficult and unlikely to occur until Mamre Road actually begins to be widened.

Any high voltage underground installed prior to Mamre Road widening and is not in final electricity alignment or to the correct depth is likely going to need to be reinstalled by the Mamre Road widening.

Endeavour Energy cannot hold-off development and their requirement for high capacity power supply until Mamre Road is widened and final alignments and levels are established. It is unfortunate the widening of Mamre Road has not been carried out prior to the rezoning of the Mamre Precinct (in similar manner to The Northern Road).

Accordingly Endeavour Energy will try to hold off as much as possible with the 22 kV conversion of the existing overhead power lines but this will not be able to provide capacity for all developments along Mamre Road.

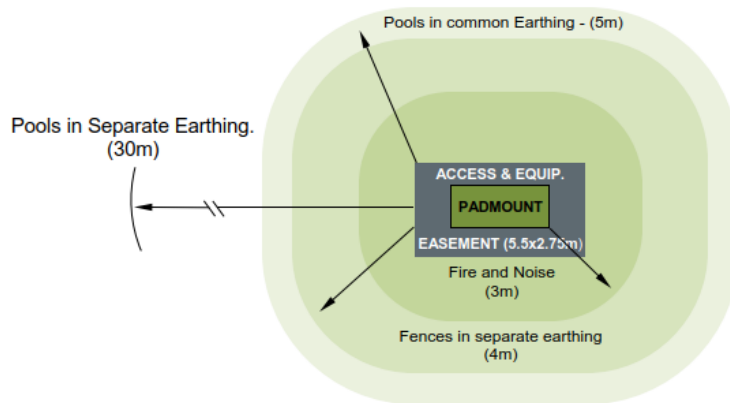
In regard to the provision of electricity supply to the Stage 1 Development Endeavour Energy has noted that as shown in the below extract of the Stage 1 Architectural Drawings that provision has been made for 'Potential Substation Location' in three places.

From Endeavour Energy's perspective the fact that provision is being made for the padmount substations is a positive. Endeavour Energy's general requirements is for a padmount substation to be at ground level and have direct access from a public street.

As shown in the following Figure A4.3 'Padmount easements and clearances', from Endeavour Energy's Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights', padmount substations require:

- Easement with a minimum size of 2.75 x 5.5 metres (single transformer)
- Restriction for fire rating which usually extends 3 metres horizontally from the base of the substation footing and 6 metres vertically from the same point.
- Restriction for swimming pools which extends 5 metres from the easement (which is an industrial development is usually not required).

A4.3 - Padmount easements and clearances



Generally it is the Level 3 Accredited Service Provider's (ASP) responsibility (engaged by the developer) to make sure that the substation location and design complies with Endeavour Energy's standards the suitability of access, safety clearances, fire ratings, flooding etc. As a condition of the Development Application consent the Department should request the submission of documentary evidence from Endeavour Energy confirming that satisfactory arrangements have been made for the connection of electricity and the design requirements for the substation, prior to the release of the Construction Certificate / commencement of works.

Please find attached for the applicant's reference a copy of Endeavour Energy's Guide to Fencing, Retaining Walls and Maintenance Around Padmount Substations.

The applicant's ASP should continue to work through the customer connection process with Endeavour Energy's Network Connections Branch who are responsible for managing the conditions of supply and can be contacted via Head Office enquiries on business days on telephone: 133 718 or (02) 9853 6666 from 9am - 4:30pm.

- Bushfire

Endeavour Energy has noted from the development application is supported by a Bushfire Protection Assessment that assesses the Proposal against NSW Rural Fire Service 'Planning for Bush Fire Protection 2019' and includes the following advice:

SECTION 5 BUSHFIRE MANAGEMENT STRATEGIES

Bushfire management strategies for the estate are as follows:

5.2 Strategy 2 – Water Supplies/Utilities for Firefighting Operations:

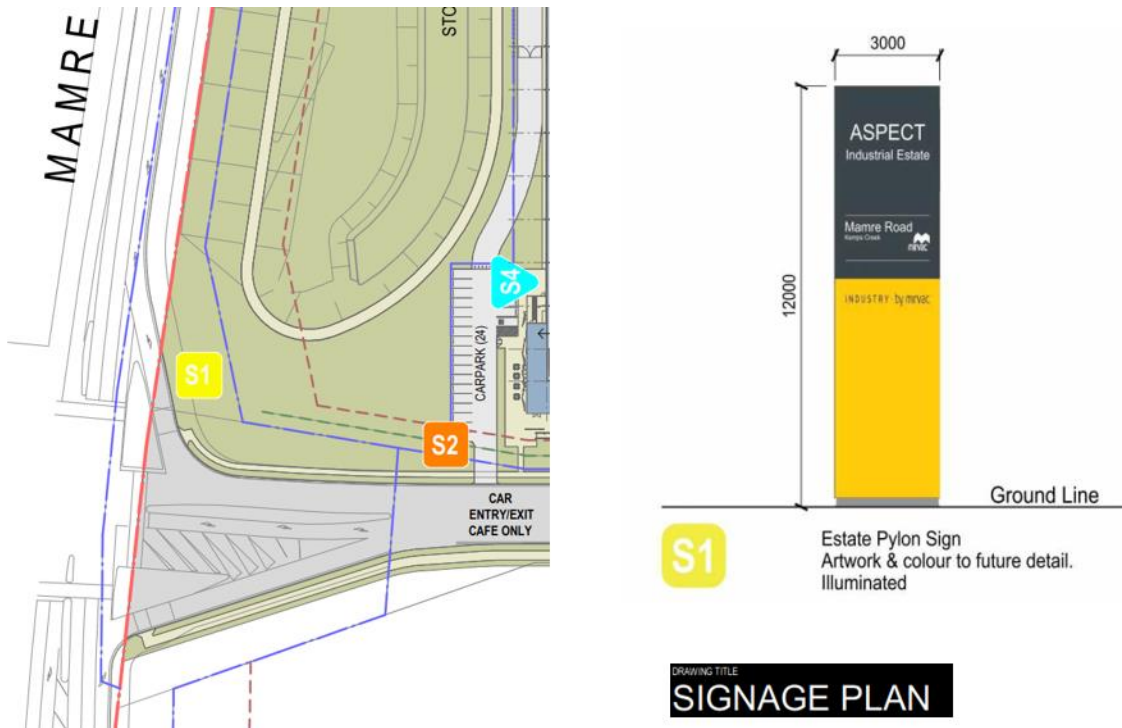
Electricity and gas supplies will be laid underground and therefore address the performance standard of Chapter 8.3.1 of *Planning for Bushfire Protection 2019*.

It is imperative that the access to the existing electrical infrastructure on and in proximity of the site be maintained at all times. To ensure that supply electricity is available to the community, access to the electricity infrastructure may be required at any time. Restricted access to electricity infrastructure by maintenance workers causes delays in power restoration and may have severe consequences in the event of an emergency.

- Safety Clearances

The advice provided in Endeavour Energy's previous submission regarding the minimum safe distances / clearances for overhead power lines applies not only to the protected assets but to all the existing and any required future overhead power lines on or near the site which are not held under easement.

As mentioned in the point 'Network Capacity / Connection' above Mamre Road is the required route for the installation of multiple 22,000 volt / 22 kilovolt (kV) high voltage overhead feeders needed to service development of the Mamre Road Precinct. Accordingly the placement of any signage near the Mamre Road frontage needs to consider the likelihood that 22 kV high voltage overhead power lines will be located to the road verge / roadway.



Even if there is no issue with the safety clearances to the pylon sign, ordinary persons must maintain a minimum safe approach distance of 3.0 metres to all voltages up to and including 132,000 volts / 132 kV. Work within the safe approach distances requires an authorised or instructed person with technical knowledge or sufficient experience to perform the work required and a safety observer for operating plant or possibly an outage request and/or erection of a protective hoarding. The retention of adequate setbacks / safety clearances and/or suitable design eg. not having parts of the building or structure normally accessible to persons in close proximity of the overhead power lines, the use of durable / low maintenance finishes to reduce the need to access areas within the safe approach distances etc., is recommended.

- Site Remediation

Endeavour Energy has noted that the Detailed Site Investigation does not identify the electricity infrastructure on or in vicinity of the site which is likely to become redundant assets as a result of the proposed development as potential areas of environmental concern (AEC) and associated contaminants of potential concern (COPC).

Endeavour Energy's Environmental Business Partner Team have advised that the remediation of soils or surfaces impacted by various forms of electricity infrastructure is not uncommon but is usually not significant eg. transformer oil associated with leaking substations, pole treatment chemicals at the base of timber poles etc. The method of remediation is generally the removal of the electricity infrastructure, removal of any stained surfaces or excavation of any contaminated soils and their disposal at a licensed land fill. The decommissioning and removal of the redundant electricity infrastructure will be dealt with by Endeavour Energy's Network Connections Branch as part of the application for the connection of load for the new development – please refer to the above point 'Network Capacity / Connection'.

If the applicant has any concerns over the remediation works related to redundant electricity infrastructure they should contact Environmental Business Partner Team via Head Office enquiries on business days on telephone: 133 718 or (02) 9853 6666 from 9am - 4:30pm.

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 easing of the COVID-19 health risk, whilst a significant number of Endeavour Energy staff are returning to the office, they are at times still working from home. Although working from home, access to emails and other internal stakeholders can still be somewhat limited and as a result it may take longer than usual to respond to enquiries. Thank you for your ongoing understanding during this time.

Yours faithfully

Cornelis Duba

Development Application Specialist

Network Environment & Assessment

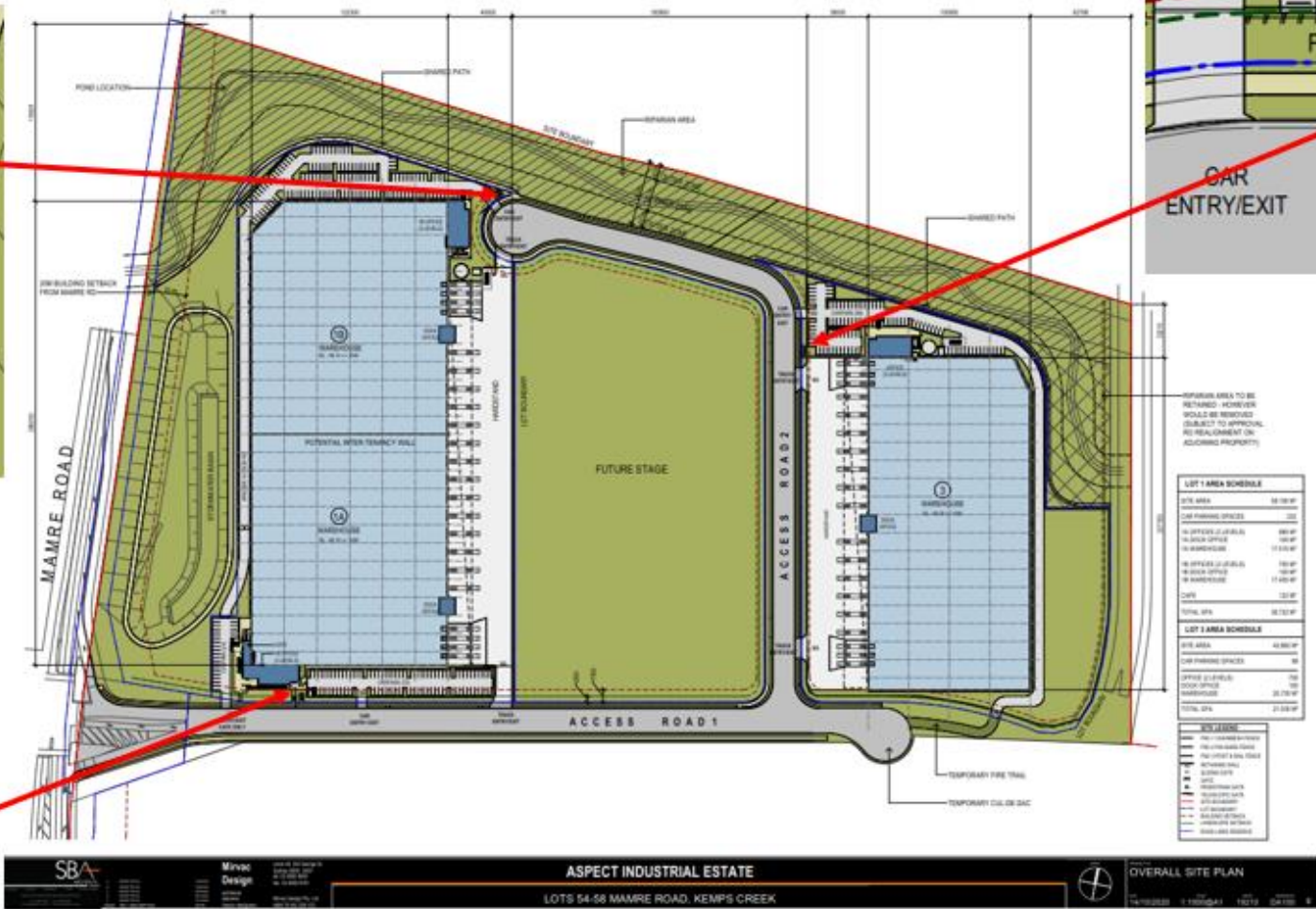
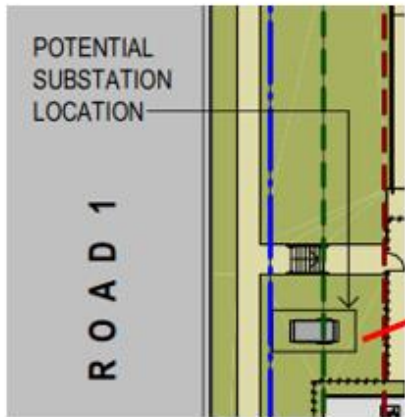
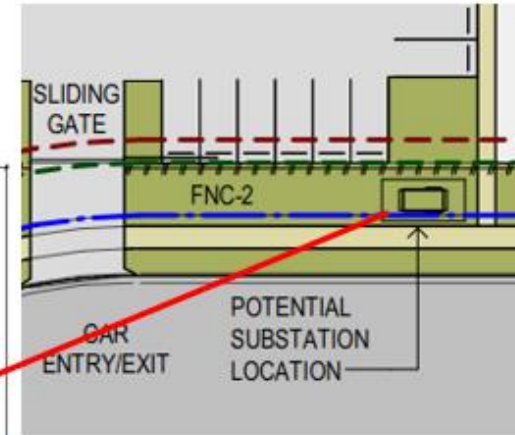
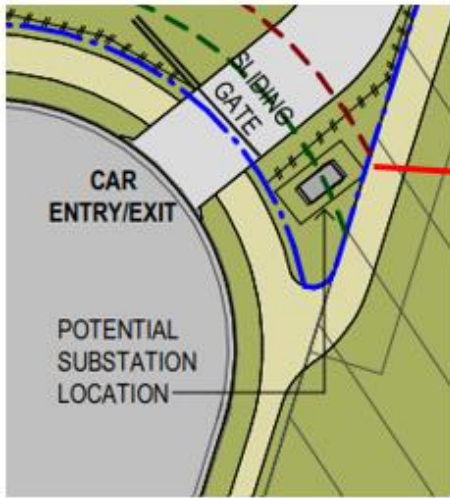
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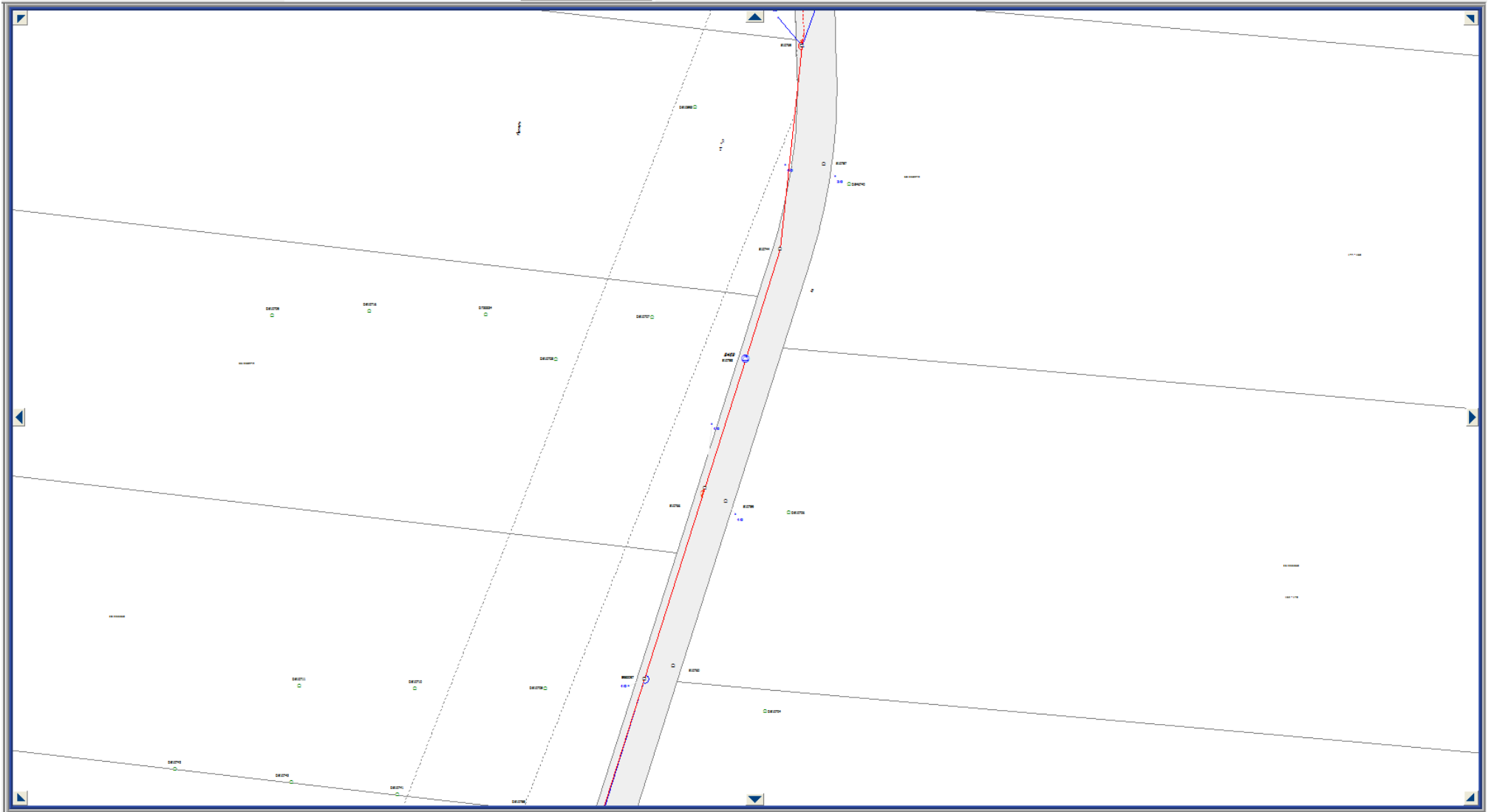
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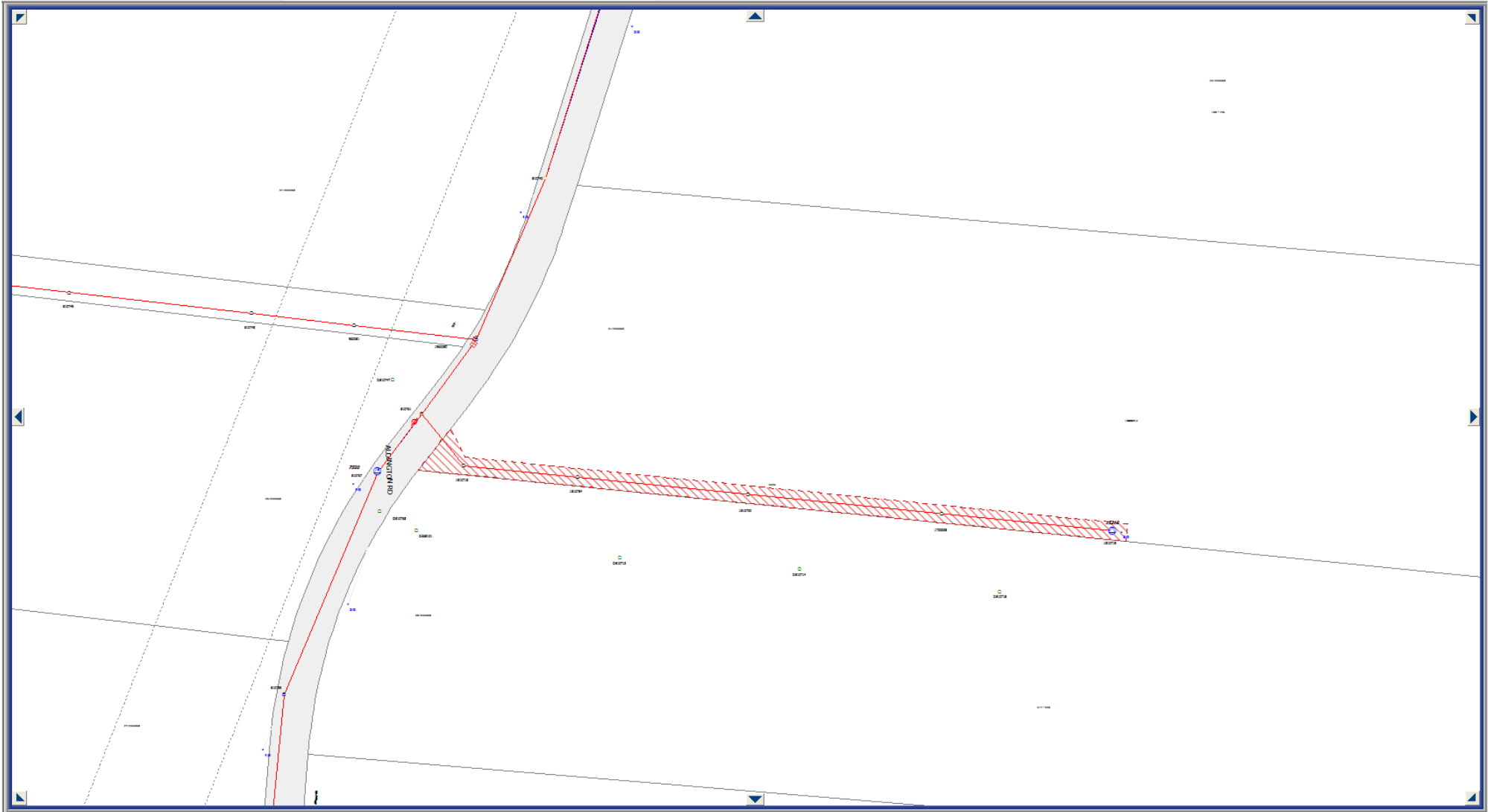
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From: David Schwebel <David.Schwebel@planning.nsw.gov.au>
Sent: Tuesday, 17 November 2020 9:23 AM
To: Property Development <Property.Development@endeavourenergy.com.au>
Subject: Notice of Exhibition – 200 Aldington Road Industrial Estate (SSD-10479)

Dear Sir/Madam

The Department of Planning, Industry and Environment has received an Environmental Impact Statement (EIS) for the 200 Aldington Road Industrial Estate (SSD-10479).

The EIS will be publicly exhibited from 18/11/2020 to 15/12/2020.

The EIS can be viewed on the Department's Major Projects website at <https://www.planningportal.nsw.gov.au/major-projects/project/37961> from 18/11/2020. If you wish to view the documents prior to this date, you will need to register an agency account on the Major Projects site. A User Guide is attached for your reference.

The Department invites you to advise on the proposal, including advice on recommended conditions by **15 December 2020**.

If you have any enquiries, please contact David Schwebel on 02 9274 6400 or david.schwebel@planning.nsw.gov.au.

Regards

David Schwebel
Planning Officer, Industry Assessments

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**Planning,
Industry &
Environment**

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.