Nathan Heath

Subject: RE: NSW Planning , Industry & Environment SSD 7709 MOD 2 Moorebank Intermodal Precinct West Stage 2

Hello Nathan

I refer to your below email of 8 June 2021 regarding State Significant Development SSD 7709 MOD 2 Moorebank Intermodal Precinct West Stage 2 Modification 2 at Moorebank Avenue (Lot 1 DP 1197707, Lot 100 DP1049508) for 'Adjustment to construction related conditions. The proposed modification seeks to amend the extent of maintenance track requirements (condition B2(g)), enable location of power services within the roadway (condition B87), and amend Out of Hours Works Protocol requirements (condition B135(g))'. Submissions need to be made to the Department by 22 June 2021.

In particular in regard to condition B87 to enable location of power services within the roadway, the Modification of Development Consent report relates to the proposal to undertake upgrade works to the Moorebank Avenue and Anzac Road intersection (MAAI) including consideration of the possible relocation of the existing overhead 33 KV (high voltage) transmission line.

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

- Easements benefitting Endeavour Energy (indicated by red hatching) for:
    - Overhead power lines to the north eastern corner of Lot 21 DP 1075884.
    - Underground cables to the western side of Moorebank Avenue over Lot 1 DP 1197707.
- Low voltage, 11,000 volt / 11 kilovolt (kV) (constructed at 22,000 volts / 22 kV) high voltage and 33,000 volt / 33 kV high voltage overhead power lines, overhead earth cables, overhead pilot cables (carrying protection signals or communications between substations) and low voltage and 11 kV high voltage underground cables to the road verges / roadways.
- Low voltage overhead power lines over the private road known as Moorebank Avenue to the south. Although not a public road or held under easement, these are protected assets and deemed to be lawful for all purposes under Section 53 'Protection of certain electricity works' of the *Electricity Supply Act 1995* (NSW). Essentially this means the owner or occupier of the land cannot take any action in relation to the presence in, on or over the land of electricity works ie. the electricity infrastructure cannot be removed to rectify the encroachment. These protected assets are managed as if an easement is in place.

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's Asset Planning & Performance has provided the following advice.

The Moorebank Logistics Park (MLP) being established by QUBE *was given a method of supply (MOS) to obtain an N-1 security 33 kV network connection for 40 mega-volt ampere (MVA) capacity by reconfiguring existing nearby 33kV feeders supplying Anzac Village Zone Substation and Holsworthy Defence Base including the subject 33kV OOS 511 overhead feeder along Anzac Road.*

The customer is currently working on designs to execute the MOS which will include one 33 kV underground feeder along the eastbound carriageway + one 33 kV underground feeder along the westbound carriageway + one 33 kV underground / overhead feeder along a proposed 6metre easement on the southern side of Anzac Road subject to acquisition from Commonwealth Government / Department of Defence.

Asset Planning & Performance have no further comments at this point in time.

Accordingly the applicant and their Accredited Service Provider (ASP) should continue to work through the MOS / asset relocation 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 from 9am - 4:30pm on telephone: 133 718 or (02) 9853 6666.

Subject to the foregoing and the following recommendations and comments Endeavour Energy has no objection to the Development Application.

- Easement Management / Network Access

The following is a summary of the usual / main terms of Endeavour Energy's electrical easements requiring that the landowner:

- Not install or permit to be installed any buildings, structures or services within the easement site.
- Not alter the surface level of the easement site.
- Not do or permit to be done anything that restricts access to the easement site without the prior written permission of Endeavour Energy and in accordance with such conditions as Endeavour Energy may reasonably impose.

Endeavour Energy's preference is for no activities or encroachments to occur within its easements. However, if any proposed works or activities (other than those approved / certified by Endeavour Energy's Network Connections Branch as part of an enquiry / application for load or asset relocation project) will encroach / affect Endeavour Energy's easements or protected assets, contact must first be made with the Endeavour Energy's Easements Officer, Philip Wilson, on business days on direct telephone 9853 7110 or alternately by email Philip.Wilson@endeavourenergy.com.au or Easements@endeavourenergy.com.au .

Please find attached for the applicant's reference copies of Endeavour Energy's:

- General Restrictions for Overhead Power Lines.
- General Restrictions for Underground Cables.
- Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights' which deals with activities / encroachments within easements.

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 electricity workers causes delays in power restoration and may have severe consequences in the event of an emergency. This is particularly important where there are poles or structures and changes in direction to a line route. In the event of fallen conductors or faults in underground cables, access to the poles or cable pits to restring or pull cables will be required by electricity workers with heavy vehicles, machinery and materials and is essential for restoring electricity supply.

- 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. For details of the ASP scheme please refer above.

- Safety Clearances

As a minimum any building or structure (including fencing, signage, flag poles etc.) whether temporary or permanent must comply with the minimum safe distances / clearances for voltages up to and including 132,000 volts (132 kV) as specified in:

- Australian/New Zealand Standard AS/NZS 7000 – 2016: 'Overhead line design' as updated from time to time.
- 'Service and Installation Rules of NSW' which can be accessed via the following link to the Energy NSW website:

https://energy.nsw.gov.au/government-and-regulation/legislative-and-regulatory-requirements/service-installation-rules .

These distances must be maintained at all times and regardless of the Council's allowable building setbacks etc. under its development controls. As a guide only please find attached a copy of Endeavour Energy Drawing 86232 'Overhead Lines Minimum Clearances Near Structures'. Factors such as the span (the longer the span the greater the sag and blowout of the overhead power lines), type of conductor, access, property type and use etc. will impact on the minimum clearances.

If there is any doubt whatsoever regarding the safety clearances to the overhead power lines, the applicant will need to have the safety clearances assessed by a suitably qualified electrical engineer / ASP. 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 .

- 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.

- 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.

Endeavour Energy's recommendation is that existing trees which are of low ecological significance in proximity of overhead power lines be removed and if necessary replaced by an alternative smaller planting. Any planting needs to ensure appropriate clearances are maintained whilst minimising the need for future pruning.

- 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.

- Excavation

The applicant should be aware of the following object of Section 49A 'Excavation work affecting electricity works' of the of *Electricity Supply Act 1995* (NSW) covering the carrying out or proposed carrying out of excavation work in, on or near Endeavour Energy's electrical infrastructure.

Electricity Supply Act 1995 No 94

Current version for 1 July 2019 to date (accessed 24 October 2019 at 14:19)
Part 5 > Division 2 > Section 49A

49A Excavation work affecting electricity works

(1) This section applies if a network operator has reasonable cause to believe that the carrying out or propose out of excavation work in, on or near its electricity works:

(a) could destroy, damage or interfere with those works, or

(b) could make those works become a potential cause of bush fire or a potential risk to public safety.

(2) In those circumstances, a network operator may serve a written notice on the person carrying out or prop carry out the excavation work requiring the person:

(a) to modify the excavation work, or

(b) not to carry out the excavation work, but only if the network operator is of the opinion that modifyin excavation work will not be effective in preventing the destruction or damage of, or interference with electricity works concerned or in preventing those works becoming a potential cause of bush fire or a risk to public safety.

(3) A notice under subsection (2) must specify the excavation work that is to be modified or not carried out.

If any excavation work affects Endeavour Energy's electricity infrastructure, prior contact must be made to Endeavour Energy's Field Operations Branch via Head Office enquiries on business days from 9am - 4:30pm on telephone: 133 718 or (02) 9853 6666 or alternately email Construction.Works@endeavourenergy.com.au .

- Site Remediation

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 from 9am - 4:30pm on telephone: 133 718 or (02) 9853 6666.

- 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/safety+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 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 the any risk or safety management plan.

I appreciate that not all the foregoing issues may be directly or immediately relevant or significant to the Development Application. However, 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.

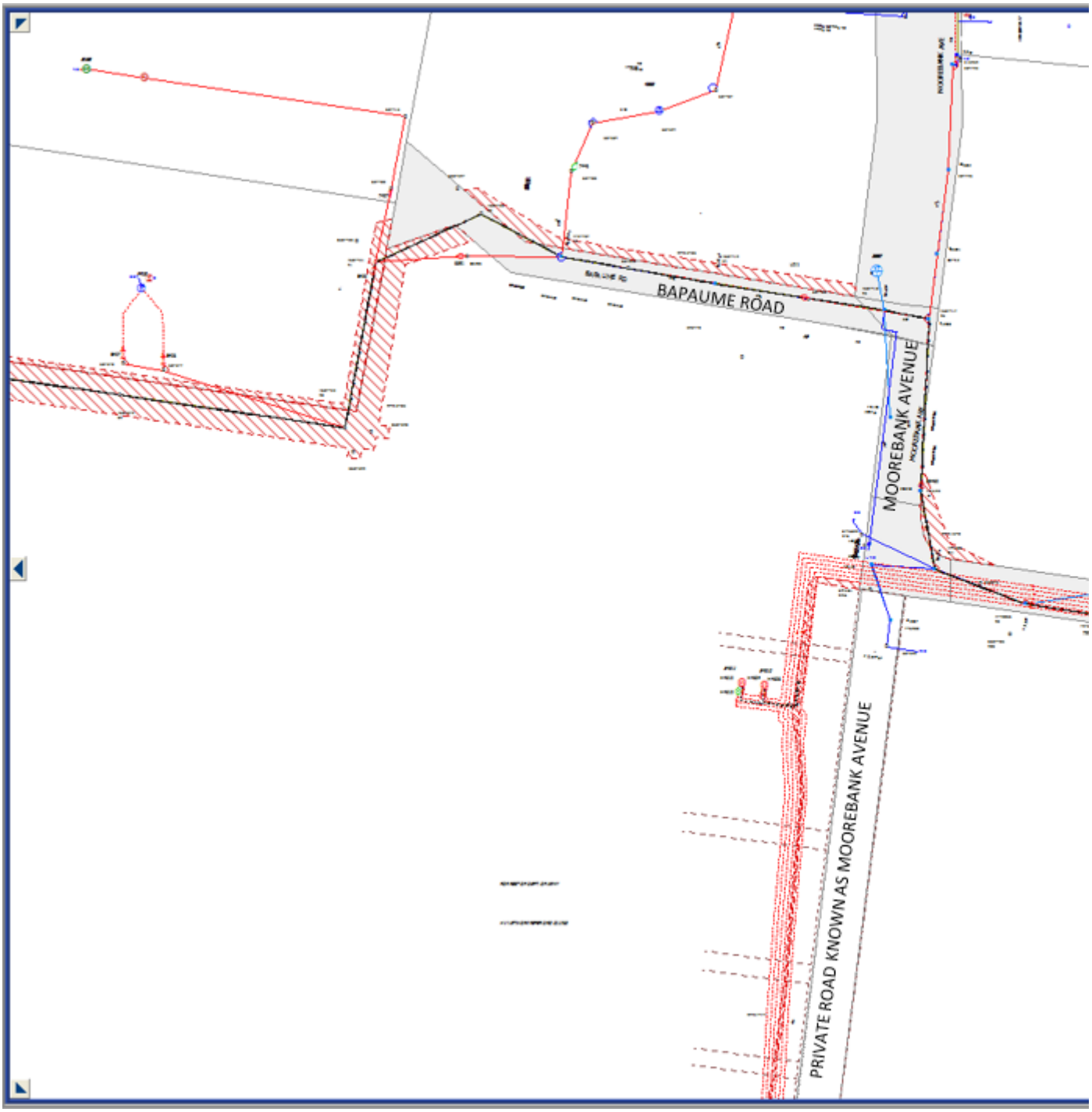
Could you please pass on a copy of this submission and the attached resources to the applicant? Should you wish to discuss this matter, or have any questions, please do not hesitate to contact me or the contacts identified above in relation to the various matters. Due to the high number of development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

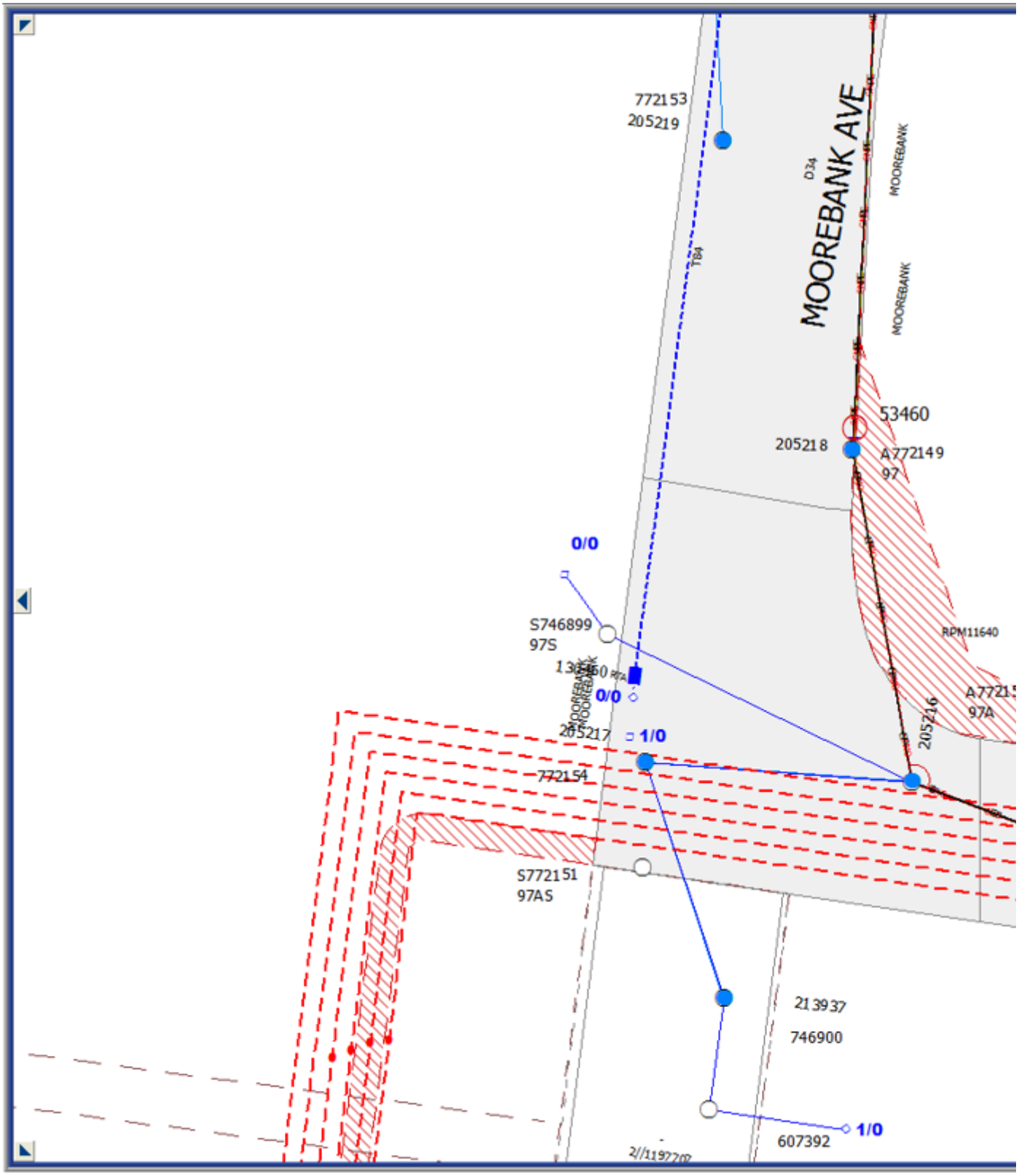
With the easing of the current COVID-19 health risk, whilst a significant number of Endeavour Energy staff are returning to the office they are at times still working from home. Although working from home, access to emails and other internal stakeholders can still be somewhat limited. As a result it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

Kind regards
Cornelis Duba
Development Application Specialist
Network Environment & Assessment

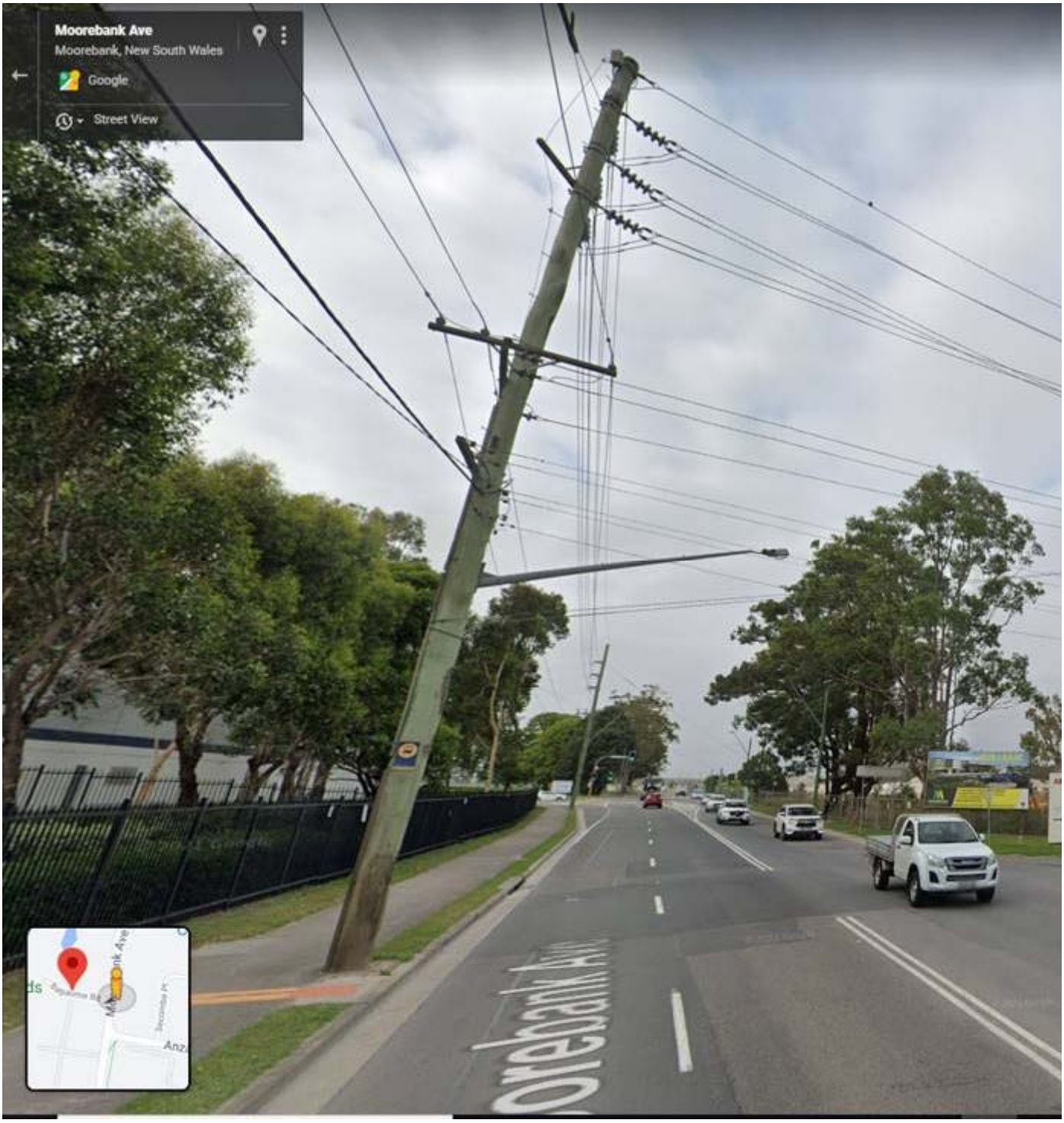
[redacted]

Endeavour Energy

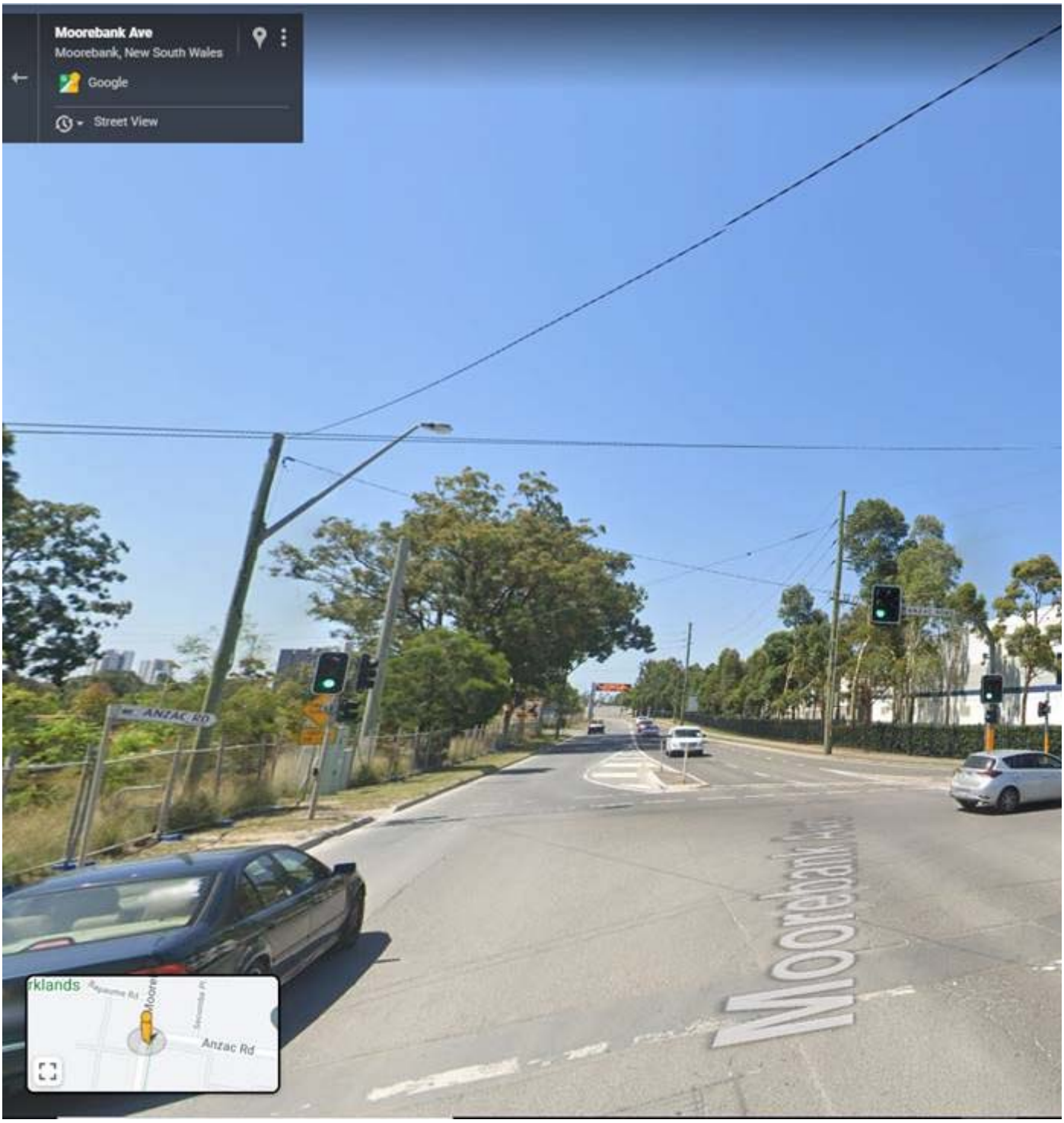

BAPAUME ROAD
MOOREBANK AVENUE
PRIVATE ROAD KNOWN AS MOOREBANK AVENUE



Intersection of Bapaume Road and Moorebank Avenue looking south.



Intersection of Anzac Road and Moorebank Avenue looking north.


Moorebank Ave
Moorebank, New South Wales
Google
Street View
ANZAC RD
Moorebank Ave
Anzac Rd