

The Secretary  
NSW Department of Planning, Industry and Environment

25 August 2020

**ATTENTION: Ellen Luu**

Dear Sir or Madam

I refer to the Department's below email of 27 July 2020 regarding the notice of exhibition of the Environmental Impact Statement (EIS) for State Significant Development SSD-10446 at 275 Adams Road, Luddenham (Lot 3 DP 623799) for Luddenham Advanced Resource Recovery Centre (ARRC) developer advice of a revision to the proposed layout and design of the ARRC, with all waste and recycled product now proposed to be accepted, stored and despatched within a fully enclosed warehouse. Submissions need to be made to the Department by 26 August 2020.

Please refer to Endeavour Energy's submission previously made to the Department on 8 April 2020 regarding the Request for Secretary's Environmental Assessment Requirements (SEARs) and 17 June 2020 in regard to the revision to the proposed layout and design. 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 that the Servicing Strategy Report includes Endeavour Energy's response to Technical Review Request (Endeavour Energy Ref: ENL3756 – 2014/02306/001) dated 16 June 2020. Accordingly the applicant should continue through the application for connection of load process with Endeavour Energy's Network Connections Branch who are responsible for managing the conditions of supply with the applicant and their Accredited Service Provider (ASP). Endeavour Energy's Network Connections Branch can be contacted via Head Office enquiries on telephone: 133 718 or (02) 9853 6666 from 9am - 4:30pm.

- Bushfire

Endeavour Energy has noted that a Bushfire Assessment which provides and assessment of the site having regard to NSW Rural Fire Service 'Planning for Bush Fire Protection 2019' and includes the following advice:

## 3 Bushfire protection measures

### 3.1 Aims and objectives of PBP

*Ensure that utility services are adequate to meet the needs of fire fighters*

The electrical substations for the project have been located on the western side of the ARRC site between the access road and carparking area so as to limit possibility of ignition of surrounding bush land or the fabric of buildings (refer to Section 3.2.4).

## 3.2 Specific issues for commercial and industrial development

### 3.2.4 Other services

Table 3.4 Performance criteria and acceptable solutions – electricity services

Performance criteria	Acceptable solutions	Complies	Detailed design	Justification/commitment
Location of electricity services limits the possibility of ignition of surrounding bush land or the fabric of buildings.	• Where practicable, electrical transmission lines are underground.	✓		Electrical lines will be underground.
	• Where overhead, electrical transmission lines are proposed as follows: <ul style="list-style-type: none"><li>– lines are installed with short pole spacing (30 m), unless crossing gullies, gorges or riparian areas; and</li><li>– no part of a tree is closer to a power line than the distance set out in accordance with the specifications in <i>ISSC3 Guideline for Managing Vegetation Near Power Lines</i> (Resources and Energy NSW 2016).</li></ul>	n/a		Electrical lines will be underground.

- Prudent Avoidance

Endeavour Energy has noted that the Noise and Vibration Impact Assessment refers to the expected operational noise from the plant and equipment it does not refer to the padmount substations required to be located on the site to facilitate the proposed development. Given the type of plant and equipment operating on the site any noise from the padmount substation transformers is unlikely to be an issue but Endeavour Energy believes it is still worth considering.

- Site Remediation

Endeavour Energy has noted the Preliminary Site Investigation does not appear to identify the timber poles on the site (which will become redundant as indicated in the Technical Review Request requires the removal of the overhead power lines and the installation of ducts for the underground cables going to the padmount substations to be located on the site) as a potential source of contamination or as areas of environmental concern.

Endeavour Energy's Environmental Business Partner section 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 section via Head Office enquiries 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 or in the previous submissions 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](mailto: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

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