

1/08/2017

Planning & Environment
By email/electronic submission

Attention: Toby Philip

Dear Mr Philip,

Environmental Impact Statement submission – The Northern Road Upgrade Glenmore Park to Bringelly

Thank you for the opportunity for TransGrid to provide its comment in relation to the exhibition of the EIS for the abovementioned road upgrade.

You would be aware that TransGrid operates the NSW high voltage electricity transmission system. In this regard, TransGrid has both owned land and high voltage transmission lines that are affected by The Northern Road upgrade between Bringelly and Glenmore Park. TransGrid's assets are essential to the State's electricity network and the reliability of power supply to the people of Western Sydney and NSW.

TransGrid has a statutory responsibility to maintain electricity supply to the people of NSW and there are associated restrictions and requirements to ensure both the safety of the public and the security of the infrastructure, where development occurs within an easement area or in close proximity to transmission lines.

TransGrid has two high voltage transmission lines as well as owned land affected by the proposed upgrade of The Northern Road, the impact on TransGrid's infrastructure and land is discussed below.

Western Sydney Airport and associated works

It is noted that The Northern Road upgrade involves a realignment of the road around the future Western Sydney Airport site at Badgerys Creek. TransGrid's single circuit 330 kV #39 Transmission Line crosses The Northern Road in this area. Therefore TransGrid has been working closely with government, the various utility providers and other stakeholders involved with the development of the future airport in relation to specific impacts for TransGrid's infrastructure.

In this regard it will be necessary for utility and infrastructure providers, such as RMS and TransGrid to liaise closely and ensure an ongoing good working relationship during the planning and construction phases of these works to ensure both public safety and access to essential infrastructure is maintained.

TransGrid owned land and Transmission Lines:

In addition to TransGrid's #39 Transmission Line mentioned above; approximately 300m south of Glenmore Parkway TransGrid's double circuit 330 kV 32/38 Transmission Line crosses The Northern Road. This is an essential high voltage supply feeder into Western Sydney

On the western side of The Northern Road in this area, TransGrid owns land which is almost entirely affected by the easement corridor for the #32/38 transmission line. The subject land, being, Lots 9 and 10 DP 26658 is affected by both a proposed property adjustment and a temporary lease for the road upgrade. The impact of the transmission line on the land means neither asset can be considered in isolation.

As such TransGrid has concerns in relation to both the property adjustment, and the lease in relation to continued safe access to, and security of the infrastructure.

Land

Essentially any approval that would impact TransGrid land must require the site to be remediated so that soils and water course are stable and do not result in sedimentation issues, or impact safe and stable vehicular access around the base of the transmission line structure. The site must be clean and tidy (all rubbish removed), and any environmental incidents that may occur on site (e.g. oil spills) will be reported to TransGrid's Corporate Environment Manager.

Specifically in relation to any environmental mitigation measures TransGrid advises that all environmental incidents, and near misses, on TransGrid land must be reported to TransGrid. All pollution incidents that threatens or harms the environment shall be reported immediately to relevant authorities, in accordance with the *Protection of the Environment Operations Act 1997* (POEO Act).

Environmental spill kits containing spill response materials suitable for the works being undertaken shall be kept on site at all times and be used in the event of a spill. Any spills shall be contained, cleaned up promptly and immediately reported to TransGrid.

On completion of the work disturbed areas shall be stabilised, and returned as close as possible to original condition.

Transmission Line

TransGrid's Engineers have assessed the preliminary designs in relation to vertical and horizontal safe clearances to the transmission line, as well as any change to clearance to the distribution lines. It appears that there are no concerns in relation to the vertical clearances, however the transmission structure (#616) is located less than 10 metres from the road reserve where works will take place. This is well within what TransGrid will typically accept as a safe horizontal clearance, and any approval must ensure that work is conducted in accordance with TransGrid requirements, there is safe access to this structure and sufficient room to set up heavy maintenance vehicles.

In this regard TransGrid has been in consultation with RMS throughout the design process and will continue to work with RMS and its designers to obtain a suitable and safe outcome.

Specifically with regard to TransGrid's access for maintenance works and the carrying out of maintenance activities on its line the following is advised:

- The proposed pavement (type 9) between Ch106.02 and Ch106.03 (drawing SM- 2224) appears to be situated at the location of TransGrid's existing access gate.
- Confirmation is requested if TransGrid's access point (the access gate) is proposed to remain at this location for TransGrid's maintenance vehicles.
- We are concerned that the new pavement route (type 9) is shown as ending in close proximity to the grassed drainage channel and may restrict the manoeuvring of TransGrid's vehicles when accessing the tower.
- Also, the new pavement (type 9) with the raised surface levels and batter extending towards the tower also limits the amount of space left available for the setup of vehicles (required on both sides of the transmission line structure, being a double circuit tower). It is requested that it be considered to move this new pavement (type 9) location further away from the structure.
- It is essential that any access means (such as new pavement) to Structure 616 and the easement, be designed to cater for the weight and size of TransGrid's maintenance vehicles - to withstand the 40 ton load capacity of maintenance trucks.
- With proposed batter works to bound two sides of Structure 616, possible water retention around the structure is of concern and this may become an issue. Tower legs could be subject to corrosion and as a result may require reinforcement and foundation repair works to be undertaken. This would need to be assessed after completion of works.
- It is requested that during construction works, adequate precaution be taken to protect the structure from accidental damage, and the easement area is not to be used for temporary storage of construction spoil, topsoil, gravel or any other construction material.

Proposed acquisition "Property Adjustment"

TransGrid is concerned that the proposed acquisition of part of the freehold of this holding will restrict the only safe access for heavy maintenance vehicles (up to 40 tonne) that are required access the land for maintenance of this transmission line.

For this reason TransGrid has formally objected to RMS in relation to the freehold acquisition of this part of its land (part Lot 9). However TransGrid is not opposed to the grant of an easement to RMS (provided suitable heavy vehicle access can be maintained) It is understood from previous discussions with RMS that an easement would be sufficient in the specific circumstances related to this parcel of land. TransGrid requests appropriate consideration is given to this issue as TransGrid has as yet had no formal response from RMS addressing these concerns.

Proposed lease

The proposed RMS lease area poses concerns for TransGrid as it is understood that the area is to be leased to facilitate adjustments to the water course on TransGrid's land and "*....new and upgraded drainage infrastructure*".

TransGrid has already stated its concerns in relation to stability of land around the structure and the need for heavy maintenance vehicles to gain access around this structure, this issue needs to be satisfactorily addressed in any approval for the project and prior to TransGrid agreeing to any lease of its land impacted by the transmission line.

Also as the land is within a transmission easement corridor there can be no stockpiling of soil or construction materials, and the usual TransGrid restrictions for third party development within easements relates, along with the appropriate WorkCover Guidelines for Working in Proximity to High Voltage Transmission Lines.

In summary:


There are a number of high voltage transmission lines that traverse this section of The Northern Road upgrade. It is essential that TransGrid's concerns about access to, and the security of, this essential electrical infrastructure be appropriately in any approval.

For all proposed work near TransGrid high voltage infrastructure it is imperative that RMS and any other relevant stakeholders obtain necessary approvals from TransGrid, and liaise closely to ensure public safety is maintained during and post construction.

TransGrid looks forward to working amicably with RMS on The Northern Road upgrade to ensure that the project can be delivered, while maintaining public safety and access for operation and maintenance purposes to TransGrid's infrastructure. This can only be achieved by ensuring TransGrid's concerns and mitigation requirements are considered in relation to all work near its high voltage infrastructure.

Should you have any questions or wish to discuss this response, please contact Ms Linda Butler on (02) 9284 3167.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Linda Butler', with a stylized flourish at the end.

Linda Butler
Senior Land Economist