

The Secretary
NSW Planning & Environment
-

ATTENTION: Emily Dickson, Key Sites and Industry Assessments

Dear Sir or Madam

I refer to the Department's letter of 14 January 2019 regarding State Significant Development SSD 8800 at 1 Eels Place, Parramatta [Lot 369 DP 752058, Lot 7054 DP 1074335 & Residual Crown Plan 80-3000 (Sydney)] for 'Parramatta Leagues Club Hotel. Construction of a 17 storey hotel comprising 209 hotel rooms, one basement level for services, ancillary uses including a pool, gym, cafe, bars and function room, vehicular access from O'Connell Street, public domain works and tree removal'. Submissions need to be made to the Department by 22 February 2019.

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

- No easements over the site benefitting Endeavour Energy (active easements are indicated by red hatching).
- Low voltage and 11,000 volt / 11 kilovolt (kV) high voltage underground cables to the O'Connell Street road verge / roadway.
- Indoor substation no. 6256 (please refer to the attached copy of RP1103) adjoins to the south with frontage to O'Connell Street and padmount substation no. 9991 located off Eels Place to the north are both protected asset under the provisions of the Electricity Supply Act 1995 (NSW) Section 53 'Protection of certain electricity works'. The owner or occupier of the land cannot take any action by reason of the presence or operation of the electricity works in, on or over the land ie. they cannot remove the electricity infrastructure from the property. These protected assets are managed on the same basis as if an easement was in existence.

Please note the location, extent and type of any electricity infrastructure, boundaries etc. shown on the plan is indicative only. 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).

In regards to padmount substation no. 9991, in accordance with the attached copy of Endeavour Energy's Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights', and as shown in the following extract of Table 1 – 'Minimum easement widths', the padmount substation requires a minimum easement of 2.75 x 5.5 metres.

Table 1 - Minimum easement widths

	Voltage	Asset Type	Construction	Minimum Easement (m)
Other	-	Padmount Substation		2.75 x 5.5 (see clause 5.3.6)

In addition to the easement for padmount substations now also include additional clearances / 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. These were introduced on a case for case basis from 2003 before becoming standard in 2009.

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

- Network Capacity / Connection

Endeavour Energy has noted the following in the Environmental Impact Statement (EIS):

4.4 Services

The proposal seeks to connect to existing services. This includes:

Electricity

The development is within the Endeavour Energy supply authority network area. Located in close proximity to the development are two padmount transformers: Padmounts 6256 (1) and 6256 (2). JHA engineers have reviewed the 30 minute incremental Meter data for the last 7 years and determined that there is insufficient capacity in these padmounts to service the new hotel. As such, a new substation will be installed to service the development. The proposed size is 1500kVA transformer.

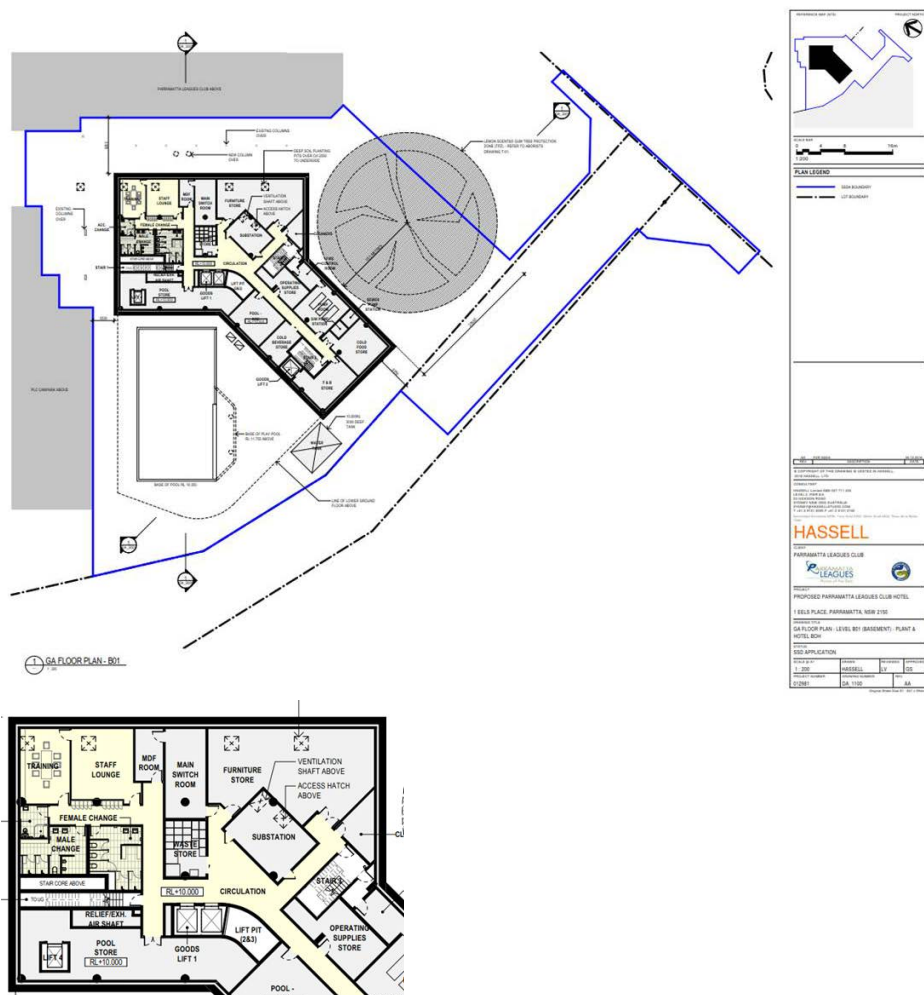
Substation No.	Transformer No	Transformer Size	Last MDI Reading	Last Recorded Date
6256	1	1000kVA	787.5kVA	14/05/2013
	2	1000kVA	525.0kVA	14/05/2013

Table 5 – Substation Requirement

The above information provided by Endeavour Energy 6 February 2015.

Endeavour Energy's Asset Strategy & Planning Branch whilst not having undertaken a detailed analysis of the Development Application have indicated that the foregoing advice remains current / correct.

In regards to the new substation Endeavour Energy has noted that as shown in the following extract of Architectural Plans Attachment A2 it is proposed to be located within the Basement.



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

In this instance the proposed indoor substation being in the basement is not compliant with Endeavour Energy's standards and presents potential access, safety and reliability risks. As an alternative, different locations for the new substation or the augmentation of the existing nearby substations may be an option. Where all other options have been exhausted, if the substation does not comply with Endeavour Energy's standards, the applicant must request a dispensation in accordance with Endeavour Energy's Company Procedure GAM 0114 'Granting Dispensations for Engineering Documents' which states:

2.0 SCOPE

This procedure applies to all dispensation requests for proposed deviation from the company's engineering documents. This includes dispensations from, but is not limited to, Accredited Service Provider (ASP) designs, the company's designs, and failed acceptance testing results for new and existing equipment.

The dispensation request must outline the risk to the company's ability to provide a safe, reliable and sustainable electricity supply at an optimal whole of life cost when proposing to deviate from engineering documents. The validity of the risk will be assessed and the request will be approved only if the risk is deemed acceptable. The request will be rejected if the risk is deemed unacceptable or substantial evidence is not provided to justify deviating from the company's engineering documents.

In due course the applicant for the future proposed development of the site will need to submit an application 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. Depending on the outcome of the assessment, any required padmount or indoor / chamber 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 Endeavour Energy's Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights'. Further details are available by contacting Endeavour Energy's Network Connections Branch via Head Office enquiries on telephone: 133 718 or (02) 9853 6666 from 8am - 5:30pm or on Endeavour Energy's website under 'Home > Residential and business > Connecting to our network' via the following link:

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

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 and further details (including the applicable charges) are available from Endeavour Energy's website under 'Our connection services'. 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.

Alternatively the applicant should engage a Level 3 Accredited Service Provider (ASP) approved to design distribution network assets, including underground or overhead. The ASP scheme is administered by NSW Trade & Investment and details are available on their website via the following link or telephone 13 77 88:

<https://energysaver.nsw.gov.au/households/you-and-energy-providers/installing-or-altering-your-electricity-service>

• Easement Management / Network Access

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

- o Not install or permit to be installed any services or structures within the easement site.
- o Not alter the surface level of the easement site.
- o 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 easement areas. However, if any proposed works (other than those approved / certified by Endeavour Energy's Network Connections Branch as part of an enquiry / application for load) will encroach/affect Endeavour Energy's easements or protected assets, contact must first be made with the Endeavour Energy's Easements Officer, Jeffrey Smith, on direct telephone 9853 7139 or alternately email Jeffrey.Smith@endeavourenergy.com.au or Easements@endeavourenergy.com.au

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

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.

- 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. 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.

- Prudent Avoidance

The electricity network is operational 24/7/365 ie. all day, every day of the year. 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 from 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 locating them where exposure to the more sensitive uses is reduced and increasing separation distances. Endeavour Energy believes that likewise Council should also adopt a policy of prudent avoidance by the siting of more sensitive uses away from any electricity infrastructure – including any possible future electricity infrastructure required to facilitate the proposed development. Even with less sensitive non-residential development, Endeavour Energy believes that a policy of prudent avoidance should be considered.

Please find attached for the applicant's reference a copy of Energy Networks Association's 'Electric & Magnetic Fields – What We Know' which provides the following advice and can also be accessed via their website at <http://www.ena.asn.au/>.

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 in the vicinity of electricity infrastructure is not supported by Endeavour Energy. Suitable planting needs to be undertaken in proximity of electricity infrastructure. Larger trees should be planted well away from electricity infrastructure and even with underground cables, be installed with a root barrier around the root ball of the plant. Landscaping that interferes with electricity infrastructure could become a potential safety risk, restrict access, reduce light levels from streetlights or result in the interruption of supply may become 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 or other utility infrastructure across the site, but also to identify them as a hazard and to properly assess the risk.

- Excavation

Applicant should be advised of the following object of Section 49A 'Excavation work affecting electricity works' of the *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 8 January 2016 to date (accessed 30 March 2016 at 08:12)
[Part 2](#) > [Division 2](#) > [Section 49A](#)

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49A Excavation work affecting electricity works

- (1) This section applies if a network operator has reasonable cause to believe that the carrying out or proposed carrying 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 proposing to 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 modifying the excavation work will not be effective in preventing the destruction or damage of, or interference with, the electricity works concerned or in preventing those works becoming a potential cause of bush fire or a potential risk to public safety.

With the increased number of developments incorporating basements often being constructed to the property boundaries, the integrity of the nearby electricity infrastructure can be placed at risk.

If any excavation work affects Endeavour Energy's electricity infrastructure, prior contact must be made to Endeavour Energy's Regional Service North via Head Office enquiries on telephone: 133 718 or (02) 9853 6666 from 8am - 5:30pm or alternately email Regional.ServicesNorth@endeavourenergy.com.au.

- 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.

- Asbestos

Endeavour Energy's G/Net master facility model indicates that the site is in an area identified or suspected of having asbestos or asbestos containing materials (ACM) present in the electricity network. Whilst Endeavour Energy's underground detail is not complete within G/Net in some areas, in older communities, cement piping was regularly used for the electricity distribution system and in some instances containing asbestos to strengthen the pipe; for insulation; lightness and cost saving.

When undertaking works on or in the vicinity of Endeavour Energy's electricity network, asbestos or ACM must be identified by a competent person employed by or contracted to the applicant and an asbestos management plan, including its proper disposal, is required whenever construction works has the potential to impact asbestos or ACM.

The company's potential locations of asbestos to which construction / electricity workers could be exposed include:

- o customer meter boards;
- o conduits in ground;
- o padmount substation culvert end panels; and
- o joint connection boxes and connection pits.

Further details are available by contacting Endeavour Energy's Health, Safety & Environment via Head Office enquiries on telephone: 133 718 or (02) 9853 6666 from 8am - 5:30pm.

- Public Safety

As the proposed development will involve work near electricity infrastructure, workers 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 within 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.

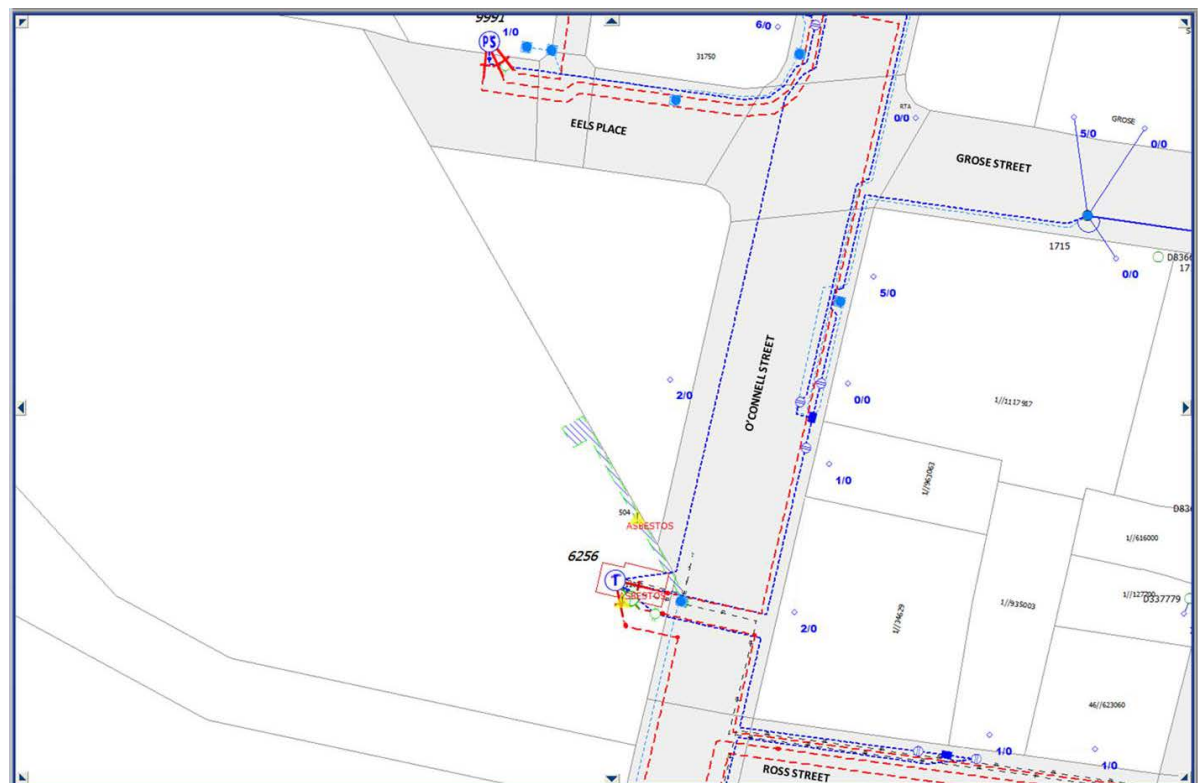
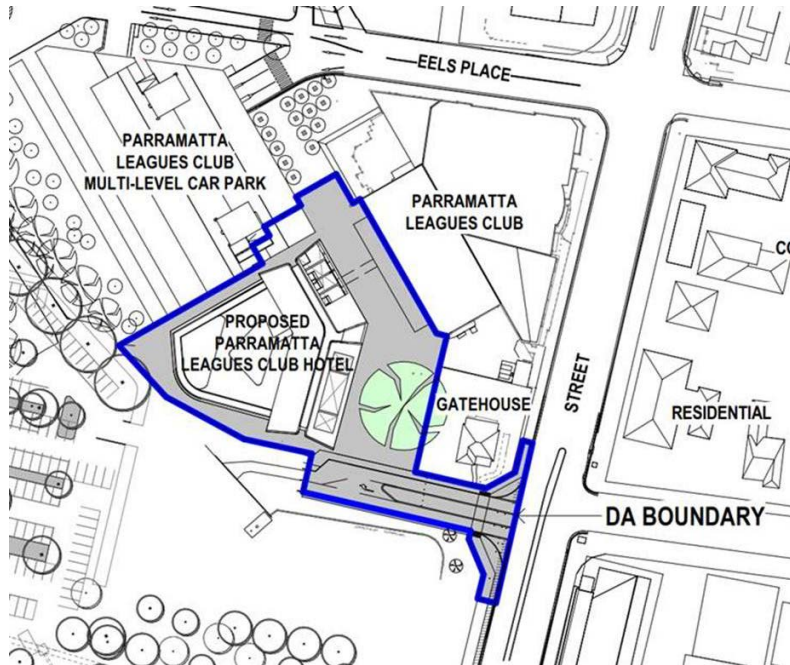
- Emergency Contact

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.

I appreciate that not all the foregoing issues may be directly 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 proposed electricity infrastructure required 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.

Yours faithfully
Cornelis Duba
Development Application Specialist
Network Environment & Assessment
T: 9853 7896
E: cornelis.duba@endeavourenergy.com.au
51 Huntingwood Drive, Huntingwood NSW 2148
www.endeavourenergy.com.au





From: Luisa Maguire [mailto:Luisa.Maguire@planning.nsw.gov.au]
 Sent: Monday, 14 January 2019 12:32 PM
 To: Property
 Subject: Notification of Exhibition of Parramatta Leagues Club Hotel (SSD 8800)

Good Afternoon,

Please find attached the Notification of Exhibition of Parramatta Leagues Club Hotel (SSD 8800) - 1 Eels Place, Parramatta.

The SSD Application and accompanying documents may be viewed on the department's website at http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8800.

The Department of Planning and Environment invites you to comment on the proposal by close of business **Friday 22 February 2019**.

For further enquiries, please contact Emily Dickson on (02) 8275 1032 or via email at emily.dickson@planning.nsw.gov.au.

Regards

Luisa Maguire

Luisa Maguire

DA Coordinator | Key Sites and Industry Assessments
Department of Planning & Environment
320 Pitt Street | GPO Box 39 | Sydney NSW 2001
T 02 8289 6757 E luisa.maguire@planning.nsw.gov.au

