

The Secretary  
NSW Planning, Industry & Environment

9 November 2021

**ATTENTION: Andy Nixey**

Dear Sir or Madam

I refer to the Department's letter of 14 October 2021 regarding the Environmental Impact Statement (EIS) for State Significant Development SSD-14378717 Telopea Concept Plan and Stage 1A for 'Concept proposal for the redevelopment of the site as a mixed-use development, including 4,700 dwellings, retail and commercial uses, community facilities, public open space and new roads. Stage 1A proposal for first stage of development' in the City of Parramatta Local Government Area (LGA). Submissions need to be made to the Department by 9 November 2021.

Please refer to Endeavour Energy's previous submissions made to the Department via email on 24 November 2017 for regarding the creation of a rezoning proposal which outlines the land uses and built form for the Telopea Precinct Stage 1 master plan area. The recommendations and comments provided therein remain valid.

In regard to the provision of electricity to the proposed development endeavour Energy has noted:

- The EIS is dated July 2021 and indicates 'A technical review request has been submitted to Endeavour Energy to confirm the required 11kV feeders'.
- The Concept DA - Utilities Servicing dated 20/11/2020 refers to:
  - In 2016, another consultant submitted a technical review request on behalf of Land and Housing Corporation for this development.
  - Shelmardines have submitted a new Technical Review Request to Endeavour Energy in order to confirm that the above four feeder situation is still required.

Endeavor Energy's Asset Planning & Performance Branch have advised Technical Review Request ENL3764 was completed on 14 July 2020 which based on the 'Telopea – Staging Plan' provided assessed the Precinct to take up 12.5 megavolt amperes (MVA) of load for which the 'Telopea HV Overlay' was completed. They have not raised any concerns or provided any additional advice regarding the EIS.

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

- Flooding and Drainage

Endeavour Energy has noted the EIS indicates there are flood risks associated with the redevelopment of the Concept Plan Area (CPA) but Stage 1A is located away from The Ponds Creek it is not subject to mainstream flooding.

Endeavour Energy requires the electricity network needed to service an area / development to be fit for purpose and meet the technical specifications, design, construction and commissioning standards based on Endeavour Energy's risk assessment associated with the implementation and use of the network connection / infrastructure for a flood prone site. Risk control has focused typically on avoiding the threat, but where this is not possible, reducing the negative effect or probability of flood damage to assets by implementing good design and maintenance practices.

Distribution substations should not be subject to flood inundation or stormwater runoff ie. the padmount substation cubicles are weatherproof not flood proof and the cable pits whilst designed to be self-draining should not be subject to excessive ingress of water. Section 7 'Substation and switching stations' of Endeavour Energy's Mains Construction Instruction MCI 0006 'Underground distribution construction standards manual' provides the following details of the requirements for flooding and drainage in new distribution substation locations.

#### 7.1.6 Flooding and drainage

Substations are to be located such that the risk of flooding or stormwater damage is minimal.

As a minimum the level at the top of the transformer footing, HV and LV switchgear, shall not be lower than the 1:100 year flood level.

All drains within the substation site area or in the vicinity shall be properly maintained to avoid the possibility of water damage to Endeavour Energy's equipment.

In areas where, as determined by the Network Substation Manager, there is a high water table or a heightened risk of flooding, indoor substations will not be permitted.

All materials used in the construction below the substation (ground level) shall be capable of withstanding prolonged immersion in water without swelling or deterioration.



Figure 51 - Example substation raised above 1:100 flood level

- Site Remediation

Endeavour Energy has noted the Preliminary Site Investigation and the Detailed Site Investigation do not appear to 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 usually be dealt with by Endeavour Energy's Network Connections Branch as part of the application for the connection of load for the new development.

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.

Could you please pass on a copy of this submission 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 Endeavour Energy's 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 easing of the COVID-19 health risk, whilst a significant number of Endeavour Energy staff are returning to the office, it may sometimes take longer than usual to respond to enquiries. Thank you for your ongoing understanding during this time.

Yours faithfully

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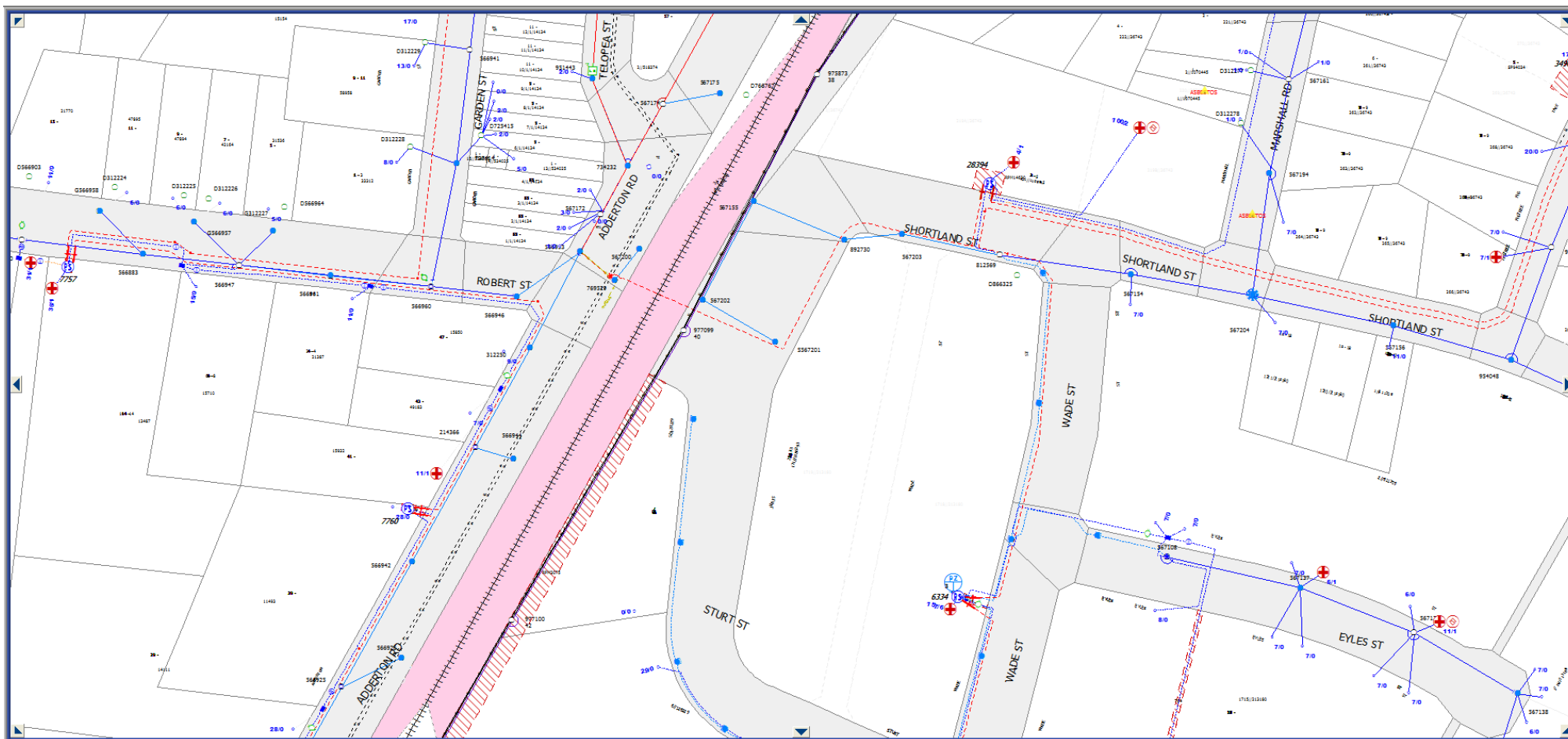
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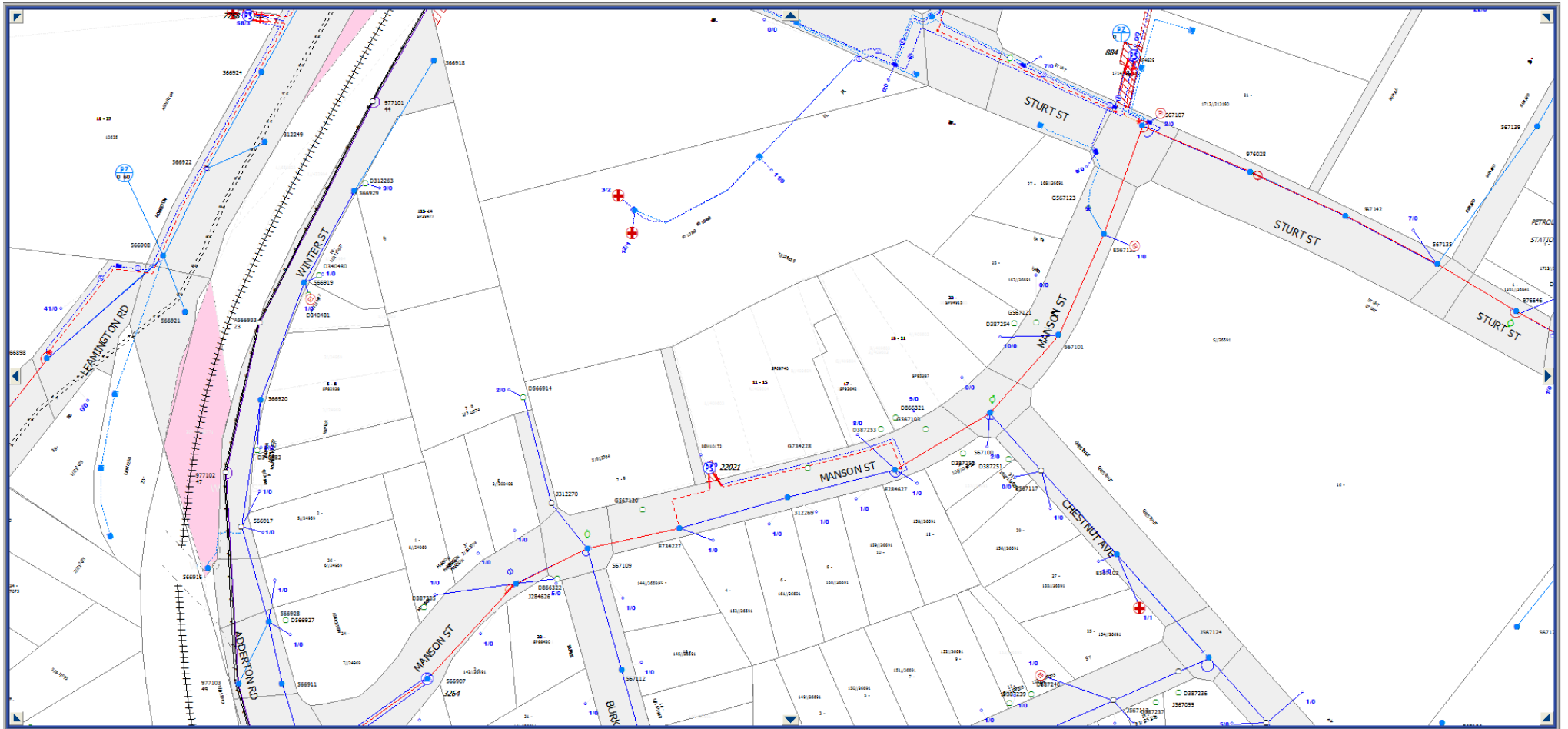
Source: Plus Architecture and Hassell







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. Easements benefitting Endeavour Energy are indicated by red hatching. 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)*.



LEGEND	
	Padmount substation
	Indoor substation
	Ground substation
	Kiosk substation
	Cottage substation
	Pole mounted substation
	High voltage customer substation
	Metering unit
	Switch station
	Indoor switch station
	Customer connection point
	Low voltage pillar
	Streetlight column
	Life support customer
	Pole
	Pole with streetlight
	Cable pit