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Dear Mr Brown

**RE: MP 10_0229 CONCEPT PLAN APPLICATION (CRONULLA SHARKS REDEVELOPMENT, NO. 461
CAPTAIN COOK DRIVE, WOOLLOOWARE**

I refer to the proponent's *Preferred Project Report and Response to Submissions - Concept Plan Application MP 10_0229 (Cronulla Sharks Redevelopment)* prepared by JBA Planning and the Department's ongoing assessment of this major project application.

As you are aware, Ausgrid made a submission in response to the public notification of MP 10_0229 by email on 1 December 2011 raising a number of matters in relation to the proposed development, including precautionary requirements for exposure limits to electromagnetic fields and potential safety risks to construction workers resulting from the presence of in-service 132,000 Volt power lines adjacent to the proposed development.

This sub transmission power line is a critical part of Ausgrid's infrastructure, supplying power to the Caltex refinery, as well as the eastern suburbs of Sydney and the CBD. Ausgrid has recently commissioned two submarine feeder cables which cross Botany Bay and has undertaken major development of sub transmission infrastructure at both Kurnell and Bunnerong at a cost in excess of \$250 million. This electricity infrastructure development, forms part of an overall strategy to utilise the spare capacity which is provided to Kurnell.

Ausgrid has invested a significant amount of capital to ensure a secure electricity supply to the Sydney metropolitan area and requires a high level of assurance from the proponent that the proposed development will not compromise the integrity of these assets in any way. Apart from ensuring the operational security of the lines, Ausgrid also requires unrestricted heavy vehicle access to the transmission easement for these power line assets, in the event that maintenance is required, either on an emergency basis or routine inspections.

With due consideration of the importance of these assets, Ausgrid insists that its approval is obtained prior to the commencement of any works in relation to construction activities for the staged development of the project. Ausgrid specifically requires unrestricted access on a 24 hour, seven day per week basis and to review works programs for the proposed development in order to ensure that safe working clearances by construction activities are maintained at all times.

In its previous submission to the Department in relation to the proposed development, Ausgrid requested details of work activities from the proponent. However in relation to the minimisation of safety risks for construction workers, the proponent responds in the *Preferred Project Report and Response to Submissions - Concept Plan Application MP 10_0229* as follows:

"Ausgrid's submission recommended a number of conditions relating to the construction phase of the development, which can be appropriately conditioned as part of the assessment and determination of the relevant Project Application/Development Application."

Ausgrid does not agree that this is an appropriate way to address this important work safety issue. Rather, it considers it important to deal with these matters before the Project Application/Development Application is determined, as required risk mitigation measures may affect the overall design of the development.

Issues relating to electromagnetic fields are also inadequately addressed in both the original documentation accompanying the concept plan application and section "3.12.4 Electromagnetic Radiation" on page 58 of the proponent's response to submissions (*Preferred Project Report and Response to Submissions - Concept Plan Application MP 10_0229*). Ausgrid makes the following additional comments for the Department's further consideration in its project assessment:

- there is no evidence in the applicant's project documentation that any consideration has been given to the adoption of low cost measures to reduce people's potential exposure to electromagnetic fields associated with the existing power lines. This is a requirement of the *Draft ARPANSA Standard* and is consistent with the industry's position on this matter;
- Section 3.12.4 (page 58) of the *Preferred Project Report and Response to Submissions - Concept Plan Application MP 10_0229* contains the following statements:

"Magshield advises that the standard referenced has been in draft format for over five years now and according to official industry news will not be adopted as an Australian Standard".

Comment: This statement is incorrect. ARPANSA have advised that the standard referenced above is likely to be adopted as an Australian guideline. ARPANSA have also indicated that the precautionary requirements will remain in the document.

"Given that the relevant international guidelines have already been formulated on the basis of applying the precautionary principle....."

Comment: This statement is incorrect. International guidelines (ICNIRP and IEEE) do not address possible long term health effects of electromagnetic fields. The referenced levels and inherent safety factors within these guidelines only address short term health effects.

Ausgrid therefore objects to the proposed development until such time as the issues raised in this submission are fully addressed to Ausgrid's satisfaction, including the submission of a *Safe Work Method Statement* for Ausgrid's approval.

Should you have any enquiries in relation to this matter please contact me on telephone 9269 2169 in the first instance

Yours Sincerely


Grant Greene-Smith
Manager - Property Portfolio