

4th April 2017

Director Industry and Infrastructure Policy
NSW Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Sir / Madam,

Public consultation draft: State Environmental Planning Policy (Infrastructure) Amendment (Review) 2016

Ausgrid submits the following comments in response to the public consultation on the proposed changes to State Environmental Planning Policy (Infrastructure).

1. Clause 16 (2) (i) development on land in a mine subsidence district within the meaning of the Mine Subsidence Compensation Act 1961 – the Mine Subsidence Board.

This clause should be restricted to development that requires approval of SANSW.

Development that is minor in nature or which has deemed approval does not require SANSW approval. Such development would not benefit from additional notifications which would only serve to create an administrative burden.

Suggested improvement:

Clause 16 (2) (i)

(i) development requiring SANSW approval on land in a mine subsidence district within the meaning of the Mine Subsidence Compensation Act 1961—the Mine Subsidence Board.

Emergency works within a SEPP 14 coastal wetland or SEPP 26 littoral rainforests areas

Emergency works should be allowed as exempt development providing that any adverse effect on the land is restricted to the minimum possible to allow the works to be carried out.

It is not reasonable to expect compliance with the S111 of the Act and NSW Code of Practice for *Authorised Network Operators* requirements prior to undertaking works which are required to protect life or property.

Suggested improvement:

8 (3) *Clauses 41 (2) (b), **43 (1) (h)**, 48B, 79 (2) (b) and 94 (2) (b) of this Policy prevail over the following environmental planning instruments to the extent of any inconsistency:*

- (a) *State Environmental Planning Policy No 14—Coastal Wetlands,*
- (b) *State Environmental Planning Policy No 26—Littoral Rainforests.*

*Note. Development may only be carried out on land to which SEPP 14 or SEPP 26 applies under clauses 41 (2) (b), **43 (1) (h)**, 79 (2) (b) and 94 (2) (b) of this Policy if any adverse effect on the land is minimised.*

43 (1) (c) (iii) Replacement of poles

Exempt development involving replacement of poles with similar poles should not be limited to 66kV or less.

Replacing a 132kV pole with a similar pole is of minimal impact and would not benefit from the requirements of S111 of the Act and NSW Code of Practice for *Authorised Network Operators*.

Suggested improvement:

43 (1) (c) (iii) *replacement of poles with similar sized poles, or of associated support structures, for electricity lines **that have a capacity of 66kV or less**,*

Capacity versus voltage

Voltage refers to the difference in electric potential energy between two points and is measured in volts. Capacity refers to rated power and is a function of both voltage and current (Amps).

Suggested improvement:

Change references of "capacity of 66kV" to "**voltage** of 66kV"

Should you or department require any further information or assistance, please contact the undersigned on (02) 9394 6659 or by email addressed to jhart@ausgrid.com.au.

Regards,



James Hart

Manager – Environmental Services