

17 December 2019



Attention Ania Dorocinska
Senior Environmental Assessment Officer
Department of Planning, Infrastructure & Environment
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Dear Ania,

SSD-10366

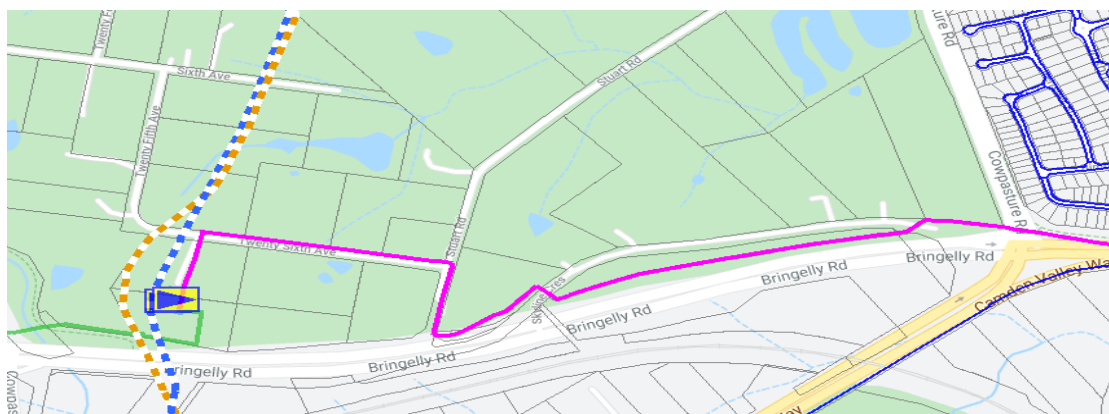
Property: Lot 3 Bringelly Road (Skyline Drive), Leppington NSW

Proposal: SSD-10366 – Proposed Bunning Warehouse, Leppington

Jemena Asset Management Pty Ltd on behalf of Jemena Gas Networks (NSW) Ltd (collectively Jemena) has reviewed and assessed the SSD-10366 and makes the comments and recommendations with respect to the location, operation and identification potential threats to the high pressure pipelines and gas main form a proposed development adjacent to high pressure pipelines transporting dangerous goods in NSW as communicated in the ISEPP clause 66C and more recently the Planning Circular PS 18-010.

In assessing the development application, Jemena can confirm that it operates a high pressure primary main, two high pressure pipelines and the West Hoxton TRS Facility. The Sydney Primary Loop is situated approximately 75 metres to the south of Lot 3 Bringelly Road Business Hub, whilst the West Hoxton TRS, Jemena Central Trunk (JGN) and Eastern Gas Pipeline (EGP) are situated approximately 400 metres to the west. Gas pipeline particulars below:

- The Jemena Eastern Gas Pipeline (NSW Pipelines Act 1967 Licence 26) – Blue line
- The Jemena Central Trunk (Wilton to Horsley Park) Pipeline (NSW Pipelines Act 1967 Licence 1) -Yellow line
- Sydney Primary Loop (West Hoxton TRS to Liverpool PV) – Pink line



Both the EGP and JGN are considered regulated pressure pipeline as defined under the Pipelines Act 1967.

The Sydney Primary Loop is a significant gas main that in part, conveys gas from trunk pipelines at the 'City Gates', to the Jemena Gas Network which services approximately 1.4 million customers. The Sydney Primary Loop assets is operated in accordance with Australian Standard AS2885. AS2885 requires a risk review, Safety Management Study (SMS) of the pipeline operation if applicable where the land around a Pipeline and/or Facility has resulted in a change in land use and change in the risk exposure to the pipeline.

Mitigations in the form of a concrete protection slab have been installed within a portion of Skyline Drive which adds an additional physical barrier to assist in the protection of the Sydney Primary Main.

As the proposed development falls within the **Measured Length** of the Sydney Primary Main, EGP and JGN high pressure pipelines.

*(A Pipeline's **Measurement Length** is defined in AS2885 as a radial distance from the Pipeline, calculated by determining the 4.7kW/m² heat radiation contour in an event of a full bore rupture event. The event causing this type of rupture is typically works related to external parties, unaware and not following Jemena's requirements. During this type of event, an unprotected person exposed to the radiation level for a short period of time is likely to experience severe burns and possible fatality. A Pipeline rupture also has the potential to impact the environment as well as destroy and damage surrounding buildings. Jemena has determined a **Measurement Length** of 766m applies to the EGP and JGN Pipelines and 300 metres for the Sydney Primary Main. The Measurement Length is to be used to determine the appropriate type of land use and development occurring near the Pipelines)*

Recommendations

Jemena recommends that a Safety Management Study (SMS) be conducted into the additional threats the development may infer on the pipelines and main. This study will identify additional physical controls that must be implemented to reduce the risk to the community in the event of a pipeline rupture.

Under AS2885 requirements, Jemena takes its rights and obligations under these instruments seriously as they relate to ensuring the ongoing safety and integrity of its mains/ pipelines and the community at large.

Duty of care exists to ensure there is no compromise to the integrity of the Jemena assets during this procedure due to the existing ground conditions that currently exist.

If you have any questions or queries about the Safety Management Study process, please do not hesitate to contact the undersigned.

Kind Regards



Luke Duncan
Land Management