



18 October 2022

Department Ref: SSD-6696-MOD-1

APA Ref: 500011

Natasha Homsey  
Department of Planning and Environment  
Locked Bag 5022  
Parramatta NSW 2124

Dear Natasha,

**RE: Submission Liverpool Range Wind Farm – Modification Assessment**

Thank you for the opportunity to provide comment on Liverpool Range Windfarm Modification Project (the Project).

APA Group (**APA**) is Australia's largest natural gas infrastructure business and has direct management and operational control over its assets and investments. APA's gas transmission pipelines span across Australia, delivering approximately half of the nation's gas usage. APA owns and operates over 15,000 km's of high pressure gas transmission pipelines across Australia.

APT Pipelines (NSW) Pty Ltd (**APA**) owns and operates one pipeline located within easement through the proposed project area being APA's Central Ranges pipeline roughly crossing east/west through the REZ along the line Dubbo to Dunedoo, Leadville and up top Coolah (see Table 1 for details):

**Table 1: Transmission gas pipelines in the area of consideration**

Pipeline	Pipeline Licence	Easement Width (m)	Diameter (mm)	Measurement Length (m)
Central Ranges Pipeline	27	15	200	191

**Note:** measurement length is applied to either side of the pipeline.

**APA's Role**

As a Licensee under the *Pipelines Act 1967*, APA is required to operate pipelines in a manner that minimises adverse environmental impacts and protects the public from health and safety risks resulting from operation of our high pressure gas transmission pipelines (**HPGTP**). Once a HPGTP is in place, APA is required to constantly monitor both the pipeline corridor and also a broader area within which we are required to consider land use changes and development and to assess what such changes means to the risk profile of the HPGTP.

APA has a number of responsibilities and duties to perform under a complex framework of legislation, standards and controls across Federal, State and Local Government landscapes. In particular, the *Pipelines Act 1967*, cites Australian Standard 2885 (**AS2885**) as a mandatory safety standard for the design, construction, operation and maintenance of transmission pipelines. In discharging our regulative responsibilities, APA needs to continuously review what is happening around its assets, what land use changes are occurring and what development is taking place to ensure it remains in a position to comply with applicable operational and safety standards and legislation whilst meeting its commercial obligations and imperatives.

## **Pipeline Risk Profile and the Measurement Length**

In managing HPGTP's and considering land use changes, APA must focus on that area geographically defined by AS2885 as the Measurement Length (**ML**). The ML area is the heat radiation zone associated with a full-bore pipeline rupture. APA is mandated to consider community safety in the ML due to the high consequences of pipeline rupture to life, property and the economy.

The ML is determined by the diameter and Maximum Allowable Operating Pressure (**MAOP**) of the pipe. APA must consider any changes of land use within the ML area to determine the effect of a new use on the risk profile of the pipeline. For reference, the ML of the Central Ranges pipeline is 191m. Note that the ML is a radial dimension, and therefore applies to both sides of the pipe.

## **Easement Management**

APA's pipeline and associated easement are located on an east-west alignment through the REZ area. The following details regarding easement management are therefore provided for general information.

To ensure compliance with the safety requirements of AS2885, APA needs to ensure our easement is managed to an appropriate standard. This includes:

- Ensuring the easement is maintained free of inappropriate vegetation and structures.
- Place warning signs at various mandated points along the pipeline route, including any change in property description/boundaries.
- Maintain a constant line of sight between warning signs.
- Undertake physical patrols and inspections of the easement.

APA will not accept outcomes that do not enable us to achieve our safety responsibilities to the surrounding community. Crossings of the pipeline should be at 90 degrees and minimised as much as possible.

Any proposed works within the easement must be approved prior to works occurring, by APA through our Third Party Works Authorisation process. This process will ensure all works are undertaken in a safe manner that does not physically impact on the pipeline. Anyone seeking to undertake works on property containing a pipeline, or are seeking details on the physical location of the pipeline, please contact Dial Before You Dig on 1100 or <https://www.1100.com.au/> or APA directly at [APAprotection@apa.com.au](mailto:APAprotection@apa.com.au).

## **Proposed development**

### Project Overview

The Project (modify approved Development Consent for construction, operation and decommissioning of up to 267 wind turbines, with a maximum blade tip height of 165 metres (m), and associated) is located approximately 4kms east of APA's Central Ranges Pipeline at its closest point (immediately east of Coolah) as shown in Figure 6 of the Modification Assessment Report.

- the removal of 47 wind turbines forming part of the Approved Project so that the maximum number of turbines proposed will be 220 (as opposed to the currently approved up to 267 wind turbines);
- an increase in the maximum turbine envelope proposed to enable the use of newer more efficient wind turbine technology with a maximum blade tip height to 250 m above ground level (as opposed to the currently approved up to 165 m tip height) as well as updates to the locations of a number of the wind turbines; and
- updates to the associated infrastructure to accommodate the revised turbine layout and the other design optimisations identified as necessary to ensure the constructability of the Project.

### Proposal Plans

Figures contained in the Assessment Report prepared by Tilt Renewables, dated September 2022 does not identify APA's infrastructure "high pressure gas transmission pipeline", nor is there a specific consideration of the HPGTP within the Scoping Report. Plans associated with this project must include the gas pipeline easement so that stakeholders, developers and construction crews are aware of the gas pipeline and its location.

### Electrical Interference

Electrical works near the pipeline have the potential to impact on the pipelines safe operation and studies in accordance with AS4853 and AS2832 are necessary. The cost of these studies and any necessary mitigations must be borne by the development proponent.

### **Comments**

Based on the information provided, APA does not object to the proposed development modification subject to the following conditions being included with any approval issued for the proposal:

### **Conditions of Approval**

#### **1. No Improvements within Easement**

Buildings, structures, roadway, pavement, pipeline, cable, fence, on-site waste water treatment (or irrigation area), or any other improvement on or under the land within the gas transmission pipeline easement must not be constructed without prior consent in writing from APA. No structure or vegetation will be permitted on the easement that prohibits maintenance of line of sight along the pipeline easement.

#### **2. Risk Assessment Required**

Prior to development near APA's pipeline commencing, and to inform detailed design, an applicant must conduct electrical hazard studies in accordance with (the requirements of) Australian Standard 4853-2012 (for Low Frequency Induction and Earth Potential Rise). The applicant must address any relevant requirements and any recommendations and/or actions must be implemented to the satisfaction of APA. All costs associated with the study, and implementing its recommendations and/or actions are to be borne by the applicant. The applicant must complete validation testing upon completion of construction.

#### **3. High Voltage Powerlines**

The applicant must make good (at the applicant's cost) any hazards or risks to the Central Ranges Pipeline (including cathodic protection systems), caused by any electrical transmission powerlines.

#### **4. Easement Delineation On Plans**

All plans which include the area of the gas pipeline easement must have the easement clearly identified with hatching on the full width of the easement. The easement must also be clearly labelled as *'high pressure gas pipeline easement – no works to occur without the prior authorisation of the pipeline operator'*.

### Note

If you are planning on undertaking any physical works on property containing or proximate to a pipeline, or are seeking details on the physical location of a pipeline, please contact Dial Before you Dig on 1100 or <https://www.1100.com.au/>, or APA directly on [APAprotection@apa.com.au](mailto:APAprotection@apa.com.au).

Note

An early works agreement from APA is required for any assessments/approvals that require greater than 3 days assessment or supervision. Lead in times for agreements can be up to 12 weeks. Please contact APA at [APAprotection@apa.com.au](mailto:APAprotection@apa.com.au) or 1800 103 452.

Note

Any improvements within the transmission gas pipeline easement undertaken by third parties is at the risk of the proponent who will remain liable. APA will not be liable for any costs associated with the reinstatement of any vegetation and/or infrastructure constructed on the easement.

Note

Where access to the pipeline will not be readily available because of the proposed development e.g. significantly obstructed by pavement etc an assessment of the condition of the pipeline coating will be required prior to development commencing. Any re-coating works required as a result of this assessment, due to future inaccessibility or as an outcome of an SMS will be at the developers expense and to the satisfaction of the pipeline licensee/operator.

Note

APA has a suite of standard engineering drawings to assist with detailed design. These are available upon request. Please contact APA at [APAprotection@apa.com.au](mailto:APAprotection@apa.com.au) or 1800 103 452.

APA does not seek to inhibit future development proximate to our assets and is happy to work with the Department and development proponents to achieve mutually acceptable and compliant outcomes. Any interested parties are strongly encouraged to contact APA early to discuss the process of integrating APA assets into future urban developments

Should you wish to discuss the contents of this correspondence, or have any further queries, please contact me on 07 3223 3385 or the Infrastructure Planning & Approvals team at [planningnsw@apa.com.au](mailto:planningnsw@apa.com.au).

Yours faithfully



**John Lawson**  
**Senior Urban Planner**  
**Infrastructure Planning and Approvals**

Att: APA Pipeline Mapping Extract

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