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Jay Wang

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Level 37, Australia Square

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Sydney NSW 2000

Re: **51-55 Archer Street, Chatswood - Project No. 133431**

DPHI Terms of Approval - Point 26: Hazards & Risks (Natural Gas Infrastructure)

Response to DPHI Request for Further Information

Dear Jay,

We write in response to the Department of Planning, Housing and Infrastructure (DPHI) Terms of Approval (TOA) issued in connection with the Environmental Impact Statement (EIS) for the above project. This letter specifically addresses Point 26 - Hazards & Risks, which requires the applicant to provide:

- Demonstration of compliance with relevant Australian Standards and Jemena guidelines in relation to the proposed natural gas infrastructure; and
- Justification that a formal Hazard Analysis is not required for the proposed development.

1. Existing Gas Infrastructure

A Before You Dig Australia (BYDA) enquiry was lodged for the site (BYDA Job No. 51585504, dated 02/11/2025). The BYDA response identifies a 150 mm steel natural gas main operating at 3,500 kPa MAOP located within the Albert Avenue road reserve to the west of the site. This main is an AS/NZS 2885 high-pressure transmission pipeline operated by Jemena.

Based on the BYDA plan, the Jemena pipeline is located approximately 45 m from the site boundary. Jemena's standard easement for high-pressure transmission pipelines is typically 30 m in width, meaning the easement boundary is positioned approximately 15 m from the pipeline centreline. The subject site therefore lies at least 30 m beyond the easement boundary.

2. Applicable Standards and Guidelines

The relevant framework governing this development in relation to the Jemena pipeline is:

- AS/NZS 2885.6:2018 - Pipeline Systems - High Pressure, Part 6: Pipeline Safety Management, which establishes the safety management process for AS/NZS 2885 transmission pipelines including requirements for Land Use Change Safety Management Studies (SMS)
- Jemena Guideline GAS-960-GL-PL-001 - Designing, Constructing and Operating Assets Near Jemena Gas Pipelines (Rev 13, July 2021), which sets out the engineering review requirements and encroachment management framework applicable to works near Jemena AS2885 pipelines
- Jemena Landholder Information (www.jemena.com.au/gas/safety/landholder-information), which sets out Jemena's development restrictions near transmission pipelines and specifies the land uses that trigger a formal Safety Management Study

3. Justification that a Formal Hazard Analysis is Not Required

3.1 Jemena Engineering Review Requirements - GAS-960-GL-PL-001

GAS-960-GL-PL-001 Section 5 and the Encroachment Management System Flowchart (Appendix A) define the conditions under which Jemena's formal engineering review process is triggered. In summary:

- A Jemena Engineering Review is required only when proposed work is within the pipeline easement or within the 10 m activity zone adjacent to the pipeline. Where work falls outside this zone, the Flowchart states: "Third Party can Proceed with works in accordance with the Jemena Guidelines (No further action required)".
- A formal Land Use Change Safety Management Study (SMS) under AS/NZS 2885.6 is required where the scope of works involves sensitive development within the pipeline measurement length - specifically schools, day care centres, hospitals, and aged care centres.
- An Encroachment SMS is required where works may apply significant structural loading to the pipe or cause physical damage to it.

The subject site at 51-55 Archer Street is approximately 45 m from the pipeline centreline and at least 30 m from the easement boundary. The site falls well outside the easement and the 10 m activity zone. On this basis, no Jemena Engineering Review is triggered under GAS-960-GL-PL-001, and the Encroachment Management Flowchart directs that the Third Party may proceed in accordance with the Jemena Guidelines without further action.

The proposed development does not involve any excavation, construction, or loading activities in proximity to the pipeline. No works are proposed within the easement or within 10 m of the pipeline, and there is no encroachment requiring Jemena's review or approval under GAS-960-GL-PL-001.

3.2 Sensitive Land Use Classification

GAS-960-GL-PL-001 Section 5 and Jemena's published landholder information both confirm that a formal Land Use Change SMS is only required where the development constitutes sensitive development such as schools, day care centres, hospitals, and aged care centres, consistent with the Sensitive Use (S) location class defined in AS/NZS 2885.6:2018 Clause 2.4(a).

The proposed development at 51-55 Archer Street comprises residential. It does not constitute a sensitive land use under either Jemena's guidelines or AS/NZS 2885.6. A formal Land Use Change SMS is therefore not required.

3.3 No-Development Zone

Jemena's landholder information states that no development is permitted within 20 m of the easement boundary without prior written consent from Jemena. The subject site is approximately 30 m from the easement boundary, well outside this no-development zone. No prior written consent from Jemena is required under this provision.

In summary, the proposed development does not trigger any of Jemena's formal engineering review or Safety Management Study requirements under GAS-960-GL-PL-001 or AS/NZS 2885.6. The site lies outside the easement and 10 m activity zone, the development is not a sensitive land use, and no works are proposed in proximity to the pipeline.

4. Conclusion

We trust this letter adequately addresses the DPHI TOA Point 26 requirement. To summarise:

- A 3,500 kPa AS/NZS 2885 transmission main is located in Albert Avenue, approximately 45 m from the site boundary, with a 30 m wide easement whose boundary is approximately 30 m from the site;
- Under GAS-960-GL-PL-001, a Jemena Engineering Review is only required when works are within the pipeline easement or within 10 m of the pipeline. The site is 30 m beyond the easement boundary and no works are proposed in proximity to the pipeline - the Encroachment Management Flowchart directs that no further action is required;
- A formal Land Use Change SMS under AS/NZS 2885.6 and GAS-960-GL-PL-001 is only required for sensitive development (schools, day care centres, hospitals, aged care centres). The proposed residential and mixed-use development does not constitute a sensitive land use;

- The site does not encroach within 20 m of the Jemena easement boundary, and no Jemena consent is required under that provision; and
- The development does not constitute a Major Hazard Facility and is not subject to any other trigger for a formal Hazard Analysis.
- Should DPHI require any further information or clarification, please do not hesitate to contact our office.

Note – Low Pressure Distribution Main (32mm)

A 32mm natural gas distribution main is also identified within the Archer Street road reserve at the street frontage of the site. This main forms part of Jemena's AS4645 distribution network and operates at a pressure below 400 kPa. GAS-960-GL-PL-001 and AS/NZS 2885 apply only to Jemena pipelines operating above 1,050 kPa. As the 32mm main does not meet this threshold, neither guideline applies and no formal hazard assessment is required in relation to this main. Any works in proximity to this main are to be undertaken in accordance with Jemena's Guideline GAS-9899-GL-CN-001 (Designing, Constructing and Operating around the existing AS4645 Natural Gas Network) and standard BYDA notification requirements.

Yours sincerely,

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