

2 March 2023

Mr Jack Turner  
Senior Environmental Assessment Officer  
Resource Assessments  
Department of Planning and Environment  
6 Stewart Avenue, Newcastle NSW 2300

**Via Email:** jack.turner@planning.nsw.gov.au

Dear Jack

**KKLP (SSI-22338205) Staging of Plan – Condition 28**

The Kurri Kurri Lateral Pipeline Infrastructure Approval condition A28 states;

*With the approval of the Planning Secretary, the Proponent may:*

- prepare and submit any strategy, plan or program required by this approval on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program);*

APA has been informed that the line pipe for the KKLP will be delivered into the port of Newcastle ahead of schedule, arriving early April 2023. This is approximately six weeks earlier than scheduled.

To ensure the integrity of the line pipe and to keep the vehicle movements to those described in the KKLP EIS, APA is requesting that the DPE approves a Line Pipe Delivery and Laydown Management Plan (LPD&L MP). This will be a staged management plan to contemplate:

- Pipe laydown areas preparation and management (as described in the KKLP EIS); and
- Line pipe delivery.

As an outcome, the KKLP construction would be in two stages:

- Stage 1 - laydown areas preparation / management and line pipe delivery; and*
- Stage 2 – the remainder of the project.*

The following table provides comments against the KKLP Infrastructure Approval required management plans and their relevance to the proposed Stage 1.

Table 1: Infrastructure Approval Management Plans

Management Plan	Response
B1. Construction Environmental Management Plan	<p>The proposed LPD&amp;L MP will:</p> <ul style="list-style-type: none"><li>clearly describe the activities planned to be undertaken as part of the laydown preparation and management and line pipe delivery</li><li>identify training and induction provisions relevant to the delivery of the line pipe</li></ul>

	<ul style="list-style-type: none"> <li>include an environmental risk analysis to identify the key environmental performance issues associated with the line pipe delivery and management</li> <li>detail how the performance outcomes, commitments and mitigation measures specified in the document(s) listed in condition A2(c) will be implemented and achieved during laydown preparation and line pipe delivery;</li> <li>outline monitoring and reporting in relation to impacts and environmental performance, and the effectiveness of management measures relevant to Stage 1; and</li> <li>provide a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible.</li> </ul>
B1 (g) (i) Soil and Water Management Plan	<p>The proposed LPD&amp;L MP plan will:</p> <ul style="list-style-type: none"> <li>provide a detailed description of the surface water management system including erosion control measures; and</li> <li>outline measures to minimise impacts on water resources in accordance with commitments in the document(s) listed in condition A2(c) and the soil and water conditions of this approval.</li> </ul>
B1 (g) (ii) Traffic	<p>The proposed LPD&amp;L MP plan will:</p> <ul style="list-style-type: none"> <li>detail the transport route(s) to be used during preparation of the laydown areas and the delivery of line pipe to the two laydown areas;</li> <li>detail the measures that would be implemented to minimise traffic safety issues and disruption to local users of the transport routes;</li> <li>provide details of oversize overmass requirements and management (if relevant);</li> <li>provide a driver's code of conduct that addresses: <ul style="list-style-type: none"> <li>travelling speed;</li> <li>driver fatigue;</li> <li>procedures to ensure that drivers adhere to the designated transport routes; and</li> <li>procedures to ensure that drivers implement safe drive practise;</li> </ul> </li> <li>include a program to record and track vehicle movements; and</li> <li>measures to minimise impacts on traffic in accordance with commitments in the document(s) listed in condition A2(c) and the traffic and transport conditions of this approval;</li> </ul>
B1 (g) (iii) Air quality	Not triggered by the proposed LPD&L MP
B1 (g) (iv) Noise	Line pipe delivery and laydown preparation and management will be undertaken in accordance with conditions B28. & B29.

B1 (g)(v) Waste management	The proposed LPD&L MP plan will include management of any contaminated materials disturbed during the preparation of the laydown areas.
B1 (g)(vi) Rehabilitation	The laydown areas described in the KKLP EIS are both areas highly disturbed existing hardstand. APA will transfer the sites back to the respective landholder at the completion of activities. No further management or rehabilitation will be required.
B3.(a) & (b)	The requirement for a Construction Safety Plan and HAZOP is not triggered by the line pipe delivery and laydown area preparation. No action required.
B5. Biodiversity offsets	No vegetation will be cleared or disturbed as a result of the line pipe delivery or laydown area preparation.
B8. Biodiversity Management Plan	No biodiversity values will be impacted as a result of the line pipe delivery or laydown area preparation.
B12. Aboriginal Cultural Heritage Management Plan	The laydown areas described in the KKLP EIS are both areas highly disturbed existing hardstand. A ACHMP is not required for the line pipe delivery or laydown area preparation.
C1. Environmental Management Strategy	<p>The proposed LPD&amp;L MP will:</p> <ul style="list-style-type: none"> <li>a) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of Stage 1;</li> <li>b) describe the procedures that would be implemented to: <ul style="list-style-type: none"> <li>i. keep the local community and relevant agencies informed about the operation and environmental performance of the development;</li> <li>ii. receive, handle, respond to, and record complaints;</li> <li>iii. resolve any disputes that may arise;</li> <li>iv. respond to any non-compliance;</li> <li>v. respond to emergencies</li> </ul> </li> </ul>

Could the Planning Secretary please consider this request and advise if the proposed approach is acceptable?

Yours Sincerely



**Trent Williams**  
**Access and Approvals Manager - KKLP**  
**APA Group**