



4 December 2023

Department Ref: SSD-6334

APA Ref: 503132

Jarrold Blane
Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

Dear Jarrod,

RE: Submission on proposed Sutton Forest Quarry

Thank you for the opportunity to provide comment on Sutton Forest Quarry (the Project). Accordingly, APA provides this submission outlining our requirements.

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.

East Australian Pipeline Pty Ltd and Gorodok Pty Ltd (**APA**) owns and operates two (2) pipelines located within a 24.385 metre wide easement being for APA's Moomba to Sydney Ethane Pipeline and Moomba to Wilton Natural Gas Pipeline within the subject site.

Table 1: Transmission gas pipelines in the area of consideration

Pipeline	Pipeline Licence	Easement Width (m)	Diameter (mm)	Measurement Length (m)
Moomba to Sydney Ethane	15	24.385	200	600
Moomba to Wilton Natural Gas	16		850	795
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.

Easement Management

APA's pipelines and associated easements are located on a north - south alignment and an east - west alignment through the project 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.

Quarry Operations

Details of construction equipment, construction vehicles (including TARE weights) and works/extraction methodology will need to be submitted to APA for approval in a Management Plan format.

Pipeline Crossings

APA seeks to minimise the number of crossings and have these perpendicular to the pipeline if possible. This should include the co-location of road and services crossings. No work on the easement, including crossings, changes in ground level or other works, may occur without the prior authorisation of APA. Detailed design for crossings will need to be informed by field works to positively locate the pipeline (alignment and depth). Such field works must only be performed under APA permit.

Meeting Request

Given the site operations and works proposed, APA requests a meeting with the Applicant to discuss the proposal to ensure the continued safe operation of APA's pipeline.

Proposed development

Project Overview

Tranteret Pty Ltd proposes to construct and operate a sand quarry that would involve:

- extraction of up to 1 million tonnes of sand products a year over 30 years;
- construction and operation of water management infrastructure, material processing and storage facilities;
- construction and use of supporting infrastructure such as offices, a workshop and weighbridge;
- construction of quarry access road and intersection;
- transportation of extracted material off-site by road; and
- rehabilitation of the site

A fixed wash plant and two mobile screening plants would be used to process the extracted raw sand to produce high quality sand products. The principal products produced would be various grades of washed concrete sand and mortar (brickie's) sands. The fixed wash plant would be used to produce concrete sand and blended products whereas the mobile screening plants would be used to produce brickie's sand products.

Access to and from the Quarry Operations Area would be from the Hume Highway via the Quarry Interchange and Quarry Access Road. Product despatch would involve the use of mainly Quad-dog trucks as well as other configurations.

At maximum production, it is proposed that products despatched from the Quarry would approach 860 000tpa. However, production during the initial stages of extraction would be lower and would increase over time to satisfy market demand.

Proposal Plans

Figure 2.1 of the Environmental Impact Statement, Section 2, Description of Proposal, prepared by Sutton Forest Quarries identifies APA's infrastructure "high pressure gas transmission pipelines", located to the south east corner of the proposed site, directly south of proposed Eastern Barrier works.

Pipeline Crossings

The Project appears to involve crossings of APA's Moomba to Sydney Ethane Pipeline and Moomba to Wilton Pipeline. APA seeks to minimise the number of crossings and have these perpendicular to the pipeline if possible. This should include the co-location of road and services crossings. No work on the easement, including crossings, changes in ground level or other works, may occur without the prior authorisation of APA. Detailed design for crossings will need to be informed by field works to positively locate the pipeline (alignment and depth). Such field works must only be performed under APA permit.

Crossings of underground services must accord with APA requirements, particularly minimum separation distances. Road crossings for heavy vehicles (as expected to be required in this case) will require a concrete slab crossing to disperse loads on the pipeline to an acceptable level. This will need to be designed to APA requirements. Vehicular crossings during construction and operation will need be at the agreed crossing points.

Comments

On the basis of the information provided, APA does not object to the proposed development 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, 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. Services

The design of any infrastructure services shall minimise encroachment on the gas pipeline easement. Any application for an APA permit for an easement crossing will be required to demonstrate that an alternative route, avoiding the easement, is not feasible.

3. Third Party Works Authorisation

Prior to the commencement of any works within the gas transmission pipeline easement, the proponent must seek a third party works authorisation from APA. Works within the gas transmission pipeline easement must comply with any conditions attached to a third party works approval. This includes both permanent roadway/driveway crossing, any sealed parking areas and any temporary crossing required during construction.

4. Quarry Operations/Management Plan

Prior to the commencement of any works, including blasting, extraction and processing, on land within 50 metres of the pipeline easement, a operations management plan must be submitted to and approved by APA. The plan must:

- Prohibit the use of blasting, extraction operations unless otherwise agreed by the operator of the gas transmission pipeline.
- Avoid significant vibration, heavy loadings stored over the pipeline and heavy vehicle / plant crossings of the pipeline.
- Be endorsed by the operator of the gas transmission pipeline where the works are crossing the relevant gas transmission easement.

The assessment manager must be satisfied that the gas transmission pipeline licensee (East Australian Pipeline Pty Ltd and Gorodok Pty Ltd) has reviewed and approved the proposed quarry operations Management Plan.

5. Easement Delineation On Site

During construction, the boundary of the easement must be clearly delineated on site by temporary fencing (or other means as agreed by APA), and clearly marked as a hazardous work zone/ restricted area.

6. 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'*.

7. Pipeline Operator Access

The ability of the pipeline operator to access the easement must be maintained at all times to facilitate prompt maintenance and repairs. This may be through interlocking padlocks so APA has keyed access as any time. APA field officers will undertake any necessary site induction to facilitate unaccompanied access.

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.

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 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 or 1800 103 452.

APA does not seek to unnecessarily 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.

Yours faithfully



John Lawson
Senior urban Planner
Infrastructure Planning and Approvals

