21 December 2020



Attention Ellen Luu Senior Environmental Assessment Officer Department of Planning, Infrastructure & Environment Level 29, 320 Pitt Street NSW 2170 <u>Ellen.Luu@planning.nsw.gov.au</u>.

Jemena Gas Networks (NSW) Ltd ABN 87 003 004 322

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Dear Ellen,

SSD-10407

Jemena reference EMS#1406

Property: 14 -16 Kiora Crescent, Yennora NSW

Proposal:

Jemena Asset Management Pty Ltd on behalf of Jemena Gas Networks (NSW) Ltd (collectively Jemena) has reviewed and assessed the SSD-10407 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.

Jemena confirms that it has no objections to the proposed development application in proximity to its high pressure gas main.

In pre- assessing the development application, Jemena can confirm that it operates a high pressure main within a road reserve of the Norrie Street approximately 155 metres from the nearest boundary of 14-16 Kiora Crescent (Pink alignment in map below):

- Sydney Primary Loop Pink
- Secondary Mains Green



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 (JGN) which provides gas to Sydney costumers.

The Sydney Primary Loop asset is operated in accordance with Australian Standard - AS2885. The primary main operates at pressures greater than 3MPa. 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.

In addition, Jemena has consider the implications of the 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. Whilst the Sydney Primary Main is not considered a regulated Licenced Pipeline as defined under the Pipelines Act 1967, Jemena has undertaken a holistic review of the interface between its high pressure gas mains and land use within the heat radiation contours within Sydney's urban growth corridors. Jemena has reviewed the additional risks that the increase in the processing capacity of the existing resourced recovery facility to 110,000 tonnes per year of liquid waste and does not believe that the risk profile has materially increased as to threat to the Primary Main. With the proposed development. Jemena is **not** seeking additional mitigations as of consequence.

The Yennora location is seeing infill industrial development to the urban community and Jemena can confirm that the SSD 10407 under review contains land use adjoining high pressure mains which are consistent with the advices contained within previous Jemena advices.

If you have any questions or quires, please do not hesitate to contact the undersigned.

Kind Regards

Luke Duncan Land Management