

21 June 2018

APA Reference: 20180621_LO_438443_Sutton Forest Quarry

NSW Department of Planning & Environment

Dear Sir / Madam,

RE: **Proposed development of Sutton Forest Quarry**
State Significant Development Application Number SSD6334

Background

APA owns the Moomba Wilton Natural Gas Pipeline and Moomba Sydney Ethane Pipeline located through the subject site in a common easement (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)
Moomba Wilton Natural Gas Pipeline	16	20	850	580
Moomba Sydney Ethane Pipeline	15	20	200	680

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

The project proponent has lodged a project Environmental Impact Statement (EIS) in support of the proposal for a new sand quarry that is currently on public exhibition.

APA statutory obligations

SEPP (Infrastructure) 2007 states that risks associated with development applications adjacent to a gas pipeline corridor needs to be assessed and those risks included in considerations prior to determining an application for development (Clause 55 'Development adjacent to corridor' in Division 9). The EIS considers the SEPP in relation to RMS, but does not give any consideration in relation to the potential impacts on existing gas transmission infrastructure of regional importance. This is despite the fact that the proposed quarry access road crosses the pipelines, and extraction (with likely blasting) is within 250m of the pipelines.

As a licence holder for high pressure gas transmission pipelines (HPGTPs) APA has statutory obligations under the *Pipelines Act 1967 (the Act)*. The associated *Pipelines Regulation 2013*, states that a licensee must ensure that the design, construction, operation and maintenance is in accordance with Australian Standards 2885 (AS2885). These are the Standards that APA must consider in assessing and addressing risks associated with development applications under the Infrastructure SEPP.

In considering a development proposal APA is obligated to ensure its pipelines are not damaged, nor subject to development which may increase the future risk of damage. Furthermore, APA must ensure the pipeline is designed to *"reflect the threats to pipeline integrity, and risks to people, property and the environment"* (AS2885.1, s4.3.1). Location classes are used to determine the appropriate pipeline design and management for the circumstances. The location class considers the land use and activities within the Measurement Length (ML), which is the area of consequence in the case of full bore pipeline rupture. The subject pipeline has a ML each side of the pipeline of the distances shown in Table 1 above.

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 maximum ML for pipelines in this instance is 680m each side of the pipelines

The ML is determined by the design parameters of the pipe (driven by the surrounding environment at the time of construction) and the Maximum Allowable Operating Pressure (MAOP) of the pipe. APA must consider any change of land uses within the ML area to determine the effect of a new use on the risk profile of the pipeline.

Location classes (based on land use) are used to determine the appropriate pipeline design and management for the circumstances. If the location class changes within the ML, a Safety Management Study (SMS) is required to assess the additional risk and ensure actions are taken to reduce the risk to an acceptable level. The proposed use is not considered to change the location class of the pipeline in the area of the development, given the quarry operations only involve a sparse population of workers. On this basis the requirement for a SMS is not triggered by the proposed development.

Proposed Development

The proposal plan clearly shows APA's pipelines but not the easement. The extraction area and quarry facilities are clear of the pipelines, but are well within the ML. The proposed quarry access road will cross the pipelines.

Comments

The EIS does not directly address the fact that the proposed quarry access road will cross APA's pipelines (s2.4.5). However, the Traffic Impact Assessment does recognise the road will need to cross the pipelines and require a "suitably designed concrete slab". Under State legislation APA authorisation is required for such a crossing and such crossing must be designed with protective slabbing to APA's requirements to ensure the pipeline is not damaged by the frequent movement of heavy vehicles. Such crossing would also need to be designed to maintain adequate depth of cover over any part of the pipeline which is not slabbed.

The proposal also anticipates the need for connection of power and telephone services (s.2.9) which may need to cross APA's pipelines, which again requires our authorisation. Such crossing and authorisation is not anticipated by the EIS. Details of all proposed crossings, and works within the easement, must be submitted to APA for consideration. No crossings or works may occur without the prior authorisation of APA, and must be completed in accordance with any conditions imposed by APA.

Section 3.2 of the EIS lists a range of consultation for the project which includes surrounding landowners, aboriginal stakeholders, and Government Agencies. However, APA, who have significant infrastructure and easement tenure on the site, were not consulted. This is considered a major oversight, which contravenes the Infrastructure SEPP, places east coast gas supply at risk, and jeopardises the safety of the development and surrounding community. It is disturbing that the gas pipelines are identified in the EIS on plans, but any potential impact on them, or consideration of the asset owner, is given little regard.

Blasting is strictly not to be undertaken within 500 m of the pipeline without prior approval of APA, and strict conditions apply as detailed below. The Noise and Vibration Impact Assessment does recognise the gas pipelines as a vibration sensitive location (s3.6.2). A criterion of 20mm/s was applied to the gas pipelines, and the report found that no management or mitigation measures were necessary to

protect the gas pipelines (s5.3). APA will need to understand the details of proposed vibration as part of our third party works authorisation required for blasting activities.

The development proponent should commit to addressing the issues raised in this letter prior to any approval being granted. APA acceptance of the proposed development is subject to the following conditions.

Conditions

1. No improvements within Easement

Buildings, structures, roadway, pavement, pipeline, cable, fence, change in ground level, or any other improvement on or under the land, must not be constructed within the gas transmission pipeline easement, without the prior authorisation of APA. This includes both temporary and permanent improvements of the type detailed above. All construction workers on site must be made aware of this requirement.

2. Road Crossings Engineering Plans

Detailed engineering plans for any proposed road crossings over the gas transmission pipeline easement must be submitted to APA for consideration. Works may only proceed under APA Third Party Works Authorisation, and subject to any conditions of the Authorisation.

3. Construction Management Plan

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

- Prohibit the use of rippers or horizontal directional drills 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 within the easement.
- Be endorsed by the operator of the gas transmission pipeline where the works are within or crossing the relevant gas transmission easement.

4. 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.

5. 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'*.

6. 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 at any time.

7. Blasting / Use of Explosives

(a) The person who is using the explosives on the site is to be the holder of a current licence to use explosives in accordance with any relevant Acts and Regulations.

(b) Detonating type fuses are not to cross the line of high pressure transmission pipeline. Carriers containing explosives must not be left within 5 m of a high pressure transmission pipeline during blasting operations.

(c) Blasting methods must be arranged to limit ground vibration so that the peak particle velocity does not exceed a value of 20mm per second at any point on a high pressure transmission pipeline. Prior to blasting, tests must be carried out to demonstrate that this requirement will be adhered to and documented results supplied to APA . Further, the peak particle velocity shall be continuously monitored on a high pressure transmission pipeline during blasting.

(d) In all cases where explosives are to be used within 50 m of a high pressure transmission pipeline, an authorised APA representative must be present during the blasting operations. No blasting should proceed until approval is given by APA. Notwithstanding anything above, blasting shall be in accordance with AS2187 Explosives Storage, Transport and Use. Restrictions can only be modified after explicit agreement with APA.

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 APA directly on APApotection@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 APApotection@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.

For any further enquiries relating to this correspondence, please feel free to contact myself on 0459 899 076 or the Urban Planning Team at planningnsw@apa.com.au.

Yours faithfully,



Ross Larsen

A/Manger Infrastructure Protection