



14 April 2020

APA Ref: 445502

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Dear Sam,

**RE: Preliminary Planning Advice  
Proposed Boorowa Solar Farm (5MW)  
Parts of Lots 130-133 and 136-139 on DP2493**

Thank you for your enquiry received 2 April 2020 in relation to the proposed Boorowa Solar Farm. Please find outlined below APA's preliminary advice response below to assist with your due diligence investigation.

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.

In proximity of the proposed Solar Farm site, East Australian Pipeline Pty Ltd and Gorodok Pty Ltd (**APA**) have two pipelines being the Moomba to Sydney Ethane Pipeline and Moomba to Wilton Natural Gas Pipeline). Refer to Table 1 for details of APA's pipelines.

**Table 1: Transmission pipelines in the area of consideration**

Pipeline	Pipeline Licence	Easement (m)	Diameter (mm)	Measurement Length (m)
Moomba to Sydney Ethane	15	24.385	200	600
Moomba to Wilton Natural Gas	16		850	675

**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 size and the 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.

For reference, the ML of the Moomba – Sydney Ethane Pipeline is 600m and Moomba to Wilton Natural Gas Pipeline is 675m. The greatest ML applies in this instance. Note that the ML is a radial dimension, and therefore applies to both sides of the pipeline.

### **Safety Management Study**

AS2885 requires a Safety Management Study (**SMS**) to be undertaken whenever the land use classification of land within the ML changes. The purpose of an SMS is to assess the risk associated with a change in land use, including both construction risks and ongoing land use risks. The SMS will also develop appropriate controls to reduce risks to 'as low as reasonably practicable' (**ALARP**).

While the proposed Solar Farm is partially located within the pipeline Measurement Length. Given the scale and location of the proposed Solar Farm, a Safety Management Study is not required to be undertaken in this instance.

Please refer to the 'Proposed Development' Section of this letter for further comment.

### **Easement Management**

APA's pipelines and associated easement are located on a south-east alignment through a portion of adjoining Lot 1402 on DP862746. 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. Crossing 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](mailto:APAprotection@apa.com.au).

## Proposed development

### Proposal Plans

APA has reviewed the preliminary plan layout titled "Boorowa 1B – Potential Solar Farm Area v.2". It is understood the proposed Solar Farm requires approximately 15 hectares of the subject site. The proposed Solar Farm is to be located in the northern portion of the subject site towards Meads Lane. The proposed point of connection is via the existing 11kV electricity distribution power lines in the northeast portion of the subject site.

APA's pipelines and associated easement are located 390 metres south-west of proposed Solar Farm at the closest point.

### Electrical Interference

Electrical works near the pipeline (including crossings) have the potential to impact on the pipelines safe operation and studies in accordance with AS4853 are necessary. The cost of these studies and any necessary mitigations must be borne by the development proponent.

### **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. Risk Assessment Required**

Prior to the development commencing, and to inform detailed design, the applicant must conduct electrical hazard studies in accordance with (the requirements of) Australian Standard 4853-2012 (for Low Frequency Induction and Earth Potential Rise). The applicant must address any relevant requirements and any recommendations and/or actions must be implemented to the satisfaction of APA. All costs associated with the study, and implementing its recommendations and/or actions are to be borne by the applicant. The applicant must complete validation testing upon completion of construction.

### 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 [APAprtection@apa.com.au](mailto:APAprtection@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 [APAprtection@apa.com.au](mailto:APAprtection@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

APA has a suite of standard engineering drawings to assist with detailed design. These are available upon request. Please contact APA at [APAprtection@apa.com.au](mailto:APAprtection@apa.com.au) or 1800 103 452.

**Conclusion**

APA does not seek to unnecessarily inhibit future development proximate to our assets and is happy to work with 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 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 & Protection team at [planningnsw@apa.com.au](mailto:planningnsw@apa.com.au).

Yours faithfully,

A handwritten signature in black ink, appearing to read 'BA', followed by a long horizontal stroke.

**Ben Setchfield**  
**Senior Urban Planner**  
**Infrastructure Planning and Approvals**