



9th October 2017

Council Ref: DA 73/2017

APA Ref: 171009_LO_438515_Freight Transport Facility Conditions

Mr Garry Stoll
Leeton Shire Council
23-25 Chelmsford Place
Leeton NSW 2705

EMAIL OUT: garrys@leeton.nsw.gov.au

Dear Garry

RE: Lot 4 DP1234806, WRIFT Irrigation Way Murrumbidgee – DA 73-2017 (Proposal for Freight Transport Facility)

Thank you for your notification of the above Development Application for a Freight Transport Facility, as part of the WRIFT precinct, Irrigation Way, Murrumbidgee. This further response follows our letter to Council, dated 17 August 2017. In our previous letter APA requested the completion of an SMS prior to determination of the application. An SMS was held on 27 September 2017, and following full consideration of the development through this process, APA is now in a position to provide a more detailed response to Council. In summary APA has no objection to the proposed development subject to the imposition of conditions as detailed in this response.

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.

APA has one pipeline located through the subject site being the Junee-Griffith Lateral Pipeline (see Table 1 for details):

Table 1: Transmission gas pipelines in the area of consideration

Pipeline	Pipeline Licence	Diameter (mm)	Measurement Length (m)
Junee-Griffith Lateral	20	168.3	164

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

APA statutory obligations

Clause 55 'Development adjacent to corridor' in Division 9 of SEPP (Infrastructure) 2007 states that risks associated with development adjacent to a gas pipeline corridor needs to be assessed and those risks included in considerations prior to determining an application for development.

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

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, 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 of 164m each side of the pipeline. If the location classification within the Measurement Length changes a Safety Management Study is required to assess the additional risk and ensure the risk is reduced to an acceptable level.

An SMS, as required under AS2885 was held on 27 September 2017. This SMS considered development within the whole WRIFT precinct, and in doing so has informed APA's requirements for the subject development application.

Development proposal

The comments in this letter are based on the development proposal as outlined in the Planningmatters Report dated March 2017 (reference 2012.59P) and Miestudio drawing da 01, (project number 112017, and dated 13/02/2017). The proposed development is located on Lots 4 and 5 DP1201358, off Irrigation Way. The proposed development is for a railway freight terminal. The development will include two rail spur crossings of the gas pipeline. One in the north west corner of Lot 5 on DP 1201358, and one in the northern part of Lot 4 on DP1201358. These crossing are integral to the development. The subject development will be surrounded by security fencing to ensure safety of the operation and prevent unauthorised access.

The proposal also includes a hardstand loading and storage area, transportable office building, and internal driveways and manoeuvring. The transportable office building is located outside of the ML.

APA response

The key issues considered during the SMS included:

- Managing the additional load and vibration of the rail spur where it crosses the pipeline
- Controlling vehicle movements and construction activities in the development phase
- Ensuring adequate drainage off the easement, with the development of the rail spur raised above existing ground level and the easement forming a depression unless subject to filling
- Restricting access to the easement to minimise unauthorised encroachments
- Maintaining access for APA to the easement for necessary works and maintenance
- Reducing the likelihood of APA's need to access the pipeline where it is under the rail crossing, but allowing for this to occur if necessary.

APA can confirm that, subject to satisfactory compliance with the following conditions, the development will not compromise the safe operation of the pipeline, and does not place the proposed development at unacceptable risk.

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 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. Detailed design

Prior to development commencing, detailed engineering designs must be submitted to APA for review, and amendment as required, to comply with APA requirements. Any application for a Construction Certificate must not be accepted by the consent authority unless accompanied by a letter from APA stating that the detailed engineering designs meet APA's requirements. At a minimum the detailed engineering design must:

- Include slab protection of the pipeline at the rail spur crossings to ensure the pipeline is not subject to unacceptable loads or vibration
- Demonstrate adequate drainage of stormwater from the easement
- Ensure any filling over the easement does not place unacceptable load on the pipeline
- Allow for crossing of the rail spur by light and heavy vehicles required to access the gas pipeline easement for future works by the gas pipeline owner /operator
- Allow for appropriate vegetation having regard to the pipeline and pipeline operations
- Location of any lighting infrastructure and proposed services.

The cost of all works included in the detailed engineering designs must be borne by the applicant.

3. Pipeline Coating Assessment

Prior to the installation of pipeline protection (slabbing or bridging), the condition of the pipeline must be assessed, and the pipeline provided with additional protection if required by APA. A Pipeline Coating Assessment (DCVG Survey) must be commissioned to inform the need for any required protection. The cost of the assessment and any required pipeline protection will be borne by the applicant.

4. Third Party Works Authorisation

Prior to the commencement of any works, including earthworks, vegetation clearing or plantings within the gas pipeline easement, the proponent must obtain a third party works authorisation from APA. Any authorised works must comply with any conditions attached to the third party works approval.

5. Recoverable Works Agreement

Prior to the commencement of works, the applicant must enter into a recoverable works agreement with APA, on terms acceptable to APA (at APA's absolute discretion). The recoverable works agreement will allow APA to recover costs incurred by APA, from the applicant, in proceeding with the permitted works.

6. Co-use agreement

Prior to the commencement of works the applicant must enter into a co-use agreement with APA for the infrastructure crossing the gas pipeline easement, on terms acceptable to APA (at APA's absolute discretion).

7. Delineation of Easement

Prior to commencement and during the course of any construction activities the southern edge of the gas pipeline easement is to be clearly delineated (e.g. bunting supported by star pickets), with signage at intervals of no more than 50m warning of the presence of a high pressure gas transmission pipeline. This must be provided and paid for by the applicant.

8. Construction Management Plan

Prior to the commencement of any works, a construction management plan must be submitted to and approved by the approving authority. 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 and heavy loadings stored over the pipeline, and heavy vehicle / plant crossings of the pipeline.
- Be endorsed by the operator of the gas transmission pipeline.
- Avoid construction access from the gas pipeline easement, except where necessary and approved by APA.
- Require a gas pipeline awareness induction (delivered by APA) for all construction workers on site.

- Include any other relevant matter to the satisfaction of the assessment manager.

The assessment manager must be satisfied that the pipeline licensee has reviewed and approved the Construction Management Plan. The construction management plan must be implemented to the satisfaction of the responsible authority. The construction management plan may be amended to the satisfaction of the responsible authority.

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 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 maintenance or reinstatement of any vegetation and/or infrastructure constructed on the easement.

Planning Panel

It is understood that the application is classed as 'regional development' and as such will be determined by the Western Joint Regional Planning Panel. The Panel reference for the application is 2017WES007. APA requests to be kept informed of the application process and any further opportunities to comment on the application. This specifically includes the public panel meeting, which forms an important part of the determination process.

Conclusion

APA does not seek to unnecessarily inhibit future development proximate to our assets and is willing to work with Council and development proponents to achieve mutually acceptable and compliant outcomes that maintain the safety of development within the pipeline ML. Any interested parties are strongly encouraged to contact APA early to discuss the process of integrating APA assets into future urban developments.

Please contact me on 0459 899 076 or planningnsw@apa.com.au should you wish to discuss the contents of this correspondence.

Yours faithfully,



Ross Larsen
Senior Urban Planner
Infrastructure Planning and Protection

CC: Martin Ruggeri
Planningmatters