

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Activation Precincts SEPP and the Wagga Wagga master plan
Date: Thursday, 17 September 2020 3:21:04 PM

Submitted on Thu, 17/09/2020 - 15:19

Submitted by: Anonymous

Submitted values are:

Submission Type: I am submitting on behalf of my organisation

First Name: Ben

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Submission file: [webform_submission:values:submission_file]

Submission: Good Afternoon, Please find attached APA's submission on the Draft Wagga Wagga SAP Master Plan. Any questions, feel free to give me a call. Kind regards, Ben Setchfield APA Group Senior Urban Planner d [REDACTED] e planningnsw@apa.com.au

URL: <https://pp.planningportal.nsw.gov.au/WaggaWaggaSAP>

APA Ref: 443214

17 September 2020

Executive Director
Regions, Industry and Key Sites
Department of Planning, Industry, and Environment
Locked Bag 5022
Parramatta NSW 2124

EMAIL OUT: via Online Submission Portal

Dear Sir / Madam,

RE: Submission on Draft Wagga Wagga Special Activation Precinct Masterplan

Thank you for the opportunity to provide further advice on the Draft Wagga Wagga Special Activation Precinct (SAP) Master Plan. APA Transmission provided initial advice to the Department of Planning, Industry, and Environment (the Department) via WSP Australia Pty Ltd (WSP) as part of the Enquiry by Design Master Planning Workshop preparation last year. This advice has been broadly summarised in WSP's Final Masterplan Report Infrastructure and Services Plan, Revision C, dated 15/07/2020.

APA Transmission seeks to build upon this initial advice by way of formal submission on the Draft Wagga Wagga SAP Master Plan now available for public comment. Accordingly, please find enclosed APA's submission, for the Department's consideration.

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 Transmission owns and operates over 15,000 km's of high pressure gas transmission pipelines (**HPGTs**) across Australia.

APA Transmission owns and operates three (3) HPGTs located within easement through the Wagga Wagga SAP area (see Table 1 for details):

Table 1: Transmission pipelines in the area of consideration

Pipeline	Pipeline Licence	Easement Width (m)	Diameter (mm)	Measurement Length (m)
Young – Wagga Wagga Pipeline	19	20	300	270
Young – Wagga Wagga Looping			450	463
Wagga Wagga – Culcairn	23	24	450	463

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

Please note this advice does not extend to any gas network pipelines that may be in the area, that are owned by APA or other utility provider. Please also note the Measurement Lengths of the Young to Wagga Pipeline (and Looping) have recently been updated to align with AS2885 (refer to Table 1 above for details).

APA Transmission owns and operates the Young – Wagga Wagga Pipeline and Young – Wagga Wagga Looping which run through the Draft Wagga Wagga SAP on a south west alignment within a 20 metre wide pipeline easement terminating at the APA Bomen site on land at 274 Byrnes Road or Lot 8 on DP869724. APA Transmission also owns and operates the Wagga Wagga – Culcairn Pipeline which originates at the APA Bomen site and runs in a west / south west alignment away from the Draft Wagga Wagga SAP within a 24 metre wide easement via crossings of Byrnes Road and the existing Railway line.

APA's role

As a licence holder for high pressure transmission pipelines, 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 of pipelines are in accordance with Australian Standards 2885 (**AS2885**).

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, our HPGTPs are required to be operated in accordance with Australian Standard 2885 (Pipelines – Gas and Liquid Petroleum) (AS2885). In discharging our regulatory 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.

The cost of undertaking an SMS including any actions (i.e. protective slabbing of pipeline) is to be borne by the proponent as the 'agent of change'. APA has developed a list of preferred SMS facilitators. This ensures facilitators are both independent and satisfactorily qualified to undertake this assessment. This list is available from APA on request. Mitigation may include slabbing of the pipeline, additional signage, marker tape, and controls during construction.

Pipeline Risk Profile and the Measurement Length

In managing high pressure transmission pipelines 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 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 Young to Wagga Wagga Pipeline (and Looping) is 270 metres and 463 metres. In this instance, the greatest ML applies. The ML of the Wagga Wagga to Culcairn Pipeline is 463 metres. Note that the ML is a radial dimension, and therefore applies to both sides of the pipe.

Sensitive Uses

APA seeks to limit sensitive uses from establishing within the pipeline Measurement Length to retain a high level of compliance with applicable safety standards. AS2885 defines a sensitive use as one which may increase the consequences of failure due to its use by members of the community who may be unable to protect themselves from the consequences of a pipeline failure.

To this end, APA's preferred position is that all land uses listed below be located outside of the ML:

- Child care centres
- Detention facility
- Educational facility
- Function facility
- Health care services
- Hospital
- Hotel
- Place of worship
- Residential care facility
- Retirement facility
- Service station
- Shop
- Shopping centre
- Theatre

Safety Management Study

AS2885 requires a Safety Management Study (**SMS**) to be undertaken whenever the land use classification of land within the ML changes. It is APA's assessment that the Draft Wagga Wagga SAP Master Plan has the potential to change the land use classification for the sections of the three (3) HPGTPs within the SAP.

As the specific industrial uses and supporting infrastructure within the SAP are yet to be confirmed, APA will require review of further information (i.e. Delivery Plan) to confirm this requirement. It is important to note, where an SMS is required, it must be completed prior to the use commencing.

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**).

The cost of undertaking an SMS is to be borne by the proponent as the 'agent of change'. APA has developed a list of preferred SMS facilitators. This ensures facilitators are both independent and satisfactorily qualified to undertake this assessment. This list is available from APA on request.

Easement Management

APA is the beneficiary of several pipeline easements for the three (3) HPGTPs detailed in Table 1 above that run through the Wagga Wagga SAP area. 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 minimised and perpendicular as possible. The proposed development will likely require the extension of services to the future industrial lots, and it is possible that these may need to cross the HPGTPs.

Any works within the easement must be approved 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. If you are 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 APA directly at APAprotection@apa.com.au.

Roads and services over easement

It is APA's preference that roads being constructed over pipeline easements be avoided wherever possible. The creation of roads over pipeline easements results in the following issues:

- Loss of control over easement area which has been secured through a legally enforceable easement agreement.
- Increased potential for external interference with the pipeline due to other parties utilising the road reservation for infrastructure (water, sewer etc.) over or around the pipeline.
- Increased difficulty accessing the pipeline due to the need for access approval from Council or other roads authorities.
- Increased cost in accessing the pipeline due to the need to make good a road reserve.
- Loss of ability to duplicate or loop the pipeline in the future.

APA will consent, in principle (and subject to detailed assessment), to periodic road or services crossings over the easement on the basis that Council and other utility operators (as relevant) enter into an agreement with APA to maintain our existing easement rights in the area to be covered by road.

The proponent must demonstrate that the number of crossings has been minimised. Crossings are to be as perpendicular as possible to the pipeline to minimise the area of impact.

Australian Pipeline Database

The pipeline industry, led and coordinated by the Australian Pipelines and Gas Association, has established the Australian Pipeline Database. This is a GIS based database that identifies all high pressure pipelines including the owner of the asset and subsequent contact details. This database is available under license, free of charge to government planning authorities. The database also allows Planning Authorities to export pipeline information for use within their own GIS systems.

The use of this data will assist Planning Authorities determine if strategic or statutory planning proposals are in the vicinity of a HPGTP and liaise with the Pipeline Licensee accordingly.

The Database can be accessed from the following link:

<https://maps.landpartners.com.au/apd/>

Comments

On the basis of the information provided, APA does not object to the Draft Wagga Wagga Master Plan subject to the following comments:

1. As part of the Delivery Plan drafting, APA recommends the Department and Regional Growth NSW Development Corporation seek input from APA to confirm the Safety Management Study (SMS) requirement (as outlined above) and any recommendations to be incorporated into future approvals for development within the SAP.
2. APA also recommends the Department and Regional Growth NSW Development Corporation seek input from APA to ensure development controls incorporated into the Delivery Plan appropriately consider the three (3) existing HPGTPs that run through the Draft Wagga Wagga SAP and build upon the *Clause 66C, SEPP (Infrastructure) 2007* provisions.
3. It should be noted that APA will not accept roads or infrastructure and other services to be located within the pipeline easement other than perpendicular crossings approved by APA.
4. The preferred treatment of pipelines in industrial areas is for the pipeline and easement to be located within linear open space or within the frontage of lots so that APA maintains access rights, and can easily perform visual checks on the pipeline easement. Where located in the frontage of an industrial lot the easement could be utilised as a landscape setback or car parking but not for permanent storage of materials.
5. Figure 7 of the Draft Wagga Wagga SAP Master Plan indicates landscaping is to be located within the HPGTP easement. APA will not accept all forms of landscaping on the easement as it has the potential to impact on the pipeline's integrity and inhibit the ability for APA to manage and maintain the HPGTP easement. Any landscaping considered as part of this proposal on the easement is required to be submitted to APA for consideration.
6. APA supports the SP2 Infrastructure zoning being retained for APA's above ground facility on land at 274 Byrnes Road, Bomen (Lot 8 on DP869724).
7. APA also supports the Department's proposed amendment to Clause 9 of the Activations SEPP to require the future Delivery Plan to also be placed on public exhibition to allow formal comment to be similarly provided.

APA thanks the Department for the opportunity to comment on the Draft Wagga Wagga Special Activation Precinct Master Plan and looks forward to further opportunity for input on the future Delivery Plan to be prepared by Regional Growth NSW Development Corporation.

Please contact Ben Setchfield on [REDACTED] to further discuss the contents of this correspondence.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'BS', with a long horizontal flourish extending to the right.

Ben Setchfield
Senior Urban Planner
Infrastructure Planning and Approvals

Att: APA Pipeline Mapping Extract

Attachment 1: APA Pipeline Mapping Extract

