

1 November 2018

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Jemena Reference : EMS#1031-West Schofields Development

Dear Sarah,

**Draft Indicative Layout Plan (ILP):** West Schofields Indicative Layout Plan (June18)

**Land Zoning Map:** Draft West Schofields - North West Growth Centre - Land Zoning Map, State Environment Planning Policy 2006

Jemena Gas Networks (NSW) Ltd (**Jemena**) has reviewed the West Schofields ILP and objects to the continued implementation of the plan.

Jemena takes the view that the land use indicated in the ILP will vastly increase the public health and safety risk borne by:

1. Jemena as the Licensee of the Northern Trunk (being, Licence 7) high pressure natural gas pipeline burdened by the altered land use; and
2. Blacktown City Council and the New South Wales Department of Planning and Environment as the entities responsible for the allocation and approval of the altered land use.

Jemena is required by the licences obtained under the *Pipelines Act 1967 No 90*, to operate the pipelines in compliance with the *Pipeline Regulations (NSW) 2013*, *Australian Standard (AS) 2885*, and the Jemena maintained Pipeline Management Plan lodged with the Secretary of the Department.

As stated in the Pipeline Management Plan, the objects of AS2885 and Jemena as the operator of the pipelines are to minimise, as low as reasonably practicable (**ALARP**), the hazards and risks:

1. to the safety of the public and customer arising from gas transmission;
2. of damage to property of the public and customers arising from gas transmission; and
3. to the safety of the public and customers arising from:

- a) interruptions to the conveyance or supply of gas; and
- b) the reinstatement of an interrupted gas supply.

Jemena believes that the continued implementation of the ILP will result in a vast increase of both the likelihood and consequence of a loss of containment event of either pipeline. Jemena has assessed that:

1. **likelihood** has been demonstrated to vastly increase in both residential and high density areas by the Australian Pipelines and Gas Association through ongoing data collection of similarly burdened pipelines; and
2. **consequence** will increase due to severely increased permanent and transient population density resulting from higher density residential development and arterial roads within the measurement length of pipeline.

The combined increase in likelihood and consequence will see a sharp increase in the level of risk associated with a pipeline rupture event outside of the Indicative Societal Risk Criteria given in the Hazardous Industry Planning Advisory Paper No 4.

In the interest of public safety in all areas where both pipelines are located, Jemena's view is that it is necessary to amend the ILP with due consideration given to the recommendations given in Attachment A in order to minimise both the likelihood and consequence of a pipeline rupture event.

Health and safety is one of Jemena's core values, and as such, Jemena seeks to minimise all identified risks wherever possible. Jemena's view is that public health and safety could be impacted by the continued implementation of the ILP. Jemena welcomes the opportunity to work with Council and the Department to minimise all identified risks in the interest of public safety.

If you have any questions or queries, please do not hesitate to contact Danny Guerrero on (02) 9867 7149.

Yours Sincerely,



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# Attachment A

## Recommendations for town planning and land use

In order to minimise the impact to public safety, Jemena recommends the following controls be implemented for all developing areas.

- Sensitive land use areas (schools, shopping centres, sports complexes, hospitals etc) shall be strictly prohibited within the pipeline measurement length<sup>1</sup>.
- Population density shall be minimised within the Pipeline measurement length to environmental living.
- No roads shall be created either parallel and within a Pipeline easement, or parallel and abutting a Pipeline easement.
- No houses shall be constructed abutting the Pipeline easement.
- The number of new roads crossing the Pipeline easement shall be minimised and cross strictly perpendicular to the Pipeline alignment.

## Recommendations for development control

- The Pipeline easement shall remain untouched from development, with the expectations noted below. The Pipeline operator may allow easements to be 'green spaces' or shared spaces to the benefit of the wider community, subject to review of the Pipeline burdening the area.
- If a development area is being developed by multiple developers, a single entity shall be responsible for the overall strategy regarding services and utilities (including electrical distribution and reticulation, stormwater and flood management, etc) and provide strict guidelines to developers.
- Services crossing the Pipeline easement shall be consolidated to minimise the number of distinct crossings and be future proofed through the use of additional conduits to allow future expansion.
- The separation distance between the Pipeline and any service crossing shall be maximised as far as possible and shall be strictly no less than 500mm.
- All service crossings shall require additional physical protection of the Pipeline via protective slabs at the crossing location.
- No open drainage shall be implemented onto, or across the Pipeline easement. All crossings of the pipeline easement shall be pipes, with no use of culverts or swales.
- Electrical hazards to the Pipelines shall be assessed in compliance with AS4853 for each development and appropriate mitigation implemented.
- If appropriate, fencing shall be installed along the Pipeline easement boundary to prevent vehicles from entering the easement area.
- Upgraded signage marking the Pipeline alignment shall be implemented in areas burdened by increased development activity.
- Developers shall be made aware that Pipeline operators will have specific design and construction guidelines for building near their assets, and ensure early engagement.

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<sup>1</sup> As per AS2885.1 – Pipelines – Gas and liquid petroleum – Part 1: Design and construction – Section 4.3.2 - the measurement length is the radius of the 4.7kW/m<sup>2</sup> radiation contour for a full bore rupture. The measurement length of Licence 7 pipeline is **405m**