

7 June 2021



Doris Yau – Team Leader – Hazards
Department of Planning, Industry
& Environment
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Parramatta NSW 2124

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Dear Doris,

Planning Proposal 49-65 Wentworth Avenue and 80 -120 Pacific Highway, Doyalson NSW

Following on from engagements with Jenny Polich from Sherpa Consulting, Jemena has prepared this supplementary advice to clarify that:

Jemena confirms that it has no objections to the proposed planning changes in proximity to its high pressure Licenced pipeline including the Senior Living dwellings and other proposed Sensitive Land uses.

Jemena Asset Management Pty Ltd on behalf of the Colongra Licence 33 Pipeline (collectively Jemena) has reviewed and provided engineering inputs as to the operation of the Colongra Pipeline into the Risk Assessment prepared by Sherpa Consulting for land parcels in the ownership of the Doyalson -Wye RSL Club Limited.

Jemena can confirm that it an easement AE 445647 (Easement for pipeline 20 metres wide affecting the site designated (A) in plan with AE445647) contained within Lot 7 DP 240685. The Land parcel is in the ownership of Doyalson -Wye RSL Club Limited. (see map insert below):

- Colongra Licence 33 High Pressure Pipeline (Colongra) – Blue dotted line
- Lot 7 DP240685 forms a portion of the Development site and contains the pipeline easement– Pink



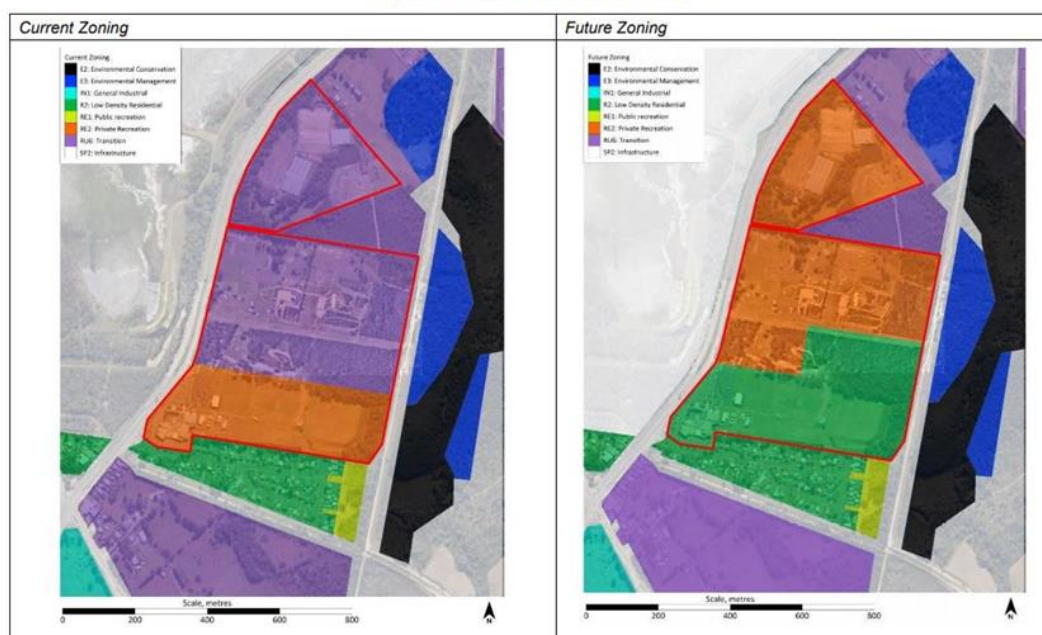
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Jemena Comments on Planning Proposal

The planning proposal seeks to change the Zoning of land to accommodate land uses that will support low density residential dwellings, seniors housing , hotel accommodation, businesses such as childcare, medical centre and service station, recreational facilities and relocation of the RSL. It is proposed that the land parcel containing the easement Lot 7 DP 240685 will be zoned a combination of R2 Low Density Residential (Orange) and RE2 Private Recreation (Dark Green) in the Future Zoning map below.

Figure 3.1: Current and future zoning



Source Sherpa Consulting

Jemena Engineering has previously supplied pipeline details that confirms that the pipeline has been designed and constructed as a 'Non Destructive' pipeline. The pipeline has been purposely design contemplating future higher density development adjoining the pipeline as the environment changes with increased (urban) development.

Jemena preference is for where possible to limit the density of development and the concentration of Sensitive Land Uses within the measure length of the pipeline. Sensitive Land Uses are typically defined as being uses that include:

- **education, child care facilities**
- **aged care facilities**
- **prisons**
- **health hubs,**
- **community health centres,**
- **primary health care clinics and**
- **ambulance stations**

However in this instance, Jemena is satisfied that the 'Non Destructive' pipeline mitigates against the threats from third party interference that may arise from increased development activities adjoining the pipeline.

The Colongra pipeline is operated in accordance with Australian Standard - AS2885. AS2885 requires a risk review, Safety Management Study (SMS) of the pipeline operation if applicable where the land around a high pressure gas main/pipeline has resulted in a change in land use

and in turn changes the risk exposure to the high pressure gas main/pipeline by introducing additional threats.

Jemena is not seeking to convene a Safety Management Study (SMS) for any change in land use, however will reserve the right to seek to convene a SMS during the Development Application phasing of any development if the threat to the pipeline is considered to credible because of proposed construction methodology or fragmentation of the existing pipeline easement.

Jemena's preference would have the 20 metre pipeline easement preserved as open space with the construction of roads and utility crossings limited to 90 degree crossings.

*(A Pipeline's **Measurement Length** is defined in AS2885 as a radial distance from the Pipeline, calculated by determining the 4.7kW/m² heat radiation contour in an event of a full bore rupture event. The event causing this type of rupture is typically works related to external parties, unaware and not following Jemena's requirements. During this type of event, an unprotected person exposed to the radiation level for a short period of time is likely to experience severe burns and possible fatality. A Pipeline rupture also has the potential to impact the environment as well as destroy and damage surrounding buildings. Jemena has determined a **Measurement Length of 766m** applies to both Pipelines. The Measurement Length is to be used to determine the appropriate type of land use and development occurring near the Pipelines)*

To provide some greater context to the decision above, the high pressure pipelines operates at pressures greater than 6MPa. Under AS2885 requirements, Jemena takes its rights and obligations under these instruments seriously as they relate to ensuring the ongoing safety and integrity of its mains/ pipelines and the community at large.

Duty of care exists to ensure there is no compromise to the integrity of the Jemena assets during this procedure due to the existing ground conditions that currently exist.

In addition, Jemena has consider the implications of the development adjacent to high pressure pipelines transporting dangerous goods in NSW as communicated in the ISEPP clause 66C and more recently the Planning Circular PS 18-010. Jemena has undertaken a holistic review of the interface between its high pressure gas mains and land use within the heat radiation contours within Sydney's urban growth corridors.

If you have any questions or quires, please do not hesitate to contact the undersigned.

Kind Regards



Luke Duncan
Property Officer
Gas Distribution