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Pipeline Maintenance Centre
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29 October 2002

Mr Kevin Allars
Head of The Safety Policy Directorate
Health and Safety Executive
1st Floor Daniel House
Trinity Road, Bootle
Merseyside

Dear Kevin,

UKOPA Views on the HSE's Proposals to Amend Land Use Planning Zones for High Pressure Gas Pipelines

I understand that the HSE are presenting their proposals for amending the current Land Use Planning distances for high pressure gas pipelines to the Major Hazards Sub Committee on the 31st October. Whilst accepting the reasons for the new requirements (i.e. to base Land Use Planning distances on risk consistent with fixed installations and to facilitate more local decision making) UKOPA still have some significant concerns about the potential impact of the new proposals.

UKOPA believe that in developing the new distances a number of conservative assumptions have been made (see Annex to this letter) and that these assumptions have resulted in overly onerous Land Use Planning distances, and hence restrict development, particularly in suburban areas. We recognise that the new rules also result in reductions in Land Use Planning distances but these are mostly in rural areas where applications for development are less frequent and development is less likely to be allowed or required.

The HSE are aware that the issues outlined in the Annex to this letter still need to be addressed, but appear to want to implement the proposed distances as an interim measure until these issues can be resolved. Given that the current rules have been operating in the UK for nearly 20 years, UKOPA do not see the need to rush to implement interim requirements that may change within the next 6 to 12 months.

UKOPA therefore request that the Major Hazards Sub Committee should defer agreement to the proposed changes until the outstanding technical issues have been resolved and that the final paper should have the support of the ACDS MHSC Working Group on Pipelines prior to agreement by the Major Hazards Sub Committee.

Yours sincerely

Roger Ellis
Chairman of UKOPA

ANNEX

Summary of outstanding Technical Issues:

1. Currently the likelihood of pipeline failure includes a failure frequency contribution as a result of failure due to ground movement. This failure rate contribution has been applied to all pipelines and for a large number of pipelines this contribution dominates the predicted likelihood of pipeline failure. Whilst accepting that ground movement can cause pipelines to fail, UKOPA would argue that the risks are only significant in areas susceptible to ground movement and therefore it is inappropriate to assume that ground movement failures can occur over the whole of the UK. The HSE have accepted that their current approach is conservative but want to implement a generic approach until a procedure for correctly predicting the risks can be developed.

Transco are currently working with the British Geological Survey on a process that would allow them to be able to identify the pipelines where it is appropriate to include a risk of failure contribution due to ground movement, however it will be another 6 months before this work is completed.

2. The HSE currently assume that all pipelines that have a stress level below 0.3 are in suburban areas and are therefore more likely to be subjected to 3rd party interference. In practice, a significant proportion of these pipelines are in rural areas. The predicted pipeline failure rates for these pipelines are therefore being over predicted by approximately a factor of 5, this could make a difference of hundreds of metres to the consultation distances for the larger diameter higher pressure pipelines. It is suggested that there needs to be a less conservative approach for considering these pipelines.
3. There appear to be significant differences in the failure rates due to third party interference predicted by the HSE's and the Transco models, these differences are particularly significant at low stress levels where they can differ by a factor of up to 100 and in a small number of cases by factors of up to 1000. It is suggested that the reasons for these significant differences need to be understood before the new requirements are implemented.