

United Kingdom Onshore Pipeline Operators' Association

Pipeline Maintenance Centre
Ripley Road
Ambergate
Derbyshire
DE56 2FZ

Telephone: 01773 852003
Facsimile: 01773 856456

Nick Starling
Chairman, ACDS
Director of Policy Group
HSE
Rose Court
2 Southwark Bridge
LONDON
SE1 9HS

cc Professor G P Walker, Chairman, WGP, MHSC
cc Dr Andy Hall, Chairman, MHSC

3 November 2004

Dear Mr Starling

ACDS MHSC Working Group on Pipelines – Technical Work Programme

I am writing on behalf of UKOPA to note pipeline operators' strong interest in and support for a paper to be submitted to MHSC and ACDS by WGP. This paper will request ACDS and MHSC support for a technical work programme directed by WGP and delivered by UKOPA to develop a recognised, consistent and authoritative approach to pipeline risk assessment for the provision of advice for land use planning in the UK. In addition a process of formal ratification of the results, which are intended for publication as a supplement to the main UK pipeline standards BS PD 8010 (2004) and IGEM TD/1 (2001).

You will be aware that the Working Group on Pipelines was established by K Allars of HSE in September 2001 as part of the formal ACDS/MHSC consultative committee structure, in response to a lobby from UKOPA pipeline operators. One of the key drivers for the formation of the Working Group was the need for recognised and consistent approach to the use of pipeline risk assessment for the provision of advice for land use planning applications.

This issue affects a large number of stakeholders, including local planning authorities, landowners, land developers, land agents and legal representatives, as well as pipeline operators. Consequently, UKOPA believes that advice must be safe, technically correct and transparent in its determination so that all interests are protected and public confidence in both the safety regulator and the pipeline operators is maintained. The Working Group on Pipelines actioned a programme of technical work supported by both HSE and industry experts on which such a recognised and authoritative approach could be agreed. The importance of this is increased by the HSE's intention to devolve the PADHI methodology for assessing the acceptability of land use planning advice to Local Authorities with the recommendation that detailed advice on local issues should be sought from pipeline operators.

A major programme of work addressing the above was commenced and significant and constructive progress was achieved jointly by HSE and industry in a number of technical areas during 2002. In 2003, HSE reported resource constraints and notified WGP of the need to focus on internal priorities,

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including the delivery of the Implementation of the Fundamental Review of Land Use Planning (IFRLUP) Project. As a result the HSE Methodology and Standards Development Unit withdrew its technical involvement in the WGP work programme. A formal mechanism for WPG's involvement in IFRLUP Product P5 was then established, and UKOPA submitted a proposal to progress technical work for submission to WGP for approval and recommendation to MHSC.

It is UKOPA's intent that the technical programme of work is directed by WGP to ensure that it aligns with IFRLUP P5 and P6, and produces technical models which can be used by HSE as consultee to planning authorities and by pipeline operators for regulatory compliance. As stated earlier, the results of the work will be published as supplements to the primary UK pipeline codes BS PD 8010 (2004) and IGEM TD/1 (2001) for consistent and transparent use by all stakeholders. The paper to be submitted to ACDS and MHSC will present this strategy. UKOPA considers that the success of this strategy will be secured through formal ACD and MHSC support and ratification, which will ensure strategic commitment from all stakeholders.

In summary I wish to emphasize pipeline operators' concerns that in dealing with the increasing volume of land use planning enquiries, avenues for public disagreement between HSE and pipeline operators regarding the use and application of basic technical tools should be avoided. This can be achieved through the agreement of a recognised technical approach, which will provide a transparent basis for the presentation of both regulator and operator views, without dictating the specific interpretation of either party.

I also wish to note that UK pipelines are a safe and efficient means of product transportation, which have an excellent safety record. As the need for land use increases then the scale of the land use planning enquiry work load will increase, as will public awareness and concern regarding hazards and safety controls. It is essential therefore that the public have confidence in the industries and regulators technical methodologies.

I trust this letter indicates the strength of views held by UKOPA on behalf of all pipeline operators, and I look forward to progress on this matter.

Yours sincerely,

Phil Brown
Chairman, UKOPA

phil.w.brown@ngtuk.com

01455 892743

07970 405301