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Application Secretariat
Planning and Land Management
PO Box 395
MITCHELL ACT 2911

**Gungahlin Community Council Submission:
Preliminary Assessment for the Installation of an underground fibre optic
cable through Mulligans Flat Reserve, ACT.**

Dear Sir/Madam,

Please find attached the Gungahlin Community Council submission with regard to the aforementioned Preliminary Assessment.

Whilst the Gungahlin Community Council does not entirely oppose the proposed installation of fibre optic cable through Mulligans Flat, we believe that this submission has highlighted some queries, concerns and suggestions to which the proponent "Nextgen Networks" should provide thoroughly justified answers and responses.

We trust that this submission meets with your approval. Should you require further information please do not hesitate to contact us.

Yours faithfully

Ian Ruecroft
President - Gungahlin Community Council

Gungahlin Community Council Submission:

1. Placement of conduit in relation to existing East Australia Pipelines gas pipeline and Powertel fibre optic cable:

- a. It has been indicated that the existing East Australia Pipelines easement has a total width of 20 metres.
- b. The Preliminary Assessment has indicated that the proposed conduit for the fibre optic cable will be offset by between 12 and 15 metres from the existing gas pipeline.
- c. It is suggested that the distance between the proposed conduit and existing services be made as small as practical¹ (if possible less than the proposed 12-15m), this is to minimise damage to the easement area.

2. Impact on Heritage Areas A28, A29 and A24:

- a. It is essential that the Traditional Owner Groups (as indicated on page 25 of the PA) do not object to the Heritage areas being traversed by directional boring to install the FOC conduit.
- b. Concern has been noted that even with the use of directional boring there may be some impact on existing vegetation root systems.
 - i. The affected vegetation is predominately in Heritage zones A29 and A24.
 - ii. The positioning of the directional boring should be such that the conduit is at a sufficient depth and/or lateral distance to ensure that the root systems of any significant or noted vegetation are not impacted in any manner.

3. Impact on other areas within the Mulligans Flat Area:

- a. Concern has been noted that in some sections of the proposed trenching (outside Heritage areas) may cause impact on existing vegetation root systems.
 - i. Specifically these areas are noted as tree vegetation near chainage 8200 (drawing SM1.TO6.L.014), tree vegetation

¹ Within the Preliminary Assessment has indicated that the trenching equipment disturbs an area of 2.5m width.

both north and south of chainage 8500 (drawing SM1.TO6.L.015), and tree vegetation between chainages 9200 and 9300 (drawing SM1.TO6.L.014)

- ii. The positioning of the trench should be such that the lateral distance is that to ensure that the root systems of this vegetation are not impacted in any manner.

4. **Case for Directional Boring in place of Trenching and Hand Digging**

a. Within the supporting documentation as presented by the proponent there is an information sheet entitled “What is directional Boring”

- i. It should be noted that there are several advantages from directional boring, these include but are not limited to the following:

1. Clean trenchless solution for underground installations without disturbing the above surface
2. Savings in excavations and shoring costs
3. Savings in reinstatement costs and eliminating the effort to blend with surroundings
4. Faster and neater, usually requiring less than half the time needed by conventional trenching method
5. Ideal for sites sensitive to surface disruptions
6. Cost effective, Prices do not vary much from conventional trenching methods.

- ii. The proponent has already indicated that directional boring will be used to traverse Heritage areas A28, A29 and A24.

b. In this Preliminary assessment the proponent is providing compelling justification for the whole of the Mulligans Flat area to be traversed using the directional boring method.

1. The entire area should be able to be traversed in no more than approximately 4x 300m directional boring sections (subject to equipment operational constraints)

2. Surface impacts within the Mulligans Flat area could thus be limited to small areas used for insertion of the directional boring equipment.
 - a. This would eliminate the need for surface clearing and the associated environmental impact expected from trenching.
3. Small trenches at the directional boring “end points” (or junctions of each boring section) could be made if the proposed conduit needs to be installed in sections.

5. Consideration of an alternative route to avoid further impact on Mulligans Flat – Nature Park Area:

- a. In the Preliminary Assessment document the proponent “Nextgen Networks” does not appear to have given any detailed explanations why an alternative route running closely along the ACT/NSW border around the eastern perimeter of the designated Nature Park Reserve area could not be utilised.
- b. It appears that the primary reasons given for traversing the Mulligans Flat area are based primarily on:
 - i. The presence of an existing easement (originally for the East Australia Pipelines - 1994) originally in place before the Mulligans Flat area was designated Nature Park Reserve.
 - ii. That the installation of fibre optic cable by Powertel in 2000 has set a precedent and justifies the use of the easement through the Mulligans Flat area for additional uses².
 - iii. An alignment along the Federal highway reserve out of the ACT was considered but there were significant issues relating together land users within the road corridor³

² Allowing the proponent access to the easement may set a further legal precedence allowing any future telecommunications carriers access to this sensitive area – potentially causing additional recurrent damage.

³ It should be noted that the Federal Highway road corridor is several kilometres to the south east of Mulligans Flat. It is difficult to understand how this statement is relevant given the distance to the Federal highway.

- c. From figures⁴ 1.3 – SM1 Cable Alignment through the ACT, and 1.4 – Overview of the Mulligan’s Flat Site it can be seen that the current gas pipeline easement is only approximately 500m (or less) from the ACT/NSW border to the east.
 - i. Consideration should be given to a route that follows closely the ACT/NSW border for the section between chainage 9370 and 8160.
 - ii. Avoiding the Mulligans Flat Nature reserve will ensure that the area does not suffer additional impact from trenching⁵.

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⁴ Sinclair Knight Merz “Nextgen Fibre Optic Cable – Sydney to Melbourne – SECTION T06 Mulligans Flat Nature Reserve Preliminary Assessment (PA)” March 2002

⁵ Consideration would need to be given to the existing land uses along the eastern boundary of Mulligans Flat in the NSW, however if this land is still being utilised for pastoral type uses low impact trenching could be utilised along this alternative route