



South East Australia Gas Pty Ltd

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Our reference: OPS.04.006

18 December 2020

Mr Michael Lennon
Chair
South Australian Planning Commission

Via email: DIT.planningreformsubmissions@sa.gov.au

Dear Mr Lennon

Consultation on Draft Planning and Design Code Urban Areas

South East Australia Gas Pty Ltd, as agent for the SEA Gas Partnership (SEA Gas), is the owner and operator of the Port Campbell to Adelaide Pipeline (PCA). SEA Gas is equally owned by APA Group and Rest Superannuation each of whom, through the SEA Gas Partnership Committee, fully support this submission.

The PCA transports fuel to the gas fired power stations that provide over 60% of the State's peak electricity demand, along with energy for industrial, commercial and residential consumers. The PCA is a vital access route to energy resources and forms part of the State's critical infrastructure.

In South Australia the construction and operation of high-pressure transmission pipelines is regulated under the Petroleum and Geothermal Energy Act 2000 (PGE Act). The Department for Energy and Mining, Energy Resources Division (DEM), is responsible for administering the PGE Act on behalf of the Minister for Energy and Mining. The PGE Act requires pipelines to be designed, constructed and operated in accordance with Australian Standard (AS) 2885 - Pipelines; Gas and Liquid Petroleum, which is consistent with an agreement of the Council of Australian Governments to adopt AS 2885 to achieve uniform national pipeline standards across the country. The overriding objective of AS 2885 is to ensure public safety, minimise environmental harm and maintain security of gas and energy supply.

SEA Gas supports the proposed amendments to the 'Gas and Liquid Petroleum Pipelines Overlay' and the introduction of the 'Gas and Liquid Petroleum Pipelines (Facilities) Overlay' in the Draft *Planning and Design Code* for urban areas. As currently drafted, the two overlays will provide an effective process for implementation of *State Planning Policy 10: Mineral and Energy Resources*, by identifying pipelines used for energy transportation and allowing changes in land uses around those pipelines and associated facilities to be reviewed by technical experts within DEM.

The proposed overlays will:

- provide more certainty for planners and developers and thereby improve efficiency and deliver better planning outcomes for all stakeholders, including local communities and those involved in planning and development; and
- enable the compatibility of existing and proposed land use to be managed and provide transparency and certainty to both developers and pipeline investors.

The framework will result in early engagement leading to optimal planning outcomes allowing pipelines and the community to safely coexist.

The proposed overlays in the draft *Planning and Design Code* for urban areas of South Australia are aligned with the principles of AS 2885. They are sufficient to ensure that Development Approvals made under the *Planning and Design Code* do not compromise the provisions in the *Petroleum and Geothermal Energy Act 2000* that are designed to protect public safety, the environment and security of energy supply.

SEA Gas has been a strong advocate for improved planning processes, as our business has been significantly impacted by having to deal with public safety issues that have arisen through inadequate consultation and technical input into planning decisions that have impacted our pipeline system.

We have provided additional minor comment through an online submission, as we believe there may be an opportunity to further streamline the Development Approval process for developers. We also note that the *Strategic Infrastructure Gas Pipelines Overlay* in the *Planning and Design Code* for rural and outback areas of South Australia remains insufficient and trust that the Planning Commission will give due consideration to also applying the 'Gas and Liquid Petroleum Pipelines Overlay' and the 'Gas and Liquid Petroleum Pipelines (Facilities) Overlay' in the Draft *Planning and Design Code* for urban areas to rural and outback areas.

SEA Gas appreciates the opportunity to provide input into the draft *Planning and Design Code* for urban areas. We also wish to thank the Planning Commission for addressing prior feedback and supporting the implementation of improved processes for planning and development in the vicinity of pipelines.

We trust that this submission has provided sufficient information to outline the basis of our support for the proposed Gas and Liquid Petroleum Pipelines Overlays. Please Contact our Head of Asset Management, Liz Brierley ([REDACTED]) should you require further information.

Yours sincerely

Wendy Oldham
Chief Executive Officer