

## **DIT:Planning Reform Submissions**

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**From:** Andrew Robertson [REDACTED]  
**Sent:** Wednesday, 16 December 2020 1:11 PM  
**To:** DIT:Planning Reform Submissions  
**Subject:** APGA Letter in Response to Consultation on Overlays in the Planning & Design Code for Urban Areas  
**Attachments:** 201214 APGA Letter - SA Planning and Design Code.pdf

To whom it may concern

Please find attached a letter from the Australian Pipelines and Gas Association (APGA) in support of 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 (SA), which are currently out for public consultation.

APGA has also provided comments directly through the online Code Feedback Tool.

Please don't hesitate to let me know if you have any questions or would like to discuss further.

Best regards  
Andrew Robertson

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Via email: [DIT.planningreformsubmissions@sa.gov.au](mailto:DIT.planningreformsubmissions@sa.gov.au)

## **Re: Consultation on Overlays in the Planning and Design Code for Urban Areas**

The Australian Pipelines and Gas Association (APGA) is the industry body representing the owners, operators, designers, constructors and service providers of Australia's high-pressure gas transmission infrastructure.

We write this letter in support of 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 (SA), which are currently out for public consultation.

Gas transmission pipelines play a critical role in the South Australian community – delivering almost as much energy to end users in SA as the National Electricity Market. (In 2018-2019, SA end users consumed 41.3PJ of energy from gas and 48.9PJ from electricity). This doesn't include the gas used for electricity generation – around 50% of electricity is generated using gas in SA. Gas fired generation also plays a vital role in firming renewables, thereby facilitating the transition to decarbonisation. It is therefore important that the land use management practices around gas transmission pipelines reflect best practice – promoting safer community outcomes and a stable operating environment for these critical assets.

The proposed overlays are aligned closely with the land use change requirements in AS 2885 and they will ensure that Development Approvals made under the Planning and Design Code are made with full awareness of the provisions of AS 2885 that are designed to protect public safety, the environment and security of energy supply.

The overlays will also ensure pipelines used for energy transportation are identified in the planning process and allow changes in land uses around those pipelines to be reviewed by technical experts within the Energy Resources Group of the Department for Energy and Mining. Through encouraging early dialogue between pipeline operators, planners and developers, the overlays will provide transparency and certainty to both developers and pipeline operators.

As all pipeline operators are aware, land use changes often increase the risk of pipeline damage as well as the potential consequences stemming from a pipeline failure. There are also significant costs associated with having to move, alter or provide enhanced protection for a pipeline that was originally constructed on land zoned for rural land-use, but which has been rezoned to permit residential, high-density or sensitive development.

Early engagement will facilitate efficient development planning which should allow for developments to proceed with appropriate recognition or help reduce the need for additional protective measures.

In many jurisdictions, planning systems and regulations recognise the principle of 'Agent of Change'; whereby the party that is driving the need for change must bear some or all of the responsibility for counter-measures required to respond to the change. APGA recognises that pipeline licensees are the party responsible for ensuring the requirements of AS 2885 are met and considers that the 'Agent of Change' principle should apply where developments around a pipeline are driving the need for new counter-measures. This would facilitate a discussion between parties on costs, responsibilities and actions to ensure the optimum public safety outcomes are achieved.

APGA also believes the existing 'Strategic Infrastructure Gas Pipelines Overlay' in the South Australian Planning and Design Code for Rural Areas is insufficient and the Planning Commission should 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 Areas as well.

As a key stakeholder in Australia's pipeline infrastructure, APGA actively encourages the implementation of improved planning provisions. Through the work of APGA's Pipeline Corridor Committee, APGA has contemplated the interface of planning decisions, pipeline regulation and public safety for many years and is active on an Australia-wide basis with initiatives to support improved planning in the vicinity of pipelines. A key APGA initiative in this regard is the Australian Pipelines Database (APD) – a service offered by APGA to assist pipeline owners and operators to provide pipeline location and measurement length information to government planning organizations. Its purpose is to improve industry communication with government stakeholders responsible for planning decisions to ensure there are good opportunities for constructive early engagement.

APGA would welcome the opportunity to engage further on this matter. If you would like to discuss any of these issues, please contact APGA's National Policy Manager, Andrew Robertson on [REDACTED] or at [REDACTED] [@apga.org.au](mailto:[REDACTED]@apga.org.au).

Yours sincerely



STEVE DAVIES  
Chief Executive Officer