



18 December 2020

APA Reference: 447710

South Australian Planning Commission

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**EMAIL:** [DIT.Planningreformsubmissions@sa.gov.au](mailto:DIT.Planningreformsubmissions@sa.gov.au)

Dear Sir / Madam

**RE: Draft Planning and Design Code – Urban Areas – Gas Pipelines**

Thank you for the opportunity to provide comment on 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 South Australian Planning and Design Code for Urban Areas, which is currently out for public consultation.

In June 2018, APA submitted to the South Australian Minister of Planning supporting a submission made by SEA Gas who were seeking pipeline provisions be in the then new Planning and Design Code. Subsequent to that submission, APA along with other pipeline representatives, presented to a Planning Commission attended by representatives of the Department for Energy and Mining. Subsequent to that hearing, APA along with other pipeline representatives, attended a workshop with Planning South Australia where concepts for a future planning control were discussed.

Whilst this submission is in response to the urban overlay, APA strongly encourages that this current version of the urban code be used as a basis for change to the rural code. The rural code does not recognise the criticality of sustaining security of supply and its importance to the South Australian community and economy. The rural code does not go far enough in recognising the breadth of land use change that can compromise both safety around high pressure pipelines and security of gas supply if not properly considered and managed.

We do not intend to repeat our previous submission outlining who APA is, the assets we own and their importance to South Australia. We do advise that APA is a 50% owner of the Port Campbell to Adelaide High Pressure Gas Transmission Pipeline (PCA), which is operated by SEA Gas and transports gas to industrial, commercial and residential consumers, along with the fuel for the gas fired power stations that provides over 50% of the State's electricity generation.

Firstly APA recognises and strongly supports the objective of the control in that it recognises the criticality of both safety and security of supply. Security of supply is a concept often not front of mind in planning processes and it is essential to understand that if high pressure gas pipelines are not maintained in a safe environment, the ultimate consequence is that the operability of that pipeline is compromised with subsequent adverse economic and social impacts on end users and the broader community.

APA supports 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).

A key issue for high pressure gas pipelines is their visibility (or lack thereof) in planning frameworks and the absence of a clear trigger for early engagement by planning authorities and land users and developers. The proposed planning tool provides this clear trigger.

The proposed overlays have the potential to address deficiencies in the current planning framework by facilitating the proper consideration of a more appropriate range of potential land use conflicts on a merits basis and providing a platform for proposed land uses coming within the area of influence of a pipeline, to be properly managed.

Australian Standard AS2885 (Pipelines – Gas and liquid petroleum) provides a land use framework within which pipeline licensees and operators must consider land use change around pipelines. As a national standard, it is not straightforward to translate its concepts into state based planning frameworks. The current version of the overlays are well aligned with the requirements and concepts of AS2885 and represent an opportunity to guide planning decisions that do not conflict (or conflict less) with AS2885 aspirations. Further, in achieving this higher level of regulatory alignment, greater compliance can also be expected with the provisions of the Petroleum and Geothermal Energy Act 2000 and pipeline licences that are fundamentally based on public and environmental safety and sustained security of energy supply.

It should also be noted that greater certainty in the ability for high pressure gas pipelines to be maintained and operated in appropriate environments underpins confidence in investment in, and construction of, pipelines more broadly.

APA thanks the South Australian government for the opportunity to make this representation and we are happy to meet, discuss, provide additional information or otherwise assist in the consideration of these important matters in any way. Please contact me on [REDACTED] [REDACTED] [REDACTED] or at [REDACTED]

Yours faithfully,



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