13 November 2015

Major Hazards Advisory Committee

C/- Planning Panels Victoria
Level 5, 1 Spring Street
MELBOURNE VIC 3000

BY EMAIL: planning.panels@delwp.vic.gov.au

TERMS OF REFERENCE - MAJOR HAZARD FACILITIES ADVISORY COMMITTEE

Dear Major Hazards Advisory Committee,

APA Networks, as network operator, makes this submission on behalf of the asset owner Australian Gas Networks (AGN).

APA Networks is writing this letter in response to the Major Hazard Facilities Advisory Committee's (Committee) terms of reference.

Although it is deemed AGN's portfolio does not include any Major Hazard Facilities, APA Networks note that the terms of reference state that the Committee will also consider and make recommendations on the principles for applying land use buffers more broadly to other uses with adverse amenity potential. APA Networks and AGN considers that this is a timely opportunity for the Committee to consider and make recommendations on the principles applying land use buffers to high pressure gas transmission pipelines and ancillary assets; a potentially hazardous type of infrastructure.

Clause 19.03-6 of the State Planning Policy Framework acknowledges the need to recognise existing transmission-pressure gas pipelines in planning schemes and protect them from further encroachment by residential development or other sensitive land uses. However, for the most part, Victorian planning schemes fail to recognise existing high pressure gas pipelines. There are a number of instances where land use planning has occurred without reference to high pressure gas transmission pipelines.

Due to the absence of suitable provisions recognising existing high pressure gas transmission pipelines, pipeline licensees are often not notified of land use planning changes around pipelines early enough in the planning process, or at all, and safety assessments are not carried out in a timely fashion. This means that the risks associated with pipelines in relation to the change in land use may not be assessed until late into the planning process, if at all, and the risk to people, property and the environment may not be within acceptable levels.
APA Networks and AGN therefore requests that the terms of reference be amended to specifically state that the Committee will consider and make recommendations regarding land use planning around high pressure gas transmission pipelines and ancillary assets. We consider that a focus on streamlining the provision of planning request information received by municipal authorities will be of benefit to the risk assessment process.

APA Networks welcomes the opportunity to discuss this matter in person. If you have any questions, please contact Andrew Hensman Manager, Compliance & Support on (03)9463 8393.

Yours faithfully

[Signature]

For Andrew Foley

General Manager Victorian Networks