## **APA Group**

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Major Hazards Advisory Committee
C/- Planning Panels Victoria
Level 5, 1 Spring Street
MELBOURNE VIC 3000

Mail to: planning.panels@delwp.vic.gov.au

**EMAIL OUT** 

Dear Major Hazards Advisory Committee

## RE: TERMS OF REFERENCE- MAJOR HAZARD FACILITIES ADVISORY COMMITTEE

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

APA owns and operates a Major Hazard Facility (MHF) located at 180 Greens Road, Dandenong. APA supports and encourages the Committee's purpose to provide advice about improvements to land use planning for areas surrounding major hazard facilities, in order to better manage the interface areas between existing and new development and land used for major hazard facilities.

APA notes 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 considers that this is a timely opportunity for the Committee to consider and make recommendations on the principles applying to land use buffers to high pressure gas transmission pipelines; a potentially hazardous type of infrastructure.

There are a number of instances where land use planning has occurred without reference to high pressure gas transmission pipelines. This occurred when land use planning was being undertaken for the Lara West precinct, where the significance of a high pressure gas transmission pipeline did not emerge until late in the planning process. This is also currently taking place in relation to the Fisherman's Bend Urban Renewal Area, where sensitive uses, including a new school and other community facilities, have been planned adjacent to a high pressure gas transmission pipeline in breach of the requirements under the Australian Standard AS2885- for Pipelines – Gas and Liquid Petroleum.

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.

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.

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APA 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.

If you have any specific questions, please contact Albert Brovedani on (03) 9797 5124 regarding any MHF matters and Lachlan Marshall on (03) 9797 5118 regarding the principles for applying land use buffers to high pressure gas transmission pipelines.

APA welcomes the opportunity to discuss this matter in person, please telephone me on (03) 9797 5184.

Yours faithfully

Edwin DePrinse

**GENERAL MANAGER TRANSMISSION SERVICES**