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DPTI

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31 August 2018

South Australia State Planning Commission
Via email: DPTI.PlanningEngagement@sa.gov.au

Dear Sir/Madam

Re: Consultation on Draft State Planning Policies for South Australia

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.

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 organisations. Its purpose is to improve industry communication with government stakeholders responsible for planning decisions to ensure there are good opportunities for constructive early engagement.

Pipelines are integral to the security of South Australia's energy supply, with more than 50% of electricity generated in the last financial year being fuelled by natural gas transported by our member's pipelines. Land use changes well outside of a pipeline easement can have a significant impact on pipeline safety and therefore public safety and security of gas supply. A land use change has the potential to introduce new threats that may impact on the integrity of a pipeline or materially change the consequence of a pipeline failure. The current planning arrangements in South Australia do not oblige the parties involved in developments to address potential risks resulting from land use changes in the vicinity of pipelines.

APGA has reviewed the Draft State Planning Policies for South Australia, with particular focus on 'Policy 10: Key Resources' and 'Policy 12: Energy'. We are encouraged by the document's recognition of the need for mining (which we assume

includes petroleum) and planning legislation to complement each other. We also acknowledge that the policy requires developments in the vicinity of major energy infrastructure to be planned and implemented in such a way as to maintain the safe and efficient delivery and functioning of the infrastructure.

However, APGA is concerned that the policy document contains no specific references to pipelines and that it may not be obvious to planners interpreting the policy that pipelines are critical energy infrastructure for the state of South Australia. The Petroleum and Geothermal Energy Act 2000, under which pipelines are regulated, is not referenced as related legislation in 'Policy 12: Energy', despite the State of South Australia currently being reliant on natural gas pipelines for 50% of the electricity generated there. Further, while the non-statutory guidance notes address future energy sources, there is no provision for identifying major existing energy infrastructure and ensuring that sensitive land uses and other potentially incompatible land use applications are assessed against policies that prioritise public safety and security of existing energy supply. APGA strongly recommends that these matters are addressed.

It also may not be apparent to planners interpreting the policy that pipelines fall under the Petroleum and Geothermal Energy Act 2000 – which means that they fall within the definition of Mining Acts in the Planning, Development and Infrastructure Act 2016. For this reason, APGA believes that more specific reference should be made to both the Petroleum Acts and the fact that pipelines are critical associated infrastructure to access energy resources under Policy 10: Key Resources.

In APGA's view, it is essential that pipelines are identified both in Regional Plans and Planning and Design Codes – which is why our industry has made the Australian Pipelines Database (APD) available to government planning organisations. We also consistently advocate for the implementation of strategies and policies that will minimise the impacts of encroachments by incompatible land uses, and that manage risks to public safety, the environment and security of energy supply through early consultation with pipeline operators during strategic planning.

APGA has been made aware of and appreciates the government's efforts improve planning policy in South Australia and would welcome the opportunity to discuss both the policy and future planning and design codes with you further.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Steve Davies', written in a cursive style.

STEVE DAVIES
Chief Executive Officer