



**Australian Pipelines
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Via email: dpti.planningreformsubmissions@sa.gov.au

Re: Consultation on Draft Planning and Design Code

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 submissions by our member companies SEA Gas and Epic Energy to this consultation. We are in agreement with them that the proposed 'Strategic Infrastructure Gas Pipelines Overlay' in the Draft Planning and Design Code is insufficient to manage the risk to both public safety and security of energy supply.

Pipeline industry representatives previously made submissions to the State Planning Commission in November 2017 on the need to improve planning processes for land in the vicinity of high-pressure natural gas pipelines through proposing amendments to the planning and design code under the Planning, Development and Infrastructure Act 2016. Joined by APGA, they met with representatives from the Department of Planning, Transport and Infrastructure (DPTI) in November 2018 to discuss appropriate overlays for high pressure natural gas pipelines and were assured that there would be further engagement on this matter. Such engagement did not occur and the overlays released in the Draft Planning and Design Code will afford less consideration to pipeline risk than existing processes, which have already been recognized by Councils and pipeline operators as being insufficient.

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.

Accordingly, 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].

Yours sincerely

A handwritten signature in black ink, appearing to read 'Steve Davies', with a stylized flourish at the end.

STEVE DAVIES
Chief Executive Officer