

18 December 2015

APA Ref: APA435223.2

Plan Melbourne
 Department of Environment, Land, Water & Planning
 GPO Box 2392,
 Melbourne VIC 3001

Email to: planmelbourne@delwp.vic.gov.au

BY EMAIL

Dear Minister,

RE: HIGH PRESSURE GAS TRANSMISSION PIPELINES & THE METROPOLITAN PLANNING STRATEGY PROPOSED VISION FOR MELBOURNE'S GROWTH TO 2050.

Thank you for the opportunity to provide comment regarding the draft Plan Melbourne (*herein the Plan*). APA GasNet (*herein APA*) submits comment on the draft plan in relation the proposed design and development around the known APA pipeline assets, throughout Melbourne. APA has the following comments and recommendations in relation to the proposed amendment.

In APA's previous response dated 6 December 2013, APA had included attachments indicating the legislative requirements of development within the vicinity of high pressure gas pipelines. APA would like to stress that these documents are still relevant and include:

- APA GasNet's Guidelines
- AS2885, Part 1, Clause 4.3.4 - Primary Location Classification (Appendix 1)
- AS2885, Part 1, Clause 4.7.4 – Change of Location Class (Appendix 2)

APA would like to respond by expressing direct interests in the design and development of the *Plan Melbourne*. It is APA's objective to protect human life and infrastructure whilst ensuring future land use, subdivision and development will not inhibit the potential of an existing high pressure transmission pipeline to be able to provide capacity required to meet the needs for natural gas in Victoria. The Plan if implemented incorrectly has the potential to create numerous safety and/or maintenance issues for APA and other pipeline licensees alike.

APA has assessed the Plan Melbourne and associated discussion paper documents in particular Chapter 2, Growth Challenges, Fundamental Principals and Key Concepts. From the information supplied, the Plan will impact on APA assets within the vicinity of the study area. As a result APA has the following general comments:

- APA supports the Plans strategic principals specific Principal 8 (Making it Happen, Infrastructure Investment that supports city growth). It is imperative that as the city grows and develops, existing infrastructure is protected accordingly.
- Costs associated with such utility and infrastructure protection mechanisms need to be taken into account and incorporated into overall developmental cost scenarios.
- Section 2.5 (Housing Policy) encourages 'higher urban densities close to neighbourhood centres as contextually appropriate. Housing densities will increase as appropriate to reflect the range and scale of activity centres and their walkable/ rollable catchments throughout Melbourne'. These higher density urban areas must be carefully designed and located to ensure they are located outside of the measurement length of a high pressure gas transmission pipeline to protect people and community from harm.
- The "**measurement length**" of a pipeline clearly defines the region that could be affected by the worst case scenario pipeline failure and identifies the distance where future development proposals should be referred to the pipeline owners by the planning authority. This measurement length 'must' be considered when proposing to design and develop land. Pipeline Licensees must be engaged at an early stage when



such land uses area proposed.

- When rezoning land under the Victorian Planning Provision's high pressure gas transmission pipelines must be considered and potential implications mitigated through carefully designed planning scheme amendments.
- APA recommends that pipeline protection specific provisions be considered and placed within any future Planning Scheme Amendments for lands in the vicinity of high pressure gas transmission pipelines.
- APA would like to emphasise that as the Pipeline licensee it will enforce Restrictions on the use of its pipeline easement area in accordance with the Creation of Easement and restrictive Covenant Instrument registered on Title. Buildings, structures, roadway, pavement, pipeline, cable, fence or any other improvement upon or under the land within the easement must not be constructed without prior consent in writing from APA GasNet. Any such future improvement within the easement is at the risk of the developer/land manager who will remain liable. APA will not be liable for any costs associated with the reinstatement of any infrastructure such as roads etc.

It is recommended that project officers from the Department of Environment, Land, Water & Planning have ongoing correspondence with APA in the future to discuss the scope of issues relating to the existing Plan Melbourne and associated future development and planning scheme amendments in relation to APA high pressure gas transmission infrastructure to ensure its assets are thoroughly protected.

It is APA's intent to ensure that transmission pressure gas pipelines are safely protected with minimum impact on and mitigating any potential risks and proposed encroachment to ensure the integrity of its pipeline assets.

For any further enquiries relating to this submission please feel free to contact the Heritage, Environment and Lands Team [removed](#)

Yours faithfully,
[removed](#)

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Attachments/Figures

- Appendix 1: AS2885, Part 1, Clause 4.7.4 – Change of Location Class.
- Appendix 2: AS2885, Part 1, Clause 4.3.4 - Primary Location Classification.

Appendix 1: AS2885, Part 1, Clause 4.7.4 – Change of Location Class.

4.7.4 Change of location class

Where there are changes in land use planning (or land use) along the route of existing pipelines to permit Residential, High Density, Industrial, or Sensitive development or Heavy Industrial development in areas where these uses were previously prohibited, a safety assessment shall be undertaken and additional control measures implemented until it is demonstrated that the risk from a loss of containment involving rupture is ALARP.

A location class change to Heavy Industrial requires compliance with this Clause only when pipeline failure in this location would create potential for consequence escalation.

This assessment shall include analysis of at least the alternatives of the following:

- (a) MAOP reduction (to a level where rupture is non-credible).
- (b) Pipe replacement (with no rupture pipe).
- (c) Pipeline relocation (to a location where the consequence is eliminated).
- (d) Modification of land use (to separate the people from the pipeline).
- (e) Implementing physical and procedural protection measures that are effective in controlling threats capable of causing rupture of the pipeline.

For the selected solution, the assessment shall demonstrate that the cost of the risk reduction measures provided by alternative solutions is grossly disproportionate to the benefit gained from the reduced risk that could result from implementing any of the alternatives.

Appendix 2: AS2885, Part 1, Clause 4.3.4 - Primary Location Classification.

Land through which the pipeline passes shall be classified as follows:

(a) Rural (R1) Land that is unused, undeveloped or is used for rural activities such as grazing, agriculture and horticulture. Rural applies where the population is distributed in isolated dwellings. Rural includes areas of land with public infrastructure serving the rural use; roads, railways, canals, utility easements.

(b) Rural Residential (R2) Land that is occupied by single residence blocks typically in the range 1 ha to 5 ha or is defined in a local land planning instrument as rural residential or its equivalent. Land used for other purposes but with similar population density shall be assigned rural residential location class. Rural residential includes areas of land with public infrastructure serving the rural residential use; roads, railways, canals, utility easements.

NOTE: In rural residential societal risk (the risk of multiple fatalities associated with a loss of containment) is not a dominant design consideration.

(c) Residential (T1) Land that is developed for community living. Residential applies where multiple dwellings exist in proximity to each other and dwellings are served by common public utilities. Residential includes areas of land with public infrastructure serving the residential use; roads, railways, recreational areas, camping grounds/caravan parks, suburban parks, small strip shopping centres. Residential land use may include isolated higher density areas provided they are not more than 10% of the land use. Land used for other purposes but with similar population density shall be assigned Residential location class.

(d) High Density (T2) Land that is developed for high density community use. High Density applies where multi storey development predominates or where large numbers of people congregate in the normal use of the area. High density includes areas of public infrastructure serving the high density use; roads, railways, major sporting and cultural facilities and land use areas of major commercial developments; cities, town centres, shopping malls, hotels and motels.

NOTE: In residential and high density areas the societal risk associated with loss of containment is a dominant consideration.

In rural and rural residential areas, consideration shall be given to whether a higher location class may be necessary at any location where a large number of people may be present for a limited period.

NOTE: Examples include roads subject to heavy traffic congestion and sports fields.