



22 November 2023

APA Reference: 502667  
Your Reference: N/A

Victorian Planning Authority  
Att: Sarah Doring  
Level 25, 35 Collins Street  
MELBOURNE VIC 3000

**EMAIL OUT:** sarah.doring@vpa.vic.gov.au

Dear Sarah,

**RE: OFFICER SOUTH EMPLOYMENT PSP – PUBLIC CONSULTATION AND DRAFT AMENDMENT**

Thank you for your notification request received on 29 September 2023 in relation to the public consultation for the Officer South Employment PSP.

APA Group (APA) is Australia's largest natural gas infrastructure business and has direct management and operational control over its assets and investments. APA's gas transmission pipelines span across Australia, delivering approximately half of the nation's gas usage. APA owns and operates over 15,000 km's of high pressure gas transmission pipelines across Australia.

APA is the Pipeline Licensee for the Morwell - Dandenong pipeline, (see table 1 for details):

**Table 1: Transmission gas pipelines in the area of consideration**

Pipeline	Pipeline Licence	Easement Width (m)	Diameter (mm)	Measurement Length (m)
Morwell – Dandenong	PI 50 (T1)	20.1	450	240
<b>Note:</b> Measurement Length is applied to either side of the pipeline.				

**APA's Role**

As a Licensee under the Pipelines Act 2005 (VIC), APA is required to operate high pressure gas transmission pipelines (**HPGTP**) in a manner that minimises adverse environmental impacts and protects the public and property from health and safety risks. Once a HPGTP is in place, APA is required to constantly monitor both the pipeline easement and also a broader area within which we are required to consider land use changes and development and to assess what such changes means to the risk profile of the HPGTP.

APA has a number of responsibilities and duties to perform under a complex framework of legislation, standards and controls across Federal, State and Local Government landscapes. In particular, our HPGTPs are required to be operated in accordance with Australian Standard 2885 (Pipelines – Gas and Liquid Petroleum) (AS2885). In discharging our regulatory responsibilities, APA needs to continuously review what is happening around its assets, what land use changes are occurring and what development is taking place to ensure it remains in a position to comply with applicable

operational and safety standards and legislation whilst meeting its commercial obligations and imperatives.

### **Pipeline Risk Profile and the Measurement Length**

In managing HPGTP's and considering land use changes, APA must focus on that area geographically defined by AS2885 as the Measurement Length (**ML**). The ML area is the heat radiation zone associated with a full-bore pipeline rupture. APA is mandated to consider community safety in the ML due to the high consequences of pipeline rupture to life, property and the economy.

The ML is determined by taking account of a number of factors including the design criteria of the pipe (driven by the environment within which it was designed for at the time of construction) and the Maximum Allowable Operating Pressure (MAOP) of the pipe. APA must consider any changes of land uses within the ML area to determine the effect of a new use on the risk profile of the pipeline.

For reference, the ML of the Morwell – Dandenong pipeline is 240 metres. Note that the ML is a radial dimension, and therefore applies to both sides of the pipe.

Whilst APA must consider the full ML pursuant to AS2885, the subject pipeline, in this location, is considered to be a 'no-rupture' pipeline. In this context, the risk of an event impacting the full measurement is considered not to be credible. For town planning purposes only, APA focused on a reduced area that would be impacted by a pipeline failure event that is credible – this area is referred to as the Area of Consequence.

### **Sensitive Uses**

APA seeks to limit sensitive uses from establishing within the ML so as to retain a high level of compliance with applicable safety standards. AS2885 defines a sensitive use as one which may increase the consequences of failure due to its use by members of the community who may be unable to protect themselves from the consequences of a pipeline failure.

To this end, APA's preferred position is that all land uses listed below be located outside of the ML:

- Aged Care Facilities.
- Retirement villages.
- Child care / family day care centres.
- Cinema based entertainment facility.
- Schools or other educational establishments.
- Prisons / corrective institutions.
- Hospitals.
- Place of assembly or worship.
- Service station.
- Higher density residential uses.
- Other uses, as determined by the relevant decision maker, as substantially used by community members unable to protect themselves from the consequences of pipeline failure.

As referenced earlier, for town planning processes, APA will focus on the reduced Area of Consequence resulting from a credible pipeline failure event.

## Comments

On the basis of the information provided, APA VTS provides the following comments with regard to the Officer South PSP further to APAs Agency Validation letter dated 17 August 2022;

1. As outlined in APA's Agency Validation letter of the 17 August 2022 it is recommended that Clause 66.06 proposed notification includes a separate line item for Cinema based entertainment facility (similar to the requirement for schedule 5 to clause 37.07), particularly given that Cinema based entertainment facility is a permit required use if within the pipeline area of consequence.
2. It is also recommended that for consistency Clause 66.06 proposed notification includes a separate line item for Child care centre and corrective institution (similar to the requirement for schedule 5 to clause 37.07).
3. Given the Officer South PSP has identified the APA VTS high pressure gas pipeline easement as being linear open space which will connect to similar existing corridors to west of the PSP, "Guideline G65" which state *"The asset manager may consider the gas easement to be located within the front of private lots where there is car parking and landscaping. In this scenario, the asset manager retains the legal access to the pipeline. Approval from the asset manager and responsible authority must be obtained prior to proceeding with any construction."* is not required and may confuse the future planning and implementation of the PSP. If this guideline is intended for high pressure distribution gas pipeline easements then its wording should be amended to reflect "distribution pipeline easements".

For any further enquiries relating to this correspondence, please feel free to contact [REDACTED]

Yours faithfully,



**MICHAEL MIELCZAREK**  
**SENIOR URBAN PLANNER**  
**INFRASTRUCTURE PLANNING AND APPROVALS**  
**APA GROUP**