

## 6.1.5 Submission to Exhibition - APA-AGL Gas Import Jetty and Pipeline - Crib Point to Pakenham - Environmental Effects Statement (EES)

**File Reference:** Nil.  
**Responsible GM:** Tracey Parker  
**Author:** Teresa Hazendonk

### Recommendation(s)

That Council:

- Notes the *Issues Paper for Council: Exhibition of Environmental Effects Statement: Proposed AGL-APA Gas Import Jetty, Pipeline and Delivery Facility - Crib Point to Pakenham, 17 August 2020*, contained in Attachments 1 and 2.
- Does not support the exhibited Environmental Effects Statement in its current form.
- Endorses a submission to the Department of Environment, Water and Planning generally in accordance with Attachment 3 which details issues to be resolved, generally relating to:
  - Inconsistency with The Renewable Energy (Investments and Jobs) Act 2017, the Climate Change Act 2017, the Victorian Reductions Emissions Targets, and incorrect and insufficient data relating to gas demands and sustainability of the proposal.
  - Impacts on groundwater have not been satisfactorily addressed and may exceed acceptable levels.
  - Inaccurate traffic impact data and the need for a traffic management strategy to be prepared based on accurate information.
  - Refinement of the pipeline alignment to reduce impacts on the future viability of agricultural land in the Green Wedge Zone.
  - Insufficient information relating to the ongoing impacts on all types of land holdings that fall within the 640 metre Measurement Length of the proposed pipeline.
  - No direct consultation with owners and occupiers of land holdings that fall within the 640 metre Measurement Length of the proposed pipeline.

### Attachments

1. CONFIDENTIAL - Issues Paper - Circulated to Councillors separately [6.1.5.1 - 66 pages]
2. Pipeline Maps [6.1.5.2 - 29 pages]
3. Cardinia Shire Submission - Gas Import Jetty and Pipeline Crib Point [6.1.5.3 - 8 pages]

### Executive Summary

The Minister for Planning requires an Environmental Effects Statement (EES) to be undertaken for the provision of an importing and degasifying liquid natural gas facility at Crib Point and the provision of a 56km gas pipeline from Crib Point to the mains pipeline north of Pakenham.

Consultation with the Technical Reference Group (TRG) was completed on 14 April 2020, and the Minister for Planning has assessed the adequacy of the EES against the scoping requirements. Formal exhibition commenced on 2 July 2020. Submissions are to be made to the Minister for Planning no later than 26 August 2020. Planning Panels Victoria (PPV) have

pre-set a tentative dates for a Directions Hearing on 17 September 2020, and the Enquiry and Advisory Committee Hearing to commence on 12 October 2020.

Officers have assessed the exhibited EES reports within the scope of officer expertise, as contained in the attached Issues Paper and made recommendations accordingly. The Issues Paper seeks to assist Council in forming a position on the proposal. The draft Submission consolidates officers' recommendations on the various matters identified in the Issues Paper. The draft Submission can be modified to reflect Council's position on the proposal. The Submission will then be submitted to the Minister for Planning.

Officers have retained the services of Maddocks Lawyers to provide advice, engage a Groundwater expert, and represent Council the Enquiry and Advisory Committee public hearings should it be required.

## Background

On 8 October 2018 the Minister for Planning required AGL and APA to prepare an Environmental Effects Statement (EES) under the Environmental Effects Act 1978 to assess the potential environmental effects of the project.

The proponent (AGL and APA) is responsible for preparing the EES documents. The Department of Environment, Land, Water and Planning (DELWP) is responsible for managing the EES process. This EES process has the following steps:

<b>Preparation of a draft study program and draft schedule by the proponent.</b>	<b>completed</b>
Preparation and exhibition of draft scoping requirements by DELWP on behalf of the Minister with public comments received during the advertised exhibition period.	completed
Finalisation and issuing of scoping requirements by the Minister.	completed
Review of the proponent's EES studies and draft documentation by DELWP and a Technical Reference Group (TRG). The proponent held community consultation and information sessions prior and during this period.	Completed
Completion of the EES by the proponent.	completed
Review of the complete EES by DELWP to establish its adequacy for public exhibition.	Completed
Exhibition of the proponent's EES and invitation for public comment by DELWP on behalf of the Minister for 40 business days from 2 July to 26 August 2020.	Current step
Appointment of an inquiry by the Minister for Planning to review the EES and public submissions received (likely including a panel hearing) and provide a report to the Minister.	September - October
Following receipt of the inquiry report, the Minister provides an assessment of the project to inform decision-makers.	

*Table 1: Steps in the EES process*

Step 7 of the of the EES process, formal exhibition of the EES, began on 2 July 2020. Documents, including technical reports, relating to the following matters are currently on exhibition:

- Project rationale
- Project development
- Project description
- Key approvals and assessment framework
- Marine biodiversity

- Terrestrial and freshwater biodiversity
- Surface water
- Groundwater
- Contamination and acid sulphate soils
- Greenhouse gas emissions
- Climate change risk
- Sustainability
- Air quality
- Noise and vibration
- Landscape and visual
- Transport
- Safety, hazard and risk
- Land use
- Social
- Business
- Agriculture
- Aboriginal cultural heritage
- Historic heritage
- Environmental management framework
- Stakeholder engagement
- Pipeline Licence Application
- Works Approval Application (only relevant to Mornington Peninsula Shire)

The exhibition period will end on 26 August 2020 and this is the final day to make a submission.

PPV have tentatively pre-set dates for a Directions Hearing on 17 September 2020, and the Public Hearing to commence on 12 October 2020.

### **Policy Implications**

The legislation that requires the preparation of the EES requires that it should assess the environmental effects of all components and stages of the project. The assessment should include:

- the likelihood of adverse effects and associated uncertainty of available predictions or estimates.
- the potential effects on individual environmental assets – magnitude, extent and duration of change in the values of each asset – having regard to intended avoidance and mitigation measures and (if different) both maximum operational capacity and intended operational rates.
- further management measures that are proposed where avoidance and mitigation measures do not adequately address effects on environmental assets, including specific details of how the measures address relevant policies.
- risk ratings of unintended but foreseeable events such as spills, leaks or other mishaps that could result from construction or operation of the project.
- the likely residual effects that are likely to occur after all proposed measures to avoid and mitigate environmental effects are implemented.
- potential cumulative impacts arising in conjunction with the impacts of other projects or actions that may affect the same environmental asset or assets.

The attached Issues Paper seeks to assist Council in forming a position on the proposal. It provides full discussions on the various assessments that have been carried out by officers.

Officers have assessed the exhibited EES reports within the scope of in-house expertise, and have made recommendations accordingly.

### Relevance to Council Plan

- 2.2 Engaged communities
  - Provide a range of opportunities that encourage community participation in Council policy and strategy development.
  - Communicate the activities and decision of Council to the residents in a variety of ways
- 3.3 Enhanced natural environment
  - Protect and improve biodiversity by increasing the area of natural ecosystems across the Shire.
  - Manage agricultural land use by supporting farmers to utilise sustainable farming practices.
- 3.5 Balanced needs of development, the community and the environment.
  - Ensure the planning of rural (green wedge) areas protects and enhances important agricultural, environmental, natural resource, infrastructure and recreational values.
- 4.2 Our economy
  - Support our farmers and growing agricultural industry in adapting to the changing economy and climate.
  - Identify innovative ways to value-add to the region's primary production and transportation.
- 5.4 Appropriate funding and support from all levels of government
  - Work with both interface and regional Councils to strengthen advocacy campaigns to Australian and Victorian governments aimed at increasing awareness and support for joint issues.

### Consultation/Communication

The proponent has consulted with every landowner whose property is proposed to be traversed by the pipeline to determine the alignment through their properties and to advise them of their compensation rights. The proponent mailed out over 30,000 letters to communities in the vicinity of the proposal and also held an information session for the public.

DELWP convened the Technical Reference Group (TRG) which Cardinia is a member of. During the TRG consultation period numerous technical reports were circulated by the proponent to the TRG for comments.

Officers have recently mailed letters to landowners directly affected by the proposed pipeline alignment inviting them to contact officers to inform us of any concerns they may have in relation to the pipe alignment through their properties.

DELWP has confirmed to Council officers that Enquiry and Advisory Committee Hearing will occur regardless of the COVID19 situation.

### Financial and Resource Implications

- A Groundwater Impacts expert is being engaged to inform Council's submission, and Maddocks have been retained to provide advice, and to represent Council at the public hearing if needed. The costs of the EES process were not forecast in the Planning Strategy and Urban Design Team's budget.
- The proposed pipeline would cross or run parallel to unsealed roads which will be upgraded at some time in the future. Given the nature of the land in these areas, these road upgrades will include drainage installation. Excavations for road



construction and drainage installation around gas pipelines are highly regulated and may add to Council's costs in the future when these roads require to be upgraded.

- There is a concern that if in the future APA's easements are pushed into public ownership, maintenance such as lawn mowing, weed and rubbish clearing etc., will become the responsibility of Council.
- There will be financial implications for each affected landowner. The extent is not entirely clear.

### **Conclusion**

Officers have assessed various EES reports within the scope of in-house expertise. Officer assessments and recommendations are discussed in detail in the attached Issues Paper.

Based on the findings of the Issues Paper it is recommended that Council does not support the exhibited Environmental Effects Statement for the Gas Import Jetty and High-pressure Gas Pipeline from Crib Point to Pakenham in its current form until the identified issues have been satisfactorily addressed, generally relating to:

- Inconsistency with The Renewable Energy (Investments and Jobs) Act 2017, the Climate Change Act 2017, the Victorian Reductions Emissions Targets, and incorrect and insufficient data relating to gas demands and sustainability of the proposal.
- Impacts on groundwater have not been satisfactorily addressed and may exceed acceptable levels.
- Inaccurate traffic impact data and the need for a traffic management strategy to be prepared based on accurate information.
- Refinement of the pipeline alignment to reduce impacts on the future viability of agricultural land in the Green Wedge Zone.
- Insufficient information relating to the ongoing impacts on all types of land holdings that fall within the 640 metre Measure length (ML) of the proposed pipeline.
- No direct consultation with owners and occupiers of land holdings that fall within the 640 metre Measurement Length (ML) of the proposed pipeline.

A separate Submission document has been prepared, which consolidates the recommendations made by officers in the Issues Paper, and it is recommended that Council makes a submission to DELWP generally in accordance with the Submission document.



# Gas Import Jetty and Pipeline Project

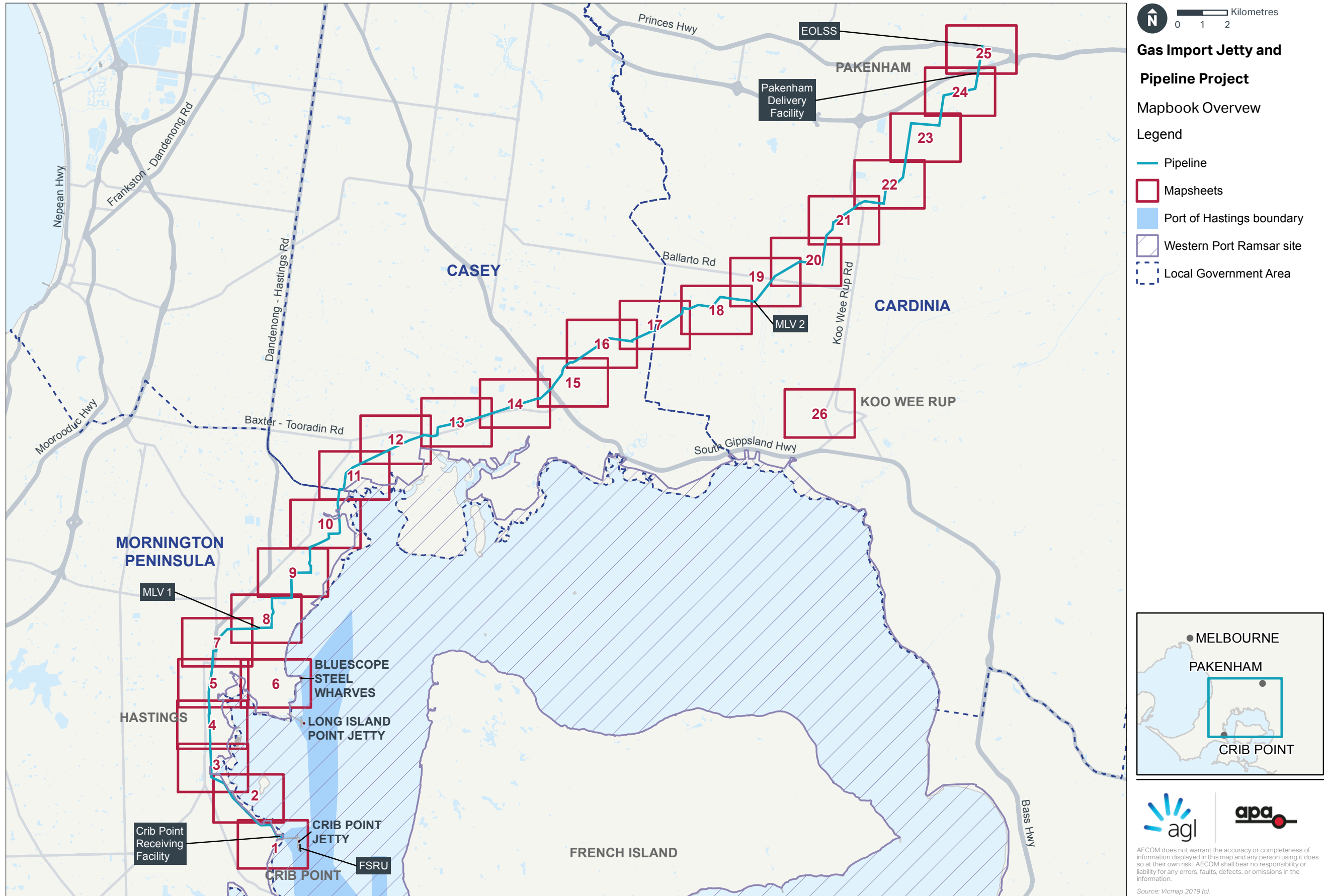
# Attachment VII

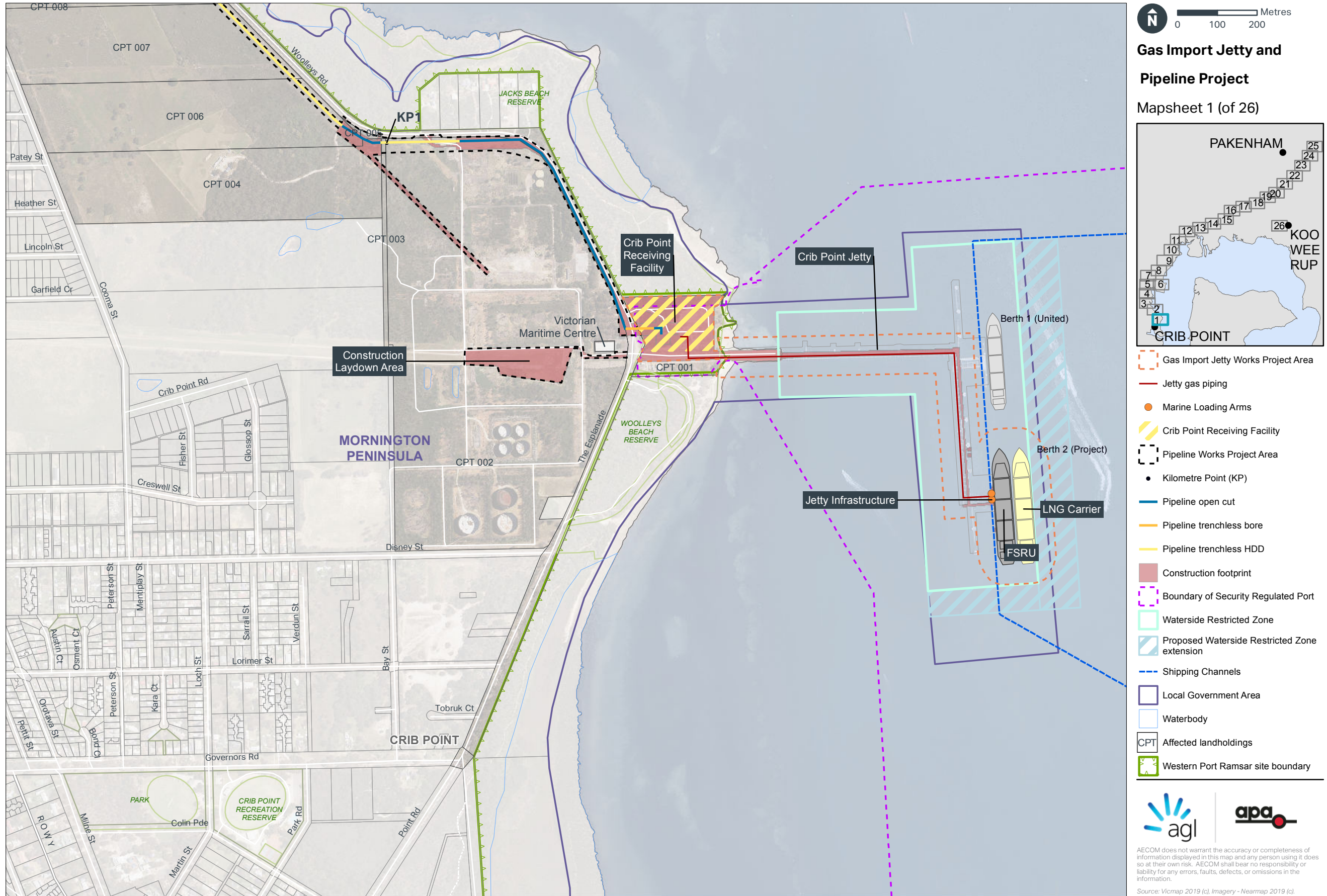
Map book



Environment Effects Statement  
July 2020





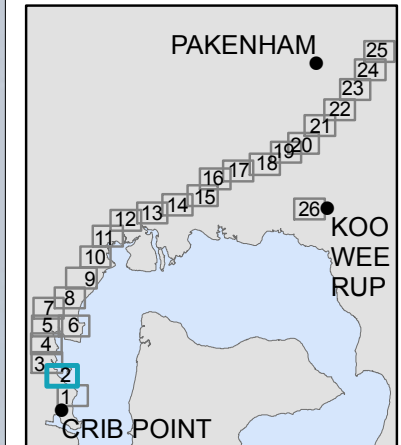






**Gas Import Jetty and Pipeline Project**

Mapsheet 2 (of 26)



- Pipeline Works Project Area
- Kilometre Point (KP)
- Pipeline open cut
- Pipeline trenchless bore
- Pipeline trenchless HDD
- Construction footprint
- Local Government Area
- Watercourse
- Waterbody
- CPT Affected landholdings
- Western Port Ramsar site boundary



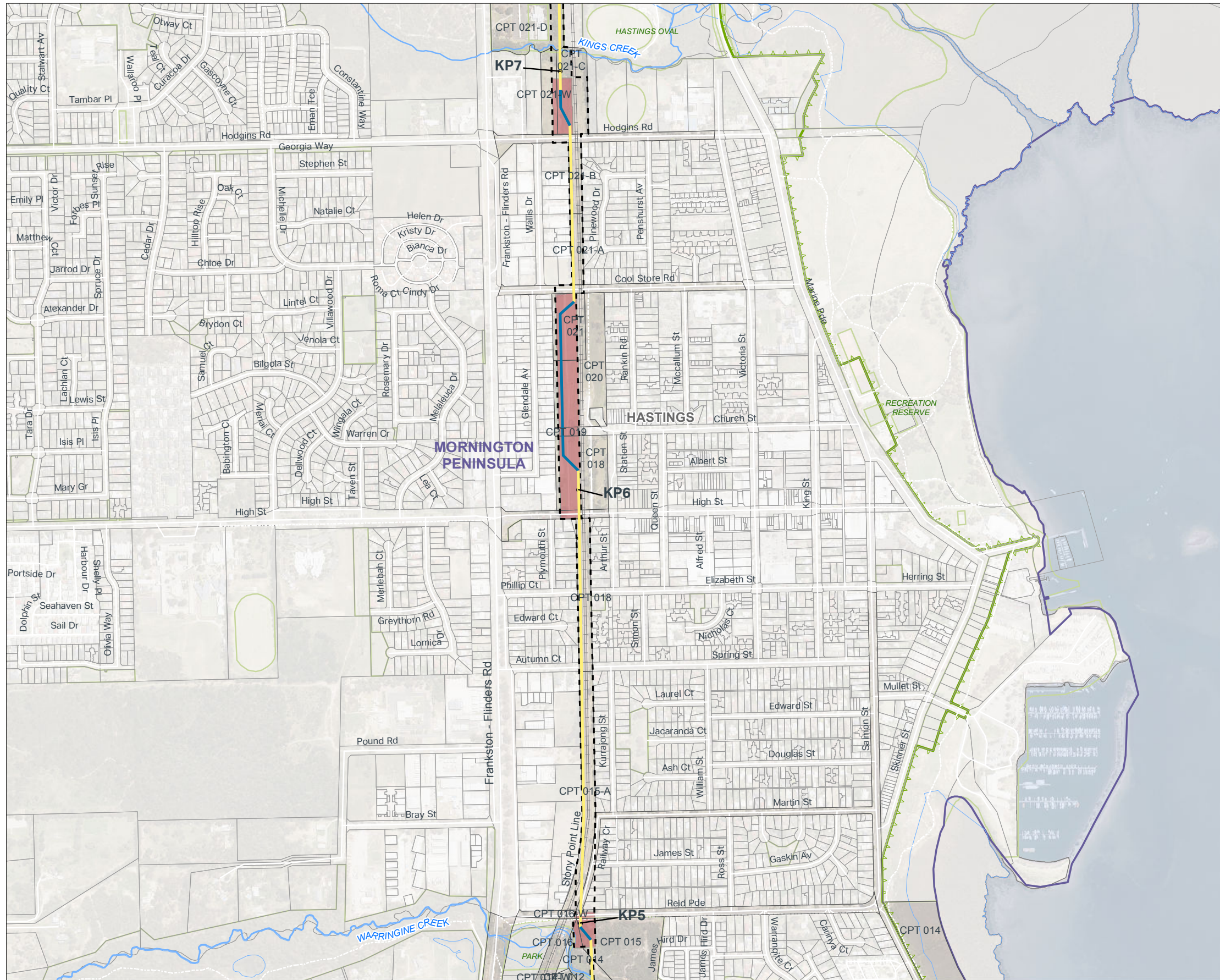
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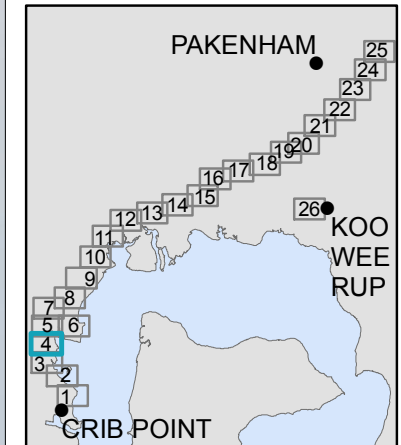






**Gas Import Jetty and Pipeline Project**

Mapsheet 4 (of 26)



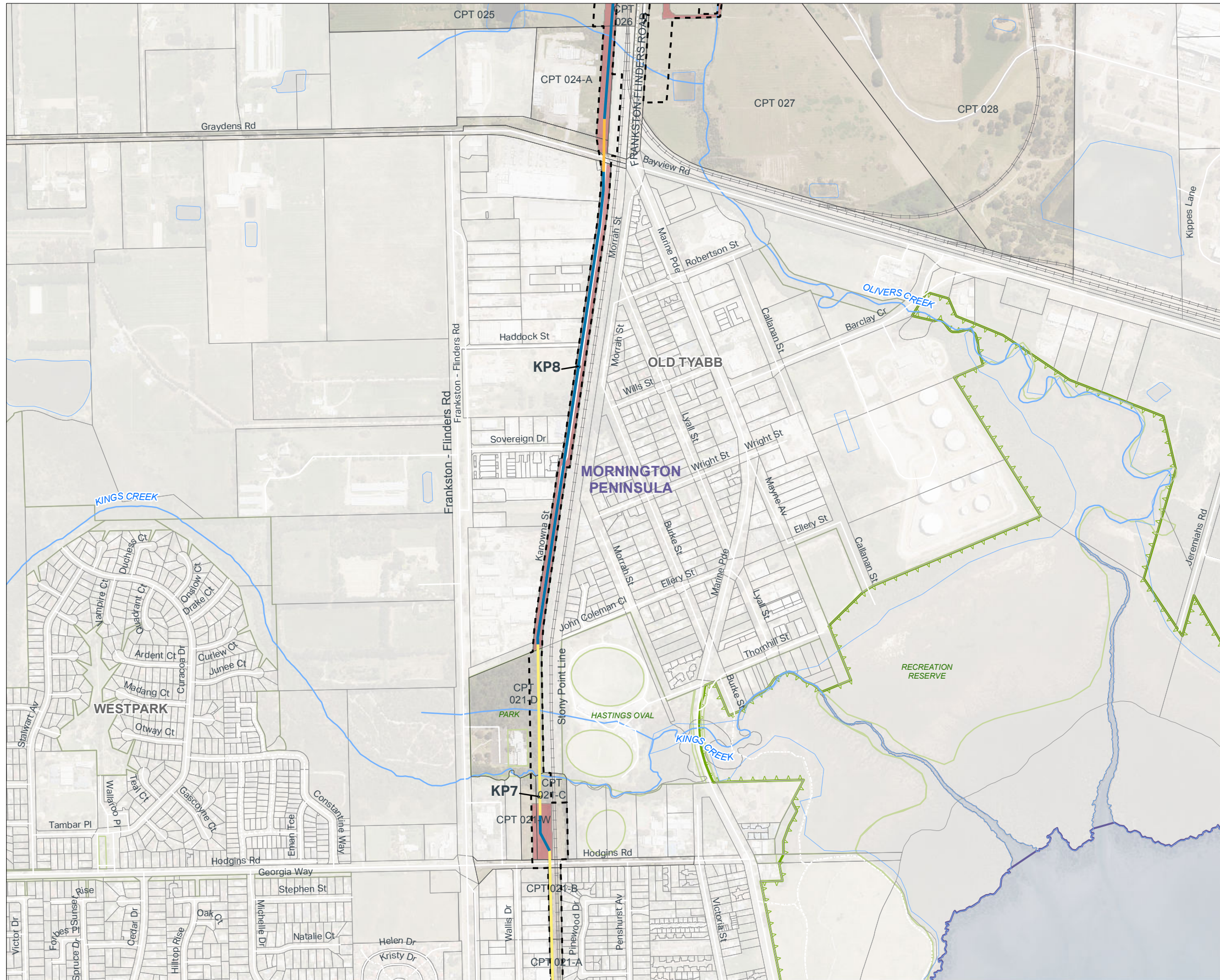
- Pipeline Works Project Area
- Kilometre Point (KP)
- Pipeline open cut
- Pipeline trenchless HDD
- Construction footprint
- Rail
- Local Government Area
- Watercourse
- Waterbody
- Affected landholdings
- Western Port Ramsar site boundary



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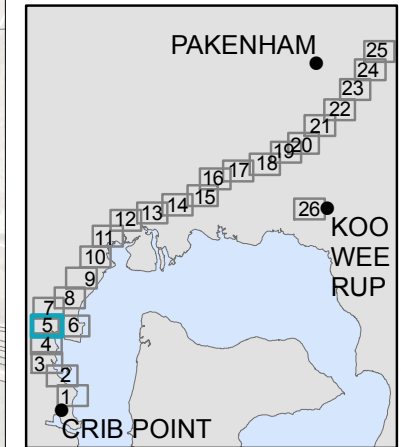
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**Gas Import Jetty and Pipeline Project**

Mapsheet 5 (of 26)



- Pipeline Works Project Area
- Kilometre Point (KP)
- Pipeline open cut
- Pipeline trenchless bore
- Pipeline trenchless HDD
- Construction footprint
- Rail
- Local Government Area
- Watercourse
- Waterbody
- CPT Affected landholdings
- Western Port Ramsar site boundary



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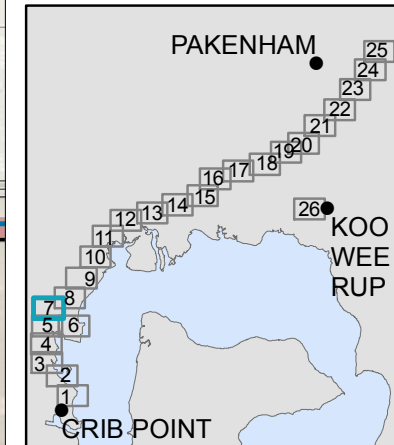






**Gas Import Jetty and Pipeline Project**

Mapsheet 7 (of 26)

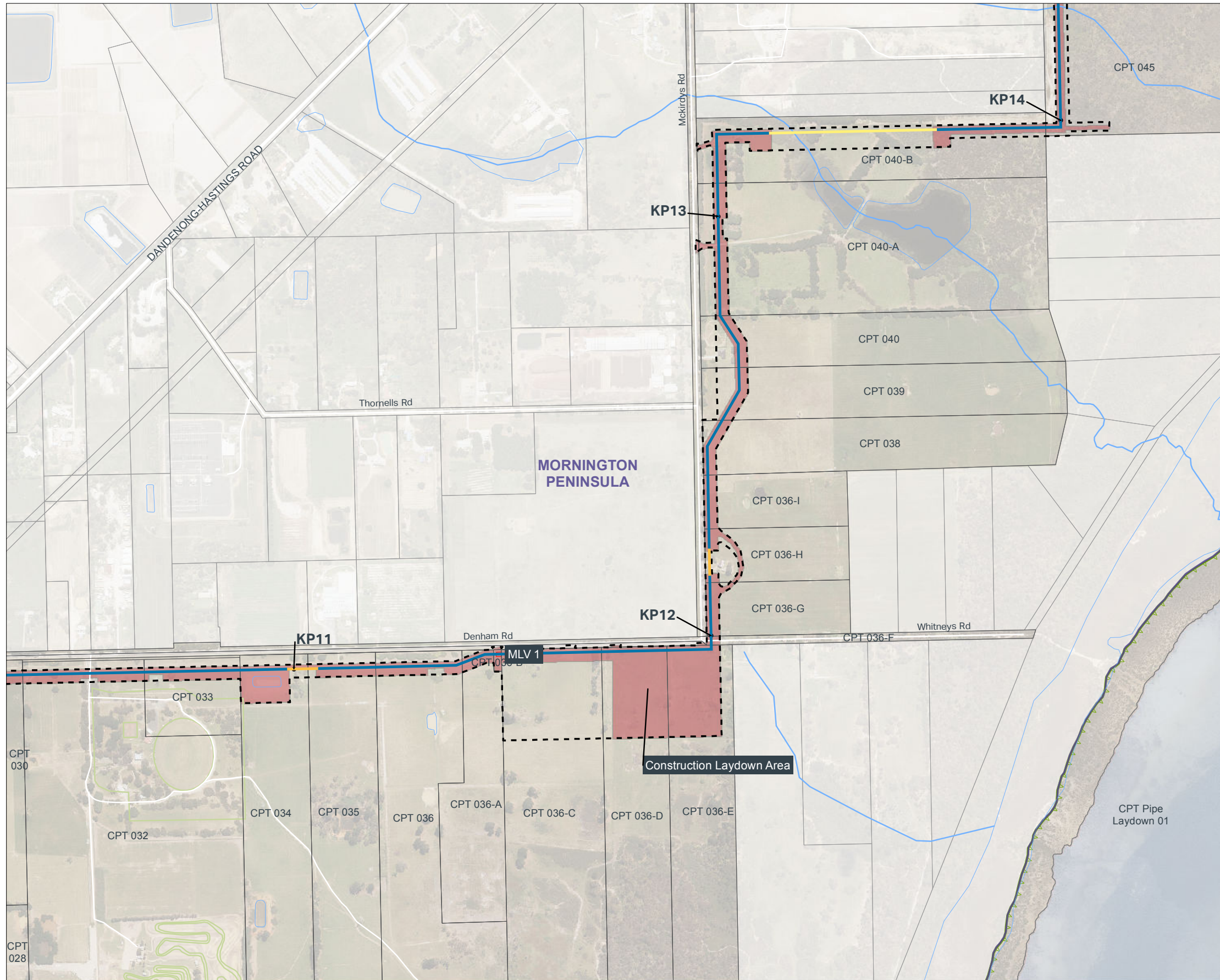


- Pipeline Works Project Area
- Kilometre Point (KP)
- Pipeline open cut
- Pipeline trenchless bore
- Pipeline trenchless HDD
- Construction footprint
- Rail
- Local Government Area
- Watercourse
- Waterbody
- Affected landholdings



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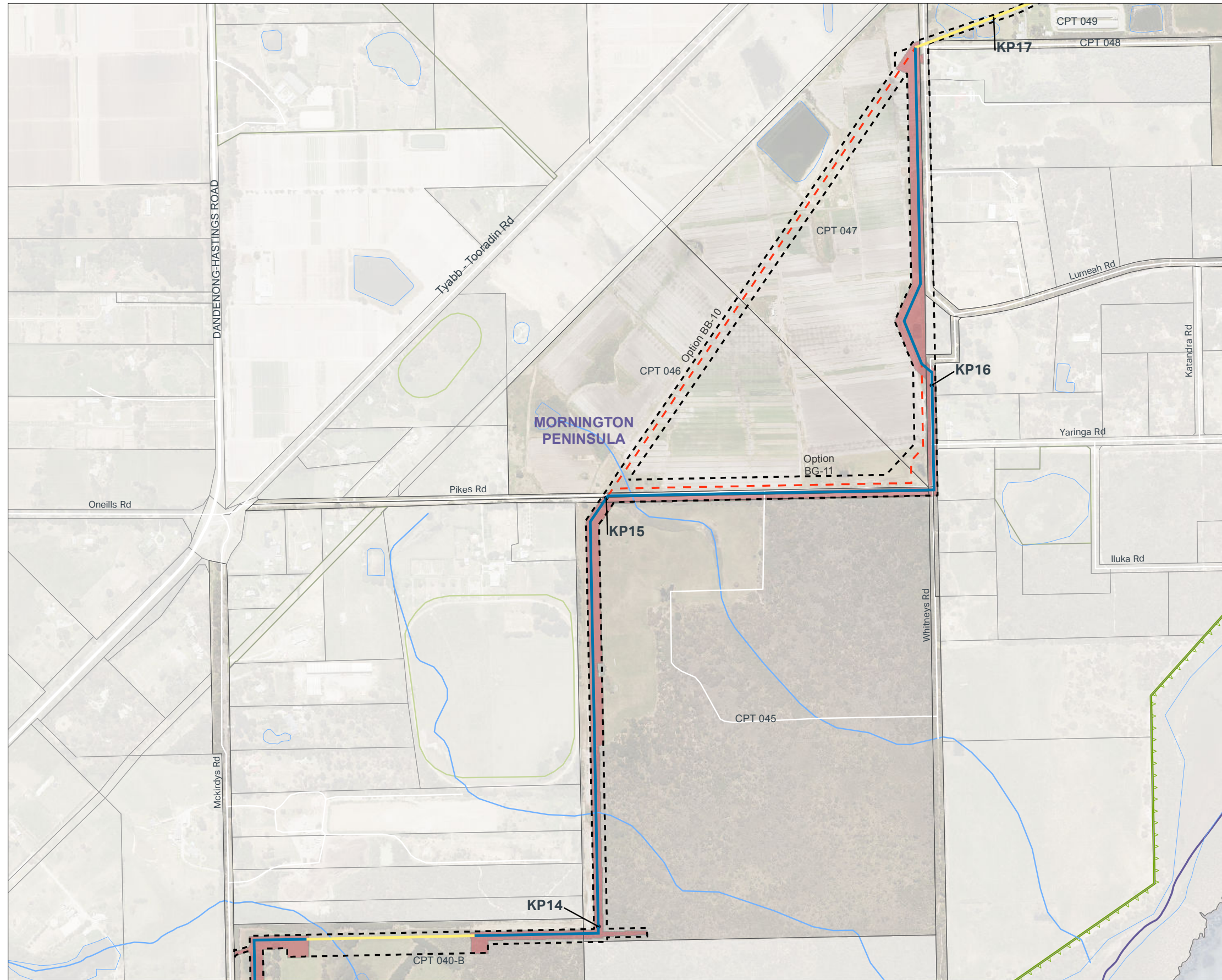
**Gas Import Jetty and Pipeline Project**  
 Mapsheet 8 (of 26)

- MLV 1
- Pipeline Works Project Area
- Kilometre Point (KP)
- Pipeline open cut
- Pipeline trenchless bore
- Pipeline trenchless HDD
- Construction footprint
- Local Government Area
- Watercourse
- Waterbody
- CPT Affected landholdings
- Western Port Ramsar site boundary

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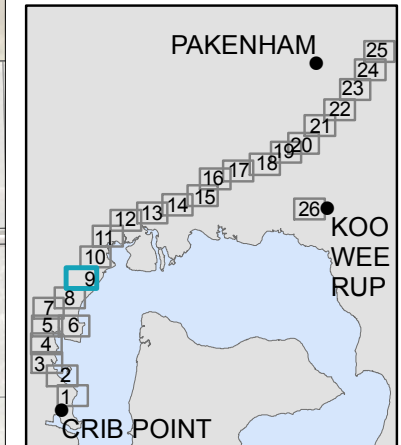
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**Gas Import Jetty and Pipeline Project**

Mapsheet 9 (of 26)



- Pipeline Works Project Area
- Kilometre Point (KP)
- Pipeline open cut
- Pipeline trenchless HDD
- Alignment Options
- Construction footprint
- Local Government Area
- Watercourse
- Waterbody
- CPT Affected landholdings
- Western Port Ramsar site boundary



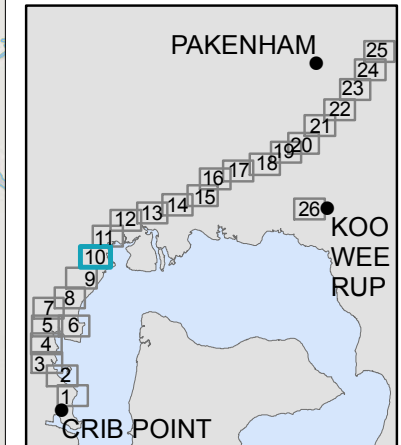
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**Gas Import Jetty and Pipeline Project**

Mapsheet 10 (of 26)

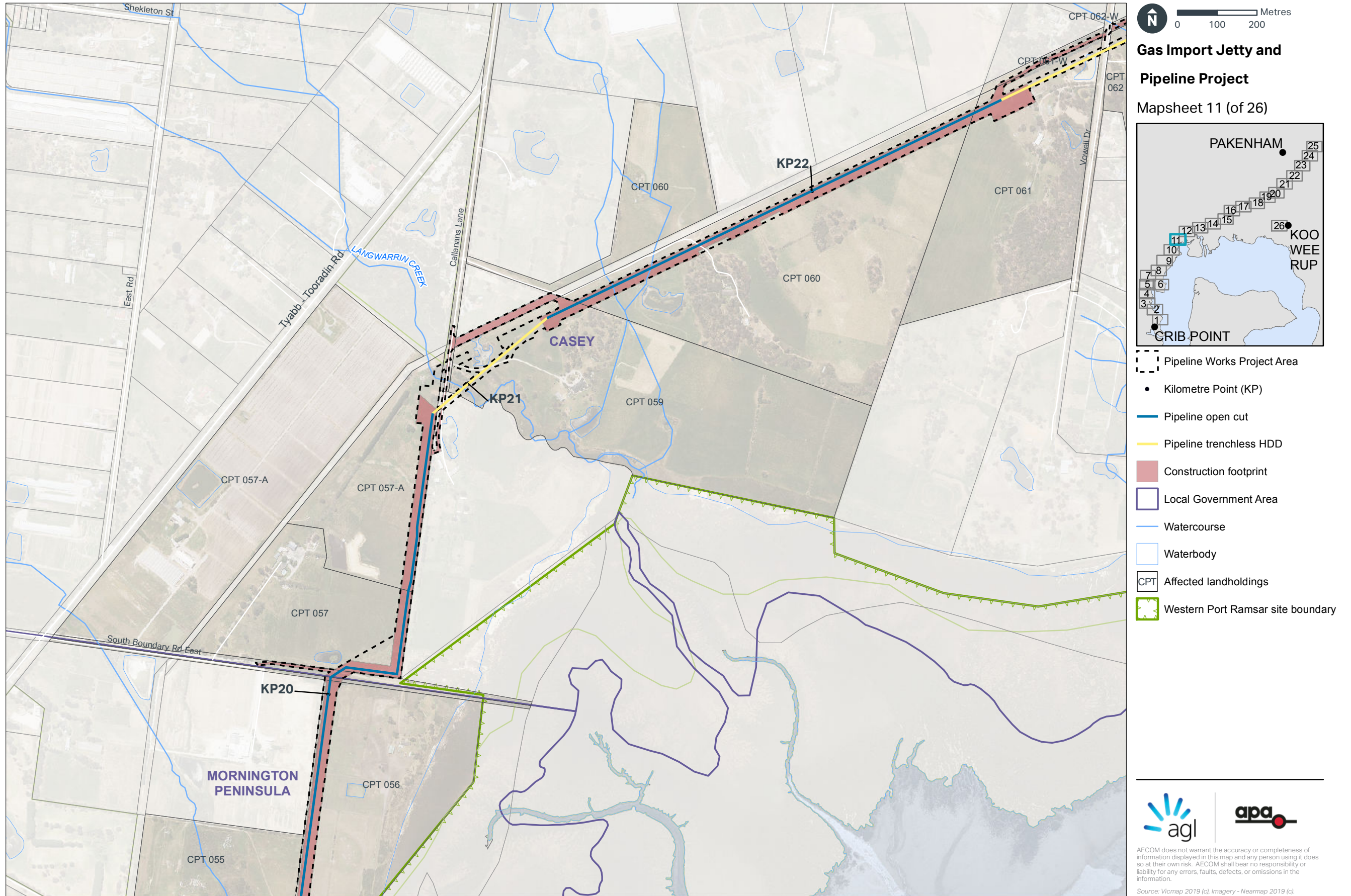


- Pipeline Works Project Area
- Kilometre Point (KP)
- Pipeline open cut
- Pipeline trenchless HDD
- Alignment Options
- Construction footprint
- Local Government Area
- Watercourse
- Waterbody
- CPT Affected landholdings
- Western Port Ramsar site boundary

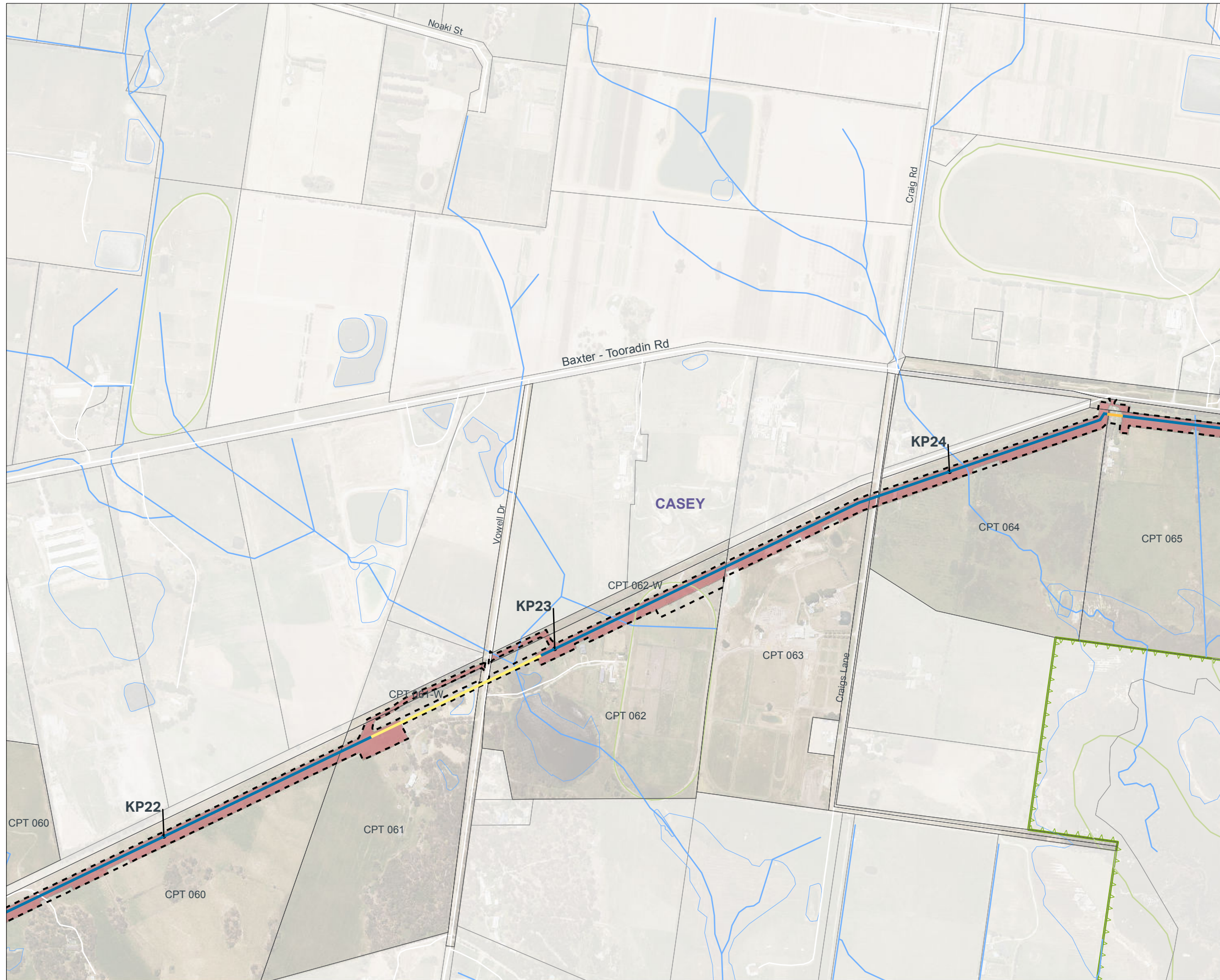


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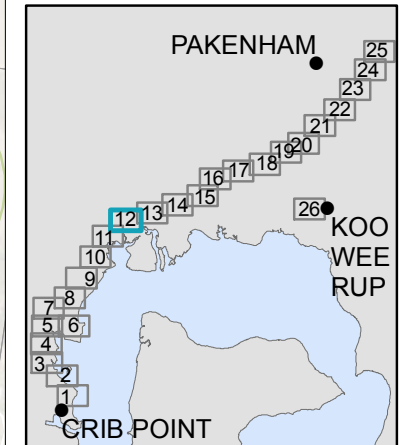






**Gas Import Jetty and Pipeline Project**

Mapsheet 12 (of 26)



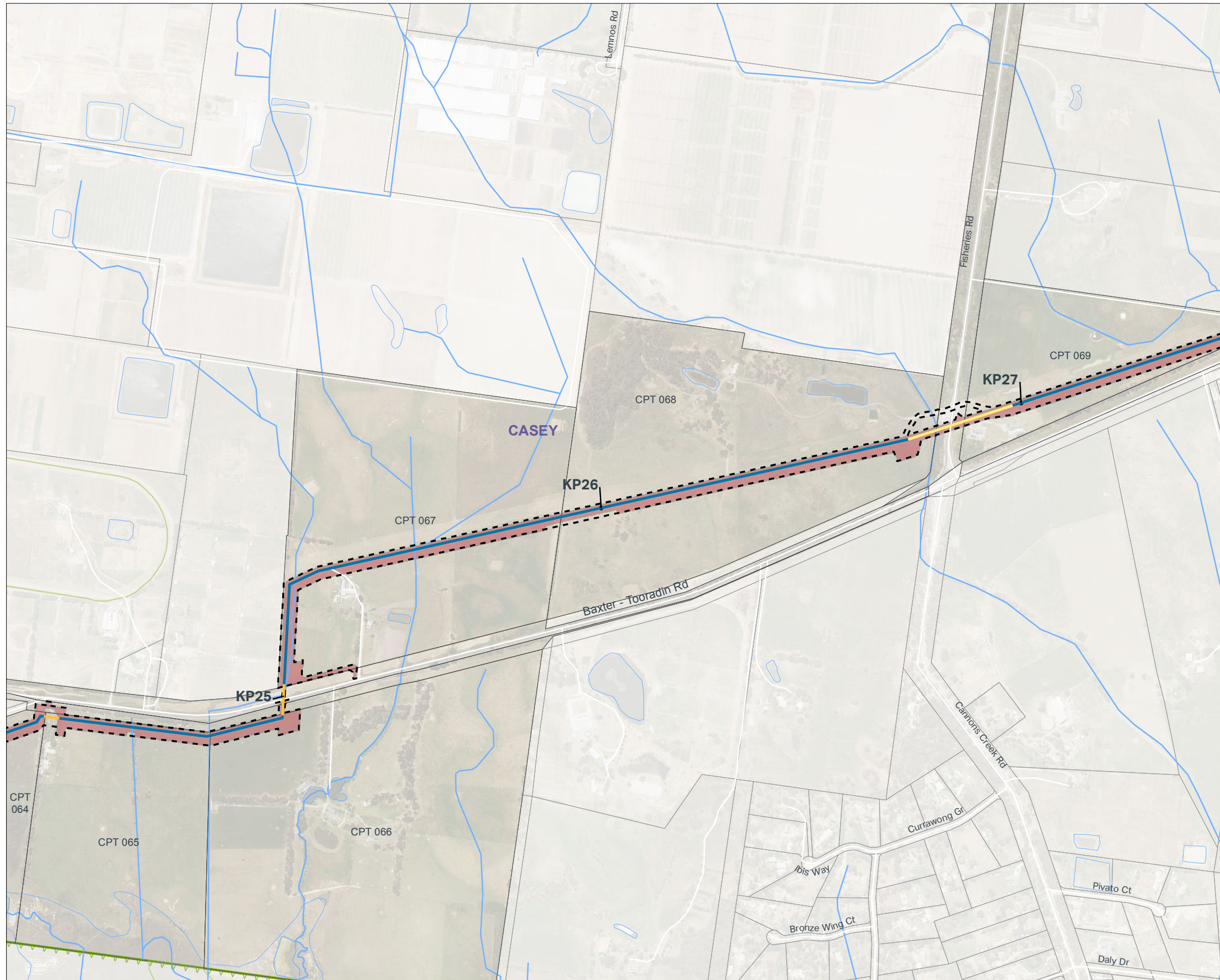
- Pipeline Works Project Area
- Kilometre Point (KP)
- Pipeline open cut
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- Pipeline trenchless HDD
- Construction footprint
- Local Government Area
- Watercourse
- Waterbody
- CPT Affected landholdings
- Western Port Ramsar site boundary



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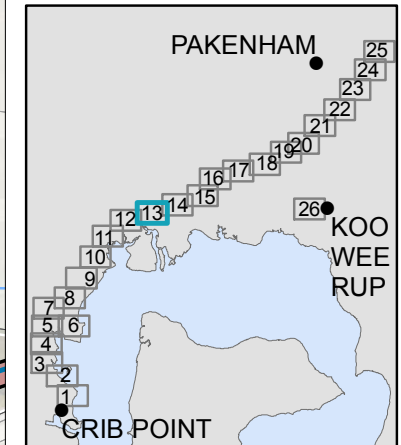
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**Gas Import Jetty and Pipeline Project**

Mapsheet 13 (of 26)



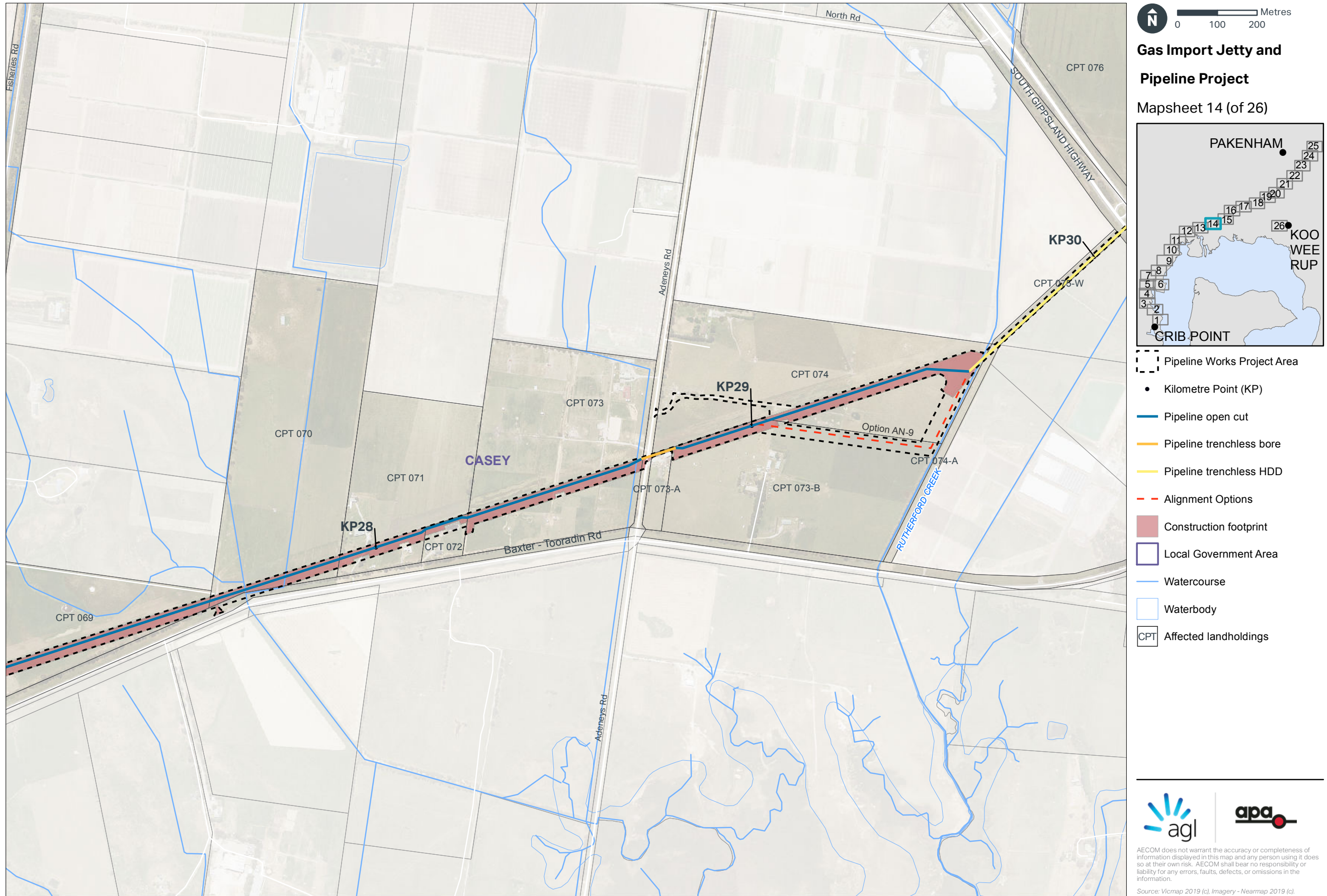
- Pipeline Works Project Area
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- Pipeline open cut
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**Gas Import Jetty and Pipeline Project**  
 Mapsheet 15 (of 26)

**Legend:**

- Pipeline Works Project Area
- Kilometre Point (KP)
- Pipeline open cut
- Pipeline trenchless HDD
- Alignment Options
- Construction footprint
- Local Government Area
- Watercourse
- Waterbody
- CPT Affected landholdings

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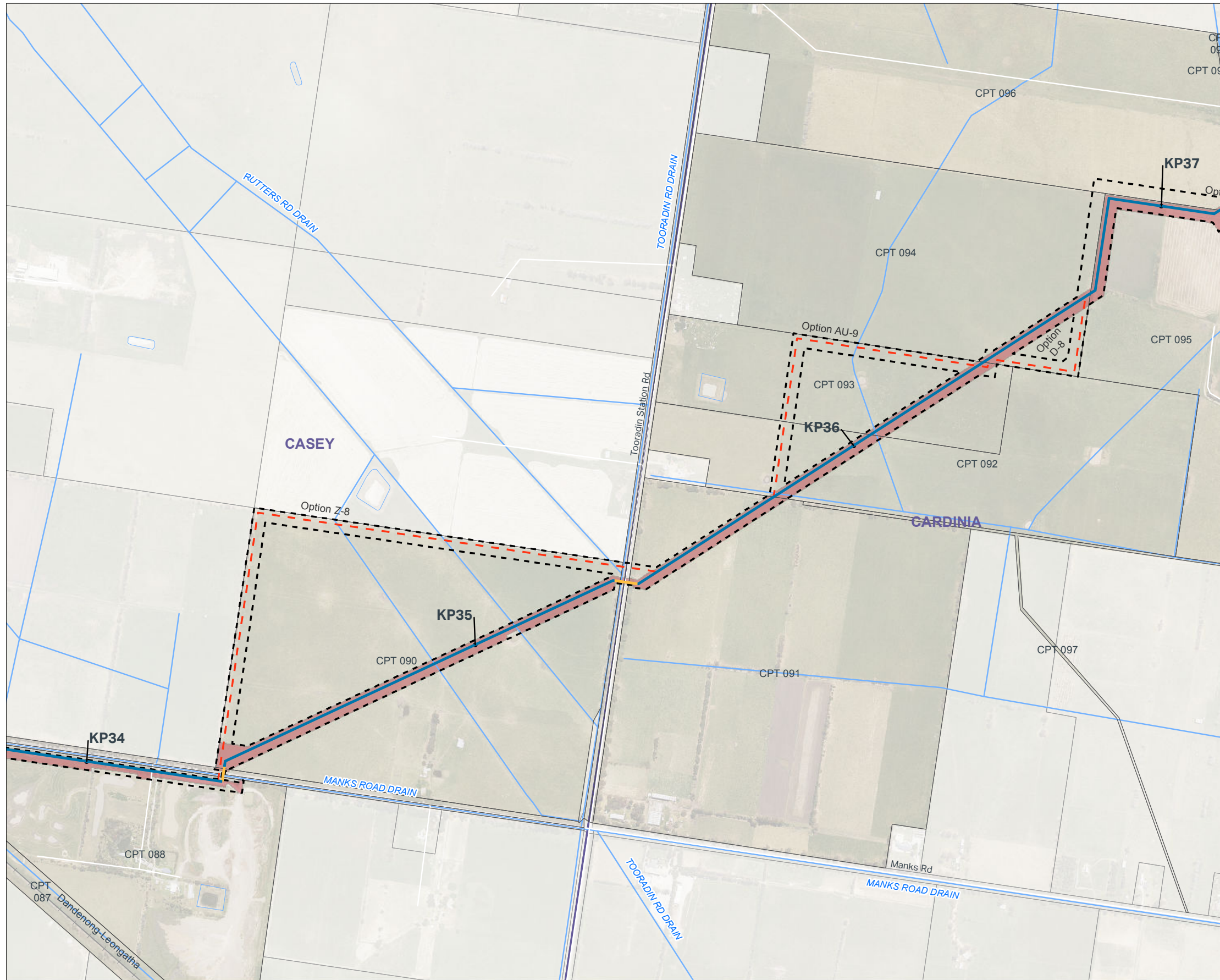
### Gas Import Jetty and Pipeline Project

Mapsheet 16 (of 26)

- Pipeline Works Project Area
- Kilometre Point (KP)
- Pipeline open cut
- Pipeline trenchless bore
- Pipeline trenchless HDD
- Alignment Options
- Construction footprint
- Rail disused/ dismantled/ rail trail
- Local Government Area
- Watercourse
- Waterbody
- CPT Affected landholdings

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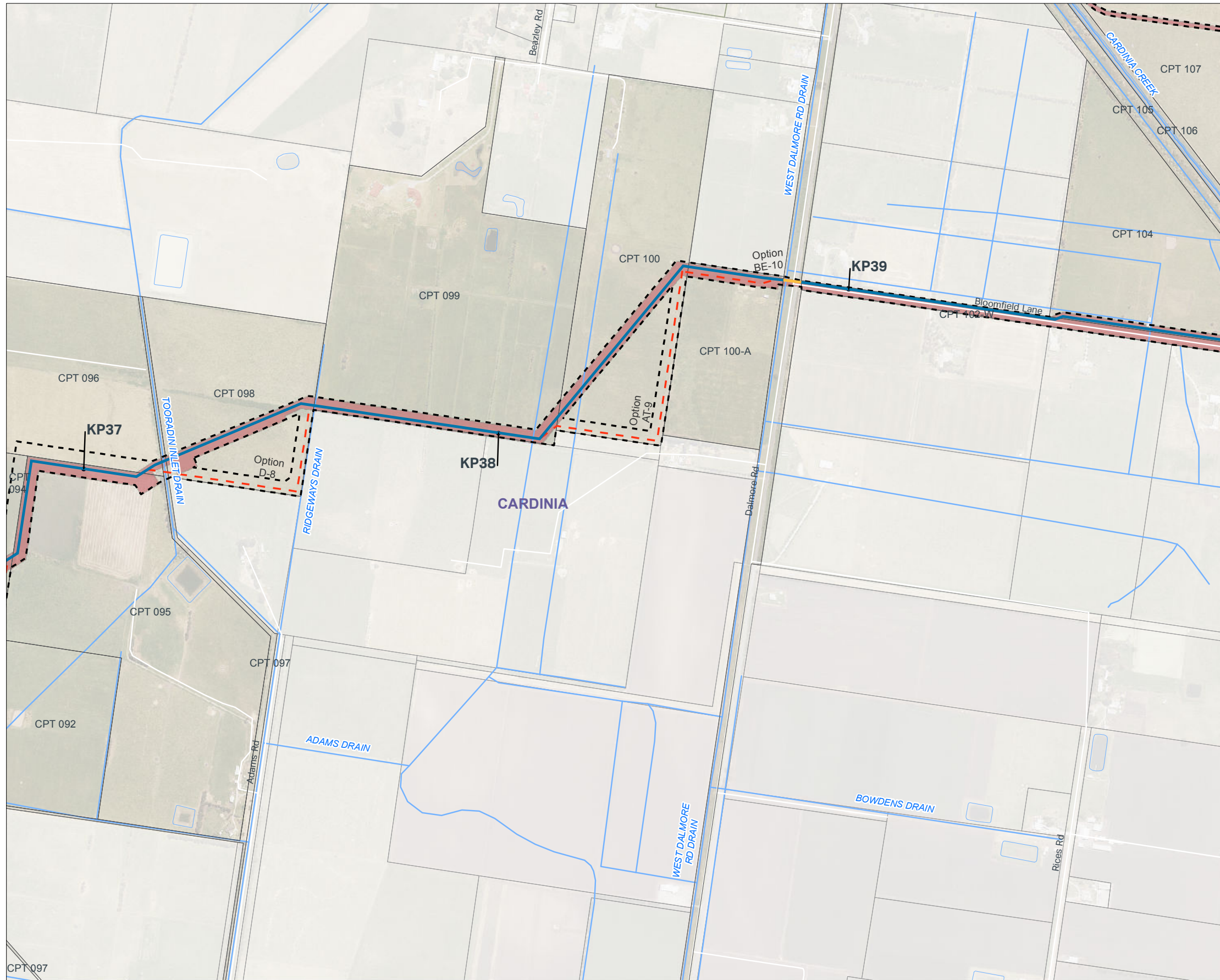
### Gas Import Jetty and Pipeline Project

Mapsheet 17 (of 26)

- Pipeline Works Project Area
- Kilometre Point (KP)
- Pipeline open cut
- Pipeline trenchless bore
- Alignment Options
- Construction footprint
- Rail disused/ dismantled/ rail trail
- Local Government Area
- Watercourse
- Waterbody
- CPT Affected landholdings

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### Gas Import Jetty and Pipeline Project

Mapsheet 18 (of 26)

- Pipeline Works Project Area
- Kilometre Point (KP)
- Pipeline open cut
- Pipeline trenchless bore
- Alignment Options
- Construction footprint
- Local Government Area
- Watercourse
- Waterbody
- Affected landholdings

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**Gas Import Jetty and Pipeline Project**  
 Mapsheet 19 (of 26)

- MLV 2
- Pipeline Works Project Area
- Kilometre Point (KP)
- Pipeline open cut
- Pipeline trenchless HDD
- Alignment Options
- Construction footprint
- Local Government Area
- Watercourse
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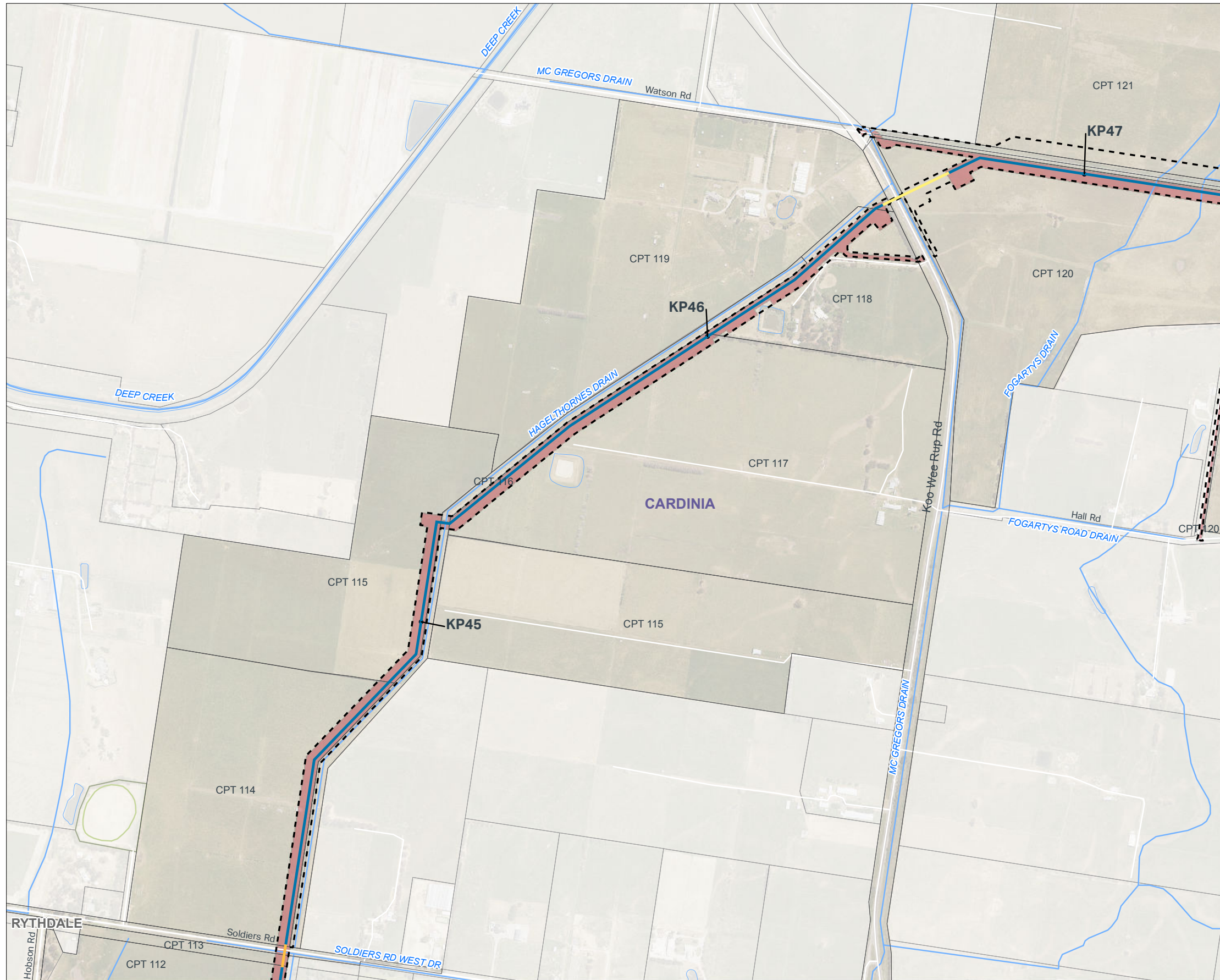
### Gas Import Jetty and Pipeline Project

Mapsheet 20 (of 26)

- Pipeline Works Project Area
- Kilometre Point (KP)
- Pipeline open cut
- Pipeline trenchless bore
- Pipeline trenchless HDD
- Alignment Options
- Construction footprint
- Local Government Area
- Watercourse
- Waterbody
- Affected landholdings

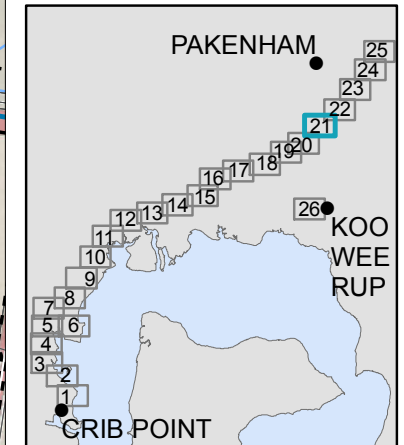
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**Gas Import Jetty and Pipeline Project**

Mapsheet 21 (of 26)



- Pipeline Works Project Area
- Kilometre Point (KP)
- Pipeline open cut
- Pipeline trenchless bore
- Pipeline trenchless HDD
- Construction footprint
- Local Government Area
- Watercourse
- Waterbody
- CPT Affected landholdings



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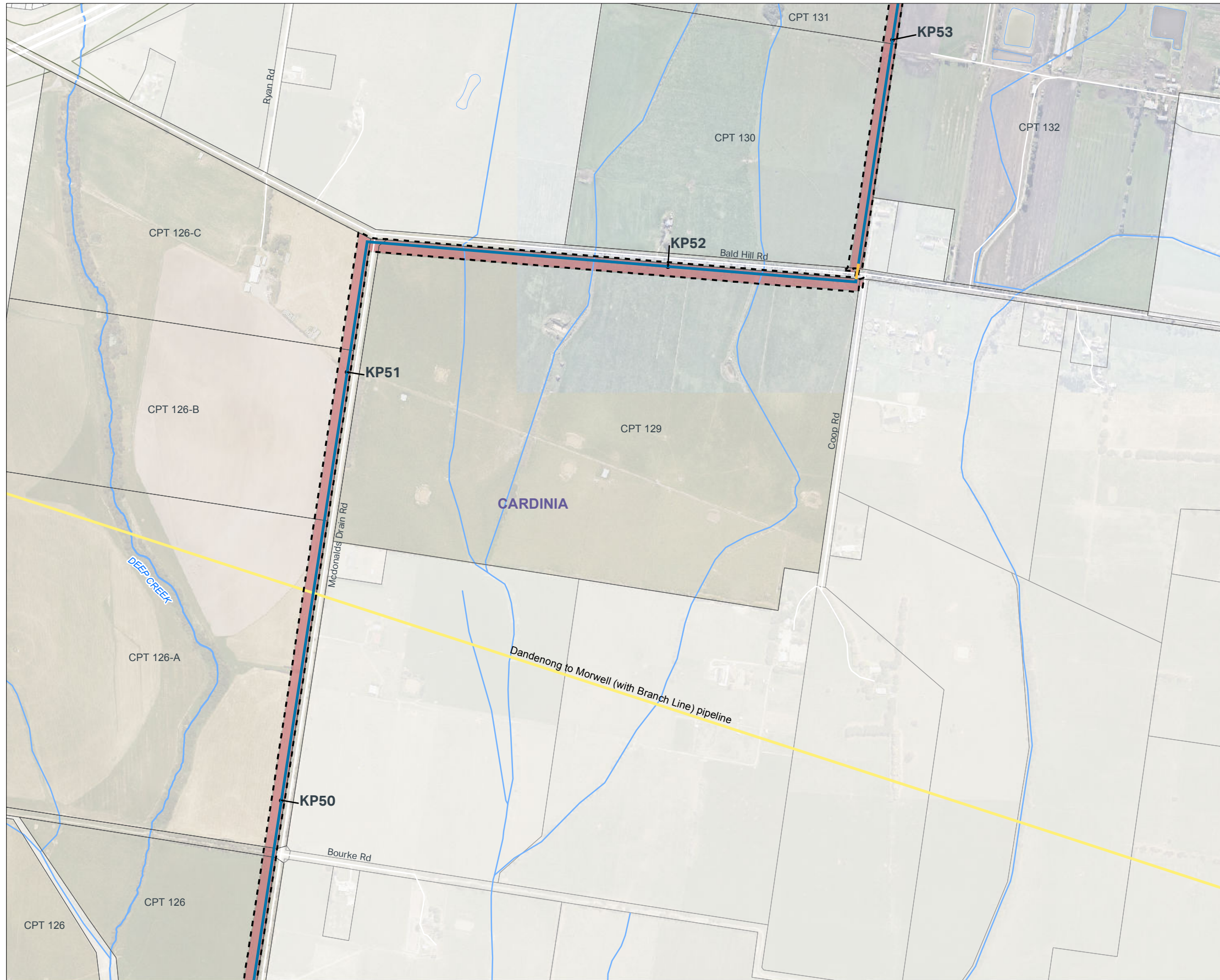
### Gas Import Jetty and Pipeline Project

Mapsheet 22 (of 26)

- Pipeline Works Project Area
- Kilometre Point (KP)
- Pipeline open cut
- Pipeline trenchless HDD
- Construction footprint
- Local Government Area
- Watercourse
- Waterbody
- CPT Affected landholdings

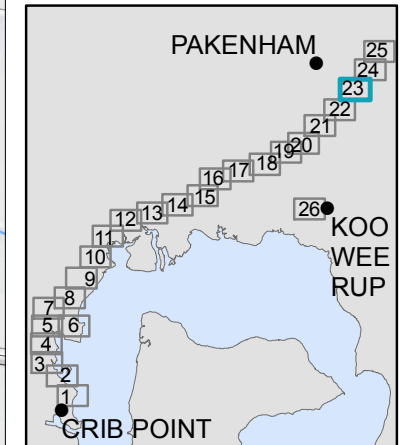
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






**Gas Import Jetty and Pipeline Project**

Mapsheet 23 (of 26)



-  Existing main gas pipeline
-  Pipeline Works Project Area
-  Kilometre Point (KP)
-  Pipeline open cut
-  Pipeline trenchless bore
-  Construction footprint
-  Local Government Area
-  Watercourse
-  Waterbody
-  CPT Affected landholdings



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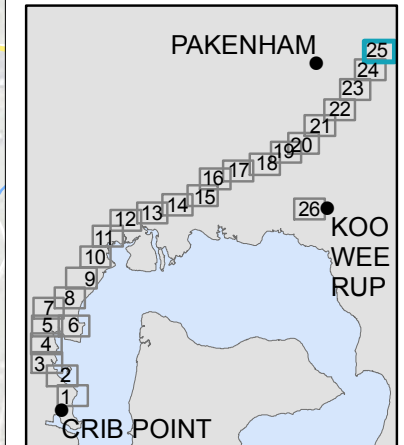
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**Gas Import Jetty and Pipeline Project**

Mapsheet 25 (of 26)

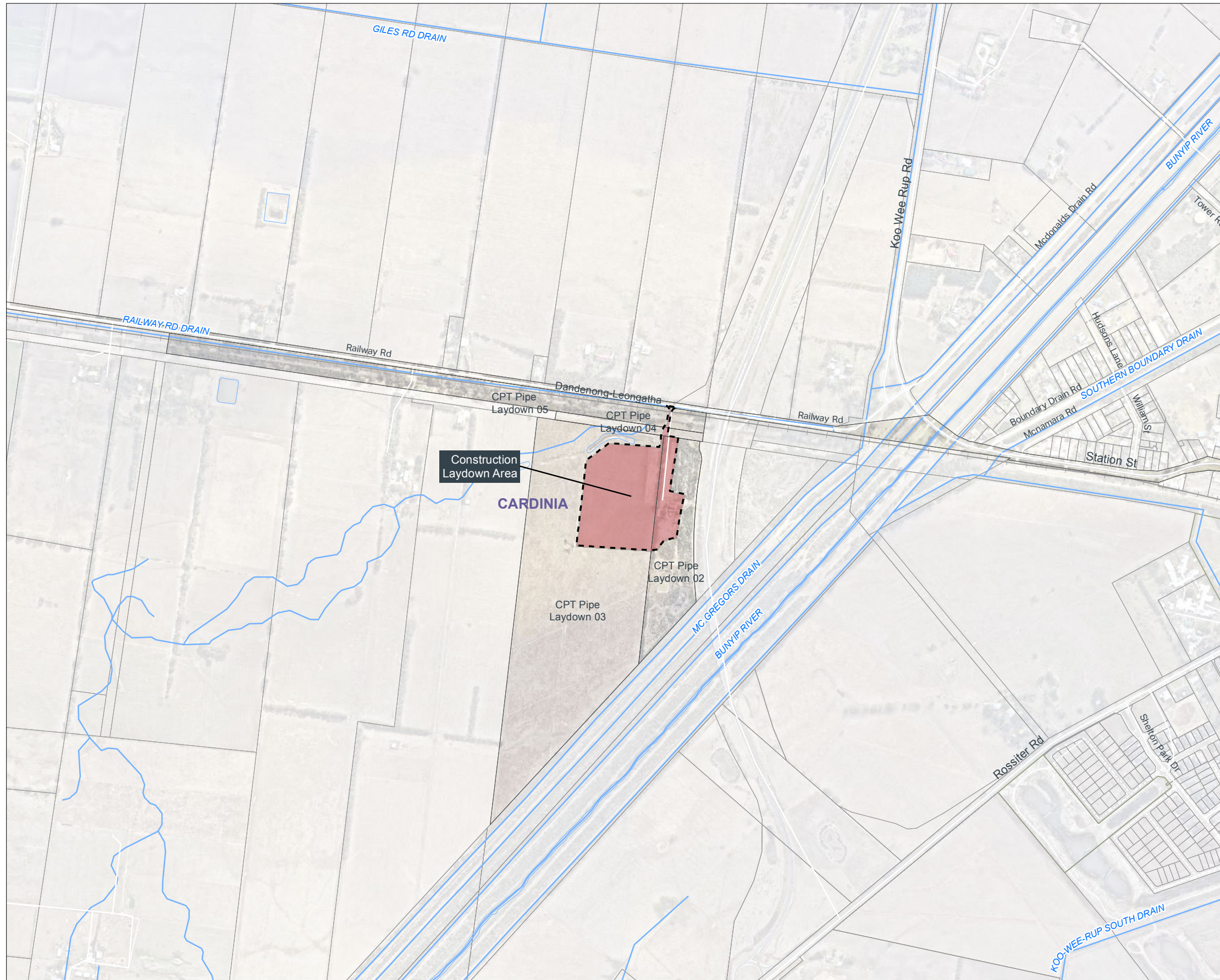


- Existing main gas pipeline
- Pakenham East Delivery Facility
- Pipeline Works Project Area
- Kilometre Point (KP)
- Pipeline open cut
- Pipeline trenchless bore
- Construction footprint
- Local Government Area
- Watercourse
- Waterbody
- CPT Affected landholdings



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Source: Vicmap 2019 (c), Imagery - Nearmap 2019 (c).





### Gas Import Jetty and Pipeline Project

Mapsheet 26 (of 26)

- Pipeline Works Project Area
- Construction footprint
- Rail disused/ dismantled/ rail trail
- Local Government Area
- Watercourse
- Waterbody
- CPT Affected landholdings



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Source: Vicmap 2019 (c), Imagery - Nearmap 2019 (c).



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**Cardinia Shire Council Submission:  
Exhibition of Environmental Effects  
Statement.**

**Proposed AGL-APA Gas Import Jetty,  
Pipeline and Delivery Facility - Crib Point to  
Pakenham.**

**17 August 2020**



Prepared by:

Cardinia Shire Council:

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## Introduction

This submission is made on behalf of Cardinia Shire Council (**Council**) on the Environmental Effects Statement for the Gas Import Jetty and High-pressure Gas Pipeline from Crib Point to Pakenham.

The submission was endorsed by Council on 17 August-2020.

Council does not support the exhibited Environmental Effects Statement in its current form until the issues discussed in this submission have been satisfactorily resolved.

## Project Rationale

### Gas reliance and transition to renewable energy sources.

Council submits that:

- The rationale is inconsistent with the Renewable Energy (Investment and Jobs) Act 2017 and the Climate Change Act 2017.
- The rationale does not align with, or support progress towards, achieving the State emissions reduction target by 2030 and 2050.
- The forecast in relation to future gas shortage does not consider data relating to the rate of transition to energy efficient houses and buildings, and renewable energy sources.
- A comparison should be provided analysing an investment of the same amount in a renewable energy facility in Victoria as another option to solve the forecasted energy shortage, including:
  - how each option would contribute to achieving the States emissions reduction targets by 2030 and 2050; and,
  - how each option would contribute to supporting the financial security and sustainability of households and businesses in the community.
- The project rationale promotes this gas supply facility to support short-term financial gains that is of benefits to AGL and not the community.

### Pipeline alignments that can reduce impacts on farmland

Council submits that:

- APA's preferred pipeline alignment should be realigned from within Green Wedge farmland at 45 Bloomfield Lane Cardinia, Lot 9 PS008853, to the adjacent road reserve to reduce impacts on the ongoing farming abilities of the land.
- APA's preferred pipeline alignment should be realigned from within Green Wedge farmland at Crown Allotment 94A PP3272 Koo Wee Rup Road, Pakenham South, to the adjacent road reserve to reduce impacts on the ongoing farming abilities of the land.



- All alternate alignment options depicted in Attachment VII Map book, July 2020, should be implemented to reduce impacts on the farming ability of farmland.
- APA should align the pipe along property boundaries (preferably) or paddock lines for every property crossed by the pipe, while ensuring to avoid important vegetation. APA should explain why the pipe crosses the following three properties in a diagonal direction:
  - 665-735 Manks Road, Cardinia
  - 2500 Ballarto Road, Cardinia
  - 1025 McDonalds Drain Road, Pakenham
- APA should explain why the pipe is required to cross the following properties at all:
  - 95 Adams Road, Cardinia
  - 765 Koo Wee Rup Road, Pakenham South
  - 825 Koo Wee Rup Road, Pakenham South

## Greenhouse gas emissions

Council submits that the greenhouse gas emissions associated with the proposal:

- are inconsistent with the directions of The Renewables Energy (Investment and Jobs) Act 2017 and The Climate Change Act 2017.
- do not align with, or support progress towards, achieving the State emissions reductions targets by 2025, 2030 and 2050.

## Sustainability & Climate Change

Council submits that:

- The proposal puts at risk achievement of Sustainable Development Goals SDG 7, SDG 12 and SDG 13.
- The proposal does not align with the AGL Sustainability Commitments 2019.
- Explanation and details should be provided on a sustainability comparison for gas verses renewable energy proposal of the same magnitude

## Terrestrial and freshwater Biodiversity

Council submits that:

- The Terrestrial and Freshwater Biodiversity Report does not discuss whether vegetation will be lost above the trenchless bores that are proposed to go underneath waterways and vegetation patches. The impacts on terrestrial biodiversity could be greater than reported, if the usual requirement of clearing of all vegetation along the entirety of the gas easement is applied.



## Groundwater

Council submits that:

- The impacts on groundwater have not been satisfactorily addressed and may exceed acceptable levels.

## Safety, Hazard and Risk

### The Pipeline ‘Measurement Length’ (ML)

Council submits that:

- APA should clarify in its EES chapter on Safety, Hazard and Risk which sections of the pipeline will be constructed to the T1 (Residential) standard.

## Land Use

### Future land uses within the ML (sensitive land uses buffer)

Council submits that:

- The study area of the Land Use report should be at least equal to the 640 metre Measurement Length of the proposed pipe.
- The report does not discuss impacts from the Measurement Length (ML) on future proposed land uses and developments along the length of the pipeline.
- All land owners within the ML be directly consulted to notify them that they would be affected by the ML and the associated requirements with which they will have to comply, so they can make an informed decision on whether to make a submission to the EES exhibition .
- The disconnect between the Planning Scheme and APAs requirements relating to sensitive land uses within the ML be addressed to make clear to landowners, statutory planners and developers that the pipe generates a ML and associated requirements.

### Pakenham East Precinct Structure Plan (PEPSP)

Council submits that:

- APA verbally advised that, within the Pakenham East Precinct Structure Plan (PEPSP) area, a reduced consequence area of 50 metres from the proposed pipeline easement is the area of interest to APA in regard to planning controls and the placement of sensitive land uses (such as schools). Therefore APA will not object to the proposed schools within the 640 metre ML on the basis they are located outside the 50 metre consequence area and the location of the schools are generally in accordance with the PEPSP. This position must be articulated in writing.



- To ensure coordinated and proper planning of the area, the reduced area of consequence of 50 metres from the proposed pipeline should be identified in the Pakenham East Precinct Structure Plan (PEPSP), along with the reduced notification requirements, in line with the requirements proposed to be applied to the existing gas pipeline in the PEPSP. Alternatively another planning mechanism (Planning Overlay), or covenants on land titles, be implemented to make it clear that a 640 metre ML (sensitive land uses buffer), and a 50 metre 'area of consequence' and 'notification area' is generated by the pipe and applies to the land.
- APA has verbally advised that, once the pipeline is in operation, any change in land use will not create the need for another Safety Management Study to be carried out by permit applicants, as long as the land use change is in accordance with the requirements of the Pakenham East Precinct Structure Plan (PEPSP). This position must be articulated in writing.

## Business

Council submits that:

- The Business Impact Assessment Report only focuses on non-agricultural businesses within the township of Hastings in Mornington Peninsula, and does not identify the businesses in Cardinia Shire that would be affected by the ML.
- The Report does not discuss impacts from the Measurement Length (ML) on businesses along the length of the pipeline.
- All businesses within the ML be directly consulted to notify them that they would be affected by the ML and the associated requirements with which they will have to comply, so they can make an informed decision on whether to make a submission to the EES exhibition.
- The disconnect between the Planning Scheme and APAs requirements relating to sensitive land uses within the ML be addressed to make clear to landowners, statutory planners and developers that the pipe generates a ML and associated requirements.
- Pipeline alignment and compensation negotiations with landowners only address the current land use and does not take in to account any potential land uses in future.
- The report does not explain that pipeline does not provide any direct gas benefits to the local business community.
- A requirement must be established that requires APA to remove the easement from the land as soon as practicable after the pipeline is decommissioned to ensure that the impact on the land is for the shortest possible time.

## Agriculture

Council submits that:



- The Agriculture Report only focuses on the impacts on the current agricultural use (eg grazing) and does not discuss the ongoing impacts on the viability and the ability of farms within the ML to expand and pivot.
- All farm owners within the ML be directly consulted to notify them that they would be affected by the ML and the associated requirements with which they will have to comply, so they can make an informed decision on whether to make a submission to the EES exhibition.
- The disconnect between the Planning Scheme and APAs requirements relating to sensitive land uses within the ML be addressed to make clear to landowners, statutory planners and developers that the pipe generates a ML and associated requirements.
- The pipeline alignment and compensation negotiations with landowners only address the current land use and does not take in to account any potential land uses in future.
- The report does not explain that pipeline does not provide any direct gas benefits to the local business community.
- A requirement must be established that requires APA to remove the easement from the land as soon as practicable after the pipeline is decommissioned to ensure that the impact on the land is for the shortest possible time.

## Social

Council submits that:

- The ongoing social impacts resulting from the land use restrictions associated with the ML (sensitive land use buffer) on the future operations and functions of private properties should be discussed.
- Landowners within the ML should receive direct consultation to help them understand technical reports and any ongoing social impacts of the proposal on their property.

## Landscape and visual

Council submits that:

- Landowners within the ML should receive direct consultation to help them understand technical reports and the ongoing landscape and visual amenity impacts of the proposal on their enjoyment of their property.

## Aboriginal cultural heritage

Council submits that:

- The Draft Cultural Heritage Management Plans should be provided to local indigenous groups for comment.
- An Indigenous Participation Plan should be explored for the project.

## Transport

Council submits that:

- There are numerous of inaccuracies in the Traffic Impact Assessment reports, particularly with regard to traffic volumes and full consideration has not been made to recent and future development particularly in Pakenham East.
- A Traffic Management Strategy and accompanying Traffic Management Plan should be prepared by a suitably qualified traffic consultant, using accurate up-to-date traffic information, in consultation with the Cardinia Shire's traffic engineers.

## Stakeholder engagement

Council submits that:

- It appears that the majority of properties affected by the 640 metre Measurement Length (sensitive land uses buffer) have not been directly notified. They should be made aware of all impacts on land within the Measurement Length.

## Pipeline licence application

Council submits that:

- APA should agree to waiver the costs of their surveillance, or any other actions required by APA, during future construction of any type carried out by, or on behalf of, Council in the vicinity of the proposed pipe.

**End of Document**