



9 July 2026

APA Reference: 510163

Your Reference: A007042755

Sonja Dahler
Planpro Town Planning
4 Narrun Place
Eight Mile Plains QLD 4113

EMAIL OUT: enquiries@planpro.com.au

Dear Sonja,

RE: Proposed development application at 3 Bronte Place Eight Mile Plains, Pallara QLD 4110.

Thank you for your referral regarding the proposed development requesting confirmation that the proposed development will not compromise the safe operation of the High Pressure Gas Transmission Pipeline [**HPGTP**] in this vicinity. This advice is required to demonstrate compliance with Brisbane City Council's Regional Infrastructure Corridors and Substations Overlay Code. AO1 of the code states (in part) "*development will not compromise the safe operation of a gas pipeline in accordance with the written confirmation of the pipeline licence holder of the gas pipeline...*".

This written confirmation is required for development within 100m of a high pressure gas pipeline.

APA Group (APA) is a leading Australian owned and operated energy infrastructure business with a \$22 billion portfolio of assets, delivering essential energy services across all of Australia. Our focus is on providing safe, reliable, affordable, and low emissions energy to Australian communities. Our investments are also critical to supporting Australian jobs, manufacturing and industry. APA is a trusted owner and operator of a range of energy infrastructure – from renewable energy, to electricity interconnectors and transmission, through to gas generation plants and transmission pipelines.

APA is the Pipeline Licensee for the Roma to Brisbane 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)
Roma-Brisbane Pipeline	PL2	15	300	197
Note: Measurement Length is applied to either side of the pipeline.				

APA's Role

As a Licensee under the Petroleum and Gas (Production and Safety) Act 2004 (QLD), APA is required to operate High Pressure Gas Transmission Pipelines (**HPGTP**) in a manner that minimises 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.

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 is required to monitor what is happening around its assets including land use change and development. This allows APA to ensure it remains in a position to comply with applicable operational and safety standards and legislation whilst meeting community expectations on energy supply.

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 Roma-Brisbane Pipeline is 197 metres. Note that the ML is a radial dimension and therefore applies to both sides of the pipe.

Easement Management

To ensure compliance with the safety requirements of AS2885, APA needs to ensure our easement is managed to an appropriate standard. This includes:

- Ensuring the easement is maintained free of inappropriate vegetation and structures.
- Place warning signs at various mandated points along the pipeline route, including any change in property description/boundaries.
- Maintain a constant line of sight between warning signs.
- Undertake physical patrols and inspections of the easement.
- APA will not accept outcomes that do not enable us to achieve our safety responsibilities to the surrounding community.

Any works within the easement must be approved by APA through our Third Party Works Authorisation process. This process will ensure all works are undertaken in a safe manner that does not physically impact on the pipeline. If you are seeking to undertake works on property containing a pipeline, or are seeking details on the physical location of the pipeline, please contact Before You Dig Australia on 1100 or APA directly at APACI@apa.com.au.

Services over easement

It is APA's preference that service connections being constructed within pipeline easements be avoided wherever possible. The creation of service connections within pipeline easements results in the following issues:

- Loss of control over easement area which has been secured through a legally enforceable easement agreement.
- Increased potential for external interference with the pipeline due to other parties utilising the easement for infrastructure (water, sewer etc.) over or around the pipeline.
- Increased difficulty accessing the pipeline due to the need for access approval from Council or other authorities.
- Loss of ability to duplicate or loop the pipeline in the future.

APA Pipelines and Preferred Position

APA's preferred position is that buildings, retaining walls, pools, sheds and other fixed structures are not located within the pipeline easement due to the reasons explained in the 'easement management' section above.

Any works within or adjacent to the easement, including excavation, earthworks, service installation, fencing, landscaping or removal of existing fixtures, must not impact the pipeline or APA's easement rights.

It is APA's position that the physical pipeline easement be open space in form and free of any structures or landscaping.

Proposed development

The details of the proposed development are shown on the following plans:

- Conceptual Site Services layout (not for construction), prepared by Bravo Consult, dated 15.04.2026.
- Proposed Reconfiguration Plan, Revision B, prepared by Axis Surveys, dated 10/03/2026

It is understood from recent correspondence, that the proposed development will involve the removal of existing structures on site and deliver two new residential dwelling outside of easement boundary.

APA's review of the proposed development identifies that there are existing structures within the pipeline easement that must be removed:

- Concrete pathways
- Existing fencelines
- and existing shed

It is understood that all identified structures will be removed from APA's easement.

The proposal plans also identifies fencing located over the pipeline. Any subdivision design must retain the existing APA easement and preserve APA's ongoing rights of access, operation, maintenance, and protection of the pipeline.

As the subdivision and construction of residential dwellings will increase the likelihood of third-party activities within residential backyards, APA advises that a protection slab to be installed over the pipeline, consistent with the intent of AS 2885, to reduce the risk of interference.

Construction Methodology

Details of construction equipment, construction vehicles (including TARE weights) and works methodology will need to be submitted to APA for consideration and approval in a Construction Management Plan format. APA requires that no vehicles, equipment or material storage or delivery laydown activities will occur on easement during or after construction.

Gas Pipeline Notation on Plan

It is appreciated the plans provided are preliminary in nature. Any future formal plans should clearly mark the HPGTP and associated easement to ensure their presence is clearly communicated to those considering or using the plans.

Comments

On the basis of the information provided, APA does not object to the proposal subject to the following conditions being included within any approval issued for the proposal. In providing this advice, APA requests notice of any approval being given and a copy of the approval package.

APA Conditions of Approval

1. Construction Management Plan

Prior to making any applications for operational works and prior to development commencing, a construction management plan identifying material storage areas, work vehicle access and parking and any material delivery/laydown areas must be prepared by the applicant and its recommendations/actions must be implemented to the satisfaction of APA. All subsequent work must comply with the approved construction management plan.

2. Engineering Plans required

Detailed engineering plans for works near or on the gas transmission pipeline and easement should be submitted to APA for review (and ultimately approval)

3. Landscape Plans

Any landscape/open space works, landscape plans impacting the easement should be submitted to APA for review (and ultimately approval).

4. No Improvements within three meters of the pipeline

Buildings, structures, roadway, pavement, pipeline, cable, fence, on-site waste water treatment (or irrigation area), or any other improvement on or under the land within the gas transmission pipeline easement must not be constructed without prior consent in writing from APA. No structure or vegetation will be permitted on the easement that prohibits maintenance of line of sight along the pipeline easement.

5. Third Party Works Authorisation

Prior to the commencement of any works within the easement of the gas transmission pipeline, the proponent must seek a third party works authorisation from APA. Works within the easement of the gas transmission pipeline must comply with any conditions attached to a third party works approval.

6. Easement Delineation on Plans

All plans which include the area of the gas pipeline easement must have the pipeline easement clearly identified with hatching 3m either side of the pipeline. The area must also be clearly labelled as 'high pressure gas pipeline right of way – no works to occur without the prior authorisation of the pipeline operator'.

7. Services

The design of any infrastructure mains and reticulation shall be designed to minimise encroachment on the gas transmission pipeline (either crossing or within three metres). Any such encroachments will require the approval of APA. The assessment manager will seek the view of APA in considering any operational works applications required for services.

8. Plan Sealing

Prior to sealing the plan of subdivision, Council must seek confirmation from APA that the applicant has complied with all the conditions imposed by APA. If the subdivision is staged this condition only applies to those stages including works and which are relevant to APA's conditions.

Note

If you are planning on undertaking any physical works on property containing or proximate to a pipeline, or are seeking details on the physical location of a pipeline, please contact Dial Before you Dig on 1100, or APA directly on APACI@apa.com.au.

Note

An early works agreement from APA is required for any assessments/approvals that require greater than 1 day assessment or supervision. Lead in times for agreements can be up to 12 weeks. Please contact APA at APACI@apa.com.au or 1800 103 452.

Note

APA has a suite of standard engineering drawings to assist with detailed design. These are available upon request. Please contact APA at APACI@apa.com.au or 1800 103 452.

Please note this advice does not extend to any gas network pipelines that are in the area, that are owned by APA or other utility provider.

For any further enquiries relating to this correspondence, please feel free to contact myself on 07 3223 3385 or the Infrastructure Planning & Approvals team at planningqld@apa.com.au.

Yours faithfully

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

John Lawson
Senior Urban Planner
Operations, Engineering & Technical Solutions
APA Group