

6 March 2025

Mr Chris Pelcz
Coordinator Strategic Planning
Lane Cove Council
CPelcz@lanecove.nsw.gov.au

Dear Mr Pelcz,

Planning Proposal - 177-183 Greenwich Road, Greenwich

This letter has been prepared by *Keylan Consulting* on behalf of *Winten (No 52) Pty Ltd* (the Applicant) in response to the informal exhibition of the Planning Proposal at 177-183 Greenwich Road, Greenwich (PP-2024-2749).

We understand the informal exhibition occurred between 10 February 2025 – 24 February 2025.

Based on the submissions received, Council has requested further information/clarification on two matters:

1. Local Planning Direction 5.5
2. Land Use Risk Assessment Study

Local Planning Direction 5.5

Section 6.3.1 of the Planning Proposal report addressed all applicable Ministerial Directions.

We have further considered Local Planning Direction 5.5 '*High pressure dangerous goods pipelines*' and confirm that it is not applicable to the Planning Proposal as:

- Direction 5.5 and the associated Guideline (*Guideline for planning proposals near high pressure dangerous goods pipelines 2024*) requires Planning Proposals to provide an assessment against this Direction if the development is within 140m of a gasoline, ethane or jet fuel pipeline or 200m of a natural gas pipeline (see extracts below).

'This direction applies when a planning proposal authority prepares a planning proposal that would permit development for one or more of the specified uses in the application area of relevant pipelines.'

"application area" is the area between either side of the following pipelines:

- *140 metres from either side of a gasoline pipeline, ethane pipeline or jet fuel pipeline, or*
- *200 metres from either side of a natural gas pipeline.'*

- The viva energy pipeline is not a natural gas pipeline, therefore the applicable distance is 140m.
- The Dial Before You Dig search (Attachment 1) demonstrates the site is beyond 140m to the pipeline. This is shown indicatively on the figure below.
- Therefore Direction 5.5 does not apply.



Figure 1: Indicative distance to pipeline (Base source: Sixmaps)

Land Use Risk Assessment Study

Council queried if a Land Use Risk Assessment Study should be prepared to support the Planning Proposal.

There is no statutory requirement for the preparation of this Study within the *State Environmental Planning Policy (Resilience and Hazards) 2021* or *Lane Cove Local Environmental Plan 2009*.

We also note that the site subject to the Planning Proposal is already zoned R4 High Density Residential and does not propose a rezoning or change of land use and that the locality is already characterised by multiple residential flat buildings of a size and scale similar to that the Planning Proposal seeks to facilitate.

Therefore, our view is that a Land Use Risk Assessment Study is not required for the Planning Proposal.

If you have any questions in relation to the above, please contact our Planner, Danielle Wigg on (02) 8413 0403.

Yours sincerely

Dan Keary

Dan Keary BSc MURP RPIA
Director