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9th October 2008

AT & JL Wood
PO Box 644
Scone NSW 2337

By Fax to: 9228 6355

Scott Jeffries
Director- Major Project Assessments
NSW Department of Planning
23-33 Bridge St
Sydney NSW 2000

Re: Queensland Hunter Gas Pipeline

Dear Sir

We own land at Cressfield Rd Parkville and we have been advised that the gas pipeline is proposed to transit our property. We have read the published environmental assessment and wish to make the following points:

1. Landholder engagement

- a) A central tenet of the environmental assessment and brochure material published by the company is that of consultative stakeholder communication. The fact is that consultation with landholders has been nothing like the touted consultative process. The company has spent time and money talking to parties that are comparatively unaffected by the pipeline, gaining press exposure and spinning furiously about their level of acceptance, when those most affected have been largely ignored.
- b) A statement at section 3.6.1 of the assessment is blatantly false. *"Extensive Consultation"* has most certainly **not** been *"undertaken with all contactable landholders within the study area"*. We are aware of one affected landholder who received a letter from the company advising that his property was to be transited by the pipeline and has had no further communication at all. I have encouraged this party to lodge a submission with you.
- c) In our case, a letter in November 07 and phone call in March 08 from the company were followed by an email containing an agreement form to be completed to allow access to our property. I wrote to the company on 21st March. I wrote again in June and involved the local MP Mr George Souris who advises that he twice

made representations to the company on our behalf. None of these sparked any response from the company at all.

In response to a story about community consultation over the pipeline in the local paper, I wrote a letter to the editor in August 08. A week later I received an apologetic phone call from the company representative, whom I have since met. I would have thought that written responses from the company addressing our issues would have been more appropriate.

If the above is a representative example of the company dealing openly with landholders they must be very confident that the State Government compulsory acquisition process through the courts will work in their favour.

2. Route selection

- a) The explanation of the decision to locate the pipeline on private land instead of maximising use of stock route, existing road and/or rail corridors is not convincing. Co-location with power easements may be undesirable or impractical, but there must be major and ongoing access benefits for landholders and company maintenance teams in co-location with road and rail easements. Even extending existing easements to provide necessary clearance would have considerably less landholder impact than carving completely new easements. This does not appear to have been considered.
- b) The assessment document briefly advises of a decision not to run the pipeline on Travelling Stock Routes (TSRs) because of a fear of affecting vegetation diversity. The contention appears to be that the TSRs are areas worthy of national park like protection. The fact is that TSRs are no more than grazing areas that have not benefited from the land care afforded most privately held pastures. I am sure that there are areas of TSRs that do warrant protection from earthworks associated with burying a pipeline, but surely not more than the same percentage as areas of privately held land that need similar protection.
I suspect that the government entity charged with the management of publicly owned TSRs is just as opposed to the pipeline as are all landholders. The difference is that they have demonstrated more political power to obstruct the project than have private landholders.

This issue needs revisiting. An independent and suitably qualified party must look dispassionately at the use of publicly held land for the pipeline route. If the pipeline project is in the public interest, then there should be a heavy preference to use public assets in its construction.

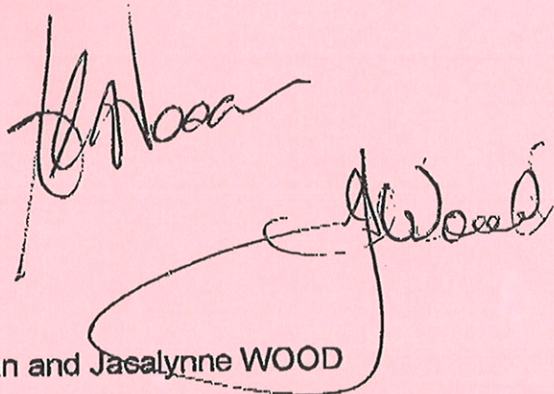
- c) The company advises that final route access for the pipeline will be negotiated with landholders to minimise the impact on each. Given that no landholder would willingly stick a gas pipeline under his property, minimising impact on one party, will inevitably increase the impact on an adjacent landholder. Resulting conflict is a social impact which has not been identified by the company in the assessment document.
- d) Landholders have been dealt with strictly individually and maps in the assessment document are not of sufficient scale to allow communication between owners about who is impacted and how. Individual owners may have "proposed route" details for their own holdings but have no idea what is being said by the company to other landholders. This is a "divide and conquer" strategy designed by the company to minimise collective opposition to the route. Where there is no alternative but to transit private land, the company should be forced to deal with groups of owners to identify a route of least resistance.
- e) In the event of a failure to agree the pipeline route across a property or properties, the only course of action appears to be a petition by the company for compulsory acquisition. There should be some provision for independent mediation involving a third party qualified in pipeline route selection criteria.
- f) The assessment document contains a map showing dwellings in the immediate area of the pipeline. Where these are on transited land, owners may be aware of the pipeline, but where the dwellings are inside the pipeline corridor, located on different land parcels, it does not appear that owners have been individually advised. There will be a considerable land value impact on these owners. The company must be compelled to deal with this issue.
- g) The financial impact of the pipeline on landholders will vary widely. The land value and amenity impact on a lifestyle property must be massively greater than that for example on a large commercial grazing or cropping property where the pipe could be located away from residences and infrastructure. A 30 metre easement may be insignificant as a proportion of hundreds of hectares, but in a small property it will be a significant feature in the landscape.

Small properties are unlikely to be run on commercial lines and their intrinsic value is in the "feel" of the location and the quality of the dwelling. They are far more likely to be affected by a ban on planting trees on any easement. There does not appear to be a preference in route selection towards large commercial enterprises. We believe there should be.

- h) We have some issues with the proposed route of the pipeline on our property which we have taken up with the company. The documentation we have, including the Environmental Assessment, assures us that the published corridor for the pipeline is still being negotiated with owners of land, but we are concerned that the provision for forced acquisition means that the company has little incentive to recognise our concerns. The litigation to force access is the province of the state government, not the pipeline company. If the company merely needs to prove to government that an owner is intractable to have the government order an acquisition, some owners may be intimidated into early capitulation. The company or the government needs to publish the process and criteria under which easements can be forced upon landholders, with specific reference to the gas pipeline and affected landholders.

We would be grateful for an acknowledgement that this document has been received and is being considered.

Sincerely

The block contains two handwritten signatures. The first signature is a stylized, cursive name that appears to be 'Alan'. The second signature is also cursive and appears to be 'Jacalynne'. Below the signatures, the names 'Alan and Jacalynne WOOD' are printed in a simple, sans-serif font.

Alan and Jacalynne WOOD