



**GREGORY HILLS**  
- CORPORATE PARK -

24 January 2013

Mr Clay Preshaw  
NSW Department of Planning and Infrastructure  
GPO Box 39  
Sydney NSW 20001

Dear Mr Preshaw,

The submission provides a detailed and **strong objection** to AGL's proposed expansion of the Camden Gas Project (Major Project Application 09\_0048) known as Stage 3 – the Northern Expansion (**AGL Project**). We specially wish to object to the proposed location of surface well CU02.

### **Gregory Hills Corporate Park**

Gregory Hills Corporate Park Unit Trust (**GHCP**) is the land owner developing a 29.7 hectare parcel of land known as 650 Camden Valley Way, Gledswood Hills (**GHCP site**). The GHCP site is legally described as Lot 701 in DP 1154772 and was purchased from Sekisui House on 15<sup>th</sup> June 2012.

The site is situated within the Camden local government area (**LGA**) 7km northeast of Camden, 20km southwest of the Liverpool Central Business District (**CBD**) and 50km southwest of the Sydney CBD. The industrial area of Smeaton Grange is located to the south, with the Narellan Town Centre being 3km to the southwest and the future Oran Park Town Centre 3km to the northwest. **The future local Gregory Hills shopping centre is just 1 km away.**

Camden Valley Way forms the northwest boundary and Gregory Hills Drive the southern boundary of the site. South Creek forms the northeast boundary with future residential development planned to the east of the site. High voltage transmission lines run through South Creek to the north of the site. The land uses close to GHCP consist of residential developments to the north, east, south east and south west. The area to the south of the site is zoned industrial and is currently under development. The undeveloped (grazing) land to the east of the site is zoned to be a primarily residential area (residential subdivision applications currently under assessment) including a future local shopping centre. The area around GHCP will in the near future support 4800 homes and 70 hectares of employment generating activities.

State Environmental Planning Policy (Sydney Region Growth Centres) 2006 (**Growth Centres SEPP**) is the prevailing environmental planning instrument applying to the site. Pursuant to Clause 7, the site is located within the Oran Park and Turner Road Precinct. Pursuant to Clause 2.2 of the Oran Park and Turner Road Precinct Plan 2007 (**Precinct Plan 2007**), and the accompanying land use map, GHCP is located within the following two land use zones:

- predominantly within the **B5 Business Development** zone; and
- a smaller portion (the riparian area) within the **RE2 Private Recreation** zone.

## **Objectives of B5 Employment Zoning**

The objective of the B5 zoning is to create significant levels of local employment opportunities for the rapid residential growth in the area. There is a limited availability of employment generating land within this area. Therefore any reduction in the amount of B5 zoned land would have a major detrimental impact on the level of employment in the area and force residents to travel out of the area.

## **Development Application 277/2012**

GHCP lodged Development Application (**DA**) 277/2012 with Camden Council (the **Council**) for a staged business park subdivision (33 business park lots, residue lot, open space, road network and riparian corridor). Council approved DA 277/2012 on 14 August 2012. Construction on the site commenced in November 2012.

## **Location of CU 02**

The AGL Northern Expansion of the Camden Gas Project Submission Report dated 29 Oct 2012 does not clearly identify the proposed location of Surface Well CU 02. The October 2010 report and the September 2012 report indicate two separate locations.

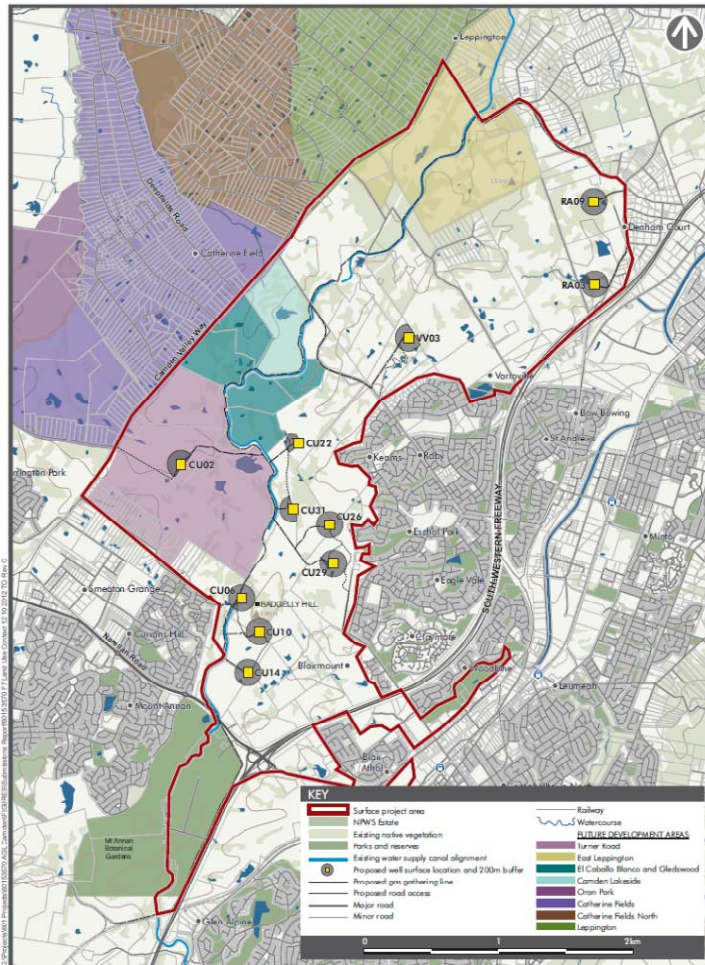
- The October 2010 report locates the well in Stage 3 of GHCP, within 30 meters of a planned residential subdivision
- The 29 October 2012 amended report moves the well site to within the riparian reserve approved by Camden Council on the 14 August 2012.

Either location is unacceptable to GHCP.

AGL's original submission in October 2010 for CU02 to be a single well has been changed in the latest submission to a 6 multi well system (similar to that shown below). It is proposed to be located somewhere on the proposed Riparian Zone. AGL map Figure 7 and 14

## **AGL's Consultation**

An open day was held at the AGL's site office in Feb 2012 to explain the differences between CSG and fracking and the proposed technique to be used at CU02. During the open day, we visited examples of existing wells (similar to that shown below). On 1 June 2012 GHCP provided AGL (Adam Lollback) the corporate park staging plan as proposed under DA 277/2012. There has been no consultation between AGL and GHCP on the location or impact the surface well CU02 will have on GHCP or the surrounding areas.



AECOM

LAND USE CONTEXT  
 Submissions Report  
 Camden Gas Project Northern Expansion

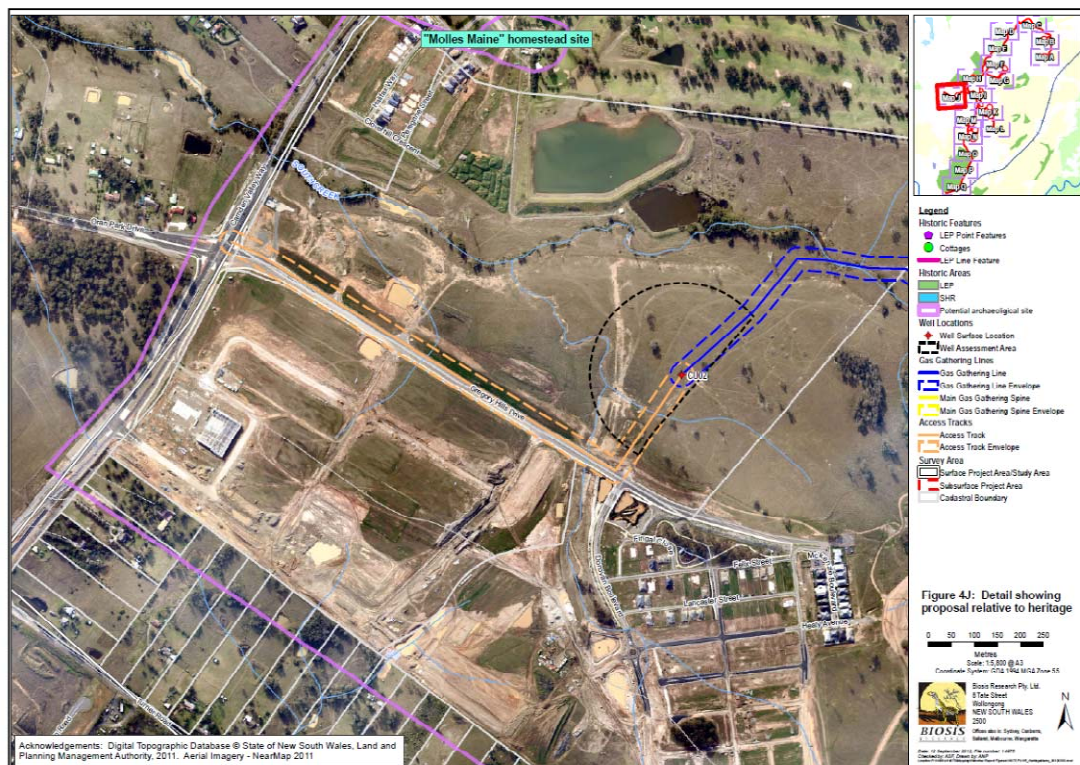
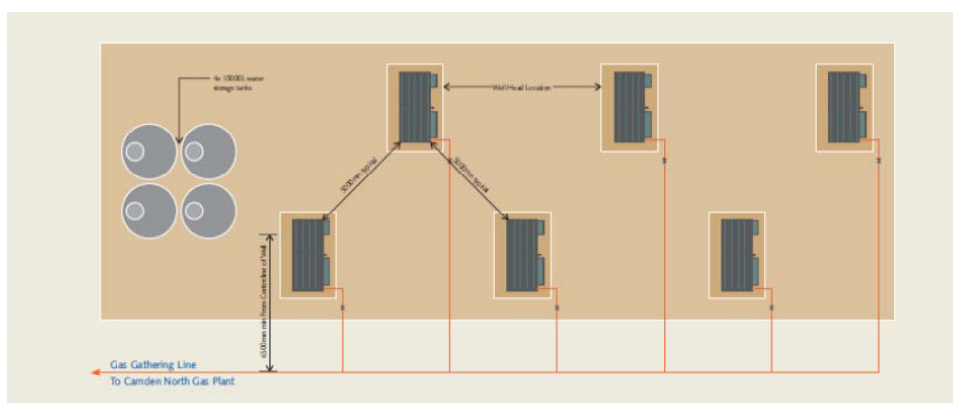


Figure 4 J



6 Multi Well Layout Figure 6 of Image extracted from AECOM report dated 5/02/2012

## GHCP position and objection to the location of CU 02

Gregory Hills Corporate Park (GHCP) strongly objects to the location of CU02 or any other CSG wells in proximity to residential, industrial or employment zones.

The AGL Project is located in an area approved and under development for a large scale urban employment and residential precinct and an area designated as a riparian reserve by the Camden Council and under the Turners Creek DCP. The proposed location of the CSG wells is therefore entirely inappropriate.



The location of the well within GHCP will have a significant detrimental impact on the development and objectives of the Council.

The end result is the devaluing of property, significant job losses (both permanent and construction) and adverse economic impacts within the surrounding locality and Camden Local Government Area (LGA) as a whole and potential impact on the health and wellbeing of residents in the Gregory Hills, Harrington Grove and Gledswood Hills areas. This is unacceptable. Our specific objections are as follows:



Proposed location of CU 02 See attached for larger plan

1. At the time the EAR report was completed, 26 Oct 2010, the following planning instruments were in place. It appears that the report did not consider any implications of arising from them:

- Growth Centres SEPP;
- Oran Park and Turner Road Precinct Plan;
- Turner Road DCP 2007;
- DA for the Central Hills Business Park;
- DA for the Gregory Hills Residential development;
- DA for the construction of Gregory Hills Drive; and
- DA for the Gregory Hills Display village.

This report gives the impression that Proposed Well CU 02 would be located on a rural landscape which even at that time was not the case.

2. It is also apparent that the 29 Oct 2012 Amended project report also did not consider the above plans and did not appear to consider the approved DA 277/2012 for GHCP. Section 5.1.2 Potential Impacts does not address issues arising from DA 277/2012 at all.
3. If the above documents had been reviewed and considered, significantly different outcomes would have been identified in the report in relation to :
  - Socio economic impact;
  - visual analysis;
  - residential amenity ;

- land use development ; and
  - Groundwater Impact.
4. Lack of consultation – there was no detailed consultation between the proponents and GHCP, other than that noted previously.
  5. Proposed well CU 02 is located within an area zoned B5, Employment lands, not industrial or rural lands. The location of the well will significantly reduce the amount of employment generated within GHCP and its economic and social contributions to the Southwest region.
  6. Proposed Well CU02 (including its 200metres radius buffer zone) will occupy an area of 12.566 hectares, over 46% of the total GHCP site.
  7. Proposed Well CU 02 will significantly impact upon the employment generation capacity as envisaged in all state government policy documents (Metro Strategy) and Council's desired vision for the Camden LGA.
  8. The B5 employment lands zoning provides for a range of uses including light industrial, bulky goods retail, hospitality to hospitals. A surface CSG well will detract from our capacity to attract employment generating service sectors to GHCP specifically and generally to the Camden LGA.
  9. It undermines the South West Growth Centre strategy and denies work opportunities for thousands of local residents.
  10. Proposed Well CU 02 is located in close proximity to the residential land estates at Gregory Hills (Dart West), Hermitage (Sekisui House) and that owned by Broad Acre Development Company which could impact on the health and well being of the residents of 4800 homes.
  11. Proposed Well CU 02 may have detrimental impact on the riparian reserve centrally located within GHCP.
  12. Neither the October 2010 nor the 29 October 2012 report addresses the specific impact the surface well CU 02 will have on the South Creek riparian reserve tributary. Reference is made to section 3.4 Groundwater of the Amended Project report.
  13. While not having the professional capacity to assess the impact on groundwater, it is suggested a 6 well CSG operation could have a significant impact on the groundwater in this riparian reserve tributary and hence on the Nepean River Catchment area.
  14. It should be noted by the PAC that there discussions between the adjoining landowners and council about locating retention ponds in this riparian reserve which will serve the needs of the future residents in this area.

We submit the above information to assist the Department in its further consideration of the proposal.

If there are any queries regarding the above please contact the undersigned .

Yours Faithfully

Satwant Calais  
Managing Director  
Gregory Hills Corporate Park Unit Trust  
0411 081 244

**Annexure**

- A Near Map Aerial photo's of the proposed location for CU 02
- B Approved site plan for the site
- C Location of the proposed well and its impact on our site