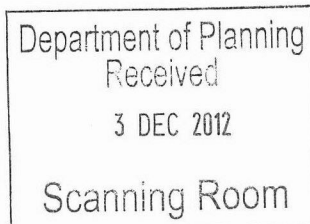




28 November 2012

Mr Clay Preshaw
NSW Department of Planning and Infrastructure
GPO Box 39
Sydney NSW 2001



Dear Mr Preshaw

I am writing to make a submission in relation to AGL's Response to Submissions report for the proposed expansion of the Camden Gas Project. The application number is 09_0048.

Dart West Developments is developing the Gregory Hills residential project (2,500 lots) in partnership with the Trustees of the Marist Brothers. Dart West is also developing Central Hills Business Park, adjacent to Camden Valley Way at Gregory Hills. Both projects are located in the Turner Road precinct of the South West Growth Centre and are affected by AGL's proposal.

General Position

Dart West wishes to reiterate its previously expressed opposition to the overall proposal. We believe that the Northern Expansion project's location in an area identified for large-scale urban development is inappropriate.

Dart West also wishes to raise a number of specific concerns about the Response to Submissions report. There are a number of factual inaccuracies and errors of omission in the report which we believe have the result of downplaying the potential impact on our projects.

Inadequate Mapping

Dart West has a number of concerns with the mapping contained in the Response to Submissions report. Firstly, mapping of the Gregory Hills and wider Turner Road precinct is significantly out of date and fails to portray the already significant urbanisation of this area. For example, the 45ha Central Hills Business Park projects is already fully developed and is not shown, and over 585 lots have been sold in Gregory Hills, and yet the area is depicted as rural in the mapping, including on Figures 1 and 7.

Other areas are also not mapped appropriately including Manooka Valley (already developing to the south of Gregory Hills) and Emerald Hill (north of Raby road and east of Camden Valley Way and currently being rezoned for urban development). We believe all areas of urban

development should be highlighted on the mapping in much the same way as surrounding existing suburbs, and that areas already identified for future urban development should also be mapped in a manner which makes clear the relationship between AGL's proposal and urban areas.

Gregory Hills is an official suburb, but is not identified on the mapping.

Key watercourses such as South Creek and its tributaries are also excluded from mapping despite less significant watercourses being identified in areas remote from the proposal.

All of these omissions have the potential to create a perception that AGL's proposal is located in an area well away from existing and future urban development, and existing watercourses, when the reality is significantly different.

A final concern with the mapping is that the wells are shown in proposed locations on maps without sufficient clarity as to whether the well is proposed to be located on one property or another. For example, wells CU02, CU06, CU10 and CU14 are all shown traversing property boundaries, making it difficult for landowners (such as the Marist Brothers) to ascertain whether the well is proposed on their land. This uncertainty also complicates proposed access arrangements.

Proposed Well CU02

AGL proposes to locate well CU02 in close proximity to existing residential areas of Gregory Hills. However, the proposed well is shown with an incomplete buffer "circle" without explanation, when the land immediately to the east of this well is zoned for residential development (by others) and is within 150m of existing housing at Gregory Hills.

Section 3.6.1 of the main report describes proposed well CU02 as being located on the western boundary of the Turner Road precinct. This is significantly incorrect, as the well is proposed in the centre of the precinct, immediately adjacent to residential land. The western boundary of the precinct is approximately 1,000m further to the west.

The well is also claimed to be outside residential land, on the basis that it is proposed on land zoned B5 Business Development. This is correct, but the proposed location is immediately adjacent to residential land which is separated by only the width of a residential street from future homes. This location is considered unacceptable to Dart West, and presumably to the owner of the residential land immediately adjacent (Broad Acre Development Company).

AGL also claim in this section that "AGL would stage the commissioning of wells to complement the stages of development of the release areas through ongoing consultation." This is a broad statement and no further specifics are provided. Does AGL intend to install wells early and have them cease operations as residential development occur? Or do they intend to only construct wells after residential development occurs? Given the rapidly developing nature of the Turner Road precinct, this statement is too vague and likely to be unable to be implemented in a meaningful way.

Section 4.3 also describes proposed well CU02 as being within a riparian corridor, but the mapping contradicts this.

Proposed Well CU06

Dart West acknowledges that AGL has responded to our previous submission and has relocated proposed well CU06 away from residential areas within Gregory Hills.

Access is being described as provided from the Currans Hill residential area. It is no known whether existing residents of Currans Hill are aware of this proposal as they were not directly affected by the original proposal from AGL.

Reference is made to “Gregory Hills College” in this section of the report. There is no such school. The report is presumably referring to St Gregory’s College Campbelltown.

Proposed Gathering Line

A proposed gathering line is located within Gregory Hills, and is proposed to link well CU02 to the main gathering line located in the Sydney Catchment Authority Upper Sydney Canal land. This gathering line is described as crossing “open grazing paddocks” when in fact it cuts directly through an area which AGL well knows to be proposed for residential development as part of Gregory Hills. Dart West is already preparing a development application for subdivision of this area and the area has been identified since 2007 as being zoned for urban development. The gathering line also appears to impact on a proposed site for a Police Citizens Youth Club in Gregory Hills.

Dart West has consistently provided AGL with the necessary information to enable the correct location of this gathering line in non-residential areas, but Figure 1 and other figures depict the line in a location which would directly clash with proposed road layouts and residential lots. Dart West is not aware of any reasonable reason why AGL could not have correctly located this gathering line within the South Creek riparian corridor.

The table on page 58 also identifies gathering lines and wells as being located on lot 2179 of DP 1166232. This reference is inconsistent with the written description of the proposal elsewhere in the report and is also a lot which has recently been developed for 58 residential lots.

Finally, the gathering line is shown following the eastern side of the Sydney Catchment Authority’s Upper Sydney Canal. One section of this pipeline is immediately east of Gregory Hills and traverses a section where the canal is located underground. No reference is made to this fact. This would require construction of the gathering line through existing sporting fields located at St Gregory’s College Campbelltown. In addition, it is shown in a location which suggests that it would traverse land known as Lot 51 in DP1134649.

This land is located west of the SCA canal immediately adjacent to the existing zoned Gregory Hills area. Dart West has just commenced a rezoning process for this parcel seeking an extension of the adjoining residential zoning. It will therefore be imperative that the gathering line not traverse this site, and instead remain wholly within the SCA landholding. The current plans provided by AGL in their Response to Submissions report does not provide sufficient detail to confirm whether this is the case or not.

I trust the above information is of assistance to the Department in its further consideration of the proposal. Should you have any further questions, please contact me on 4648 5511 or david.taylor@dartwest.com.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'D. Taylor', written in a cursive style.

David Taylor
General Manager – Property