

# TN CONSULTING PTY LTD

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18 December 2012

Department of Planning and Infrastructure  
Mining and Industry Projects  
GPO Box 39  
SYDNEY NSW 2001



Attention: Clay Preshaw (via email: clay.preshaw@planning.nsw.gov.au)

Dear Sir,

**RE: STAGE 3 OF THE CAMDEN GAS PROJECT – NORTHERN EXPANSION (09\_0048)**  
**Exhibition of Response to Submissions and Amended Development Application**

**Submission on behalf of landowners of Lot 3 DP 260703**  
**Properties: 188 Raby Road Catherine Fields**

Reference is made to the Stage 3 of the Camden Gas Project – Northern Expansion (09\_0048) prepared on behalf of AGL which has recently been on Public Exhibition.

On behalf of the Landowners we are seeking to make a submission on the Exhibition of response to Submissions and the Amended Development Application, in particular objecting to any potential impacts associated with the proposed Gas Well location CU 22 and CU 31 and any potential impacts associated with the 200m buffer area on the future Residential development, Noise and Vibration Effects, and the proposed vehicular access through the site.

We act for the Landowners of Lot 3 DP 260703 include;

- Joe and Eva Bernatovic
- Rok and Theresa Friscic

The subject Lands are part of the ECB / Gledswood / East Side proposed rezoning, known as Camden Council Draft LEP 151. Part of the lands are proposed to be zoned Private Recreation, Part of the lands are proposed to be zoned Residential Large Lots R5, Residential Low Density R 2 and General Residential R1. Under the Draft LEP 151 the lands have development potential for some 860 lots as shown on the attached Zoning plan. **(Attachment 1)**

It has come to our attention that as part of the Amended Development Application - Gas Project that the proposed position of surface gas wells identified as CU 22 and CU 31 are situated on the adjacent property known as Lot 4 DP 260703, CU22 is proposed to be located adjacent to the existing residence No 188 Raby Road, and adjacent to proposed residential development, within the 200m zone.

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(2)

Overall, our major concerns with the proposed locations of CU 22 and CU31 are;

- Firstly, the proposed location of CU 22 is too close to the existing residence at 188 Raby Road, and the siting does not consider future residential development to the east of the existing residence, and surrounding the existing residence.
- Secondly, the vehicular access proposed to both the well sites CU 22 and CU 31 proposed locations suggests access through "Private Property" to utilise the existing Private Access Road. The Landowners do not give permission for access across their land.
- Thirdly, the entire surrounding area in Camden Council is undergoing substantial transformation and change of use from Rural Residential to Residential Estates. The proposal for the Camden Gas Project to be nearby residential development is not acceptable, and any well location should be moved towards the east into the Campbelltown Local Government area within the existing Rural Zoned lands.

**ISSUES WHICH THE DEPARTMENT OF PLANNING AND INFRASTRUCTURE NEEDS TO HAVE THE APPLICANT ADDRESS IN THE AMENDED DEVELOPMENT APPLICATION:**

**1. Location of the proposed well site CU 22 near proposed residences**

In relation to (CU 22) the position of the Gas Well must be relocated to not affect any existing or proposed residential zoned land within Draft LEP 151, and it is further suggested the Well Sites to be relocated further to the north or further to the east of the proposed location, on the eastern slopes of the Scenic Hills, on Rural Zoned Land, within the Campbelltown LGA.

The Noise and Vibration Impact Assessment report, as amended, prepared by SLR Consulting provides operational and drilling noise predictions for the well location at CU 22. **(Attachment 2)**

The predicted operational noise levels relevant noise criteria are quoted as Leq (15min) 38 - 42 dba.

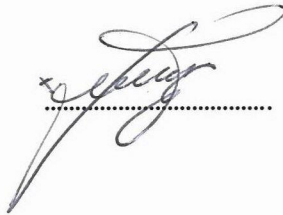
This level of operational noise will operate indefinitely, and will affect not only one existing residence at 188 Raby Road, but all future residences in the eastern end of the site.  
(Approx 15 new residences). **(Attachment 3)**

(Note: there are two proposed Large Lot residences to the east of the existing residence which will be affected; the most easterly residence will be within the Leq (15min) 42-55 dba, which is unacceptable.

The position of the CU 22 Gas Well must be relocated to not affect any existing or proposed residential zoned land, and it is further suggested the Well Sites to be relocated further to the north or further to the east of the proposed location, on the eastern slopes of the Scenic Hills within the Rural zoned land in Campbelltown LGA.

Signed By Landowners'

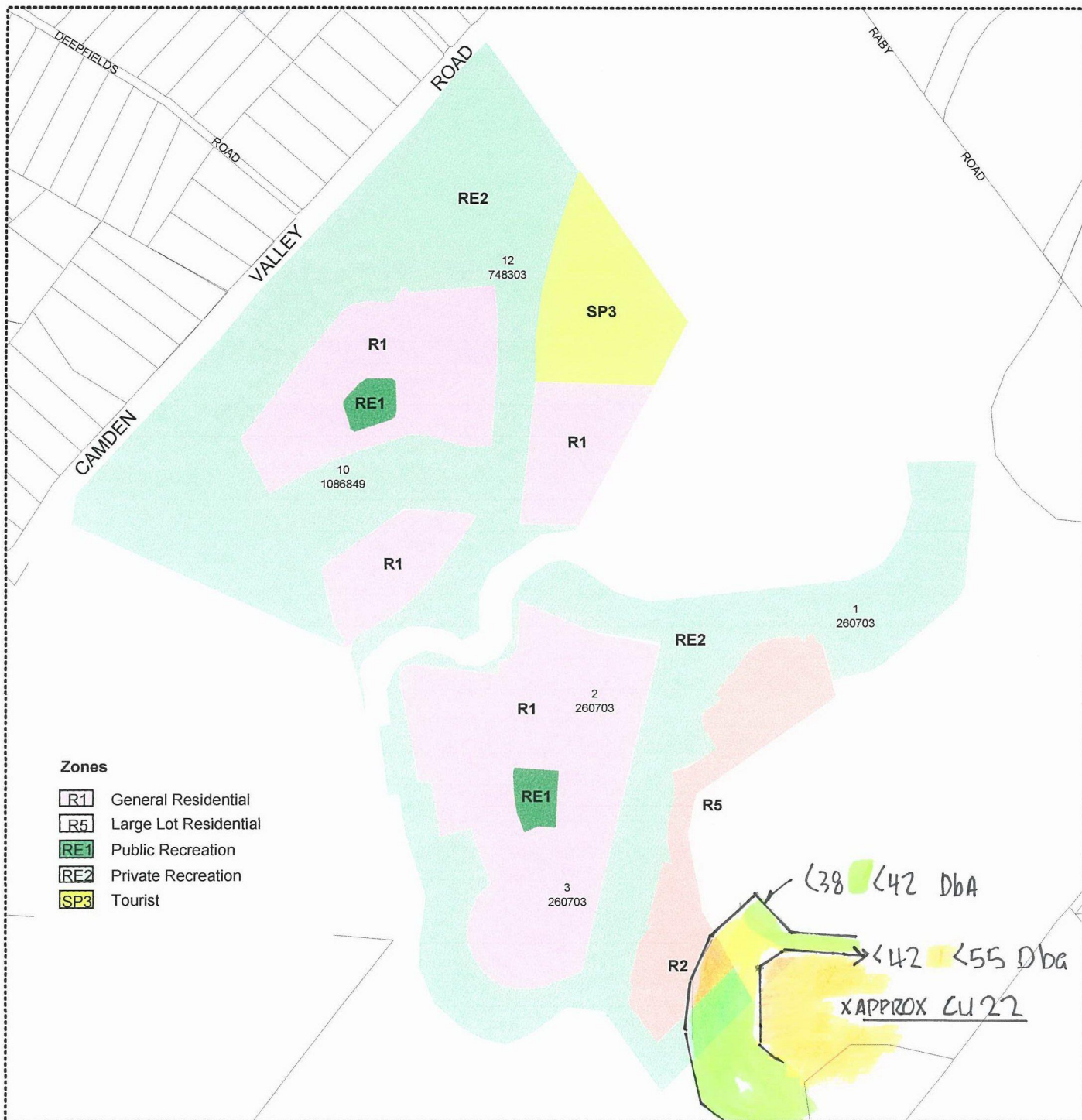
Rok and Theresa Friscic

Handwritten signature of Rok Friscic in black ink, written over a dotted line.Handwritten signature of Theresa Friscic in black ink, written over a dotted line.

Joe and Eva Bernatovic

Handwritten signature of Joe Bernatovic in black ink, written over a dotted line.Handwritten signature of Eva Bernatovic in black ink, written over a dotted line.





ENVIRONMENTAL PLANNING & ASSESSMENT ACT, 1979

COUNCIL OF CAMDEN

## DRAFT LOCAL ENVIRONMENTAL PLAN NO. 151

DRAWN BY: A Pringle DATE: August 2008

SUPERVISING OFFICER:

PLANNING OFFICER: C Lalor

COUNCIL FILE NO:

DEPT. FILE No:

GAZETTE No:

DATE:

SCALE: 1:13000

LOCALITY: Catherine Field

STATEMENT IN RELATION TO OTHER PLANS:

REPEALS LOCAL ENVIRONMENTAL PLAN No.48

CERTIFIED IN ACCORDANCE WITH THE ENVIRONMENTAL  
PLANNING & ASSESSMENT ACT, 1979, AND REGULATIONS

General Manager

Date

ATTACHMENT 1



### 3.2 CU22 - Operation

**Figure 2** provides the operational noise predictions for well location CU22 with no mitigation measures in place. The area shaded yellow indicates where the relevant criteria (LAeq(15minute) 38 dBA) may be exceeded. There is one residential property located in the predicted area of affectation; operation noise levels at this residence are predicted to be 1 dBA above the relevant noise criteria.

**Figure 2 CU22 Operational Noise Predictions, Pump Assisted, Night-time Inversion**



Source: Google Earth

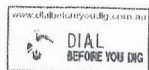
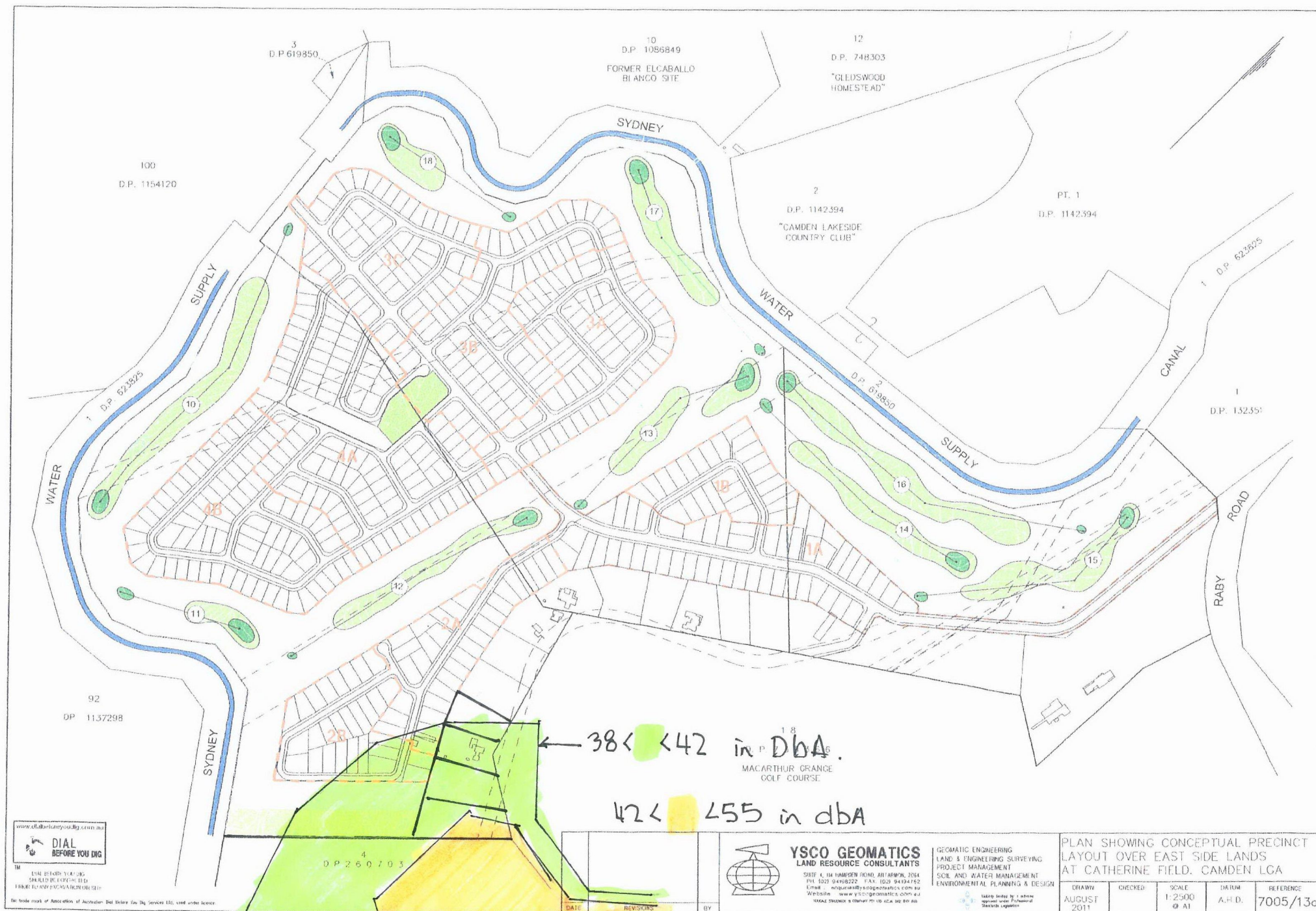
Due to the predicted exceedence of the relevant noise criteria it is recommended that further noise mitigation be considered at this location. Possible mitigation options are provided as follows:

- Noise barriers on the boundary of the relevant well compounds could reduce noise emission levels by up to 10 dBA. The actual noise reduction achieved will depend on the orientation and height of the barrier and the relative distance and difference in elevation between the source/s and receivers.
- Full-enclosures surrounding all equipment including well heads and pumps/generators. This could reduce predicted noise emission levels by 10 dBA. The actual noise reduction achieved will depend on the specific design of the enclosure.

It is also noted that ambient noise levels in the area are likely to increase as a result of significant residential development west of the subject site. It may be appropriate to re-evaluate ambient background levels, and thus relevant noise criteria, at that time.

ATTACHMENT 2.





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GEOMATIC ENGINEERING  
 LAND & ENGINEERING SURVEYING  
 PROJECT MANAGEMENT  
 SOIL AND WATER MANAGEMENT  
 ENVIRONMENTAL PLANNING & DESIGN

PLAN SHOWING CONCEPTUAL PRECINCT  
 LAYOUT OVER EAST SIDE LANDS  
 AT CATHERINE FIELD, CAMDEN LGA

DRAWN	CHECKED	SCALE	DATUM	REFERENCE
AUGUST 2011		1:2500 @ A1	A.M.D.	7005/13a



