



18th April 2016

Executive Director
Resource Assessments & Business Systems
Department of Planning and Environment
GPO Box 39, Sydney NSW 2001

Sent via website: http://planspolicies.planning.nsw.gov.au/index.pl?action=view_job&job_id=7381

Dear Sir/Madam:

Re: Submission on Revised Community Consultative Committee Guidelines for State Significant Projects

Our Association is a community association dedicated to preserving Campbelltown's Scenic Hills Environmental Protection Area (South West Sydney Sub-region) and its natural and cultural heritage. We also take a keen interest in other heritage and environmental issues in the Macarthur area as requested by our supporters, and are an affiliate of the Better Planning Network. The Scenic Hills Environmental Protection Area was the anticipated site of Stage 3 of the Camden Gas Project (Northern Expansion) prior to its recent cancellation.

Our Association has had a representative on the Camden Gas Project Community Consultative Committee (the Committee) since November 2010. In the five years ending December 2015, we attended every meeting except one: AGL (the proponent of the Camden Gas Project) and/or the Committee determined to hold the last meeting of 2014 in a public restaurant where AGL was hosting a Christmas dinner for the Committee. We did not think it appropriate, as a community representative to be accepting, or be *seen* to be accepting 'gifts in kind' from AGL. Since AGL would not change the venue for the meeting we were unable to attend.

We not only participated in Committee meetings but attended all site visits, though these were few in number and were at our request. We also participated in the NSW Enquiry into Coal Seam Gas and made numerous submissions on CSG on behalf of our Association and its supporters, and were active in the early days of Lock the Gate though were not members due to a difference in strategy.

We have not seen, or contributed to any other submission made on this issue, including any from the Committee (if any submission was made).

We are disappointed that while we eventually became aware of this issue through the Committee and while the deadline was extended, due to an avalanche of development in the Macarthur area (in particular in the Scenic Hills Protection Area) we are unable to make a considered submission to the NSW Department of Planning & Environment (DoPE) at this time.

On the closing date of the exhibition we merely wish to register our interest, and to state that we have deep concerns about the functioning of such committees based on our experience over the last five years. It seems to us that, as the only producing coal seam gas (CSG) project in NSW, the Camden Gas Project was being used as a model for how CSG could be rolled out across the state. Yet the DoPE's existing *Guidelines for Establishing and Operating Community Consultative Committees for Mining Projects, June 2007* were never included in the Consent Conditions for the Camden Gas Project, and despite raising this and other issues with the DoPE over the years and in the NSW enquiry, nothing substantially changed in planning's role in the management of the project, causing us deep concern. The way our submissions and representations have been carelessly treated over the years by the DoPE, on nearly all planning issues, has led to cynicism on our part that the work we do is wasted and is more about box ticking than serious community engagement or project assessment.

With regard to the new Guidelines being proposed, we find much to support but have ongoing concerns as well; vagueness of definitions, verification of qualifications and 'representativeness' in the community, what defines 'regular attendance' and 'knowledge', problems of minute taking (format, corrections), what constitutes 'respect', whether there should be rotation of members and defined terms for members, whether members should step down when the mining operation has ceased in their area of residence or they no longer represent any active community association, the role of committees in expansion phases of a project, whether the chair can ever exercise true independence given selection processes, avenues for dealing with bullying, procedural fairness and so on. It is also one thing to have guidelines and another to ensure their enforcement. At this point in time we would have trouble having any confidence in the proper functioning of these committees without further refinement and tightening of these guidelines. There is already too much discretion in the planning system, resulting in opaqueness and non-accountability that undermines public confidence. Should the DoPE wish to consult with us on any of these issues, time permitting, we would be happy to discuss further.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Jacqui Kirkby', written in a cursive style.

Jacqui Kirkby
Scenic Hills Association