



# Hunter Environment Lobby Inc.

PO Box 188  
EAST MAITLAND NSW 2323  
17<sup>th</sup> October 2013

To the NSW Department of Planning and Infrastructure:-

**Please find Feedback on strategic agricultural land mapping that will be subject to the Gateway and additional residential growth areas that will be added to the CSG exclusion by 8 November.**

Hunter Environment Lobby Inc (HEL) is a regional environmental organization that has commented on most developments in the Hunter and surrounding areas that involve coal or coal seam gas exploration. HEL has been submitting to your department and its predecessors for a period of over twenty years.

In the case of strategic agricultural land mapping, we submit that:-

- Rural residential land (zone R5 in the standard LEP) and all large lot residential zonings should be added to the CSG exclusion.
- The 2km buffer should be applied to the critical industry clusters exclusion areas, as well as the residential exclusions.
- The village exclusions for CSG must apply to the entirety of the villages of Goongerry, Broke and Bulga.
- The exclusion areas for residential land and critical industry cluster should be extended to coal mining, which should not be permitted in residential zones or critical industry clusters, with a 2km buffer around each.
- Resource companies should not be able to nominate to exempt land they own from the critical industry clusters: it will defeat the purpose of the protections to create holes in the maps.
- There is no protection for agricultural land under the Gateway process. The Regulation must be amended to create a strict exclusion to protect agricultural land from mining for coal and gas, and must apply to all projects not determined before the creation of the amended regulations.
- The new Gateway provisions are contradictory, implying at one point that the Panel will not even have the power to recommend rejection of a mining application.
- The process to verify biophysical strategic agricultural land is at the discretion of the Director-General of the Department of Planning, who only needs to "have regard to" the verification

criteria. There should not be any discretion to remove land from the map if it meets the criteria

- There is still no protection for water catchments and aquifers from coal mining and gas extraction. The next step should be the introduction of exclusion zones to protect surface water and groundwater resources from CSG and coal mining.

We trust that you examine these points in detail and that we receive an answer from your department.

Sincerely,

Jan Davis

President Hunter Environment Lobby Inc.