

PASPALLEY

Submission by the Paspaley Pearls Properties ("PPP") to State Environmental Planning Policy

November 2013

PPP has the following land entitlements relevant to strategic planning processes presently underway in New South Wales:

Property	Type	Use	Location (vicinity)
Kurrajong Park	Estate in fee simple	cropping, cattle and sheep production	Coolah
Erunderee	Estate in fee simple	winery and hay production	Mudgee
Thornthwaite	Estate in fee simple	cattle and feed	Scone
Bunnamagoo	Estate in fee simple	vineyard	Rockley

It is highlighted that these properties have a range of agricultural, livestock and viticulture activities conducted on the land. The specific lot numbers of each property will be forwarded as required.

The various state planning processes presently underway and their mapping, are complex and rich in detail. Further much of the detail with regard to the mapping is quite difficult to ascertain at the property boundary level.

Given the above, our initial assessment suggests that the above properties, with the exception of Bunnamagoo, may have been mapped as part of the BSAL process, but only in part. We have also reviewed the Strategic Regional Use Plan for the Upper Hunter Region, specifically the critical industry cluster mapping. At this point the critical industry clusters are only applicable to equine and viticulture activities in this region, not agriculture.

Noting the above, we are concerned that agriculture has been omitted as an exclusion area for CSG. Like equine and viticulture interests, the land the subject of the above properties is highly productive and the businesses contribute significantly to regional employment. We therefore make the following submission:

- There is no specific protection for agricultural land under the Gateway process, but rather a process for review of mining applications. The Gateway process does not say no to a development, only that the development will go ahead with conditions on it. The severity of those conditions is determined by government. The Regulation must be amended in order to create strict exclusion zones to protect agricultural land from mining for **both** coal and gas, and must apply to all projects not determined before the creation of the amended regulations;
- As the new maps appear only to apply to CSG and not to mining, it is essential that coal mining be included in the Strategic Agricultural Lands mapping;



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- The process to verify biophysical strategic agricultural land is discretionary- there should not be any discretion to remove land from the map if it meets the criteria;
- There appears to be no protection for water catchments and aquifers from coal mining and gas extraction. Water is essential to our operations. Exclusion zones to protect surface water and groundwater resources from CSG and coal mining are essential; and

We are disappointed that PPP's agricultural properties are not, as currently mapped, quarantined from coal and gas development.

We request that the above noted properties be included as areas that are quarantined from these activities.

Yours sincerely
pp.

A handwritten signature in black ink, appearing to be 'Stuart Hughes', with a stylized, cursive script.

Stuart Hughes
General Manager

