COFFS HARBOUR CITY GOUNCIL

Our ref: 3567724

5 November 2013

Director, Assessment Policy and Systems & Stakeholder Engagement Department of Planning & Infrastructure GPO Box 39 SYDNEY NSW 2001 Received 1 3 NOV 2013 Scanning Room



Dear Sir/Madam

Draft State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) Amendment (Coal Seam Gas Exclusion Zones) 2013

Thank you for your letter dated 18 October 2013. The Mayor has asked me to respond on her behalf.

Please accept this as a submission on behalf of Coffs Harbour City Council to draft State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) Amendment (Coal Seam Gas Exclusion Zones) 2013, hereafter referred to as the draft CSG SEPP Amendment, which is on exhibition until 8 November 2013.

Council strongly endorses the initiatives to prohibit exploration and production activity on or under land within 2km of a residential zone or identified growth area. Council requests that in the event that amendments are made to the draft CSG SEPP Amendment, that the 2km exclusion zone be retained at a minimum.

Council notes that the draft CSG SEPP Amendment proposes to only exclude CSG exploration within R5 Large Lot Residential zones across the state, where these areas meet certain criteria including a mix of land uses and sizes up to 4000m². Coffs Harbour City Council has several historic rural residential zones within the LGA, which do not meet this criteria, but which have average lot sizes of 6000m² and which are essentially residential communities. CSG exploration in these localities would be hugely detrimental to these established communities.

Coffs Harbour City Council also has strong concerns regarding potential environmental impacts of CSG exploration and extraction. These concerns include:

- Detrimental effects on the visual amenity of rural lands;
- Direct economic and social impacts on the viability of the agricultural sector and the farming community;
- Impacts upon biodiversity due to potential clearing of vegetation;
- Potential impacts upon potable water quality which may have direct influence on community health; and
- Insufficient information has been provided regarding the rehabilitation of environments once CSG exploration / extraction activity has ceased.
- Communications to: The General Manager, Locked Bag 155, Coffs Harbour 2450
 Administration Building,
 Castle Street, Coffs Harbour
 Tel: (02) 6648 4000
- Fax: (02) 6648 4199 DX: 7559 ABN 79 126 214 487
- Email: coffs.council@chcc.nsw.gov.au
- Website: www.coffsharbour.nsw.gov.au

Additionally, while Council understands the Department's decision to generally allow CSG exploration and production in rural residential areas, Council's position is to request that prohibitions be applied to ALL R5 Large Lot Residential zones and R5 investigation areas across the state.

In the event that the Department rules against this request for general R5 exclusions, Coffs Harbour City Council specifically requests that the following areas, refer below, be added to the exclusion zone. Council would be pleased to provide GIS map data of these areas for inclusion in the SEPP should the department allow these areas to be considered.

- Middle Boambee Rural Residential Area (mix of school, swim centre, residential and rural residential land uses). Lots are mainly 1-2 hectares in area, however many are less than 4000m², some are less than 3000m² which satisfy the exclusion zone criteria. Established in the 1980s.
- Bonville Rural Residential area and extended investigation area (golf resort, limited commercial and residential zoned areas, schools). Existing lots averaging 6000m². Existing areas established in the 1980's, the extended rural residential investigation area is currently underway in terms of a planning proposal including environmental studies, and preparation of draft LEP, DCP and S94 contributions plans.
- Grandis Road Rural Residential Area (permanent residential mobile home park, school, church and camping centre in various locations in proximity to the rural residential area).
 Lots averaging 7000m². Established in the mid 1990s.
- Coffs Harbour Drinking Water Catchment (Cochranes Pool).
- All water catchment areas, the streams and tributaries of which flow into the Solitary Islands Marine Park.

Included in this submission are maps of:

- Middle Boambee Rural Residential Area (Map 1);
- Bonville Rural Residential Area including Grandis Road Rural Residential Area (Map 2); and
- Cochranes Pool Drinking Water Catchment (Map 3).

For further information please contact the undersigned on 6648 4654.

Yours faithfully

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Grahame Fry Planner – Sustainable Planning

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Attachment











Map 3 - Cochranes Pool Drinking Water Catchment