



Hunter Environment Lobby Inc.

PO Box 188
East Maitland NSW 2323
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Department of Planning and Environment
23-33 Bridge Street Sydney NSW 2000
www.planning.nsw.gov.au/proposals

State Environmental Planning Policy Amendment (Gas Exploration and Mining) 2014 [NSW]

The Hunter Environment Lobby Inc (HEL) is a non profit, regionally based community group established to promote environment protection in the Hunter Valley. The group has been in existence for over twenty years and has made many submissions in relation to coal mining and development projects, participated in committees and public inquiries, and organised a number of successful public workshops.

HEL wishes to strongly object to the proposed State Environmental Planning Policy Amendment (Gas Exploration and Mining) 2014 because it increases uncertainty for the environment and communities and will lead to unsustainable development of fossil fuels in the Hunter region.

The proposal to remove the requirement for full assessment of gas exploration activities in environmentally sensitive areas of State significance is irresponsible. The groundwater systems of the Hunter region have been poorly studied and have been seriously depleted by the cumulative impacts of open cut and longwall mining operations.

Exploration drilling for unconventional gas requires a thorough and transparent assessment process. The long term impacts on groundwater systems needs to be fully understood.

The proposed *Voluntary Land Acquisition and Mitigation Policy* (the Policy) seeks to lock in various current practices for open cut coal mine approvals that have detrimental impacts on human health and rural community well being.

HEL strongly objects to the proposed Policy because it misuses the application of the National Environmental Protection Measure (NEPM) for Ambient Air Quality. The NEPM currently has a goal for PM10 concentrations over a 24 hour period of 50µg per cubic metre. In the standard, there is a goal for “maximum allowable exceedances” of five days per year.

The Policy provides a loophole that the 24-hour threshold for PM10 concentrations of 50µg per cubic metre only be applied at the 98.6 percentile, excluding extraordinary events like bushfires and dust storms.

This current practice in approving open cut coal mines effectively doubles the number of days that the NSW Government considers it is acceptable for people in rural areas near mines to experience air quality that exceeds the 24-hour limit for particulates – from five days a year to ten days a year.

The known health impacts from dust particulates need to be taken seriously by the Department of Planning and Environment.

The Policy fails to recognise the cumulative impacts of landscape scale property acquisition on the functionality of rural communities and rural industries. The process is effectively implementing the compulsory acquisition of large areas of private property surrounding open cut coal mining operations.

The Department of Planning and Environment is actively threatening the health of citizens of NSW through the current approvals process for large scale coal mine operations.

The mining industry must be required to operate within the parameters of the assessment criteria for noise and dust emissions that have been developed to protect human health.

The wholesale emptying out of entire communities is not taken into account along with the loss of productive agricultural land and groundwater systems associated with open cut mining.

The Policy is entirely inappropriate and should not be included in *State Environmental Planning Policy (Mining, Gas Exploration and Extractive Industries) 2007*.

Yours sincerely

A handwritten signature in cursive script that reads "Jan Davis".

Jan Davis
President