



ADVISORY COMMITTEE

PO Box 552, Katoomba NSW 2780
Phone: 4784 7300 Fax: 4782 6199
gbm.worldheritage@environment.nsw.gov.au

Our reference : DOC13/2336 AC 1210
Our contact : Jacqueline Reid ph: (02) 4784 7326

The Hon. Brad Hazzard, MP
Minister for Planning and Infrastructure
Level 31 Governor Macquarie Tower
1 Farrer Place
SYDNEY NSW 2000

Dear Minister,

Re: Coalpac Project Proposal

As you would know, the Advisory Committee for the Greater Blue Mountains World Heritage Area (GBMWhA) has always taken a strong position that it is essential to consider any adverse direct and indirect impacts on World Heritage and other values from developments that occur adjacent to the GBMWhA and has long given its support to the reservation of the Gardens of Stone Stage 2 proposal, which largely consists of proposed State Conservation Areas over key areas, such as Ben Bullen State Forest and Newnes Plateau.

With reference to our submission to the Dept Planning and Infrastructure dated 28 May 2012, the Advisory Committee confirmed its strong opposition to the proposed Coalpac Project within Ben Bullen State Forest, near the edge of GBMWhA.

The Advisory Committee notes the findings of the Planning and Assessment Commission of Inquiry (PAC) released on 14 December 2012 in regard to the Coalpac Project. The findings concluded:

"The Commission has found that, when the merits of the project are considered as a whole, the benefits of the project are substantially outweighed by the breadth and potential magnitude of the impacts. The Commission therefore recommends that the project should not be approved."

The Advisory Committee expresses its agreement with, and full support for, the findings of the PAC. We note further that the PAC found that:

"The impacts of the project are substantial and occur across a range of domains. The terms of reference specifically direct the Commission to three areas (health and amenity impacts on residents, impacts on biodiversity and impacts on water resources) and to consider any other matters raised in submissions or at public hearings."



**Office of
Environment & Heritage**
NSW National Parks & Wildlife Service



The PAC further stated:

"The Commission has substantial concerns about impacts arising from dust, noise and blasting on the health and amenity of residents of Cullen Bullen and the **surrounding district**' (my emphasis)."

As noted in the Advisory Committee's submission to the Department of Planning and Infrastructure dated 28 May 2012 the project would also be only some two kilometres from the GBMWhA. The 'surrounding district' therefore includes an internationally recognised World Heritage Area, though this is sadly not specifically noted in the PAC report. However, dust, noise and blasting could be expected to impact on the GBMWhA. If it were to proceed, the proposal would have significant visual impact on the GBMWhA and the Castlereagh Highway, which is a key gateway to the GBMWhA.

We note also that the PAC report states:

"The pagodas are considered to be internationally significant geological features some 250 million years old and worthy of total protection. No mining induced damage should be permitted to these features."

The Advisory Committee is pleased to note that the significance of the pagodas has been recognised. We also note that the PAC recognised the cumulative impact of other mining proposals nearby such as Pinedale and Neubeck's Creek. The Advisory Committee is impressed to see discussion of cumulative impact and believes that the NSW Government must consider the cumulative impact of all development near the GBMWhA when assessing future development proposals.

The Advisory Committee recognises that this is not the *final* decision on the Coalpac Project. The Department of Planning and Infrastructure will now submit its own report on the project, and then a PAC panel of 3 new people will make the final decision. The Advisory Committee strongly supports the findings in this first decision; a decision which has arisen from consideration of extensive submissions and public hearings.

The Advisory Committee reiterates its previous recommendation that Ben Bullen State Forest should be included within a new GOS State Conservation Area. The Advisory Committee concurs with the PAC Commission of Inquiry finding that the Coalpac Project would have an unacceptable impact on the local community and the surrounding district. Australia and NSW are committed (under the World Heritage Convention) to the long-term protection of the GBMWhA, which is part of the affected 'surrounding district'. Preventing unacceptable projects on the doorstep of the GBMWhA – such as the Coalpac project – is part of that commitment.

In summary, the Advisory Committee considers that the proposed Coalpac 900 hectare open cut project would have an *unacceptable impact on the GBMWhA* and that the potential impact on the GBMWhA is sufficient to warrant Ministerial intervention.

Should you or your staff require further information, please contact our Executive Officer, Jacqueline Reid via email to jacqueline.reid@environment.nsw.gov.au or by telephone to 4784 7326.

Yours sincerely,



Prof Richard Mackay, AM
Chair
Greater Blue Mountains World Heritage Area Advisory Committee

24/01/2013

copy: The Hon. Robyn Parker, Minister for Environment and Heritage
 The Hon. Tony Burke, Minister for Sustainability, Environment, Water, Population and Communities