

Carl Dumpleton
Department of Infrastructure and Planning, NSW
by email carl.dumpleton@planning.nsw.gov.au

23 March 2013

RE: Coalpac Consolidation Project – Coalpac Review of PAC Report

Dear Mr Dumpleton

I am writing in response to Coalpac's Review of PAC Report recently published on the Department's website.

As a bushwalking group leader, I devise and lead walks for several bushwalker clubs and spend a lot of time in the affected area. I can say that I know this part of Ben Bullen State Forest very well and that it contains some of the finest bushwalking country in NSW.

In this submission, I wish to particularly address the Pagoda Landforms and the Aboriginal Cultural Heritage sites of Ben Bullen State Forest.

Pagoda Landforms and Ecology

I was appalled to read Appendix F of the Coalpac Review concerning the pagoda landforms that make this area so unique. As very few if any of the pagodas in the project area would be spared, Coalpac's consultants had a 'wonderful' idea – to redefine 'pagodas' in such a way as to in fact show that there are none of them in this part of Ben Bullen State Forest.

To claim that anything less than 60m tall and less than 10ha in area is not a pagoda is utter rubbish. This would eliminate most pagodas in the Greater Blue Mountains. I walked extensively in the areas where pagodas are only 3-10m tall and occur in small size outcrops – these areas are just as geologically and ecologically significant, just as unique and as visually stunning as any others. In fact, when it comes to pagodas, it is not the size that matters!

Coalpac consultants further claim in their SPL ('Significant Pagoda Landform') definition that there are no pagodas in the project area north of Cullen Bullen. This is utter rubbish again because I walked in these areas on many occasions (eg Ben Bullen Range and Tyldesley Hill), and they are full of magnificent pagodas.

I note that the Coalpac consultants who wrote Appendix F on pagodas are based in Queensland. I doubt whether they have actually ever visited the site, even as a quick road trip, as many of the pagodas are clearly visible from the main road (Castlereagh Highway). May I extend an invitation to them to come to the area with me and to see for themselves the stunning pagoda landforms that they claim don't exist?

From all the above, I can only conclude that Coalpac and their consultants have treated the DOPI and PAC with contempt and arrogance. Particularly as in the Appendix J (Scorecard) of their Review, when it comes to PAC Recommendations on Pagodas and Ecology, Coalpac have given themselves only (1) 'Purple, Not Adopted'

mark, whereas in fact they should be given 'Purple, Not Adopted' marks for all PAC Recommendations in this area, namely 38, 45-55.

The bottom line is, if this proposal is allowed to proceed, most of the pagodas in that area and their associated ecosystems will be lost forever. The potential for a sustainable, long term, international and national tourism and eco-tourism industry that the Ben Bullen State Forest currently presents will be lost forever. I know there is a big potential for tourism because every single one of the walks I lead in this area gets booked out weeks and sometimes months in advance. This is due to the combination of stunning scenery, the variety of outdoor experiences that the area offers, as well as the easy access to it from Lithgow.

As a bushwalker, I can tell you I would not like walking around a perimeter of an ugly open mine one single bit, and neither would any of my bushwalking colleagues, nor any visitors from Sydney, interstate or overseas.

Aboriginal Cultural Heritage Sites

The Coalpac Review document makes no mention of Aboriginal Cultural Heritage Sites that PAC report identified as a significant issue affecting the project determination. Despite this fact, Coalpac, with their characteristic contempt and arrogance, have given themselves in Appendix J (Scorecard) all 'Green, Adopted' marks for all PAC Recommendations in this area, namely 76-80, whereas in fact they should be given 'Purple, Not Adopted' marks for failure to address all these points.

Ben Bullen State Forest and the project area in particular are extremely rich in Aboriginal shelters. During the last 6 months, whilst bushwalking there, we found 2 shelters not identified by Coalpac, one of them has significant and very important art. Several other Aboriginal shelters in the project area were mentioned in an earlier Coalpac EIS and labelled by them 'not significant'. I spent time at these locations with the local Aboriginal people and they were dismayed by the fact that some outside consultants had decided that these sites that are so important to them are not worth preserving.

If the open mine goes ahead, all these sites, and many more that no doubt exist in the area but have not yet been found and studied, will be destroyed. This must not be allowed to happen.

In summary, I believe that the Coalpac Consolidation Project must be rejected entirely.

Sincerely



Yuri Bolotin
17 Cogan Place
Lane Cove NSW 2066
0413 715 943